

Policy for Preservation of Records

(Version 3 dated May 16, 2025)

Preamble and Purpose:

Securities Contracts (Regulation) (Stock Exchanges and Clearing Corporations) Regulations, 2018, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013 mandate preservation of documents/records by Clearing Corporation for certain periods of time. This policy intends to lay down specific periods for maintaining such records.

Scope

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and/or physical documents as per various statutory/regulatory requirements and as per best practice.

Definitions:

“Company” National Commodity Clearing Limited (NCCL)

“Electronic Record(s)” means the electronic record as defined under section 2 (1)(t) of the Information Technology Act, 2000.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“Documents/records” shall mean and include all documents and records referred/specified in the Tables A to I herein.

Classification

Documents/records are classified into three categories:

1. Permanent Records - Documents that needs to be preserved/retained permanently
2. 8 years to 10 years Records - Documents that may be preserved/retained for a period of 08 years to 10 years.
3. Less than 8 years' records- Documents that may be preserved/retained for a period of less than 08 years.

Destruction of Records:

The Documents/Records may be destroyed by the respective departments after seeking approval of its HOD post expiration of the period indicated against them in the Tables.

Provided however, 1) in case of any pending litigation or any proceeding before any authority/committee, the relevant documents shall be preserved until the conclusion of the proceedings or till such time as the Management of the Company shall decide.

2) In case a copy of records / documents is taken by enforcement agencies like CBI, Police, Crime Branch etc. either from physical or electronic record during the course of their investigation or trial

of the case, then the respective original is to be maintained till the trial or investigation proceedings have concluded.

A. Details of Clearing & Settlement related records maintained by National Commodity Clearing Ltd (“the Clearing Corporation” or “NCCL”)

Sr. No.	Name of the record	Whether maintained in physical form or electronic form	Minimum Period for which the record is maintained (years)
A	Risk Management		
1	Margin files	Electronic	10
2	Daily MTM files	Electronic	10
3	Daily position data files	Electronic	10
4	Member disablement / enablement	Electronic	10
5	Penalties levied (Disablement charges and Algo Penalty)	Electronic	10
6	Correspondence with members	Physical /Electronic	10
B	Clearing & Settlement		
1	Stock position – member / client-wise (for staggered dates)	Electronic	10
2	Delivery allocation details	Electronic	10
3	Shortages	Electronic	10
4	Delivery details	Electronic	10
5	Client margin collection details	Electronic	8
6	Margin deposits book	Electronic	8
7	Transaction records	Electronic	8
8	Record of security deposits	Electronic	8
C	Membership		
Permanent Records			
1	The Clearing Corporation maintains a database of registered members, including their full names and addresses. If a member is a firm, the names and addresses of all partners are also recorded.	Electronic	Permanent
Other Records			
2	Member Correspondence through email	Electronic	10
3	All the membership related documents received	Electronic/Physical	8

B. Details of other records maintained by NCCL

Sr. No.	Name of the record	Whether maintained in physical form or electronic form	Minimum Period for which the record is maintained (years)
A	Finance & Accounts		
1	Accounts	Electronic	8
2	Ledgers	Electronic	8
3	Journals	Electronic	8
4	Cash book	Electronic	8
5	Vouchers	Physical /Electronic	8
6	Bills / approvals	Physical /Electronic	8
7	Other / correspondence	Physical /Electronic	8
8	Bank statements	Electronic	8
B	Compliance		
Permanent Records			
1	SEBI correspondence/ approvals	Physical /Electronic	Permanent
2	Original Agreements / Contracts/MoUs with outsourced agencies/ vendors / third parties/ group Companies, arbitration awards, share certificates.	Physical	Permanent
3	Structural Digital Database	Electronic	8
Other Records			
3	Records relating to process audit	Physical /Electronic	10
C	Member Inspection		
1	Inspection/ Audit reports	Physical /Electronic	10
2	Correspondence with members (with respect to various matters including but not limited to penalties, fines, notices, etc.)	Physical/Electronic	10
D	Enforcement		
Permanent Records			
1	All documents including show cause notice, proceedings and final order.	Physical/Electronic	Permanent
D	Customer Service Group		
Permanent Records			
1	Membership details – (User id ,Status Reports)	Physical / Electronic	Permanent
Other Records			

Sr. No.	Name of the record	Whether maintained in physical form or electronic form	Minimum Period for which the record is maintained (years)
2	All Correspondence including complaints, queries received by and against members/WSPs, clarificatory emails and related matters.	Physical /Electronic	10
E Technology			
1	Incident Records	Physical	3
2	Configuration Changes (Application, Server, Network Devices and Firewall)	Physical	3
3	Access Logs and Failed access logs (Firewall and Active directory server)	Electronic	1
4	Network Device Logs	Electronic	6 months
5	Records of Procurement and disposal	Electronic	3
6	Backup Logs	Electronic	10
7	Patch deployment records for all workstation	Electronic	1
8	Antivirus Reports	Electronic	1
9	Clearing related Data Backups	Electronic	10
F Legal			
Permanent Records			
1	Litigation documents (notices, replies, petitions etc), submissions made before authorities, any correspondence with authorities (EOW/police).	Physical/Electronic	Permanent
G Secretarial			
Permanent Records			
1	Minute books of the General meetings	Physical	Permanent
2	Minute books of the Board meetings	Physical	Permanent
3	Minute books of the Committee meetings	Physical	Permanent
4	Memorandum of Association and Articles of Association	Physical	Permanent
5	Statutory Registers required to be maintained under the Companies Act, 2013	Physical	Permanent

Sr. No.	Name of the record	Whether maintained in physical form or electronic form	Minimum Period for which the record is maintained (years)
Other Records			
6	Notices pertaining to disclosure of interest of directors	Physical / Electronic	For a period of 8 years from the end of the financial year to which it relates
7	Notices and agendas of the Board, Committees meetings	Physical / Electronic	To be preserved in good order in physical or electronic form for as long as they remain current or for 8 financial years, whichever is later and may be destroyed thereafter with the approval of the Board
8	Annual Returns	Physical / Electronic	For a period of 8 years from the date of filing with the Registrar of Companies
H	All other depts.		
Permanent Records			
1	Office correspondence including internal approvals	Physical /Electronic	Permanent
2	Agreements / MoUs with outsourced agencies/ vendors / third parties, arbitration awards, share certificates	Physical	Permanent
Other Records			
3	Routine correspondence with external parties/ records	Physical /Electronic	10

Training

The policy shall be circulated among all employees of NCCL for their careful study and adherence.

Updation

This framework for preservation of records shall be updated and reviewed by NCCL as and when required.