POLICY ON PRESERVATION AND RETENTION OF DOCUMENT

VERSION 6.0

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DOCUMENT CONTROL PAGE

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		Name	**Date**
Document Owner	**:**	**Mr. Mandar Kulkarni**	**18/08/2025**
Reviewed By	**:**	**Mr. Narendra Ahlawat**	**18/08/2025**
Approved By	**:**	**Board of Directors**	**29/09/2025**

Revision History

Version No.	Description	Prepared By / Revised By	Reviewed / Approved by	Issue / Revision Date
1.0	**Initial Version**	**Ms. Riddhi Parekh**	**Reviewed by Ms. Riddhi Parekh** **Approved by MCXCCL Board**	**19/07/2018**
2.0	**Revision through introduction to SECC Regulations, 2018.**	**Ms. Riddhi Parekh**	**Reviewed by Mr. Narendra Ahlawat** **Approved by MCXCCL Board**	**22/04/2019**
3.0	**Revisions incorporating:** a) Provision relating to Disposal/Destruction of records are modified. b) Inclusion of provision for policy review period c) Annexure 1 and 2 brought in line with MCX d) Inclusion of Annexure 3 viz. The format of the register of documents/records disposed/destroyed	**Mr. Mandar Kulkarni**	**Reviewed by Mr. Narendra Ahlawat** **Approved by MCXCCL Board**	**22/10/2021**
4.0	**The policy has been reviewed and no changes are proposed**	**Mr. Mandar Kulkarni**	**Reviewed by Mr. Narendra Ahlawat** **Approved by MCXCCL Board**	**25/08/2023**

5.0	**Revisions incorporating:** A) Addition of following in the policy: **i)** "SEBI (Prohibition of Insider Trading) Regulations, 2015" **ii)** Definition of "PIT Regulations" **iii)** Addition of "Information and Database in SDD (Structure Digital Database) as required under PIT Regulations." In Annexure 1.	**Mr. Mandar Kulkarni**	**Reviewed by Mr. Narendra Ahlawat** **Approved by MCXCCL Board**	**19/10/2024**
6.0	**Revised to include:** a) Amended purpose and scope and b) The word 'regulatory or' is added after the words 'become aware of a' and before the words 'governmental investigation', in the Point 7 - Suspension of records disposal in the event of litigation/ claims.	**Mr. Mandar Kulkarni**	**Reviewed by Mr. Narendra Ahlawat** **Approved by MCXCCL Board**	**29/09/2025**

MULTI COMMODITY EXCHANGE CLEARING CORPORATION LIMITED

POLICY ON PRESERVATION AND RETENTION OF DOCUMENT

1. PURPOSE AND SCOPE

This Policy is formulated in accordance with the provisions of the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, SEBI (Prohibition of Insider Trading) Regulations, 2015 and other applicable law(s).

The policy is intended to define the Company's preservation of documents responsibilities and to provide guidance to the executives and staff working in the Company. It also frames the guidelines for fundamental accountability of the Company to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy contains guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. DEFINITION

"Board of Director" or "Board" shall mean the Board of Directors of the Company, as constituted from time to time.

"Company" shall mean Multi Commodity Exchange Clearing Corporation Limited (MCXCCL).

"Documents" shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices, etc., and the like as required to be maintained under any law or regulation for the time being in force.

"Listing Regulations" shall mean the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

"SECC Regulations" shall mean the Securities Contracts (Regulation) (Stock Exchanges and Clearing Corporations) Regulations, 2018.

"PIT Regulations" shall mean the SEBI (Prohibition of Insider Trading) Regulations, 2015.

3. LEGAL FRAMEWORK

Regulation 33 of SECC Regulations provides that the disclosure requirements and corporate governance norms as specified for listed companies shall *mutatis mutandis* apply to a recognised stock exchange and a recognised clearing corporation.

Listing Regulations have prescribed certain obligations and disclosure requirements on all listed entities. One of the common obligations for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents to be approved by the Board.

4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED/RETAINED

This Policy sets the standards for managing, storing and preservation of documents of the Company which broadly classified in the following two categories:

A. The documents of a permanent nature (**listed in Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (**listed in Annexure 2**) shall be preserved by the Company for the term not less than ten years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than ten years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

5. MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

6. DISPOSAL/DESTRUCTION OF RECORDS

At the end of specified period for retention of a particular document/records, with the prior approval of the Head of Department, the same may be disposed/destroyed with proper noting of the purpose as per details given in **Annexure 3**.

7. SUSPENSION OF RECORDS DISPOSAL IN THE EVENT OF LITIGATION/ CLAIMS

In case the Company is served with any notice for request of documents or any employee becomes aware of a regulatory or governmental investigation or audit concerning the Company or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such case shall inform all concerned employees by email or otherwise about the need to retain the documents and suspension of disposal of the same, in terms of this Policy.

8. POLICY REVIEW

The Policy shall be reviewed by the Regulatory Oversight Committee as and when required or at least once in two years and changes made therein, if any, shall be approved by the Board.

Annexure 1

Documents whose preservation shall be permanent in nature

1. Certificate of Incorporation /Certificate of Commencement of Business/ Certificate granting recognition to act as a clearing corporation / any other registration certificate/(s) issued by any other statutory authority(ies) etc.
2. Memorandum and Articles of Association and Rules, Bye-laws and Business Rules of the Company and the publication thereof in Official Gazettee of India and the State Gazettee.
3. Affidavit from the subscribers to the Memorandum and from person named as the first Directors.
4. Statutory Registers required under applicable laws.
5. Audited financial statements of the Company.
6. Minutes of Board/General/Committee Meetings.
7. Material Agreements/Contracts etc.
8. Order issued by any Courts/Statutory Bodies etc.
9. Annual Return(s) of the Company.
10. Information and Database in SDD (Structure Digital Database) as required under PIT Regulations.
11. Correspondence with Regulators.
12. Any other amendments/modifications made to the aforesaid documents.
13. Any other documents as may be required to be maintained and preserved permanently in accordance with applicable statues, law(s), rules and regulations from time to time.

Annexure 2

Documents whose preservation shall be for a minimum period of ten years after completion of relevant transaction:

1. Books of Accounts including Ledgers, Journals, Cash book, Bank pass book, etc.
2. Records of members showing their full names and addresses. Where any member is a firm, full names and addresses of all partners shall be shown.
3. Records of authorized persons.
4. Transaction records.
5. Personnel Documents.
6. Insurance Policies/Claims.
7. All notices pertaining to Disclosure of interest of Directors/KMP's etc.
8. Correspondence with Department/Shareholders / Law Enforcing Agencies / Revenue Authorities etc.
9. Non-Statutory Registers/Documents etc.
10. Instrument creating a charge or modification thereof.
11. Record of clearing members with their full names, addresses and details of bank and depository accounts for settlement purposes.
12. Transaction records.
13. Margin Deposit books.
14. Client margin collection details.
15. All business records and/or other records as may be decided by the Management from time to time.
16. Any other amendments/modifications made to the aforesaid documents.
17. Any other documents as may be specified by SEBI or as may be required to be maintained and preserved in accordance with the applicable statues, law(s), rules and regulations from time to time.

Annexure 3

The format of the register of documents/records disposed/destroyed -

Sl. No.	**Particulars of document disposal/destruction**	**Reference details of approval(s) sought for disposal/ destruction**	**Date and mode of disposal/ destruction**	**Signature/Initials of persons present during disposal/ Destruction**