

# NEXUS COMMODITIES AND TECHNOLOGIES LIMITED

## POLICY FOR PRESERVATION OF DOCUMENTS

### Introduction

The Board of Directors (the "Board") of Nexus Commodities and Technologies Limited (the "Company") has adopted the following policy and procedures with regard to preservation of documents and records in terms of Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) (The Policy).

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every Listed Company to formulate a policy on Preservation of Documents which has to be approved by the Board of Directors.

### Purpose of the Policy

The corporate records of the Company are important assets. The law requires the Company to maintain certain types of corporate records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject you and the Company to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

The main objective of this policy is to ensure that all statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

### Definitions

**"Act"** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;

**"Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

**"Board"** means the Board of Directors of the Company or its Committee;

**"Company"** means Nexus Commodities and Technologies Limited;

**“Policy”** means this Policy on Preservation of Documents;

**“Maintenance”** means keeping Documents, either physically or in Electronic Form.

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

**“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

### **Preservation of Various Documents**

➤ **Documents to be preserved permanently:**

- i. Memorandum and Articles of Association of the Company as amended from time to time.
- ii. Register of Members of the Company
- iii. Register of Contracts.
- iv. Register of Charges.
- v. Register of Directors and KMPs and the securities held by them.
- vi. Register of Loans and Investments made by the Company.
- vii. Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots.
- viii. Resolutions passed by Circulation.
- ix. Various Forms and Returns filed with the Authorities.
- x. Audited Financial Statements.
- xi. Listing Agreement executed with the Exchanges.
- xii. Letter of offers – like IPO, Rights Issue, Buy back etc.
- xiii. Shareholders’ and Joint Venture Agreement.
- xiv. Register of Records and Documents destroyed.

➤ **Documents to be preserved for a period not less than 8 (eight) years:**

- i. Books of Accounts including vouchers and bills.
- ii. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots.
- iii. Register of Debenture Holders.
- iv. Annual returns together with Annexures.
- v. Disclosure of interest received from Directors of the Company.
- vi. Employment Records/ Personnel Records of the Employees of the Company.
- vii. Purchase/ Production/ Marketing and Sales Documents.
- viii. Press Releases.

➤ **Documents to be preserved for a period less than 8 (eight) years:**

- i. Legal Files.
- ii. Contracts.
- iii. Development / Intellectual Property and Trade Secrets.
- iv. Leases and Licenses related documents.
- v. Electronic Mail.
- vi. Documents disseminated on the Company's Website.

**Destruction of Records**

After the expiry of the preservation period specified in this Policy, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of the Compliance Officer of the Company. The records of the documents destroyed shall be maintained by the concerned department and shall be produced whenever required by the concerned authority / auditors.

### **Review of the Policy**

This policy shall be reviewed by the Board of Directors of the Company as and when any changes are to be incorporated in the policy due to change in regulations or as may be felt appropriate by the Board of Directors.

### **Disclosure**

The Company shall disclose this Policy on its website of the Company.