

# Nivi Trading Limited

## **PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY**

### **PREAMBLE:**

The Securities and Exchange Board of India (SEBI), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations). The Regulations came into force from December 1, 2015. In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Nivi Trading Limited, (the Company) is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as specified in the said Regulation. In terms of Regulation 30(8) of the Listing Regulations, the Company is required to formulate an archival policy for all disclosures of events/information to the Stock Exchanges in terms of the Company's Policy for Disclosure of Events/Information and Determining of Materiality.

### **OBJECTIVE:**

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the Listing Regulations, in terms of Regulation 9 and also to archive any of the material events or information which are disclosed by the Company to the Stock Exchanges prior to the period of five years in terms of Regulation 30.

### **POLICY FOR PRESERVATION OF DOCUMENTS:**

1. Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in two categories as below:
  - a. Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;
  - b. Other Documents, shall be preserved as below, after completion of the relevant transactions, subject to the modifications, amendments, addition, deletion or any changes made therein from time to time:
    - i) Board of Directors Records: Minutes of meetings of the Board of Directors shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for no less than three (3) years.
    - ii) Press Releases & Public Filings: All press releases and publicly filed documents shall be maintained in perpetuity. All events and press releases filed with the stock exchanges shall be maintained for no less than five (5) years on the website of the company.

- iii) Books of Accounts and Tax Records: Books of accounts and Tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used.
- iv) Employment Records: The Company maintains personnel records that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against personnel.  
  
These records should be retained for a period of three (3) years following the cessation of employment.
- v) Intellectual Property Records: Documents relating to the development and protection of intellectual property rights should be maintained for the life of such intellectual property right.
- vi) Contracts: Execution copies of all contracts entered into by the Company should be retained for at least three (3) years following the expiry or termination of the contracts.

- 2. The listing documents and records in physical form shall be in the custody of the Company Secretary.
- 3. The Company may keep the listing documents and records as specified above in electronic mode.
- 4. The Registrar and Share Transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained by them.

## **ARCHIVAL POLICY**

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years. Thereafter, the information/documents may be deleted permanently after obtaining approval from the Chief Financial Officer or the Company Secretary.

## **DISCLOSURE/AMENDMENT**

This policy as amended from time to time shall be made available at the website of the Company. The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

## **EFFECTIVE DATE**

The policy as approved by the Board of Directors shall come into effect immediately.