

NATIONAL COMMODITY CLEARING LIMITED
FINANCE & ACCOUNTS

Document Management Information

Item	Description
Document No.	NCCL-F&A-POL-001
Document Title	Investment Policy (for other than treasury investments)
Version No.	3
Classification	Confidential and Internal Circulation
Issue Date	May 6, 2026
Issue Purpose	For making investments other than treasury investments

	Document Version	Designation/Committee Name	Date
Created/Updated By	3	AVP	April 23, 2026
Reviewed By	3	CFO	April 24, 2026
To be recommended by	3	Investment Committee Audit Committee	May 4, 2026 May 5, 2026
To be approved by	3	BOD	May 6, 2026

Document Ownership and Distribution List

This table serves the purpose to record and track the document distribution. The staff members having access to the latest electronic version of this document on a “read-only” basis are listed below, along with those staff members to whom hard copies have been issued on a controlled basis.

(Access Rights: R - Read, W - Write)

#	Department	Purpose	Access Rights
1	Finance & Accounts	Custodian	R,W
2	Interested parties	Need to know basis	R

Document Review History

Ver. No.	Issue Date	Reviewed/Updated By	Description of Changes
1.0	August 5, 2024	CFO	Base version
2.0	May 16, 2025	CFO	Base version with no changes
3.0	May 6, 2026	CFO	Review clause modified, Revision in limit from 25 lakh to 50 lakh under clause b for procurement of assets, Clause c modified to make it more explanatory

Document Change History

#	Description of Change	Effective Date	Version No.	Reviewed By	Approved By
1.	Base version	August 5, 2024	1.0	CFO	BOD
2.	Base version with no changes	May 16, 2025	2.0	CFO	BOD
3.	Review clause modified, Revision in limit from 25 lakh to 50 lakh under clause b for procurement of assets, Clause c modified to make it more explanatory	May 6, 2026	3.0	CFO	BOD

Investment Policy (for other than treasury investments)

Objective:

As per SEBI circular no. SEBI/HO/MRD/MRD-PoD-3/2024/018 dated June 25, 2024 on Statutory Committees at Market Infrastructure Institutions, the Terms of Reference (ToR) of the Investment Committee are as follows:

- a. Evaluate each investment and divestment proposals, whether requiring infusion of funds or otherwise, except treasury investments.
- b. Evaluate proposals of capital expenditure.
- c. Make detailed analysis of existing investments.
- d. Investment Committee can provide the recommendation along with rationale to the governing Board.

The objective of the policy is to ensure that the required information pertaining to investments (other than treasury investments) is presented to the Investment Committee to enable compliance with the above stated SEBI directives

Scope :

- a. Evaluate each investment and divestment proposals, whether requiring infusion of funds or otherwise, except treasury investments.

All proposals for strategic investments or divestments (except treasury investments) will be placed before the Investment Committee for its consideration, giving following details:

- The quantum of proposed investment/divestment
- The rationale/justification for investment/divestment
- The sources of funds for the proposed investments
- Compliance with statutory, regulatory and legal provisions

b. Evaluate proposals of capital expenditure.

The Company's capital expenditure can comprise of the following :

- i. Procurement of tangible assets such as computer hardware, office equipments, furniture, vehicle, etc. and intangible assets such as software applications, software licenses, etc.
- ii. In-house developed software applications

It is proposed that the approvals for the above capital expenditures can be in the following manner :

- Procurement of tangible assets and intangible assets

In order to meet business exigencies and ensure operational efficiency, it is proposed that procurement of tangible and intangible assets in excess of Rs. 50 lakhs per instance will be placed before the Investment Committee for its consideration and recommendation to the Board.

Any proposal for procurement of tangible and intangible assets less than Rs. 50 lakhs per instance can be approved by MD. A summary of all capital expenditure incurred during the year will be placed in the Investment Committee annually for its noting

It is further submitted that in case of utmost business urgency such as regulatory requirements, etc. the capital expenditure can be incurred subject to ratification by the Investment Committee. Details of such capital expenditure will be placed before the Investment Committee and Board within 90 days from the date of approval by Managing Director & CEO.

- In-house developed software applications

NCCL, with the help of outsourced IT vendors, carries out development of software applications, Change Requests (CR), testing and maintenance of software applications. For this, outsourced IT vendors bill NCCL on per man day basis. Based on analysis of work done by IT vendors, the cost pertaining to development and enhancement of the software and related testing is capitalized, whereas cost pertaining to maintenance work is charged to revenue.

The outsourced IT vendor, the number of resources and rate per man day is approved in the beginning of the financial year. The monthly costs is bifurcated into capex and opex based on time spent on development and maintenance work respectively. It is therefore proposed that capital expenditure on account of in house development, enhancement and testing is considered as business as usual and can be approved by MD. A summary of all such capital expenditure incurred during the year annually will be placed in the Investment Committee for its noting

c. Make detailed analysis of existing investments

An analysis of existing strategic investments, i.e. other than treasury investments will be placed before the Investment Committee annually for its review.

d. Investment Committee can provide the recommendation along with rationale to the governing Board.

The Investment Committee can deliberate on proposals for investment/ divestment (other than treasury operations), evaluate the rationale for the same and if considered appropriate, recommend the same to the Board for its approval.

Review of the Policy:

The policy has to be reviewed annually and placed before the Investment Committee, Audit Committee and Board for approval in their immediate subsequent meetings.