



**MILLENNIUM ENGINEERS AND
CONTRACTORS LIMITED**

**(Formerly Known as Millennium Engineers
and Contractors Private Limited)**

Registered Office: Elite Transbay, Office No. 501 TO 504, 3, H No. 22 & 23, Nr Mitcon Road,
Balewadi, Pune -411045, Maharashtra, India

CIN: U45202PN1999PLC013609

DOCUMENT RETENTION

&

ARCHIVAL POLICY

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DOCUMENT RETENTION & ARCHIVAL POLICY

1. Preamble

This policy is primarily framed based on Regulations 9 & 30 (8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) and Companies Act, 2013. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

The website of Millennium Engineers And Contractors Limited (“Company”), contains information on its business and operations for information and awareness of stakeholders. The website is required to be regularly updated and certain information and documents are archived periodically so as to be available on the website, whilst simultaneously keeping it crisp and relevant.

2. Objective

The purpose of implementing this Policy is to facilitate efficient operation of our Company as regards to adequate preservation and protection of documents in compliance with the statutory and regulatory requirements applicable from time to time and also to set principles for classifying, managing and storing of records of the Company.

Pursuant to Regulation 30 of Listing Regulations, the Company shall disclose on its website certain events or information prescribed therein to the Stock Exchanges. Such disclosures shall also be made available on the Company’s website for certain periods as statutorily required. This Policy shall be disclosed on the Company’s website in order to inform the stakeholders to facilitate them to retrieve past information which is of a statutory nature for a period as disclosed in the Policy.

3. Scope & Purpose

All the information and/ or documents created and/ or received by the employees in the course of their duties on behalf of the Company, preserved in the form of records, are covered by this policy. It is emphasised here that this policy is equally applicable to records created and/ or received in electronic

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format as it is to paper records, which are bound by the legislative requirements.

Except as stated otherwise in this Policy, all documents shall be preserved:

- a. Permanently;
- b. For the period not less than eight (8) years after completion of relevant transaction;
- c. For the period other than mentioned under (a) and (b) herein above.

4. Archival Policy

In accordance with the provisions of the aforesaid Regulation, the Company shall ensure that the information shall be hosted on the Company's website for a period of 5 years as specified in SEBI and thereafter maintain this information under the archival section for a further period of at least one (1) year in the manner as deemed appropriate by the Company. However, if any, applicable law requires preservation for longer period, then those shall be preserved/ maintained accordingly.

5. Governing Laws

This Policy shall be governed by:

- Securities and Exchange Board of India (Listing Obligations And Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India Act, 1992
- the Companies Act, 2013;
- Secretarial Standards;
- Labour Laws, Factory Laws, Tax Laws and all other applicable laws for the time being in force.

6. Preservation of Documents

Methodology of Preservation of Documents

The Company shall primarily utilize any one and / or combination of the following methods in preserving the records:

- Department or function-wise;
- Subject or topic-wise; and / or
- Such other method as the Departmental heads may consider appropriate, in order to preserve the documents.

The preservation of Documents should be such as to ensure that there is no tampering, alteration,

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destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

Maintenance of Records

All physical records shall be maintained in the form of books and files by the respective departments/sectors.

Electronic records are to be stored in file servers, wherein the computer equipment is maintained by the IT Department. Also the respective departments of the Company who is responsible to maintain these records must formally agree to the backup and recovery procedures with the IT Department.

A reproduction of any original record on microfilm or on any other medium shall be certified to be a true and accurate reproduction of the original of such record.

7. Responsibility of Record Keeping/ Custody of Documents

All the Documents shall be under the custody of respective head of the departments. The Departmental heads must be familiar with this Policy and also it is their responsibility to enlighten their Department personnel in this regard.

It is the responsibility of all the employees of the Company, to ensure that appropriate security measures are observed for maintaining records containing personal or other confidential information.

8. Role of Registrar and Transfer Agent

The Registrar and Transfer Agent of the Company shall ensure that the correct procedures are followed for maintenance of the Records required to be maintained with them.

9. Ownership of Records

All records, irrespective of format, (*i.e. both physical and electronic, including emails*) created or received by the employees during their duties on behalf of the Company, are the property of the Company and subject to its overall control. Employees leaving the Company or changing positions within the Company are to leave all records for their successors.

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10. Disposal of Records

No record should be allowed to be taken outside the premises of the Company without being torn in to small shreds.

A register of the Documents disposed and/ or destroyed shall be maintained stating the brief particulars of Documents destroyed, date of destruction and mode of destruction. All entries made therein shall be authenticated by the person so authorized by the Board for the purpose. Inspection of this register is restricted.

11. Role of Registrar and Transfer Agent

The Registrar and Transfer Agent of the Company shall ensure that the correct procedures are followed for maintenance of the Records required to be maintained with them. The Company shall obtain an annual undertaking from the Registrar and Transfer Agent of the Company in this regard.

12. Suspension of Record Disposal in the event of Litigation or Claim

In the event any employee of the Company reasonably anticipates or becomes aware of a governmental investigation or audit concerning the Company or the commencement of any litigation against or concerning the Company, such employee shall inform the respective Head of the Department and any further disposal of documents shall be suspended until such time as the Director of the Company and the Company's legal counsel, determines otherwise.

13. Amendments to The Policy

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

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Annexure-I

DOCUMENTS PRESERVATION SCHEDULE

COMPANY RECORDS:

| S. No. | Record Type | Minimum Retention Period |
|--------|--|--------------------------|
| 1. | Certificate of Incorporation | Permanent |
| 2. | Memorandum and Articles of Association | Permanent |
| 3. | Certificate to Commence Business | Permanent |
| 4. | Common Seal (if any) | Permanent |
| 5. | Certificate of change of name (if any) | Permanent |
| 6. | Minutes Books as well as Resolutions including circular of Board, General Meetings and Committees Meetings | Permanent |
| 7. | Adopted Policies/ Codes etc. | Permanent |
| 8. | License and Permits | Permanent |
| 9. | Annual Reports | Permanent |
| 10. | Scrutinizer Reports | Permanent |
| 11. | Central Government Approvals | Permanent |
| 12. | Statutory Registers maintained under Companies Act, 2013 | Permanent |
| 13. | Index of Members | Permanent |
| 14. | SEBI & Stock Exchanges Records submitted from time to time - Disclosures under SEBI (Prohibition of Insider Trading) Regulations, 2015; - Disclosures under SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011; - Quarterly / Annual / Non-Quarterly / Other Compliance related documents; - Statutory Returns / Reports; - Documents pertaining to Listing Regulations, 2015; - Disclosure in Newspapers; | Permanent |
| 15. | Declaration by directors under section 164 of the Companies Act, 2013 | Permanent |
| 16. | Declaration by directors under section 184 of the Companies Act, 2013 | Permanent |
| 17. | Declaration by Independent Directors as the Companies Act, 2013 | Permanent |

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| 18. | Correspondences with Statutory bodies | Permanent |
| 19. | Agenda of Board and Committee Meeting(s) and supporting documents thereto | 8 years |
| 20. | Office copies of Notice of Board Meeting / General Meeting / Committee Meeting and other related papers | 8 years |
| 21. | Attendance Registers | 8 years |
| 22. | Share Transfer, transmission etc., correspondences with the Registrar & Share Transfer Agent | 8 years |
| 23. | Correspondences towards NSDL / CDSL | 8 years |
| 24. | Documents on which the common seal of the Company has been affixed. | 8 years |
| 25. | Annual Returns | 8 years |
| 26. | ROC Filings and Stock Exchange Filings in physical and Electronic form | 8 years |
| 27. | Correspondences with the shareholders | 8 years from the date of the compliant is resolved |
| 28. | Register of Debenture-holders (if any) | 15 years after the redemption of debentures |
| 29. | Index of Debenture-holders (if any) | 15 years after the redemption of debentures |

ACCOUNTS AND FINANCE:

| S. No. | Record Type | Minimum Retention Period |
|--------|---|--------------------------|
| 1. | Annual Audit Reports and Financial Statements | Permanent |
| 2. | Books of Account, Ledgers and Vouchers | 8 years |
| 3. | Annual Plans & Budgets | 8 years |
| 4. | Banks Statements & cancelled cheques | 8 years |
| 5. | Internal Audit Report | 8 years |
| 6. | Cost Audit Report | 8 years |
| 7. | Employee Expense Reports | 8 years |
| 8. | Investment Records | 8 years |
| 9. | Correspondences with Statutory Authorities | 8 years |
| 10. | Treasury documents – Credit approvals from bank | Permanent |

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| 11. | Bank Account passbook or statement, Bank Reconciliation Statement and LC Documents | 8 years |
| 12. | Bank Guarantees | Till the expiry of the claim period |

TAX RECORDS:

| S. No. | Record Type | Minimum Retention Period |
|--------|--|--|
| 1. | Tax Exemption and Related documents | Permanent |
| 2. | Tax Bills, receipts and payments | Permanent |
| 3. | Tax Litigation documents | Permanent |
| 4. | Annual Information Returns – State and Central | Permanent |
| 5. | Tax Returns – Income, Franchise, Property | Permanent |
| 6. | Excise Records | 8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later |
| 7. | Tax Deducted at Source Records | 8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later |
| 8. | Income Tax papers | 8 years from the end of the Financial Year or completion of assessment under the Income Tax law is over whichever is later |
| 9. | Service Tax Records | 8 years from the end of the Financial Year or completion of assessment under the Service Tax is over whichever is later |
| 10. | Sales Tax Records | 8 years from the end of the Financial Year or completion of assessment under Sales Tax whichever is later |
| 11. | GST Records | 8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later |

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INSURANCE RECORDS:

| S. No. | Record Type | Minimum Retention Period |
|--------|----------------------------|--------------------------|
| 1. | Insurance Policies | Permanent |
| 2. | Annual Loss Summaries | 8 years |
| 3. | Group Insurance Plans | 8 years |
| 4. | Claim Files | 8 years |
| 5. | Journal Entry Support Data | 8 years |

HR & PAYROLL RECORDS:

| S. No. | Record Type | Minimum Retention Period |
|--------|--|--|
| 1. | Official Personnel Files of Active employees | Permanent |
| 2. | Official Personnel Files of inactive employees | 8 years from separation |
| 3. | Commission / Bonuses / Incentives / Awards | Permanent |
| 4. | Employee Handbook & Induction Manual | Permanent |
| 5. | Payroll Registers | Permanent |
| 6. | Bonus, Gratuity and other Statutory Records | Permanent |
| 7. | Retirement and Pension Records | Permanent |
| 8. | Payroll Deductions | 3 years after termination of service of employment |
| 9. | Employment Contracts | 3 years after termination of service of employment |
| 10. | Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers | 3 years after termination of service of employment |
| 11. | Labour Distribution Cost Records including details pertaining to gratuity and retrial disbursement | 3 years after termination of service of employment |
| 12. | Time 3 years after separation Cards / Sheets | 2 years |
| 13. | Unclaimed Wage Records | 3 years |
| 14. | Leave Records | 2 years after the relevant period |

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CORPORATE SOCIAL RESPONSIBILITY RECORDS:

| S. No. | Record Type | Minimum Retention Period |
|--------|--|--------------------------|
| 1. | Records on CSR Projects (including amount budgeted, spent and balance, if any), Projects undertaken and progress thereon | 8 years |

PROPERTY RECORDS:

| S. No. | Record Type | Minimum Retention Period |
|--------|--|--------------------------|
| 1. | Original Purchase and Sale Deeds | Permanent |
| 2. | Original Lease Agreements | Permanent |
| 3. | Original Leave and License Agreements | Permanent |
| 4. | Property Insurance Documents | Permanent |
| 5. | Correspondence related to Property deals | Permanent |

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