



**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

**CODE OF INTERNAL PROCEDURES  
AND  
CONDUCT FOR REGULATING, MONITORING AND  
REPORTING  
OF  
TRADING BY INSIDERS**

**CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING,  
MONITORING AND REPORTING OF TRADING BY INSIDERS**

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**CODE OF INTERNAL PROCEDURES AND CONDUCT FOR  
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**1. Definitions**

1.1 “Act” means the Securities and Exchange Board of India Act, 1992.

1.2 “Board” means the Board of Directors of the Company.

1.3 “Calendar Quarter” means a period of 3 consecutive calendar months, ending with the last day of March, June, September or December.

1.4 “Code” or “Code of Conduct” shall mean the Code of Internal Procedures & Conduct for Regulating, Monitoring & Reporting of Trading by Insiders of MILLENNIUM ENGINEERS AND CONTRACTORS LIMITED as amended from time to time.

1.5 “Company” means MILLENNIUM ENGINEERS AND CONTRACTORS LIMITED.

1.6 "Compliance Officer" means Company Secretary or such other senior officer, who is financially literate & capable of appreciating requirements for legal & regulatory compliance under these regulations designated so & reporting to the Board of Directors & who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades & implementation of the codes specified in these regulations under the overall supervision of the Board of Directors.

1.7 “Connected Person” means:

- (i) any person who is or has during six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a

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director, officer or an employee of the Company or holds any position including a professional or business relationship between himself & the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access;

(ii) Without prejudice to generality of foregoing, persons falling within following categories shall be deemed to be connected persons unless the contrary is established,

(a) an immediate relative of connected persons specified in clause (i); or

(b) a holding company or associate company or subsidiary company; or

(c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or

(d) an investment company, trustee company, asset management company or an employee or director thereof; or

(e) an official of a stock exchange or of clearing house or corporation; or

(f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

(g) a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

(h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or

(i) a banker of the Company; or

(j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten percent, of the holding or interest.

1.8 “Dealing in Securities” means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in securities of the Company either as principal or agent.

1.9 Designated Person(s) shall include:

1. Promoters of the Company;
2. Directors and Key Managerial Personnel of the Company;
3. Employees of the Company in the grade of vice president and above;
4. Every executive secretary/ executive assistant to every employee covered under (2) above in this definition;
5. Any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company, as may be determined by the Compliance Officer ,on the basis of their functional role to whom the trading restrictions shall be applicable;

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6. Any employee in the Finance, Accounts, Secretarial, Information Technology (IT) and Legal Departments, as may be determined by the Compliance Officer;
7. Any other employee as may be determined and informed by the Compliance Officer from time to time
8. Any other person who has access to Unpublished Price Sensitive Information.

1.10 “Director” means a member of the Board of Directors of the Company.

1.11 “Employee” means every employee including Directors in employment of the Company.

1.12 “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

1.13 “Generally available Information” means information that is accessible to public on a non-discriminatory basis.

1.14 “Immediate Relative” means a spouse of a person & includes parent, sibling & child of such person or of spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

Note: if spouse is financially independent and doesn’t consult an insider while taking trading decisions, the spouse won’t be exempted from the definition of immediate relative. A spouse is presumed to be an “immediate relative”, unless rebutted so.

1.15 “Insider” means any person, who is,

- (i) a connected person; or
- (ii) in possession of or having access to unpublished price sensitive information.
- (iii) Any person in receipt of UPSI pursuant to a “legitimate purpose”. Due notice shall be given to such person to maintain confidentiality of such UPSI in compliance with these regulations.

1.16 “Key Managerial Person” means person defined u/S 2(51) of the Companies Act, 2013.

1.17 “Legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

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1.18 "Promoter" shall have the meaning assigned to it under SEBI (Issue of Capital & Disclosure Requirements) Regulations, 2018 or any modification thereof.

1.19 "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund.

1.20 "Takeover regulations" means the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

1.21 "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

1.22 "Trading Day" means a day on which recognized stock exchanges are open for trading.

1.23 "Unpublished Price Sensitive Information" means: any information, relating to a company or its securities, directly or indirectly, that is not generally available, which upon becoming generally available, is likely to materially affect the price of securities & shall, ordinarily including but not restricted to, information relating to the following:

- (i) financial results; (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delisting, disposals & expansion of business & such other transactions; and
- (v) changes in key managerial personnel.

1.24 "Regulations" shall mean SEBI (Prohibition of Insider Trading) Regulations, 2015 & any amendments thereto.

Words & expressions used & not defined in these regulations but defined in the Act, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 & rules & regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

## **2. Role of Compliance Officer**

2.1 Compliance Officer shall report on trading in securities by Designated Persons to the Board of Directors of the Company from time to time, but not less than once in a year.

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2.2 Compliance Officer shall assist employees in addressing any clarifications regarding the Regulations & Company's Code of Conduct.

### **3. Coverage**

Directors/ Promoters of the Company; Designated Persons, Immediate Relatives of Directors, Promoters, Designated Persons/ Employees of the Company, Insiders/ Connected Persons having possession of UPSI shall be governed by this Code. No insider shall communicate or counsel or procure or cause the communication of any unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

### **4. Preservation of "Price Sensitive Information"**

3.1 All information shall be handled within the Company on a need-to-know basis & no Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of insider's legitimate purposes, performance of duties or discharge of legal obligations. Effective system of internal controls based on the following guidelines, shall be put in place within the Company, for preservation of Price Sensitive Information:

1. all employees who have access to Unpublished Price Sensitive Information shall be identified;
2. all the Unpublished Price Sensitive Information shall be identified and its confidentiality shall be maintained as per the requirements of this Code;
3. adequate restrictions to be placed on communication or procurement of Unpublished Price Sensitive Information.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:

- entails an obligation to make an open offer under takeover regulations where the Board is of informed opinion that proposed transaction is in best interests of the Company; or
- not attract obligation to make an open offer under takeover regulations but where the Board is of informed opinion that proposed transaction is in best interests of the Company & the information that constitute unpublished price sensitive information is disseminated to be made generally available at

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least two trading days prior to the proposed transaction being affected in such form as the Board may determine.

However, Board shall require parties to execute agreements to contract confidentiality & non-disclosure obligations on the part of such parties & such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

**3.2 Need to Know:**

(i) “need to know” basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty & whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

(ii) All non-public information directly received by any employee should immediately be reported to the head of the department.

**3.3 Limited access to confidential information**

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

3.4 All information shall be handled within the Company on a need-to-know basis i.e. should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or apprehension of misuse of the information. No UPSI shall be communicated to any person except in furtherance of the insider’s legitimate purposes, performance of duties or discharge of his legal obligations.

3.5 Lists of all employees and other persons with whom UPSI is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons.

3.6 No insider shall communicate, provide, or allow access to any UPSI, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

3.7 No person shall procure from or cause the communication by any insider of UPSI, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.



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3.8 Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an “insider” and due notice shall be given to such persons to maintain confidentiality of such UPSI.

3.9 A structured digital database shall be maintained by Compliance Officer containing the names of such persons or entities, as the case may be, with whom information is shared along with the PAN (or any other identity authorized by law where PAN is not available). Such database shall be maintained with adequate internal controls and checks such as time, day, date, Name, Address, Telephone/ mobile number, holdings and other details. Time-stamping and audit trails to ensure non-tampering of the database.

### **Trading when in possession of UPSI**

No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of UPSI or communicate, provide or allow. When a person who has traded in securities has been in possession of UPSI, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

### **Limited access to confidential information**

All manual files containing confidential information shall be kept secure. All Computer files must have adequate security such as login and password etc.

## **5. Prevention of misuse of “Unpublished Price Sensitive Information”**

Employees & connected persons designated on basis of their functional role [‘Designated Person(s)’] in the Company shall be governed by an internal code of conduct governing dealing in securities.

No insider shall trade in securities of the Company when in possession of unpublished price sensitive information provided that the said trades were pursuant to a trading plan set up as under:

### **5.1 Trading Plan**

An insider shall be entitled to formulate a trading plan for dealing in securities of the Company & present it to Compliance Officer for approval & public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

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5.2 Such trading plan shall:

- (i) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- (ii) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Company and the second trading day after the disclosure of such financial results;
- (iii) entail trading for a period of not less than twelve months;
- (iv) not entail overlap of any period for which another trading plan is already in existence;
- (v) set out either the value of trades to be effected or the number of securities to be traded
- (vi) along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- (vii) not entail trading in securities for market abuse.

5.3 Compliance Officer shall consider & review aforesaid trading plan to assess whether the plan would have any potential for violation of Regulations for implementation of the plan. However, Compliance Officer shall be entitled to take express undertakings as may be necessary to enable such assessment & to approve & monitor the implementation of the plan as per provisions of the Regulations.

5.4 The Trading Plan once approved shall be irrevocable & Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, implementation of trading plan shall not be commenced, if at time of formulation of the plan, Insider is in possession of any unpublished price sensitive information & the said information has not become generally available at time of commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information.

Further, Insider shall also not be allowed to deal in securities of the Company, if date of trading in securities of the Company, as per approved Trading Plan, coincides with date of closure of Trading Window announced by Compliance Officer.

5.5 Upon approval of trading plan, Compliance Officer shall notify the plan to stock exchanges on which securities are listed.

### **6. Trading Window and Window Closure**

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6.1 Designated Person(s) and their immediate relatives not in possession of unpublished price sensitive information may execute trades in securities of the Company subject to compliance of following:

(i) The trading period, i.e. the trading period of the stock exchanges, called 'trading Window', is available for trading in the Company's securities.

(ii) The trading window shall be, inter alia, closed from the first day of every financial quarter till 48 hours after the declaration of financial results, during the time any UPSI is published or any other time as may be decided by the Compliance Officer. The Compliance Officer after taking into account various factors including the UPSI in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

(iii) All Designated Person(s) and their immediate relatives shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed or during any other period as may be specified by the Company from time to time, as referred to in point No. (ii) above.

6.2 The Compliance Officer shall intimate the closure of trading window to all the Designated Person(s).

### **7. Pre-clearance of trades**

All Designated Person(s) who intend to deal in the securities of the Company when the trading window is opened and if the value of the proposed trades is above Rs. 10,00,000.00 (Rs. Ten Lakh) (market value) should pre-clear the transaction. However, no Designated Person(s) shall be entitled to apply for pre-clearance of any proposed trade if such Designated Person(s) is in possession of unpublished price sensitive information even if the trading window is not closed and hence, he shall not be allowed to trade. The pre-clearance procedure shall be as under:

- 1) An application may be made in the prescribed Form (attached as Annexure-I) to the Compliance Officer.
- 2) An undertaking (attached as Annexure-II) shall be executed in favour of the Company by such Designated Person(s).
- 3) The Compliance Officer shall confidentially maintain a list of such securities as a 'restricted list' which shall be used as the basis for approving or rejecting applications for pre-clearance.

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- 4) Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price-sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered in accurate.
- 5) The Compliance Officer shall communicate the approval (attached as Annexure-III) preferably on the same working day but not later than the next working day unless he is of the opinion that grant of such an approval would result in a breach of the provisions of this Code, or the SEBI Regulations.
- 6) All Designated Person(s) and their relatives shall execute their order in respect of securities of the Company within seven trading days after the approval of pre-clearance is given. The Designated Person(s) shall file within two days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not executed, a report to that effect shall be filed. (Attached as Annexure-IV).
- 7) If the order is not executed within seven trading days after the approval is given, the Designated Person(s) must pre-clear the transaction again.
- 8) All Designated Person(s) who buy or sell any number of shares of the Company shall not enter into contra trade i.e. sell or buy any number of shares during the next six months ('holding period') following the prior transaction. All Designated Person(s) shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- 9) In the absence of the Compliance Officer, the Officer designated by him/ her, shall discharge the aforesaid functions.

**8. Other Restrictions**

8.1 The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

8.2 The disclosures of trading in securities shall also include trading in derivatives of securities, if any, and the traded value of the derivatives shall be taken into account for purposes of this Code.

8.3 The disclosures made under this Code shall be maintained for a period of five years.

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**9. Reporting Requirements for transactions in securities**

**Initial Disclosure**

9.1 Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a promoter in the prescribed Form (Form-B).

**Continual Disclosure**

9.2 Every Promoter, member of Promoter Group, Key Managerial Personnel, or Director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000.00 (Rs. Ten Lakhs) in the prescribed Form (Form-C).

**Disclosures by other Connected Persons**

9.3 The Company may, at its discretion, require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in securities of the Company in prescribe form (Form D) and at such frequency as may be determined by the Company in order to monitor compliance with these regulations.

**10. Disclosure by the Company to the Stock Exchange**

The Company shall notify the particulars of such trading to the Stock Exchange within two trading days of:

- (a) the receipt of the disclosure; or
- (b) from becoming aware of such information.

**11. Dissemination of Price Sensitive Information**

11.1 No information shall be passed by Designated Person(s) by way of making a recommendation for the purchase or sale of securities of the Company.

11.2 Disclosure/ dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

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The following guidelines shall be followed while dealing with analysts and institutional investors:

- Only public information to be provided.
- Any Executive Director of the Company or at least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.

### **12. Penalty for contravention of the code of conduct**

12.1 Every Designated Person(s) shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/ her immediate relative).

12.2 Any Designated Person(s) who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.

12.3 Designated Person(s) (s) who violates the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension etc.

12.4 In case it is observed by the Board that the Designated Person(s) has violated the Regulations, they shall inform SEBI promptly.

12.5 The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.

### **13. Amendment**

This Insider Trading Code is prepared in compliance with and in terms of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as “Code”) and any amendment or modifications thereto shall automatically be applicable to this Insider Trading Code, wherever applicable. The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

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**14. Interpretation**

In any circumstance where the terms of this Policy differ from any Applicable Law governing the Company, such Applicable Law will take precedence over this Policy and the procedures there under until such time as this Policy is modified in conformity with the Applicable Law.

**THIS POLICY IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. IT WILL BE THE RESPONSIBILITY OF EACH EMPLOYEE TO ENSURE COMPLIANCE OF SEBI GUIDELINES AND OTHER RELATED STATUTES FULLY.**

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**Annexure-I**

**FORMAT OF APPLICATION FOR PRE-DEALING APPROVAL**

Date:

To,

The Compliance Officer,

**MILLENNIUM ENGINEERS AND CONTRACTORS LIMITED**

Dear Sir/ Madam,

**Application for Pre-dealing approval in Securities of the Company**

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I, seek approval to purchase/ sale/ subscribe to/ deal in securities of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No./ DP ID/ Client ID No.	
5.	The proposal is for	
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be acquired/ subscribed/ sold/ dealt	
8.	Price at which the transaction is proposed	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or off-market deal	
11.	Folio No./ DP ID/ Client ID No. where the securities will be credited/ debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

\_\_\_\_\_  
Signature

Name:

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**Annexure-II**

**FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR  
PRE-CLEARANCE**

Date:

To,

The Compliance Officer,

**MILLENNIUM ENGINEERS AND CONTRACTORS LIMITED**

**Undertaking**

I, \_\_\_\_\_, \_\_\_\_\_ of the Company, residing at \_\_\_\_\_, am desirous of dealing in \_\_\_\_\_\* shares of the Company as mentioned in my application dated \_\_\_\_\_, for pre-clearance of the transaction. I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Insider Trading Code up to the time of signing this Undertaking. In the event that I have access to or receive any information that could be construed as "Unpublished Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the same to the Compliance Officer and shall completely refrain from dealing in the securities of the Company until such information becomes public. I declare that I have not contravened the provisions of the Code as notified by the Company from time to time. I undertake to submit the necessary report of execution of the transaction / a 'Nil' report if the transaction is not undertaken. If approval is granted, I shall execute the deal within 7 (seven) trading days of the receipt of approval failing which I shall again be liable to seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Signature:

Name:

Date:

*\* Indicate number of shares*

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**Annexure-III**

**FORMAT OF PRE-CLEARANCE ORDER**

To,

Name:

Designation:

Place:

This is to inform you that your request for dealing in \_\_\_\_\_\* shares of the Company as mentioned in your application dated \_\_\_\_\_ is approved. Please note that the said transaction must be completed before \_\_\_\_\_, that is within 7 (seven) trading days from today. In case you do not execute the approved transaction/ deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/ deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached form within 2 (two) days from the date of transaction/ deal. In case, the transaction is not undertaken, a 'Nil' report shall be necessary.

For **MILLENNIUM ENGINEERS AND CONTRACTORS LIMITED**

**Compliance Officer**

Date:

Place:

Encl.: Format for submission of details of transaction.

*\* Indicate number of shares*

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**Annexure-IV**

**FORMAT FOR DISCLOSURE OF TRANSACTIONS**

*(To be submitted within 2 days of transaction/ dealing in securities of the Company)*

To

The Compliance Officer,  
Millennium Engineers And Contractors Limited

I hereby inform that I

- have not bought/ sold/ subscribed/ dealt any securities of the Company
- have bought/ sold/ subscribed/ dealt to securities as mentioned below on \_\_\_\_\_.

<b>Name of holder</b>	<b>No. of securities dealt with</b>	<b>Bought/ sold/ Subscribed/ dealt</b>	<b>DP ID/ Client ID/ Folio No</b>	<b>Price (Rs.)</b>

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance Officer/ SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (Applicable in case of purchase / subscription).

I declare that the above information is correct and that no applicable laws/ regulations have been contravened for effecting the above said transactions(s).

Signature:

Name:

Designation:

Date:

Place:

-X-X-X-

**MILLENNIUM ENGINEERS AND CONTRACTORS LIMITED**  
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