

Policy on Preservation of Documents

PREAMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“Regulations”] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

SCOPE

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

DEFINITIONS

“**Act**” means the Companies Act, 2013 & rules made thereunder.

“**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

“**Board**” means the Board of directors of the Company or its Committee.

“**Company**” means MITCON Consultancy & Engineering Services Limited.

“**Current Document(s)**” means any document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

“**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

“**Electronic Record(s)**” means the electronic record as defined under section 2 (1)(t) of the Information Technology Act, 2000.

“**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.

“**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.

“**Regulations**” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (LODR).
The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

CLASSIFICATION

Based upon the recommendations of the management, the Board of Directors have classified the following documents to be retained and preserved as tabulated hereunder, in the manner detailed under Annexure I:

SR. NO.	PARTICULARS	CATEGORY
1.	Documents that needs to be preserved/retained permanently	Type A
2.	Documents that may be preserved/retained for a period of 8 years or more after the end of financial year	Type B
3.	Other documents which may be retained for less than 8 years	Type C

The documents concerning other routine matters & having substantial long-lasting consequences shall be preserved by all concerned as may be decided by the respective Departmental Heads/ CEO/COO of the Company based upon usefulness and necessity.

MODE OF PRESERVATION & RESPONSIBILITY

The Documents may be preserved in physical form or electronic form. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

The Departmental Heads of the Company/CEO/COO shall be responsible for maintenance of the documents in their respective division/department taking into account this policy prescribing the minimum period for maintenance of documents and shall take decision to retain/preserve or destroy documents pertaining to their division/department keeping in view ongoing or anticipated litigation(s), if any.

Annexure A

A. Accounts, Finance & Taxation records including Annual Financial statement

RECORD TYPE	RETENTION RECORD	DOCUMENT TYPE
Books of Accounts including work papers and other documents related to the audit including Tax and Vat Audit, Accounts Payable/Receivable ledgers, General Ledger, Annual Plans and Budgets, Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition, Payroll TDS, PF, ESI return and challan applicable on payroll, Bank Account passbook or statement, Bank Reconciliation Statement and Letter of Credit Documents, Import/Export Documentation, Excise Tax /GST records/returns and Payroll Tax records	8 years	Type B
Investment Records, Treasury documents – Credit approvals from bank and Tax Litigation documents	Permanent	Type A
Bank Guarantees	Till the expiry of the claim period	Type B/ Type C

B. Corporate Secretarial Records

RECORD TYPE	RETENTION RECORD	DOCUMENT TYPE
Certificate of Incorporation/ Certificate of Change of Name, Memorandum and Articles of Association, Certificate to Commence Business and Minute Books, Register and Index of Members	Permanent	Type A
Notice/Agenda and other related papers, Register of Allotments, Register of Buy-back of Securities, Register of Charges, Register of Deposits, Register of payment of Dividend, Register of Directors' Attendance, Register of Proxies, Register of inspection and Annual Return, Register of Employees Stock Option, Annual Return	8 years	Type B
Register of Postal Ballot and Scrutinizer Report and Office copies of the notices	Until the resolution has been implemented or for a period of 10 Years, whichever is later	Type B
Register and Index of Debenture holder/ Foreign Register of Debenture holders	8 years from the date of redemption of debentures	Type B
Foreign Register of Members	Preserved until discontinued	Type B/C
Register of renewed and duplicate certificates, register of contracts in which Directors are interested, Register of Directors, Managing Director, Manager and Secretary, Register of Directors' Holding and Register of Inter-Corporate Loans and investments, Register of Investments (other than securities not held in the name of the Company), Register of transfer of shares, Register of Transmission of Shares, Register in Respect of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, Register in Respect of SEBI (Prohibition of Insider Trading) Regulations, 2015, Annual	Permanent	Type A

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Reports, Records on CSR Projects undertaken and progress thereon and Register of Investments in securities not held in the name of the Company		
Dividend reconciliation statement	Preserved as long as any dividend remains unclaimed	Type B/C
ROC/Stock Exchange filings in physical & electronic form	5 years	Type C

C. Legal & Insurance Records

RECORD TYPE	RETENTION RECORD	DOCUMENT TYPE
License and Permits, and other statutory approvals	Permanent or till the date of validity	Type A/B/C
Legal Memoranda and Opinions	3 years after the closure of the matter	Type C
Litigation files/court orders, Trade Mark and related correspondence, property Deeds, Assessments, Licenses, Rights of way and Original purchase/ Sale Deeds	Permanent	Type A
Claim Files etc., Insurance Policies for the Company, Contracts and Related Correspondence (including any proposal that resulted in the contract) and all other supportive documents	8 years	Type B
Non-Disclosure Agreement	One year after end of period	Type C
Original lease Agreements	3 years after expiry of lease	Type C

D. Personnel and HR Records including Payroll Records

RECORD TYPE	RETENTION RECORD	DOCUMENT TYPE
Personnel Files of individual employees	Permanent	Type A
Correspondence with Employment Agencies and Advertisements for job openings	1 year after job opening is closed	Type C
Leave Records	1 year after termination of employment	Type C
ESI/PF/LWF/Profession Tax contribution & Returns	8 years	Type C

E. Miscellaneous Records

RECORD TYPE	RETENTION RECORD	DOCUMENT TYPE
Consultant Reports	8 years	Type C
Policy and procedures manuals	Current version with revision history	Type C
Electronic mails	1 year	Type C
Web page files	5 years. Can be archived for a period of 3 years after initial period of 5 years of live page	Type C
Registration under various statutes	Permanent	Type A