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Document Retention Policy

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08/22/02

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This manual has been prepared under the direction of the Office of the Corporate Secretary, and supersedes any previously issued Records Management Manual or Schedule.

In the interest of economy and efficiency, records are assigned the shortest practical retention time which satisfies Company needs and legal requirements, and which provides generally uniform retention periods for comparable records throughout the Company.

Requests for assistance in the interpretation of application of this manual should be directed to the Office of the Corporate Secretary.

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IMPORTANT NOTICE REGARDING RETENTION OF DOCUMENTS AND INFORMATION RELATING TO PENDING LAWSUITS AND ENVIRONMENTAL MATTERS

RECORDS RETENTION SUSPENSION NOTICES FROM THE LAW DEPARTMENT

As previously announced, Monsanto is currently involved in various litigations that require the suspension of our current Records Retention policy for certain types of documents, including electronic files and E-mail. To clarify, any document, whether hard copy, electronic or E-mail that relates to the following categories must be maintained. This applies not only to past documents, but those created now and in the future. E-mail should be retained electronically in folders, whether on the servers, or in personal folders. E-mails are considered documents just as any hard copy correspondence or letter.

With the pending IPO, this notice serves as a reminder that all Records Retention Suspension Notices previously sent are still in effect. While the cases are moving forward, Monsanto is still required to maintain these documents until further notice. Please read the document categories below and note that these notices override any normal records retention policies.

Further, all these documents CANNOT be purged during the upcoming "trash bash" day. This action is to prevent any inadvertent loss of information which may be relevant or needed in the defense of the litigation pending. Destruction of these documents could have serious repercussions for the company. Please take the necessary steps to insure that those in your group understand the serious nature of this notice.

Additionally, any request for information from outside sources needs to be coordinated though the Law Department. Please contact Joan Purk at 314-694-6060 for any questions you may have regarding this notice or any request for information.

Your attention and cooperation with this notice is necessary and appreciated.

David F. Snively

Assistant General Counsel - Litigation

1. DELTA AND PINE LAND

Sleiman, et al v. Monsanto Company: USDC - DE (Shareholders Suit)
and
Delta and Pine Land v. Monsanto Company: Circuit Court - MS

Monsanto Company has been served with lawsuits in both Delaware and Mississippi for matters related to the Delta and Pine Land transaction and our subsequent divestiture of Stoneville. Monsanto believes that the allegations are totally without merit and we will move rapidly to oppose the litigation. In the course of defending the litigation we need your assistance and request your immediate attention to this record-retention notice.

Please note and advise others within your organization that the Law Department has suspended the Corporate record-retention policy as it pertains to any Delta and Pine Land or Stoneville transaction information by requiring that all documents of the following types BE RETAINED until further notice. This action is to prevent any inadvertent loss of information which may be relevant or needed in the defense of the litigation pending. Retention of these materials is until further notice from the Law Department's litigation group. This suspension is being distributed to the entire Ag organization and Corporate (Foundatation) functions. Most of

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the documents that will be relevant have already been tagged for the Department of Justice investigation, and are still to be retained for these litigations.

This notice does include hard copy, electronic and email messages. Electronic and email documents may only be deleted if an exact hard-copy duplicate exists in the file. Please take the appropriate steps with email by creating folders to ensure the documents are not deleted.

For purposes of guidance, the following Agricultural Sector or Monsanto Corporate materials must be retained:

* Any documents related to the potential acquisition of Delta & Pine Land, since its inception, including communications, business plans, deal proposals, negotiations or proposed intergration of the companies.

* Any documents or communications with the Department of Justice regarding the transaction or negotiations.

* Any documents related to the sale of the Stoneville business. Again, this includes communications, business plans, deal proposals, negotiations or agreements with Hicks, Muse, Tate & Furst.

2. RIFKIN ANTITRUST LAWSUITS

Higgenbotham, et al v. Monsanto Company: USDC DC (Class Action Suit Asserting Product Safety and Antitrust Claims)
and
Massey v. Monsanto Company: USDC MS (Class Action Suit)

Monsanto Company has been sued by six farmers seeking to represent a class of farmers contesting the continued marketing of biotechnology products by Monsanto and asserting that past business practices have been anti-competitive under the antitrust laws. Monsanto believes that the allegations are totally without merit and we will move rapidly to oppose the litigation. In the course of defending the litigation we need your assistance and request your immediate attention to this record-retention notice.

Please note and advise others within your organization that the Law Department has suspended the Corporate record-retention policy as it pertains to certain Agricultural Biotech Products and Business Activities business information by requiring that all documents of the following types BE RETAINED until further notice. This action is to prevent any inadvertent loss of information which may be relevant or needed in the defense of the litigation pending. Retention of these materials is until further notice from the Law Department's litigation group. This suspension is worldwide.

This notice does include hard copy, electronic and email messages. Electronic and email documents may only be deleted if an exact hard-copy duplicate exists in the file. Please take the appropriate steps with email by creating folders to ensure the documents are not deleted.

For purposes of guidance, the following Agricultural Sector or Monsanto Corporate materials must be retained:

* All safety testing on all biotechnology product. This includes product performance; product efficacy; toxicology; studies of pollen movement; and all data needed to obtain any regulatory approval in any nation.

* All business plans and marketing plans associated with the products containing recombinant DNA technology. This includes grower agreements; licenses; contracts and communications with other companies or licensees of the technology; any analysis of how the products should be marketed, priced, technology restrictions, etc.

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* All communications and correspondence with any other company regarding the pricing, marketing, regulatory approval, technology restrictions or licensing, sale or governmental approval or business practices associated with the sale or introduction of agricultural biotechnology. This includes most specifically: Delta & Pine Land Company; E.I. duPont deNemours and Co.; Pioneer Hi-Bred International, Inc.; Dow Chemical Company; Mycogen Corporation; Mycogen Plant Sciences Inc.; Agrigenetics, Inc. d/b/a Mycogen Seeds; Novartis International, AG; Novartis Seeds, Inc., Northrup King Co.; Astrazeneca, PLC.; Zeneca, Inc.; Garst Seed Company; Agripro Seeds, Inc.

* All business records associated with efforts to secure public approval or regulatory approval for agricultural biotechnology. This includes any third-party contractor that is directed by Monsanto.

* All documents associated with Jeremy Rifkin or any other environmental or activist group that has opposed or engaged in the public discussion associated with biotechnology.

* All sales records and documentation associated with pricing; and marketing to farmers in any crop segment regardless of whether the product is genetically modified or is merely regular seed. This request pertains to Asgrow; Stoneville; Holdens; DEKALB and any other seed company that is owned in whole or in part by Monsanto Company. If any such company is no longer owned by Monsanto Company then this record-retention notice must be communicated to the management of that entity and the documents should be retained.

* All documents associated with the merger, acquisition or plan to acquire or any analysis of the agricultural business. This includes efforts to acquire any company including DEKALB, Holdens, Asgrow, Calgene, Agracetus, Delta & Pine Land, Pioneer or any other entity.

* All documents regarding efforts to prevent violation of grower agreements including refuge requirements and/or saved seed; efforts to enforce grower agreements; investigations associated with use of Monsanto technology under various license agreements; litigation and settlements associated with any of these activities.

* All patents and intellectual property associated with the agricultural biotechnology products developed or marketed by Monsanto, including the research and development investment associated with these products.

* All business records of Monsanto associated with biotechnology acceptance; regulatory approval and safety of Monsanto's agricultural products; meetings with other companies regarding any of the above topics.

3. E.I. DuPONT De NEMOURS LAWSUITS

E.I. DuPONT DE NEMOURS AND COMPANY v. MONSANTO COMPANY CAUSE NO: 4:00-952-23 (USDC - SC)

E.I. DuPONT DE NEMOURS AND COMPANY v. MONSANTO COMPANY AND ASGROW SEED COMPANY LLC CAUSE NO: 00-359 (USDC - DE)

Monsanto Company has been sued by E.I. DuPont De Nemours and served with the above-referenced lawsuits in both Delaware and South Carolina alleging Antitrust violations associated with any agricultural business (Glyphosate, Roundup Ready Soybeans and Roundup Ready Cotton). Monsanto believes that the allegations are totally without merit and we will move to rapidly to oppose the litigation. In the course of defending the litigation we need your assistance and request your immediate attention to this supplemental records retention notice.

Please note and advise others within your organization that the Law Department has suspended the Corporate record-retention policy as it pertains to any documents relating to DuPont, STS Soybeans, Staple Plus, Roundup

Ready Soy and Cotton or Glyphosate marketing associated with those crops by requiring that all documents of the following types BE RETAINED until further notice. This action is to prevent any inadvertent loss of information which may be relevant or needed in the defense of the litigation pending. Retention of these materials is until further notice from the Law Department's litigation group. This suspension is being distributed to the entire Ag organization and Corporate (Foundation) functions.

This notice does include hard copy, electronic and e-mail messages. Electronic and e-mail documents may only be deleted if an exact hard copy duplicate exists in the file. Please take the appropriate steps with e-mail by creating folders to ensure the documents are not deleted.

For purposes of guidance, the following Agricultural Sector or Monsanto Corporate materials must be retained:

- Roundup Ready Soybean and Cotton products (including foundation seeds, hybrid seeds, inbred seeds, transgenic technologies and specific trait products related hereto). This includes any documents retained by Asgrow, Hartz or Monsanto. Examples of materials which must be retained include documents relating to:

  Competition and market shares or positions in Soybean and Cotton seed markets; Soybean and Cotton seed strategies and objectives, planning, budgets and financial analyses, and research and development; acquisitions by Monsanto or any other company in Soy or Cotton; contracts or agreements pertaining to Soy or Cotton; advertising materials for Soy or Cotton products; pricing and pricing policies, plans and analyses respecting Soy or Cotton products; and grower licenses and other requirements or restrictions placed upon purchasers of Soy or Cotton products.

- Any documents or communication with DuPont regarding agriculture biotechnology products, STS Soybeans, or Asgrow/Monsanto development of Roundup Ready Soybeans. This includes business plans, deal proposals, negotiations or any agreements relating to Roundup Ready Soy or Cotton, along with any documents relating to DuPont's Staple Plus product for "over the top" application in Cotton.

4.US EPA Administrative Order Related to W. G. Krummich Plant, Sauget, IL.

The United States Environmental Protection Agency has issued a unilateral administrative order to Pharmacia Corporation, which, among other things, requires Pharmacia not to dispose of any documents relating to Pharmacia's potential liability with regard to the Sauget Area 2 Groundwater Operable Unit and source areas. Because of the corporate relatedness of Monsanto and Pharmacia, it is possible that some relevant records may be in Monsanto's possession. In its contractual arrangements with Pharmacia, Monsanto has certain obligations with regard to the Sauget matter. Accordingly, Monsanto is issuing this record retention guidance.

Please note and advise others within your organization that the Law Department has suspended the Corporate record-retention policy as it pertains to certain information by requiring that all documents described below BE RETAINED until further notice. This action is to prevent any inadvertent loss of information that may be relevant or needed with regard to the Sauget matter. Retention of these materials is until further notice from the Law Department's litigation group. This suspension is worldwide.

This notice does include hard copy, electronic and email messages. Electronic and email documents may only be deleted if an exact hard-copy duplicate exists in the file. Please take the appropriate steps with email by creating folders to ensure the documents are not deleted.

For purposes of guidance, any documents in Monsanto's possession and relating to the following must be retained:

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- Sauget Area 2 Superfund Site (in Sauget, Cahokia, and East Saint Louis, Illinois)
- Sauget Area 1 Superfund Site (in Sauget, Illinois)
- W. G. Krummrich Plant (in Sauget, IL)
- Clayton Chemical Company (a Division of Emerald Environmental, LLC) Facility (in Sauget, IL)

Please contact Molly Shaffer (314-694-3883) with any questions you may have regarding this notice.

Additionally, any request for information from outside sources needs to be coordinated through the Law Department. Please contact Joan Purk at 314-694-6060 or Kathleen Tucker at 314-694-6183 for any questions you may have regarding this notice or any request for information.

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This manual has been prepared under the direction of the Office of the Corporate Secretary, and supersedes any previously issued Records Management Manual or Schedule.

In the interest of economy and efficiency, records are assigned the shortest practical retention time which satisfies Company needs and legal requirements, and which provides generally uniform retention periods for comparable records throughout the Company.

Requests for assistance in the interpretation of application of this manual should be directed to the Office of the Corporate Secretary.

R. William Ide III
Senior Vice President,
General Counsel and Secretary

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Introduction

In a large company like Monsanto, a great many forms, reports, letters and other kinds of documents are produced and received each year. Many of these documents end up in file folders, which end up in file drawers and are never used again. The result is a waste of Company's storage space and a drain on corporate assets.

Monsanto's policy is, once each year, to clear all files of documents that are no longer required to be retained pursuant to this manual.

By June 30 of each year, each Sector or Foundation Team Lead and each LSBT Member must certify in writing to the Office of the Corporate Secretary that his or her entire sector or foundation team has reviewed its files and has kept or discarded all documents in accordance with the retention times in this manual. All such persons will be responsible for ensuring that all files, desks, credenzas, computer main frames, hard drives and disks, and any other storage space used by them or their sector or foundation team members, are cleared of unnecessary documents; and they must certify compliance with this manual.

NOTE: *Electronically stored documents and data are covered by this manual and are to be treated the same way that a corresponding paper document would be handled.*

A sample CERTIFICATION OF COMPLIANCE letter appears at the end of this document.

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Questions Often Asked

1. **Who May Receive This Manual?**
   This manual is available to Monsanto employees who have a need to know its contents. It is not to be given to anyone outside Monsanto without approval from the Office of the Corporate Secretary.

2. **Which Parts Of Monsanto Are Covered By This Manual?**
   This manual covers all U.S. subsidiaries which have not opted to develop their own manual. Ex-U.S. locations may use this manual, but it is geared to U.S. requirements, and Ex-U.S. locations should be aware of local regulations which take precedence. This manual does NOT override local regulations in Ex-U.S. locations.

3. **Are Documents Concerning Past Products & Businesses Covered?**
   Documents that pertain exclusively to divested or discontinued products or businesses should be treated the same as any other documents in Monsanto's possession. The question of which documents to transfer to the purchasers of the business and when to retain copies of transferred documents will be handled on a case-by-case basis.

4. **When Do The Retention Times In This Manual Not Apply?**
   Documents which the Law Department considers relevant to current or pending judicial or agency proceedings or investigations must not be destroyed until after the final resolution of those proceedings and release by the attorney supervising the litigation.

5. **What About Indexes To Documents?**
   Any index entry that refers to a record is considered part of that record. When you destroy a record, be sure to delete any reference to that record that may appear in a retained index.

6. **What About Library Materials?**
   This manual applies to any Company records kept in Company libraries. It does not apply to other library materials such as books, periodicals and reference materials purchased from sources outside the Company.

7. **What About Records Stored Off-Site?**
   Never store work-related records at home. These records are Monsanto property; home storage does not convert them to personal property. Bring any home-stored records to your work site. If the retention period specified for such records in the manual has already ended, dispose of them by using procedures that appropriately safeguard Company confidentiality. If the record retention period for the documents has not passed, see that the documents are properly stored until the end of the period.

   Audit any records belonging to your unit that may be in off-site storage the same way you review on-site records.

8. **What About Items That Have Historical Value?**
   Monsanto has an Archives to store historical items, documents, photos, films, etc. Items that have historical value, but would be disposed of according to this manual, may be sent to the Company Archives for retention at the discretion of the Archives personnel and the Corporate Public Affairs Department.

   Be sure to follow any relevant Monsanto archiving policy developed after this manual is published.

9. **What If You Need To Keep A Document Beyond Its Specified Retention Period?**
   Permission to deviate from the time specified in this manual may be requested from the Office of the Corporate Secretary. The request must come from a Sector or Foundation Team Lead or applicable LSBT Member. The request should include: 1) a copy of the record (or a description of it), 2) the reasons for wanting an exception, 3) the retention period requested. A sample REQUEST FOR EXCEPTION letter is at the end of this document.

10. **What If You Can't Find Reference To A Particular Document In The Manual?**
    If you cannot locate a specific retention time for a document, check with the legal counsel assigned to your sector or foundation team.

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If a Company or corporate department develops documents for which there is no applicable category in this manual, the Office of the Corporate Secretary should be notified so that appropriate changes can be made when this manual is next revised.

11. **What If A Particular Record Is Relevant To More Than One Subject?**
If a record pertains to more than one subject and fits under more than one item, use the longest applicable retention time.

12. **Is There A Rule Regarding How Long to Keep Drafts Of Documents?**
Unless directed otherwise in this manual, discard drafts as soon as they are superseded, which is usually immediately upon preparation of the next draft or upon completion of the final document.

13. **Are There Special Rules For Computerized Records? (See Also, Chapter III, Computers & Data Processing)**
Unless otherwise specified, if a record is retained in a computerized format but not on paper, the computerized record should be retained for the length of time specified in this manual. If the "official" copy of a document is retained on paper, the computerized version should be retained only as long as needed, and in no event longer than the paper copy.

14. **What About Computerized Records?**
All documents on a CD, ROM or other disk which cannot be selectively erased or printed out should be retained until the document with the longest retention period must be destroyed.

    Documents on main frames and hard drives should be saved annually onto a disk unless you are actively using them. Main frames and hard drives should be erased with special software available from a designated representative in your unit.

Backup documents for hard drives and main frames should be deleted, using the proper procedures, when the documents are to be disposed of according to this manual or when a paper copy of the document is retained.

Documents on electronic or optical disks that are about to become obsolete should be printed out and retained for the remainder of the retention period specified in this manual whenever feasible. If this is not feasible, the obsolete disks should be kept throughout the designated retention period, and a way to convert the documents to a usable format should be designated in case the documents are needed during the remainder of the retention period. After the documents are retained on paper or converted, the obsolete disks should be destroyed or erased by IT.

Contact IT for proper disposal of obsolete workstations.

Follow procedures established by your IT group when deleting computerized documents to comply with this manual.

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How To Use This Manual

This manual lists documents by subject category and assigns the length of time the documents should be kept before they are destroyed. Confidential business or trade secret information should always be placed in burn bags.

There are 20 chapters in the manual, listed alphabetically. Each represents a broad topic area, e.g., Human Resources, Real Estate, and Purchasing. However, in the files of every unit there are many different kinds of documents, reports, forms, etc., that are originated outside the unit. It is important, therefore, to become familiar with all chapters of this manual, not just the topic area(s) relating to your primary job responsibilities.

An example: The filed document in question is a purchase order. First look up "Purchasing" in the Table of Contents. The Table of Contents tells you to turn to the Purchasing chapter, page 44.

There you find:

	Retention Time
1. **Purchase Orders** — Including essential related papers	
• Originating purchasing office file copy	Until 1 year after termination of contract

This says that the purchasing office that generated the order may keep the document on file for one year **after** the contract has been terminated.

It is obviously impossible to list all documents that are used in Monsanto. Therefore, it is necessary for those who clear the files to make judgments about many documents regarding which category in this manual fits them best.

Terms Used in This Manual:

Record — All written or printed papers, maps and drawings, books, photographs and micro-photographs, film and microfilm, electronic and optical disks and tape recordings, slides, transparencies and programs, as well as E-mail such as cc:Mail, All-in-One, DEC, HP Desk and all electronic data systems and records of any type; or similar documentary or electronic material made or received by any segment of Monsanto in the performance of its responsibilities.

Any Index entry that refers to a record is considered a part of that record.

Retention Period Expressed As A Certain Number of Years — The document should be disposed of after the specified number of years have passed, on the anniversary of its creation, or, at the latest, by June 30 following that anniversary.

After Microfilming — Once the record has been microfilmed, the paper record should be disposed of immediately unless this manual specifically instructs otherwise.

After Review — Indicates that the record may be destroyed only after it has been reviewed by the office indicated. That office has the authority to extend the retention time of the record for specific reasons.

Year Originated — Means the calendar year during which the record was originated or acquired. "Year originated +1" means that if the document was originated this year, it is to be kept the rest of this year plus one more year.

Completion — Indicates the completion of a defined project or file.
Examples are:

- a research project
- expiration of a patent
- a lawsuit
- design or construction of a facility

Where statutory or regulatory requirements specify the retention of a report or data for a prescribed time period, the "completion" date the end of that time period. "Completion + 3 years" means that records are to be kept until the third anniversary of the project's completion date.

Permanent — Indicates that the record should be retained as long as Monsanto continues in business, or until legal counsel reviews and determines whether further retention is useful or required.

Purpose Served — "Purpose" may refer to a legal, governmental or patent purpose, or to a quality or cost control purpose, or to a statistical study of process variables.

Superseded — Indicates that the record has been replaced by a modified or new record.

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"Until 10 years after superseded" means that a record is to be kept until the tenth anniversary of the date on which it was superseded.

Termination — Indicates the end of an activity or the use of a file. For example:

1) When used with HR records, "Terminated" indicates termination of employment.

2) When used with Contract or Agreement records, "Terminated" indicates the completion of the performance required of all parties under the contract.

3) "Until 3 years after termination" indicates that the record is to be kept until the third anniversary of the termination date.

While Useful Only — Indicates that there is no statutory or general business requirement for retention for a specified period of time. The document should be destroyed when, in the judgment of the person reviewing the files, it no longer serves a useful business, legal or research purpose. If the manual says that a copy of an original document is to be retained "while useful only," the copy should never be kept longer than the retention time specified for the original document. If the original document is destroyed prior to the stated retention time, the copy should be maintained as if it were the original document.

2. This file review must be accomplished in accordance with this Records Management Manual.

3. A certificate of compliance letter from each Sector or Foundation Team Lead or applicable LSBT Member must be received by the Office of the Corporate Secretary by June 30 of each year.

4. Any questions about this manual should be directed to the Office of the Corporate Secretary.

Summary

1. All files, desks, credenzas, computers, disks and bookshelves must be cleared of unnecessary documents once each year before June 30.

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I. Administrative

Manuals

1.	**Policy Manuals** — and other Corporate Department or Operating Unit directives which express or interpret Company policy. (See also Chapter VI, ENGINEERING and Chapter XI, MANUFACTURING)	**Retention Time**
•	Originating office file copy	Until 10 years after superseded
•	Other copies	Until superseded
•	Drafts & work papers	Until completion of manual, or less if not useful
2.	**Procedural Manuals** — and other directives that are procedural only and do not express new policy or interpretation (includes Records Management Manual)	**Retention Time**
•	Originating office file copy	Until 5 years after superseded
•	Other copies	Until superseded
3.	**Safety Manuals & Instructions**	**Retention Time**
•	All copies	Until 10 years after superseded

Reports:

1.	**Administrative** — Internal Operating Unit and Corporate Departments	**Retention Time**
•	Originating office file copy & one copy in Operating Unit's vice president's office	Year originated + 1
•	Other copies	Until superseded
•	Drafts & work papers	Until completion of report, or less if no longer useful
2.	**Annual (year-end or last quarter) to the President**	**Retention Time**
•	Originating office file copy and work papers	Year originated + 6
•	President's office file	Year originated + 1
•	Other copies	2 months
3.	**Quarterly - to the President**	**Retention Time**
•	Originating office file copy and work papers	Year originated + 2
•	President's office file	Year originated + 1
•	Other copies	2 months

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II. Communications

A. External

Communications from Monsanto to Outside Audiences.

1.	**Advertising**	See "Marketing" chapter, page 39.
2.	**Public Relations — Press or News Release** — or other Company publications such as Monsanto Pledge or Monsanto Magazine	**Retention Time**
•	Public Relations Department file copy	Year originated + 50
•	Other copies as correspondence	Year originated + 1
•	Unreleased drafts	Until no longer useful, but in no case longer than 1 year
3.	**Published Papers & Speeches** — Revealing new policy, financial performance, or scientific and technical accomplishments of Monsanto	**Retention Time**
•	Public Relations Department file copy	Year originated + 50
•	Patent Department copy	Year originated + 3
•	Research Information Center copy on microfilm	Permanent
4.	**Shareowner** — Reports, etc., to shareowners of Monsanto	**Retention Time**
•	Annual Report copy in Corporate Secretary's office file	Permanent
•	Copy of all other shareowner communications in Corporate Public Relations Department file	Year originated + 50
•	Other copies	Year originated + 1
•	Unreleased drafts of the above	While useful only
5.	**Other** — Having scientific, technical, educational, trade, or other orientation, but not revealing previously unpublished policy, financial performance, or proprietary technology	**Retention Time**
•	Originating office copy, including work papers	Year originated + 1
•	Other copies	Year originated + 1, or less if no longer useful

B. Internal:

Communication Records Generated Inside Monsanto for Internal Use.

		Retention Time
1.	**Chronological Files & Reading Files**	1 year
2.	**Correspondence** related to other records with specified retention times	**Retention Time** Same as record to which it relates
3.	**Correspondence of Temporary Value** – Having neither informational value nor evidential value after action has been taken, or informational copies which require no action	**Retention Time** Immediate disposal
4.	**Forms** — General business and operating (not involving contracts, purchasing, labels, employee records) not otherwise noted in this manual	**Retention Time**
•	Copy or master plates in originating office file	Until 5 years after superseded
•	Other copies	Until superseded
5.	**Publications** — Monsanto-originated catalogs and brochures for internal use	**Retention Time**
•	Originating office file copy	Until 5 years after superseded unless in Archives
•	Other copies	Until superseded
6.	**Publications** — Other than Monsanto-originated catalogs and brochures for internal use	**Retention Time**
•	Originating office file	Until 5 years after superseded unless in Archives
•	Other copies	Until superseded
7.	**Transcribed Shorthand Notes** — Transcribed dictation	**Retention Time**

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tapes, voice mail, voice recordings	Dispose of tapes, notes and recordings within 21 days after transcription

8. Visitor Logs	**Retention Time**
• General logs of office and plant visitors in location file	Year originated + 5
• With "Keep Confidential" agreement as prescribed by Security Manual in location file	Year originated + 5
• Company logs — copy in Marketing file	Year originated + 6 and after tax audit

C. Photographs:

Media Originated by Monsanto for Internal or External Use.

- **Photography, Videotapes and Film** — Monsanto-related media produced by Monsanto or others — are to be retained in accordance with the retention period for the record category to which photographs pertain. For example:

	Retention Time
• **Photographs as Evidence** — Relating to patents, trademarks, contract compliance, insurance, litigation (actual or potential)	In accordance with the retention period for the record category to which the photos pertain
• **Photographs for Publicity** — Submitted with or as a news release or a press communication	Keep photo as long as press release
• **Photographs for Advertising**	While potentially useful for advertising, unless otherwise instructed
• **Photographs for Engineering Design** — With Project Engineering Manual	Keep photo as long as associated design records are kept

NOTE: *Photographs retained for specific purposes (including historical purposes) should be accompanied by adequate identification of purpose, location, people, products, time, etc., as needed to assure that the photograph is a complete record.*

D. Other:

1. Telephone Directories	**Retention Time**
• Copy of Monsanto directory in originating office file	Until 3 years after superseded
• Other copies	Until superseded
• External directories	Until superseded

2. **Trade Associations** — Bulletins, reports, committee activity	**Retention Time**
• Administrating office file copy	Until superseded or while useful only

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III. Computers & Data Processing

1. **Programs** — Descriptions, process charts, program listings, operating instructions, etc. — all automatic data processing devices.

Note: *Generally the records of programs will be retained only until superseded. More extended retention periods may be required in some instances to satisfy the following requirements:*

- **Accounting Related Data Processing** — Sufficient records of programs must be maintained to satisfactorily support or validate any report which is subject to audit, if the program or report generation procedure is not self-evident in the report.

- **Non-Accounting Related Data Processing** — Sufficient records of programs must be maintained to satisfactorily support, validate, or permit reconstruction of any generated or calculated data which may serve evidentially — in contract compliance, demonstration of engineering competence, etc. — if the program or calculation procedure is not self-evident in the generated data or report. These must be brought to the attention of data processing groups by the users of data when the circumstances exist. Programs relating to reconstruction of any generated or calculated data which may serve evidentially in patent matters should be kept for the life of the patents plus 6 years beyond expiration of any patent-related agreement to which the program pertains.

- **Core Memory** — Any machine using "core memory" must either be administratively erased or have the core memory physically removed and destroyed prior to disposal of the machine, with the records in "core memory" retained in paper form within the retention times specified below.

	Retention Time
• Patent Law Department's Patent Data System and Agreement Data System	25 years after system is superseded

2. **Data & Information Recorded in Machine Sensible Form** — Including punched cards, magnetic tapes, disks, main frames, electronic data systems, electronic mail, networks, indexes to disks, but not optical and other read-only disks:

	Retention Time
• Serving as, or replacing a source	Same as the source document being replaced
• Recorded for data processing only	While useful, but no longer than the source document from which recorded
• Retaining information reports, summary calculations, serving as a ledger, etc.	If machine sensible form is the only recording, retain as specified for the paper record. Otherwise, retain while useful, but no longer than specified for the record in any other form
• Hard Copy Reports	In accordance with the requirements for the business records produced
• Magnetic Data – Tapes – Disks – Diskettes – Microfilm, microfiche – Optical Disks	In accordance with the requirements for the business records produced

3. **Data and Information Recorded on Optical and Other "Read-Only Memory" Disks** which do not allow for selective deletion or printing of single document	**Retention Time** Until the expiration of the longest retention period of any document on the disk

4. **Electronic Records** - The term "electronic record" includes all information and documents stored on a computer or other digital or electronic format. Electronic mail messages (whether created or received by the individual), all attachments thereto and all documents created on Monsanto's computer systems constitute electronic records.

	Retention Time
• "In-Box" messages	Delete if more than 60 days old
• "Message Log" messages	Delete if more than 60 days old
• "Trash" messages	Delete if more than 2 days old

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Note: If you must retain the message or attachment for a longer period, you should either: (i) print a hard copy of the message and store it in an appropriate folder; or (ii) move the message or attachment to a cc:Mail "folder" or other electronic file.

5. **Documents** on obsolete disks and workstations	**Retention Time** Convert information to usable format, or save information on obsolete disks with provision for conversion if necessary (Have IT erase obsolete workstations and any obsolete disks not used to store records)
6. **Printouts** of accumulated or processed data	**Retention Time** In accordance with the appropriate retention time for the document

Note: The *following computerized records or magnetic tapes must be retained until notification from Tax Department:*

- *General Ledger*
- *Voucher Register/Distribution*
- *Master Property List*
- *Year-End Tax Depreciation Computations*
- *Tax Report Reserves — Report R-31*
- *EDP Programs, Layouts, etc., necessary to print the above records*

Note to Computer Users: *Computer data in magnetic forms generally have a destroy date encoded. This date is recognized by the computer, and the data erased at that time.*

It is the responsibility of the user, working with the MIS staff, to properly identify and encode the retention time for data systems. Users of on-line, interactive or terminal systems bear the responsibility for establishing and inputting proper retention times for their data.

Note to Electronic Mail Users: *Monsanto communication equipment and services are intended for business purposes. As a result all electronic communications created within or sent in the Company are considered the property of Monsanto and may be viewed by authorized representatives of the Company if there is a business reason so to do. The privacy of such documents and messages is not guaranteed.*

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IV. Contracts & Agreements

General Provisions

In order to apply a retention time to a contract-related record, you must first establish a termination or expiration date for the contract.

For records management purposes, a contract is terminated when all of the following have occurred:

- There has been performance by all parties under all provisions of the contract or agreement. All work has been performed and payment made.
- The term of any guarantee, warranty or indemnification has expired.
- If the contract has a "hold confidential" clause, it will not be terminated until the confidential matter can be released.
- There has been complete satisfaction of any claim by or against the Company which may have arisen because of the contract.
- The document is deemed to have no future value as essential evidence to maintain or protect Company Confidential know-how, to defend the Company from claims or to assist the Company in asserting claims.
- There are no unresolved capitalization or expense tax problems.

A termination date should be established when a contract is signed. Alternatively, an outline of the circumstances which define termination of the contract should be written. A future review time should be set, in order to establish a definite termination date.

Major Contract

For the purposes of this manual, a "major contract" has one or more of the following features:

- A commitment for purchase or sale of products, raw materials, services or supplies in connection with normal commercial operations exceeding:
  - $5,000,000 in one year, or
  - $10,000,000 in five years, or
  - $15,000,000 in fifteen years.
- A commitment to acquire, sell, or construct a capital asset, if the total consideration exceeds $500,000.
- Provisions involving the acquisition, organization or dissolution of a corporation or contractual joint venture.
- Provisions for the acquisition, sale or licensing of patents or know-how.
- Provisions that, in the judgment of the attorney preparing or reviewing the contract, necessitate retaining
- It for more than six years after completion because of special circumstances such as:
  - The magnitude and importance of contract obligations,
  - The fact that liability may not be ascertainable for a substantial period of time after the time stated for
  - performance of the contract,
  - Difficulty of determining the date on which performance by the parties under the contract will be completed.

Supporting Papers, Correspondence, Etc.

Unless otherwise specified, Law Department copies of supporting papers, correspondence, etc., collected in connection with the preparation of contracts and agreements covered in this section should be retained until execution of the contract and/or completion of negotiations, and should be reviewed by the Law Department before destruction.

Copies of such records which are retained elsewhere than in the Law or Patent Department files should be retained for one year after execution of the contract and/or completion of negotiations.

Unless otherwise specified, Patent Department copies of supporting papers, correspondence, etc., collected in connection with the preparation of contracts and agreements covered in this chapter shall be retained until 6 years beyond the termination of the contract, or until completion of negotiations if the contract was approved by the Patent Law Department but not executed, and will then be reviewed by the Patent Department before such records are destroyed.

All papers generated in connection with abandoned negotiations on contracts or agreements should be retained for one year after abandonment.

Retention Periods For Specific Types of Contracts

1. **Bills of Lading**	**Retention Time**

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• Domestic — in responsible office file	Year originated + 6 and after tax audit
• Export — in responsible office file	Year originated + 6 after tax audit
• Other copies	Year originated + 6, or less if no longer useful

2. **Contracts Individually Prepared** — by Law Department or Patent Department for purchase, sale, patent license, know-how, consultation, etc.	**Retention Time**
Major, Retained by Office of Corporate Secretary:	
• Company (signature) copy in Corporate Secretary's vault	Until 10 years after termination of contract; but note Item 12 in this chapter
• Conformed signed copy in Operating Company or staff department file	Until 6 years after termination of contract; but note Item 12 in this chapter
• Other conformed copies	Until termination of contract

Note: *If a given transaction is governed by more than one major contract, all of the contracts should be kept until ten years after the termination of the contract which terminates last. This standard shall also apply to major contracts approved by the Law Department but not executed.*

Minor, Not Retained by Office of Corporate Secretary:	
• Company (signature) copy in originating or administrating office file	Until 6 years after termination of contract; but note Item 12 in this chapter
• Other conformed copies	Until termination of contract
• Technical Consulting	Until 10 years after termination of the consulting period and after review

Note: *This standard shall also apply to minor contracts approved by the Law Department but which are implemented on an ad hoc basis without signature.*

3. **Employment Contracts & Agreements** — on approved, printed Monsanto forms	**Retention Time**
• Company (signature) copy in Payroll Department file	Duration of employment + 20 years
• Other copies	For duration of employment
4. Government (U.S.) Contracts	**Retention Time**
• Company (signature) copy in originating or administrating office file or conformed copy at location of government audit	In accordance with retention period for non-government contracts unless a time is set by the terms of the specific contract and any relevant renegotiations
5. Labor Contracts	**Retention Time**
• Company (signature) copy and essential work negotiation papers in division or location file	Until 20 years after termination of contract
• Other copies, work and negotiation papers	Until 20 years after termination of contract
6. Leases — (excluding Real Estate) See also "Shipping, Storing and Transportation Equipment," page 44; also item 12, page 15, of this chapter	**Retention Time**
• Company (signature) copy in originating or administrating office file	Until 6 years after termination of the lease
• Other copies	Until termination of the lease
7. Material Exchange Agreements/Conversions	**Retention Time**
• Company (signature) copy in division file	Until 6 years after termination of the contract
• Other copies	Until termination of the contract
8. National and Area Purchase Agreements and Related Records	**Retention Time**
• Company copy in Purchasing Department file	Until 2 years after termination of contract
• Other copies and excerpts	Until termination of contract
9. Product Warranties	**Retention Time**
• Company (signature) copy in division file	Until 6 years after termination of warranty or discontinuance of product sale
10. Purchase Orders — Including essential related papers	**Retention Time**
• Originating purchase office file copy	Until 1 year after termination of contract
• Engineering, maintenance, storeroom, supply depot or other requisitioning and receiving office file	Until termination of contract, or less if no longer useful

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• Research record copy maintained with notebook in connection with experimental work	Year originated + 25; microfilm before destroying. Keep microfilm permanently
11. Sales Contracts and Agreements — on approved printed Monsanto forms	**Retention Time**
Major Contracts:	
• Executed Company (signature) copy	Until 10 years after termination of contract
• Other executed copies	Until termination of contract
• Specimen copy of forms	Until superseded + 5 years
Minor Contracts:	
• Executed Company (signature) copy	Until 6 years after termination of contract
• Other executed copies	Until termination of contract
• Specimen copy of forms	Until superseded + 5 years
12. Construction, Maintenance and Third Party Service Contracts, including Transportation Services — which require indemnity or certificates of insurance from the contractor or service provider.	**Retention Time**
• Original signature copy	Permanent
• Other copies	See item 2 this chapter

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V. Corporate Records

These records pertain to the formation, continuation, and dissolution of corporate bodies. Monsanto Company is the principal corporation. The records pertaining to the formation and continuation of Monsanto Chemical Works and any company which was merged with Monsanto are considered, for the purposes of this manual, to be corporate records of Monsanto Company.

A. General Records:

1. Acquisitions, Mergers, Consolidations, Reorganizations, Dissolutions, Joint Ventures, etc.	**Retention Time**
• Company records in file of secretary of the corporation involved	Permanent if stock acquisition is involved; 50 years if purely asset acquisition
• Papers, correspondence, drafts, etc., collected in connection with negotiations and preparation	While useful only
• Due diligence studies and documents	First review, year or origination + 7. Review before destroying. Subsequent reviews, every 5 years until records can be destroyed.
2. Certificates of Incorporation	**Retention Time**
• Company copy in file of secretary of the company involved	Permanent
3. Corporate Guide — Data and information concerning subsidiary, associated and affiliated companies of Monsanto	**Retention Time**
• Company copy in Office of Corporate Secretary file	Until 2 years after superseded
• Other copies	Until superseded
4. Corporate Secretary's Records — Data and information concerning directors, officers and other company personnel, committees of directors, as essential for preparing corporate records and applications	**Retention Time** Until superseded or report completed
5. Minutes, Committees of Directors — Executive, Finance, Budget, Bonus, Audit, etc.	**Retention Time**
• Company copy and underlying papers in file of secretary of the company involved, or in file of secretary of committee in keeping with assigned responsibility	Permanent
• Copies and excerpts in all other offices	Year originated + 1
6. Minutes, Corporate — Stockholders and directors meetings	**Retention Time**
• Company copy and underlying papers submitted for action in file of secretary of the company involved	Permanent
• Copies and excerpts in all other offices	While useful only
7. Qualifications to do Business and Related Records	**Retention Time**
• Company copy in file of secretary of company involved	Permanent

B. Securities/Stock Records:

1. SEC, Reports to	**Retention Time**
• Company copy in file of secretary of the corporation involved	Year originated + 40
• Other copies and work papers	Year originated + 5, or less if not useful
2. Securities, Evidence Thereof — Listing applications, registration statements, etc.	**Retention Time**
• Company copy in file of secretary of the corporation involved:	

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• Stock and securities convertible into stock	Until 25 years after security termination
• Securities non-convertible into stock	Until 10 years after security termination
• Other files	While useful only

3. **Stock Certificates, Canceled**	**Retention Time**
• Company copy in stock records file of corporation involved	Year canceled + 15

4. **Stock Certificates, Lost** — Affidavits & records	**Retention Time**
• Company copy in stock records file of corporation involved	Year originated + 50

5. **Stock Transfer Sheets**	**Retention Time**
• Company copy in stock records file of corporation involved	Year originated + 1; then microfilm and permanently retain microfilm
• Other copies	While useful only

C. Shareowner Records:

1. **Proxies & Proxy Lists**	**Retention Time**
• Company copy in stock records file of corporation involved	Year originated + 3

2. **Shareholder Inquiries Concerning Holdings**	**Retention Time**
• Company copy in stock records file of corporation involved.	Year originated + 5

3. **Shareholder Ledger**	**Retention Time**
• Company copy in stock records file of corporation involved — on microfiche	Permanent
• Other copies of record data printouts	While useful only

4. **Shareholder, Reports to** — The stated retention time for these records presumes continuation of the corporation. If the corporation is dissolved, these records will be retained for 5 years after termination of the corporation	**Retention Time**
• Copy of Annual Report in Office of Corporate Secretary file	Permanent
• Copy of all other communications in originating office file	Year originated + 50
• Forms 10-K, 10-Q, Proxy Statements	Permanent
• Registration Statements on Forms S-1, S-2, S-3, S-8, S-14	30 years

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VI. Engineering

(Note: Enviro-Chem engineering and construction records are subject to the retention times in the special Enviro-Chem part of this Section on page 19.)

A. Drawings:

1. **Facility Engineering Drawings**	**Retention Time**
• Company file of tracings, microfilm or computer-aided drawings (CAD) of copies in Chemical Group Engineering and Agricultural Group Engineering (hereinafter CGE/AGE), Operating Company or plant file	Until 10 years after termination of the facility
• Other copies	Until termination of the facility, or less if no longer useful

2. **Product Engineering Drawings**	**Retention Time**
• Company copy of tracings, prints, microfilm and CAD in responsible office file	Until 10 years after termination of product
• Other copies	Until termination of product, or less if no longer useful

B. Manuals:

1. **Product Project Engineering Manuals** — Description, design, instructions, etc., for manufacture of fabricated or assembled products	**Retention Time**
• Company copy in responsible office file	Until 10 years after termination of product
• Patent Department copy	Until 10 years after termination of product
• Other copies	Until termination of product

2. **Project Design Manuals** — Description, design, instructions for capital addition, improvement projects, plus Scope Reports and CEAs/Eas	**Retention Time**
Installed Projects and Subsequent Revisions:	
• Company copy in CGE/AGE Information Center central file	Until 10 years after termination of facility
• Division and plant copy	Until termination of facility
• Construction copies	Until 1 year after termination of facility
Abandoned Projects:	
• Company copy in CGE/AGE Information Center file if project report assembled	Until 10 years after termination of project
• Relevant work papers if no report assembled	Until 5 years after termination of project

C. Project Files:

1. **CGE/AGE Project Files** — CGE/AGE closed project files prepared in accordance with CGE/AGE procedure 106	**Retention Time** Until 10 years after completion of project

2. **CGE/AGE Project Support Files Not Included in Above Project** — Engineering development records, file lab data, documentations, calculations, programs resulting from development work in Engineering Technology and D&C Branches	
Including:	**Retention Time**
• CGE/AGE — Purchasing Department master purchase order files	Until 5 years after completion of project
• CGE/AGE — Purchasing Department CGE/AGE files	Until 5 years after completion of project
• CGE/AGE — Accounting Department purchase order files	Until 5 years after completion of project
• Project status reports from Financial and Operations Analysis	Until 5 years after completion of project
• Engineering Activity reports from Financial and Operations Analysis	Until 5 years after completion of project

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D. Technical:

1. **Engineering Technical Reports** — Technology of value, not specific capital addition or improvement project	**Retention Time**
• Company circulating copy in CGE/AGE central files, local library or Technical Information Center files	Year originated + 35
• Originating office copy, work papers and drafts	Until 1 year after completion of project
2. **Engineering Technical information** – Not specific to Monsanto project, facility, product or proprietary know-how, and not library material	**Retention Time**
• All copies	Until superseded, or less if no longer useful
3. **Environmental Control Data** — for engineering analysis and design purposes	**Retention Time** Until completion of project, unless a longer period is required by law or legal proceedings

Engineering — Enviro-Chem Systems, Inc.

The retention times listed below apply only to Monsanto Enviro-Chem Systems, Inc., ("MEC"). For MEC, completion of a construction or design project (contract) is defined as receipt of a letter of acceptance and payment of final invoice from the client. On unsuccessful proposals and estimates, completion is defined as the date of the last correspondence with the client.

Note: *In addition to the retention times specified in this section, see item 12 under the "Contracts & Agreements" chapter, page 15.*

A. Construction:

1. **Daily Report**	**Retention Time** Until 10 years after completion
2. **Local Craft Labor Agreement** — Work rules	**Retention Time** Until 20 years after completion
3. **Progress Photos**	**Retention Time** Until 10 years after completion

B. Project Control:

1. **Project Cost and Schedule History**	**Retention Time** Until 10 years after completion

C. Project Management:

1. **Contract and Related Correspondence**	**Retention Time** Until 10 years after completion
2. **Project Cost Report**	**Retention Time**
• Final copy	Until 10 years after completion
3. **Project Schedule**	**Retention Time**
• Final copy	Until 10 years after completion
4. **Variation Orders and Related Correspondence**	**Retention Time** Until 10 years after completion

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Engineering – Enviro-Chem Systems, Inc.
Project Records

D. Engineering Documents:

1.	**Correspondence Relating to Design**	**Retention Time** Until 5 years after completion
2.	**Design Date and Calculations**	**Retention Time** Until 10 years after completion
3.	**Design Summaries** — Reduced print books	**Retention Time** Until 10 years after completion, or less if no longer useful
4.	**Drawings, Bills of Materials, Specifications**	**Retention Time**
•	Originals (Master/Tracing)	Until 30 years after completion
•	Other copies	Until 1 year after completion, or less if no longer useful
5.	**Foreign Drawings** — Prepared by other than MEC	**Retention Time** Until 10 years after completion

E. Purchasing:

1.	**Commitment Sheet**	**Retention Time** Until 30 years after completion
2.	**Material and Equipment Status Report**	**Retention Time** Until 30 years after completion
3.	**Operating/Maintenance Manuals**	**Retention Time** Until 1 year after completion
4.	**Purchase Order Files**	**Retention Time**
•	Prime copy including subcontracts	Until 10 years after completion
•	Other copies	Until 1 year after completion, or less if no longer useful

F. Proposals:

1.	**Proposals That Result in an Awarded Contract**	**Retention Time** Transfer to active project file
2.	**Proposals That Do Not Result in an Awarded Contract**	**Retention Time** Until 3 years after completion

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VII. Environmental, Safety & Health
(Previously Medical & Environmental Health Chapter)

A. General:

The retention time for records listed in this General subsection shall apply unless a specified record and retention time are listed in Sections B. through E. below.

1. Authorizations for Signatures to Documents (for example, air, water, solid waste permit applications, periodic reports, required permits, etc.)	**Retention Time**
• Company copy in Environmental Law file	Permanent *
• Other copies	Until superseded

* *"Permanent" for purposes of this subsection shall mean original hard copy is to be retained year originated + 20; then document may be retained in original form or stored by means of photographic, electronic or other means of copying and retained permanently.*

2. Company Guidance and Procedures	**Retention Time**
• Company copy of opinions and other records for legal guidance (internally and externally generated) in Environmental Law file	Until no longer useful, or until superseded
• Company copy of other guidance and procedures in originating office file	Until superseded
• Other copies	Until no longer useful

3. Regulatory Agencies — Federal, State, County, Municipal (for example, discharge monitoring reports, Superfund spill reports, etc.)	**Retention Time**
a. Compliance and other records required by law to be submitted to the government, and OSHA Material Safety Data Sheets	
• Company copy of compliance record and supporting data in originating office file	As specified by law or regulation
• Company copy of noncompliance and other records supporting data in originating office file	Permanent
• Drafts	Until completion of record
• Other copies and excerpts	While useful only
b. Compliance and other records required by law to be retained by the Company (for example, hazardous waste shipping manifests, financial assurance demonstrations, etc.)	
• Company copy and supporting data in originating office file	Unless otherwise instructed elsewhere in this Section, as specified by law or regulation or, in the case of medical records, until released by Department of Medical & Health Services (DM&HS) at a later date
• Other copies	Until no longer useful
c. Government Contracts (for example, correspondence, records of meetings and telephone conversations with government regulators, etc.)	
• Company copy of relevant correspondence and notes of conversations and meetings with government in originating office file	Permanent
• Drafts	Until completion of record
• All other copies	While useful only
• Company copy of other documents pertaining to government contract (for example, third party correspondence, technical studies, allocation of liability, financial documents) in originating office file	Until no longer useful or as specified by law or regulation
d. Documents pertaining to permits, registrations, petitions, variances, waivers, orders, etc.	
• Company copy of applications and requests, supporting data used to complete applications and requests, draft	Permanent

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permits and orders, comments and correspondence provided to or by the regulatory agency, and final copies in originating office and Environmental Law files	
• Other drafts	Until completion of record
• Other copies	While useful only

4. **Surveys and Audits**	**Retention Time**
• Company copy of surveys or assessments in the responsible office file or the Company Information Center	Until superseded or until no longer useful
• Company copy of the audit closure file (final report, action plan and plan resolution documents) in responsible office file	Permanent
• Work papers, completed questionnaires, and other copies	Until superseded
• Drafts	Until completion of record

B. Industrial Hygiene:

Company copy of records not required by law in originating office file.

	Retention Time
1. **Correspondence** — Relating to reports	Year originated + 1
	Retention Time
2. **Drafts** — of reports	Until completion of report, or until no longer useful, whichever occurs first
3. **Experimental Project Reports**	**Retention Time**
• Original copy	Permanent
	Retention Time
4 **LP & EC Reports, Environmental Assessments**	Until completion
	Retention Time
5. **LP & EC Procedures and Checklists**	3 years

C. Medical:

1. **Employee Medical History** — Documents containing health assessment and medical surveillance or monitoring program assessments, similar information for contract workers, requests for medical records and back-to-work clearance, injury reports for Monsanto employees and contractors' employees — records accessible to Medical Staff only	**Retention Time**
World Headquarters and Other Locations With Company-Operated Medical Facilities:	
• Company copy in medical facility file	As specified by law or regulation, or a later date specified by the Director - DM&HS
Locations Utilizing Retained Medical Facilities:	
• Company copy in physician's or medical facility file	As specified by law or regulation, or a later date specified by the Director - DM&HS
• Company copy in sealed record (opened only by physician) at office location if medical facility cannot retain	As specified by law or regulation, or a later date specified by the Director - DM&HS

2. **Employee X-Rays** — Files available to physicians only	
	Retention Time
• Files in all locations	As specified by law or regulation, or a later date specified by the Director - DM&HS

3. **Narcotic Records** — All necessary orders, invoices, inventory or dispensing records	**Retention Time**
• Company copy in administrating office file	Year originated + 2, unless longer retention time is

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		specified by law or regulation

D. Toxicology:

1.	**Advisory Information on Toxicity** — Written or telecommunications records	**Retention Time**
•	Company copy in DM&HS file	Year originated + 10
•	Other copies	Year originated only
2.	**Product Information** — Product application data assembled for sales guidance and manufacturing relating to raw materials and other substances, toxicity statements and data sheets	**Retention Time**
•	Company copy in DM&HS file	Until 10 years after superseded
•	Other copies	Until superseded
3.	**Study Reports** — All Monsanto-sponsored toxicity studies	**Retention Time**
•	Company copy of original or validated copy in DM&HS file	Year originated + 25, microfilm before destroying, retain microfilm permanently
•	Microfilm in DM&HS file	After review by Law Department
•	Other copies	Until study completed

E. Miscellaneous:

1.	**Automatic Continuous Area Monitoring Data and Other Plant-Monitored Data**	**Retention Time** Hard copy — 3 years; microfilm before destroying; retain microfilm permanently
2.	**OSHA Material Safety Data Sheets (MSDS)** — Supporting data, and documents requesting or denying disclosure of confidential trade secret information in MSDS	**Retention Time** Permanent
3.	**Personal Protection Equipment Selection Requirements**	**Retention Time** Permanent
4.	**Safety Training Records** — For regular Monsanto employees and contractor employees	**Retention Time** Permanent
5.	**OSHA — Individual Records** — Maintained as required by 29 CFR 1910.20	**Retention Time** 30 years; longer if certain specific requirements apply or if DM&HS specifies

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VIII. Financial

Pertaining to financial matters of the Company including receipt, disbursement and accounting of funds and measurement of financial performance.

A. Accounts Payable and Other Payments:

1.	**Daily Activity Reports** — Invoice lists and corrected Resp. 0001 exception reports	**Retention Time** Year originated + 6 and after tax audit
2.	**Daily Control Statements** — Batch control reports, additions report, daily distribution summary and outbound freight daily activity summary	**Retention Time**
•	Company copy in Accounts Payable Department file	Year originated + 1
3.	**Distribution Reports** — Monthly distribution reports, corrected general ledger summary reports	**Retention Time**
•	Company copy in Accounts Payable Department file	Year originated + 6 and after tax audit
4.	**IRS 1099 Data**	**Retention Time**
•	Plant input forms	All IRS 1099 data to be retained for year originated + 6 and after tax audit
•	Final update & correction listings	All IRS 1099 data to be retained for year originated + 6 and after tax audit
•	Employees' 1099 copy, all electronic, optical or other storage methods	All IRS 1099 data to be retained for year originated + 6 and after tax audit
•	Update and correction detail	All IRS 1099 data to be retained for year originated + 6 and after tax audit
5.	**Invoices and Freight Bills** — All accumulated data for payment of vendor invoices for goods, freight and other services, correction forms, replacement check detail and necessary related documents	**Retention Time**
•	Company copy in Accounts Payable Department file	Year originated + 6 and after tax audit *Except: invoices for defense of insurable claims — permanent*
•	Other office copies of invoices, freight bills and related documents	While useful only
6.	**Payment Reports**	**Retention Time**
•	Semi-annual payment reports	Year originated and after tax audit
•	Daily, bi-monthly and monthly payment reports	While useful only
7.	**Selected Accounting Reports** — Weekly distribution report, corrected exception report, pickout reports, set-up reports, outbound freight shipper run, and MAG early monthly report	**Retention Time**
•	Company copy in Accounts Payable Department file	Year originated
•	Other copies	While useful only
8.	**Status Reports** — Debit balance report, past-due report, duplicate payment report, open item list and data management report	**Retention Time**
•	Company copy in Accounts Payable Department file	Year originated
•	Other copies	Until superseded
9.	**Vendor Master File Activity List**	**Retention Time** Year originated + 1 and after tax audit

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B. *Accounts Receivable — and Other Receipts:*

1. Cash Receipt Documents — Check photostats or microfilm, transfer-depository reports, distribution reports, etc.	**Retention Time**
• Company copy in administrating office file	Year originated + 3 and after tax audit
2. Cash Receipts Ledger	**Retention Time**
Total Company:	
• Company copy & essential source documents in Central Accounting Department file	Year originated + 6 and after tax audit
• Other copies	While useful only
• Ledger reconciliations	Year originated + 6 and after tax audit
Local Funds: (*Plant cafeterias; petty cash, etc.*)	
• Company copy in administrating office file	Year originated + 6 and after tax audit
• Ledger reconciliations	Year originated + 6 and after tax audit
3. Customer History Records — Any form	**Retention Time**
• Company copy in administrating office file	Year originated + 6 and after tax audit
4. Registers — Cash, control report, invoice, journal, split cash washout	**Retention Time**
• Company copy in administrating office file	Year originated + 2 and after tax audit
5. Trial Balances	**Retention Time**
• Company copy in Accounting Department file	Year originated + 6 and after tax audit
• Credit Department copy	Until superseded
• International Division copy	While useful only
• Other copies	Until superseded

C. *Audit:*

1. External Audit Reports	**Retention Time**
• Company copy in Controller's Office file	Year originated + 15
• Other copies & excerpts	While useful only
2. Internal Audit Reports	**Retention Time**
• Company copy in Internal Audit file	Year originated + 15
• Other copies	While useful only
3. Tax Audits	**Retention Time** See "Tax" Section, page 51.

D. *Banking:*

1. Bank Account Statements & Reconciliations	**Retention Time**
• Company copy in administrating office file	Year originated + 6 and after tax audit
2. Bank Resolutions	**Retention Time**
Board of Directors Minutes:	
• Treasury Department copy	Until resolution is revoked + 6 years
• Other copies	Until resolution is revoked
3. Bank Statements of Condition	**Retention Time**
• Treasury Department file	Until superseded
4. Canceled Checks & Check Registers — In files authorized by Treasury Department	**Retention Time**
• Payroll, salary & wages	Year originated + 3

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• Dividend, voucher and local working fund checks and registers	Year originated + 6 and after tax audit

5. **Depository Receipts**	**Retention Time**
• Treasury Department file	Year originated + 6 and after tax audit
• Accounts Receivable Department file	Year originated + 3

E. Billing:

1. **Consigned Stock (Product) Ledger, Related Documents & Work Papers**	**Retention Time**
Domestic:	
• Company copy in Billing (or other preparing) Department file	Year originated + 1
• Other copies	While useful only
International:	
• Company copy in International Division Accounting file	6 years and after tax audit
• Other copies	While useful only

2. **Debit & Credit Source Documents**	**Retention Time**
• Company copy in Billing Department file	Year originated + 1
• Other copies	While useful only

3. **Invoices, Debits & Credits** — Pertaining to supply of goods and services by Monsanto	**Retention Time**
• Company copy in Billing Department file including essential related papers	6 years and after tax audit
• Other copies of invoices and related papers	While useful only

4. **Returnable Container Inventory Ledger**	**Retention Time**
• Company copy in Billing (or other preparing) Department file	Year originated + 2
• Other copies, excerpts, and source or related documents	While useful only

5. **Returnable Container Receiving Reports**	**Retention Time**
• Company copy in Billing Department file	Year originated + 1
• Other copies, and source or related documents	While useful only

6. **Shipping Papers (Intra-company)** — and other requests for billing, also related and essential work papers	**Retention Time**
• Company copy in Billing Department file	Year originated + 2
• Other copies	While useful only

F. Budget:

1. **Actual vs. Budget Financial Reviews - Quarterly, Annual, Special**	**Retention Time**
• Company copy & work papers in Controller's Office file	Year originated + 5
• Other copies and excerpts	While useful only

2. **Actual vs. Budget Reports for Expenses** — All MAT departments, plant service departments, etc.	**Retention Time**
• Company copy in Controller's Office file	
• Monthly	Year originated + 1
• Year-end	Year originated + 10
• Other copies & excerpts	While useful only

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• Patent Department Director's files - year-end	While useful only

3. Budget Documents, All — for expenses, sales, income, etc. (annual budget books, budget statements, all excerpts, work papers, etc.)	**Retention Time**
• Company copy in Controller's Office file	Year originated + 10
• Other copies & excerpts	While useful only

4. Product Group Data Books — and essential work papers	**Retention Time**
• Company copy in Controller's Office file	Year originated + 10
• Other copies and excerpts	While useful only

5. Utilization Plant Facilities — Actual vs. capacity reports	**Retention Time**
• Company copy in Controller's Office file	Year originated + 10
• Other copies & work papers	While useful only

G. Capital Expenditures & Property Records:

1. Appropriation & Retirement Requests	**Retention Time**
Above Managing Director Approval:	
• Controller's Office copy	Until 10 years after completion of project
• Corporate Planning and Evaluation or Patent Department copy, including work papers or approved and unapproved requests	Year originated + 10, or less if no longer useful
• Originating company or department copy and work papers	Until 10 years after project completion or less if no longer useful
• Other copies	Year originated + 1, or less if no longer useful
Managing Directors' or Managing Director's Delegated Approval:	
• Company copy in originating Operating Company file	Until 5 years beyond project completion

2. Construction Expense Data — Company Construction Programs	**Retention Time**
• Company copy, work papers, and other data records for forecast of corporate expenditure in Controller's Office file	Year originated + 5
• Other copies, work papers, etc.	While useful only

3. Oil & Gas Lease Transaction Records — Undeveloped mineral rights lease record folder and file (LD forms) included therein	**Retention Time**
• Company copy in originating Operating Company accounting department file	Until termination of lease + 6 years and after tax audit
• Other copies	While useful only
• Journal entries	Year originated + 25

4. Project Performance Reports — Appropriation Requests vs. Actual	**Retention Time**
• Company copy in Controller's Office file	Until completion of project + 10
• Other copies, work papers, etc.	Until completion of project + 3
• Journal entries	Year originated + 25

5. Property Additions & Construction Records — In file of Operating Company:	**Retention Time**
• Forms, tabulations & work papers establishing asset value	Year originated + 10 and after tax audit

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Property Inventory Record (Property Cards):

• Active equipment files	Until retirement of equipment
• Retired equipment files	Year originated + 10 and after tax audit

6. **Property Master Listings (Tabulation Printout)**	**Retention Time**
• Company copy in file of Operating Company Accounting Department	
• Bi-monthly listings	Year originated + 2
• Year-end listings	Year originated + 10 and after tax audit
• Other copies	While useful only

7. **Property Repair Records**	**Retention Time**
• Major or minor authorization and records of cost	Year originated + 10 and after tax audit

8. **Property Retirement Records**	**Retention Time**
• All forms, work papers & tabulations establishing amount of asset retired in file of Operating Company	Year originated + 10 and after tax audit

9. **Property Transfer Records**	**Retention Time**
• Forms, work papers & tabulations in file of Operating Company	Year originated + 2

10. **Statement of Capital Additions & Replacement by Company & Summary for Directors**	
• Copy in Corporate Engineering Department accounting file	Year originated + 10
• Other copies, plant reports, work papers, etc.	While useful only

H. Company Ledger, Financial Statements & Reports of Finances:

1. **Company to Shareholder Reports —** (Annual Reports, etc.) See page 17.	

2. **Financial Statements - Foreign Subsidiaries —** Statements in foreign currency translated to U.S. currency by International Division	**Retention Time**
• Company copy in International Division Accounting Department file	Year originated + 5

3. **Financial Statement - Monsanto Company —** Documents which report the financial circumstances (balance sheet and P&L) of Monsanto Company, and the Operating Companies, subsidiaries, and other segments entering the consolidated statement	**Retention Time**
• Company copy & essential work papers in Controller's Office file	Year originated + 25
• Board of Directors' minutes copies	Permanent
• Other copies	While useful only

4. **General Ledgers** — of all Operating Company & staff departments	**Retention Time**
• Company copy in Controller's Office file	Year originated + 25
• Other copies	While useful only

5. **Journal Entries**	**Retention Time**
• Company copy in originating office file	Year originated + 10 and after tax audit
• Other copies	While useful only
• Journal entries recording oil & gas undeveloped mineral rights lease transactions for any units of	Year originated + 25

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Monsanto and Lion Oil Company.

6.	**SEC Annual Report & work papers** See page 16.	

I. Cost:

1.	**Cost & Service Reports**	**Retention Time**
•	Company copy in Operating Company Accounting Department file	Year originated + 10 and after tax audit
•	Other copies	While useful only
2.	**Cost Standards** — Including work papers	**Retention Time**
•	Company copy in Operating Company file	Until 10 years after superseded, or less if no longer useful
•	Other copies	While useful only
3.	**Ledgers** — Raw materials, goods-in-process, and finished goods	**Retention Time**
•	In Operating Company Accounting Department file	Year originated + 10 and after tax audit

J. Profitability:

1.	**Profit by Products & Product Groups**	**Retention Time**
•	Company copy in Operating Company Accounting Department file	Year originated + 10
•	Other copies	While useful only
2.	**Profitability Studies** — by industries, trade areas, countries, etc.	**Retention Time**
•	Company copy in Operating Company Accounting Department file	Year originated + 10
•	Other copies	While useful only

K. Miscellaneous:

1.	**Accounting & Budget Procedures, Directives & Manuals**	**Retention Time**
•	Copy in originating office file	Until 10 years after superseded
•	Other copies	Until superseded
2.	**Expense Reports & Travel Statements of Personnel**	**Retention Time**
•	Company record in file of accounting office making payment:	
•	Reports of employees engaged directly in government contract work	Year originated + 4 and after tax audit
•	Reports of all other employees	Year originated + 3 and after tax audit
•	Other copies — all reports	While useful only
3.	**Individual Authorizations for Expenditures**	**Retention Time**
•	Copy in Internal Auditor file	Until superseded + 5
•	Other copies	Until superseded
4.	**Renegotiation**	**Retention Time**
•	Sales records & work papers in Operating Company Accounting Department file	Until 3 years beyond completion or renegotiation of contract
•		
Reports & Summaries:		
•	Company copy in Controller's Office file	Year originated + 25

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•	Other papers	Year originated + 1
5.	**Royalty Payments & Receipts Required by Contracts, Agreements, etc.**	**Retention Time**
•	Company copy in administrating office file	Until 6 years beyond expiration of agreement and after tax audit
•	Other copies	Until expiration of agreement, or less if no longer useful
6.	**Vouchers — Oil & Gas Activities**	**Retention Time**
•	MCLC, MPPC, H&P Division or Lion Oil Company vouchers with accompanying tax returns issued prior to January 31, 1963	Year originated + 50
•	Vouchers recording oil and gas undeveloped mineral rights lease transactions	Year originated + 25

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IX. Human Resources & Payroll/Benefits
(Previously "Personnel & Payroll" Chapter)

A. Benefit Records:

1. Employees with Vested Interests in Pensions, Insurance, Stock Options, etc.	**Retention Time**
• For salaried employees, Company copy in Personnel/Payroll Department file	Until death of employee and last surviving beneficiary
• Local copy in Company/department	Until employee retires and commences benefits
• For wage employees, Company copy during employment: in Company or location file	Until employee retires or terminates, then transfer file to Personnel/Payroll Department
• Company copy after termination or retirement in Personnel/Payroll Department file	Until death of employee and last surviving beneficiary
2. Employees Not Vested	**Retention Time** Until age 70
3. Medical Benefit Records	**Retention Time**
• Copy of employee's records in responsible office file	Until released by Director, DM&HS
• Copy of employee's family records in responsible office file	Year originated + 7

B. Employment Records:

Employment records not specified below — Company (original) copy (until 3 years after effective date of employee's separation from Monsanto).

1. Application and Attached Resume	**Retention Time** If hired, duration of employment plus 3 years; if not hired, 3 years
2. Attendance Record	**Retention Time** Year originated + 4
3. Commendations — All Files	**Retention Time** Year originated + 4
4. Disability/Medical — DIP leave notices, etc.	**Retention Time** Until released by Director, DM&HS
5. Disciplinary Action — Performance-related memos in employee personnel file	**Retention Time** 4 years unless union contract or plant policy (or labor agreement) on progressive discipline requires shorter retention
6. Employment Contracts	**Retention Time** Duration of employment + 20
7. Memoranda Discussing Performance and Other Work-Related Issues	**Retention Time** Duration of employment
8. Performance, Results Reviews or Appraisals — All copies	**Retention Time** Duration of employment + 3
9. Records Required Under Equal Pay Act for Hourly Workers — Regarding work week, hours, pay rates, total wages and deductions, collections, bargaining agreements	**Retention Time** 3 years
10. Form 359's and Related Documentation	**Retention Time** Duration of employment + 3

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11. Training Courses — Record all courses	**Retention Time**
• Non-safety-related courses	Duration of employment + 3
• Safety-related courses	Permanent

12. Work History — In personnel file or retained elsewhere; bid sheets	**Retention Time**
• Company (original) copy in Personnel/Payroll file	Until released by Director, DM&HS

Personnel & Payroll

C. Payroll Records:

1. Authorization for Payroll Deductions — Other than tax	**Retention Time**
• Company copy in responsible office file	Until 2 years after superseded

2. Canceled Payroll Checks & Check Registers	**Retention Time**
• Originals in file of responsible office	Year originated + 3

3. Employee Tax Records	**Retention Time**
Federal Income:	
• W-4 form (original) in responsible office file	Year originated + 6 and after tax audit
• W-2 form (copy) in responsible office file	Year originated + 6 and after tax audit
• 1099 form (copy) in responsible office file	Year originated + 6 and after tax audit
State & Local Income or Earnings:	
• All records in responsible office file	Year originated + 6 and after tax audit unless longer retention required by statute and/or regulation

4. Payroll Distribution Records	**Retention Time**
Journal Entries:	
• Company copy in division Accounting Department file	Until released by Director, DM&HS
• Other copies	Year originated + 2, or less if no longer useful
• Payroll Department work papers	Year originated + 6 and after tax audit

5. Tax Summary Reports	**Retention Time**
• Company copy in responsible Accounting Department file	Year originated + 6; audit by Tax Department before destroying
• Other copies	Year originated + 2, or less if no longer useful

6. Time Cards, Time Sheets, and Related Schedules	**Retention Time**
• Company copy in responsible office file	Year originated + 3

7. Wage and Rate Schedules, Merit System	**Retention Time**
• Company copy of published or posted statements or schedules in issuing office file	Until 25 years after superseded
• Other copies	Until superseded

D. Policies & Procedures:

1. Employee Benefit Plans Other than Pension	**Retention Time**
• Legal background and opinions in Law Department file	Until 25 years after superseded
• Company copy of published plan documents in issuing office file	Until 25 years after termination of plan
• Other copies of published plan documents	Year originated + 1

2. Personnel Policy Manual & Other Company Bulletins	**Retention Time**
• Company copy in Corporate Personnel Department file	Until 10 years after superseded
• Other copies	Until superseded

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3. Pension Plans	**Retention Time**
• Legal background and opinions in Law Department and/or administrating office file	Until 10 years after death of last beneficiary
• Company copy of published plan documents in issuing or administrating office file	Until 10 years after death of last beneficiary

E. Related Subject Files — All Personnel:

These files are maintained separately from the personnel file folder and are not available to the employee nor to anyone in management not directly involved in the proceeding without approval of the Law Department.

1. Documentation and/or Investigations of EEO-Related Matters — and other charges or legal proceedings	**Retention Time** Until 1 year after end of investigation
2. Salary and Wage Garnishments	**Retention Time** 1 year after satisfaction of garnishment

F. Other:

1. Administrative Reports of Employment — Statistical or analytical	**Retention Time**
• Company copy of continuing statistics reports in Personnel/Payroll Department file	Year originated + 50
2. Affirmative Action Plans and Supporting Documents – such as validation and results of selection procedures	**Retention Time** Year originated + 2 except for documents reflecting "adverse impact" of selection procedures, which should be kept for 2 years after cessation of adverse impact
3. Applicant Lists of People Who Do Not Become Monsanto Employees — Records, lists	**Retention Time** Year originated + 1
4. Documents Reflecting Performance Issues of Temporaries	**Retention Time** 3 years after superseded
5. Drug Testing Records	**Retention Time**
• For employee	Duration of employment + 3
• For rejected offerees	3 years
6. Employee Lists — Skills inventory, addresses, memberships and applications, distribution, and other factual information (not employment or benefit record)	**Retention Time**
• All copies	Until superseded
7. I-9's and other IRCA Documents	**Retention Time**
• All copies	Until 3 years after hiring or 1 year after termination, whichever is longer
8. Job Descriptions and Advertisements	**Retention Time**
• Company copy in issuing office file	Until 1 year after superseded
9. Labor Contracts — Work papers and negotiation records (See also "Contracts and Agreements")	**Retention Time**
• Company copy in Company or location file	Until 20 years after termination of the contract
• Other copies	Same as above, or less if no longer useful
10. Local Wage Bid Sheets — Seniority lists and other records of contract compliance (unless used as work history)	**Retention Time**
• Company copy in location file	Until 20 years after termination of the contract

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• Other copies	While useful only
11. Notices and Other Records Required by WARN Act	**Retention Time** 6 years
12. Records of Grievances and Arbitrations	**Retention Time** 50 years
13. Records Reflecting Architectural Compliance with ADA Requirements	**Retention Time** Until superseded
14. RIF Releases under OWBPA	**Retention Time** Duration of employment + 3
15. Salary Increase Planning Sheets • Company copy in Payroll Accounting office • Other copies	**Retention Time** Year originated + 1 While useful only
16. Time Cards or Time Sheets for Temporary Workers	**Retention Time** 2 years
17. Workmen's Compensation Claim Medical Files	**Retention Time** Duration of employment + 3, or at a later date when released by Director, DM&HS

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X. Legal

Pertaining to activities in which guidance or assistance of attorneys is generally required.

1. Antitrust Investigations — FTC & Department of Justice	**Retention Time**
• All relevant and appropriate documents	Until termination of investigation and notice from Law Department
2. Authorizations for Signatures to Documents	**Retention Time**
• Company copy in administrating office file	Permanent
• Other copies	Until superseded
3. Compliance Investigations — Federal, state, county, municipal & private	**Retention Time**
Safety, Health and Environmental Practices, etc.:	
• Company copy in Law Department file	Until termination of investigation and notice from Law Department
• Other copies	Until termination of investigation and notice from Law Department
4. Contracts, Agreements & Related Records	**Retention Time** See "Contracts & Agreements," page 13.
5. Documents Created to Comply With Export Trading Company Act	**Retention Time** 5 years
6. Incorporation, Acquisitions, Mergers, Consolidations, Reorganizations & Other Related Corporate Matters	**Retention Time** See "Corporate Records," page 16.
7. Litigation & Claims	**Retention Time**
• Court files & work papers in Law Department file	Until completion of litigation and notice from the Law Department. *Except: Suits covered by insurance — permanent*
• Patent litigation in Patent Department file	Until termination of investigation and notice from Patent Law Department. *Except: Suits covered by Company insurance — permanent*
8. Monsanto Annual Compliance Certification (Policy on Business Conduct, Antitrust Laws, Political Activity and Conflict of Interest)	**Retention Time**
By Company Personnel:	
• Company copy (signature copy of statement) & related records in files of responsible office	Year originated + 10
• Other copies	Year originated + 1
9. Opinions & Other Records for Legal Guidance — Internal or external generation	**Retention Time**
• Company copy in Law, Patent or Treasury Department files	Year originated + 25, but if they are modified or replaced, then while useful only. Legal opinion given in connection with stock or asset acquisition or financing should be kept as long as the contracts pertaining to the transaction in question are kept
• Other copies & excerpts	While useful only
10. Patent, Trademark & Copyright Matters	**Retention Time** See "Patent, Trademark & Copyright," page 41.
11. Pending Claims — Year-end Report to Auditors	**Retention Time**
• Company copy in Law Department file	Year originated + 5
• Other copies	Year originated + 1

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12. Powers of Attorney	**Retention Time**
• Company copy in originating office file	Upon expiration + 10 or until expiration of retention period for patent file in question, whichever is later
• Other copies	Upon expiration
13. Regulatory Agencies — Federal, state, county, municipal	**Retention Time**
Permits, Registrations, Petitions, Variances, Waivers, Orders, etc.:	
• Company copy of applications and requests, supporting data used to complete applications, draft permits and orders, comments, and correspondence provided to or by the regulatory agency and final copies in originating office and Environmental Law files	Permanent
• Other drafts	Until completion of record
• Other copies	While useful only
14. Settlements and Releases of Legal Claims Signed in Advance of or During Litigation	**Retention Time** Permanent
15. Tax Matters	**Retention Time** See "Tax," page 51.

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XI. Manufacturing

A. Maintenance:

1. Maintenance Manuals & Instructions	**Retention Time**
• All copies	Until superseded
2. Maintenance Records — For control of operations and cost, analysis of equipment performance, etc.	**Retention Time**
• All copies	Until purpose served

B. Operations:

1. Manufacturing Data — Operating schedules, data logs and recordings, batch records, etc. — for control, operation analysis, patent purposes, etc.	**Retention Time**
• All copies	Until purpose served
2. Materials Manufactured & Shipped Under Food & Drug Administration (or Other Agency) Control — Drugs, pharmaceuticals, cosmetic ingredients, feed additives, etc.	**Retention Time**
Necessary Manufacturing and Shipping Records:	
• Company copy in responsible office file	As specified by law or regulation
3. Process or Facility Operating Manual — Description, flow charts, operating characteristics, instructions, and limits, as necessary to define process or operation	**Retention Time**
• Company copy in responsible office file (division, plant, CGE/AGE Technical Information Center or other)	Until 10 years after termination of product
• Other copies	Until superseded
4. Process Technology — Technical data and information essential for supervision of manufacturing processes, but not included in process manual	**Retention Time**
• All copies	Until superseded
5. Record of Alcohol Use — All required government reports	**Retention Time**
• Company copy in administrating office for specific permit	Year originated + 5 or as specified by law or regulation
6. Specifications — Products, raw materials, packaging & other supplies	**Retention Time**
• All copies	Until purpose is served
7. Testing/Analytical Procedures — Products, raw materials, supplies	**Retention Time** Permanent if used in connection with an application or request for permits, registrations, petitions, variances, waivers, etc., draft permits and orders, comments and correspondence provided to or by a regulatory agency. Permanent if required by law to be submitted to the government, or if required by law to be retained by the Company to show compliance with federal regulations. Otherwise, until purpose served or as required by law
8. Test & Analysis Results — Products, raw materials, supplies	**Retention Time** Permanent if used in connection with an application or request for permits, registrations, petitions, variances, waivers, etc., draft permits and orders, comments and correspondence provided to or by a regulatory agency.

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	Permanent if required by law to be submitted to the government, or if required by law to be retained by the Company to show compliance with federal regulations. Otherwise, until purpose served or as required by law

C. Environmental Documents:

1. Data Collected to Demonstrate Compliance with Regulations — Federal, state, county, municipal	**Retention Time**
• All copies	Permanent if required by law to be submitted to the government, or if required by law to be retained by the Company to show compliance with federal regulations. Otherwise, until purpose served or as required by law
• Drafts and work papers	Until completion of report
2. Data Collected for Engineering Analysis, Engineering Design, etc.	**Retention Time**
• All copies	Permanent if supporting data for permit or application from government agency. Otherwise, until completion of project
3. Regulations, Procedures, Analytical & Sampling Methods	**Retention Time**
• All copies	Permanent if supporting data for a permit. Otherwise, until 10 years after superseded
4. Test Data for Internal Company Control Purposes	**Retention Time**
• All copies	Until purpose served or until data superseded, whichever occurs first

D. Safety:

1. Safety Manuals & Instructions	**Retention Time**
• All copies	Until 10 years after superseded
2. Safe Handling Procedures	**Retention Time** Until superseded

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XII. Marketing

1. Advertising Copy	**Retention Time**
Proof or Sample:	
• Company copy in Marketing or other issuing office file	Year originated + 2
• Log of advertisements in Marketing file	Year originated + 10
2. Advertising Research Projects, Market Research and Development Projects	**Retention Time**
Periodic Progress Reports:	
• Company copy in originating office file	Until completion of project
• Other copies	2 months
Interim, or Final, Summary Reports:	
• Company and lending copies in originating office (or library) file	Year originated + 5
• Information center file — microfilm	Permanent
• Other copies	2 months
• Work papers and drafts	Until 1 year after completion of report, or less if no longer useful
• Corporate Report Index	Until superseded
3. Call Reports	**Retention Time** Year originated + 1, or if earlier, until superseded
4. Customer Complaint Records	**Retention Time**
• Complaints about products adjusted or resolved without litigation in division file	Year originated + 3
• Complaints litigated, in all files	Until completion of case, and upon notice from Law Department
5. Customer General Information File or List — Identity, addresses, personnel lists, financial status, material requirements, etc., of customers and prospects	**Retention Time**
• Copies in all files	Until superseded
6. Customer Payment Records — Marketing copy of balances & histories	**Retention Time** Until superseded. See "Financial" Section, page 24.
7. Forecast or Strategies — Product, industry, market, customer, etc.	**Retention Time**
• Company copy and work papers in originating division file	Until 3 years after superseded
• Corporate Planning and Evaluation copy	Until 1 year after superseded
• Other copies	Until superseded, or less if no longer useful
8. Invoices, Shipping Papers, Debit & Credit Documents, Consignment Records, etc.	**Retention Time** Year originated + 3, or less if no longer useful
9. Labels — Identifying Monsanto products as shipped to customers	**Retention Time**
• Company copy, all labels in Distribution Department	Permanent
• Company copy selected for trademark evidence in Distribution Department (or Patent Department)	Until termination of trademark
• Other copies	Until termination of label use
10. List Price Deviation Record — Evidence of legality	**Retention Time**
• Company copy in issuing office file	Until 4 years after termination of contract
11. Material Exchange Agreements & Contracts — See Chapter on Contracts, page 13.	**Retention Time**
• Other copies	Until termination of contract, or less if no longer useful

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12. Orders - Marketing — Copy of customer purchase orders and other order entry documents	**Retention Time** Year originated + 2, or less if no longer useful
13. Price Sheets, Bulletins, or Lists	**Retention Time**
• Company copy in issuing office file	Until 5 years after superseded
• Other copies	Until superseded
• Statistical records of pricing	Until 2 years after termination of products
14. Product Guarantees on Approved Monsanto Printed Forms	**Retention Time**
• Company (signature) copy in division files	Until 6 years after termination of guarantee
15. Product Quality Specifications	**Retention Time**
• Company copy in division Manufacturing Department file	Until 10 years after superseded
• Marketing office copy	Until 1 year after superseded
• Other copies	Until superseded
16. Shipping Product Specifications	**Retention Time**
• All copies	Until superseded
17. Sales Contracts & Agreements — See also "Contracts & Agreements," page 13.	**Retention Time**
Sales Contracts in Approved Printed Monsanto Forms:	
• Company (signature) copy in division files	Until 6 years after termination of contract
• Other copies	Until termination of contract, or less if no longer useful

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XIII. Patent, Trademark & Copyright

Pertaining to preservation of know-how and other industrial property rights.

1. Contracts & Agreements — Patents, know-how, secrecy, consultants, etc.	**Retention Time** See "Contracts & Agreements," page 13.
2. File Histories	**Retention Time** For life of patent, or less if no longer useful
3. Foreign Patent Application and Patent Files	**Retention Time**
• Issued patents	Until expiration, lapse or abandonment of patent, but only after review by Patent attorney
• Abandoned applications	Until expiration, lapse or abandonment of patent, but only after review by Patent attorney
• Lapsed patents	Until expiration, lapse or abandonment of patent, but only after review by Patent attorney
4. Patent Applications and Files (U.S.)	**Retention Time**
Issued Patents:	
• Company copy in Patent Department file	For life of patent and after review by Patent attorney
• Other copies	For life of patent, or less if no longer useful
Abandoned Applications:	
• Company copy in Patent Department file	
◦ If parent case	Same as last descendant
◦ If not parent case	For 10 years after abandonment and after review by Patent attorney
• Other copies	For 2 years after abandonment
5. Patent Assignments and Powers of Attorney	**Retention Time** Same as patent application or patent to which it relates
6. Patent Disclosures	**Retention Time**
If Patent Application Filed:	
• Company copy in Patent Department file	For life of patent and after review by Patent attorney
• Other copies	For life of patent, or less if no longer useful
If No Patent Application Filed:	
• Company copy in Patent Department file	Year originated + 15 and after Patent attorney review
• Other copies	Year originated + 2, or less if no longer useful
7. Patent Studies & Searches (Including Opinions)	**Retention Time**
Company Copy in Patent Department File:	
• For novelty	Same as item 6, Patent Disclosure, above
• For infringement & validity	Until expiration of patent + 6 years, or less if no longer useful
• For state of the art	Completion of search + 10
• Other copies — all searches	Year originated + 2, or less if no longer useful
8. Submitted Ideas & Releases from Outside Inventors — Ideas & inventions from outside inventors	**Retention Time**
• Company copy in Patent Department file	Year originated + 25
9. Technology Pertinent to Patent Activity	**Retention Time**
• Processes, products, and other technical information in	Year originated + 25, or less if not useful

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Patent Department file

10. Trademark & Copyright Registrations and Related Proceeding Records	**Retention Time**
• Company copy in Patent Department file	Until termination of registration
11. Trademark, Evidential — Labels, invoice copies, etc., as required by Patent Department	**Retention Time**
• Company copy in originating office file or Patent Department file as arranged	Until termination of trademark
12. Trademark Searches	**Retention Time**
• Company copy in Patent Department file	Until 5 years after completion of search, or less if no longer useful

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XIV. Planning Documents

1.	**Appropriation and Retirement Requests for Executive Committee and Board Action**	**Retention Time**
•	Copy of approved requests in Controller's Office file	Until 10 years after project
•	Originating Company or Corporate Department copy and work papers of approved and unapproved requests	Until 10 years after completion of project, or less if no longer useful
•	Corporate Plans Department copy, Patent Department copy and work papers of approved and unapproved requests	Year originated + 10, or less if no longer useful
•	Board of Director and Executive Committee individual copy	While useful only
•	Other copies of approved and unapproved requests	Year originated + 1, or less if no longer useful
2.	**Appropriation and Retirement Requests at Unit Vice President Level or below**	**Retention Time**
•	Company copy in originating division file	Until 5 years after completion of project
•	Other copies	Year originated + 1, or less if no longer useful
3.	**Business Direction Papers - Including Supply Direction Papers, Staff Function Direction Papers, World Area Direction Papers**	**Retention Time**
•	Originating office and Corporate Plans Department copies	Year originated + 10, or less if no longer useful
4.	**Forecasts - Sales, Market, Economic, etc.**	**Retention Time**
•	Copy in originating or sponsoring office file	Until 5 years after superseded
•	Other copies	Until superseded, or less if no longer useful
5.	**Job Results Analysis/Goals Documents**	**Retention Time** Year originated + 1
6.	**Long Range Plans**	**Retention Time**
•	Originating company or staff department copy, work papers and related files	Until 5 years after superseded
7.	**Summary Long Range Plan**	**Retention Time**
•	Corporate Plans Department copy, and related files of summaries and evaluations	Year originated + 25, or less if no longer useful
•	Other copies, including summaries and evaluations	Until superseded, or less if no longer useful
8.	**Strategies — Product, Industry, Market Customer, etc.**	**Retention Time**
•	Company copy and work papers in originating division file	Until 5 years after superseded
•	Corporate Plans Department copy	Until 1 year after superseded
•	Other copies	Until superseded, or less if no longer useful

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XV. Purchasing

1.	**Purchase Orders** — Including requisitions, supplier acknowledgments and other essential related papers	**Retention Time**
•	Originating purchasing office file copy	Until 1 year after termination of contract
•	Engineering, maintenance storeroom, supply department or other requisitioning and receiving office file	Until termination of service, material or equipment purchased, or less if no longer useful
•	Research copy if required to substantiate, validate or supplement experimental record	Year originated + 25, or permanent if on microfilm
2.	**Purchase Requisitions**	**Retention Time**
•	Company copy in Purchasing Department file	Same as purchase order, or less if no longer useful
•	Other copies	Until completion of purchase
3.	**Purchasing Statistics**	**Retention Time**
•	Monthly and quarterly — Company copy in Central Purchasing file	Year originated + 1
•	Annual — Company copy in Central Purchasing file	Year originated + 10, or less if no longer useful
•	Other copies	Year originated + 1, or less if no longer useful
4.	**Shipping Requirements, Technical and/or Commercial Information** — Pertinent to purchasing	**Retention Time** Until superseded, or less if no longer useful
5.	**Vendor Lists** — Information, catalogs, etc.	**Retention Time** Until superseded

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XVI. Real Estate

1. Abstracts of Title	**Retention Time**
• Original	Normally delivered to buyer at closing
• Other copies, if any	Until 10 years after termination of ownership
2. Deeds — Title opinions and related documents	**Retention Time**
• Company copy in Treasury Department or designated file	Until 10 years after termination of ownership
• Other copies	Until termination of ownership, or less if no longer useful
3. Employee Housing Activity Records	**Retention Time**
• Company copy in Corporate Personnel or Relocation Office file	Until 3 years after termination of activity and completion of tax audit
• Other copies	Until termination of activity
4. Leases	**Retention Time**
• Company copy in Treasury Department in designated file	Until 10 years after termination of lease
• Other copies	Until termination of leases, or less if no longer useful
5. Title Insurance Policies/Opinions	**Retention Time** Permanent

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XVII. Risk Management And Insurance
(Previously "Insurance" Chapter)

1.	**Insurance Policies — Work and Related Papers**	**Retention Time**
•	Company copy in Risk Management Department file	Permanent
•	Documents reflecting all other insurance coverage issues, limits of liability, and aggregate impairment	Permanent
2.	**Annual Insurance Policy Schedule/Insurance Policy Listing**	**Retention Time**
•	Company copy in Risk Management Department file	Permanent
•	Other copies & excerpts	While useful only
3.	**Insurance Claim Files —** (Other than Workmen's Compensation)	**Retention Time**
•	Company copy in Risk Management Department file	Permanent
•	Other copies	10 years beyond termination of claim
4.	**Insurance Claim & Reimbursement Request Files**	**Retention Time**
•	Company copy in Risk Management Department file	Permanent
5.	**Workmen's Compensation Claim Files**	**Retention Time** 7 years beyond termination of claim
6.	**Insurance Certificates Furnished by Contractors Working on Monsanto's Premises**	**Retention Time** Permanent
7.	**Correspondence Regarding Litigation**	**Retention Time**
•	Ongoing litigation correspondence	In accordance with Law Department instructions

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XVIII. Scientific and Technical

Records & Indexes:

1.	**Experimental Project Planning** — Recording inception, intent, continuity and relationship of experimental and developmental projects — minutes, plans, memos, etc.	
		Retention Time
•	Company copy in originating office file if not in notebook record	Year originated + 20
•	Other copies	Year originated + 1, or less if no longer useful
2.	**Experimental Project Reports** — All labs, pilot plants and other experimental facilities — periodic progress reports	
		Retention Time
•	Originating office copy	Until interim or final report
•	Company copy, all reports, in Information Center file	Permanent
•	Patent Department copy	Year originated + 25, or less if no longer useful
•	Division and/or local library or Technical Information Center copy report	Until interim or final
•	Other copies	2 months
3.	**Evidential Record** — Essential to substantiate, validate, or supplement experimental records (e.g., notebook entries), material specifications, drawings, calculations, analysis and test data minutes, correspondence, affidavits, etc.	
		Retention Time
•	Original or validated copy, in or maintained with notebooks to every extent possible	Year originated + 25; microfilm before destroying
•	Microfilm copy in same reel with pertinent notebook	Permanent
4.	**Experimental Samples** — Pertaining to preparation, identification, analysis, testing, evaluation, distribution, etc.	
		Retention Time
•	New material — chemicals, products, assemblies, prototypes, etc.	Year originated + 25; microfilm before destroying
•	Improved products — initial preparation in lab, pilot plant and plant	Year originated + 25; microfilm before destroying
•	New processes — initial product from lab, pilot plant and plant	Year originated + 25; microfilm before destroying
•	Materials supplied — to customers, government or other outside party for testing and evaluation	Year originated + 25; microfilm before destroying
•	Materials received — from outside for testing or evaluation	Year originated + 25; microfilm before destroying
•	Microfilms of the above	Permanent
5.	**Experimental Work** — All original records of scientific or technical experimentation or investigation, whether as bound notebooks, log books, data sheets, etc.	
		Retention Time
•	Original — In research laboratory, research office, or designated repository (an exception to this manual may be made for records having historical or archival value)	Year originated + 25; microfilm before destroying
•	Microfilm — Company copy from all Monsanto Company and subsidiary labs, in Information Center file, local copy in lab or library file	Permanent
6.	**Interim or Final Reports, Tentative Process, Literature Survey, Special, Product and Summary Reports**	
		Retention Time
•	Originating office copy, work papers and drafts	Year originated + 1
•	Company and circulating copy, all reports, in Information Center file	Original copy for year originated + 35; permanent on microfilm

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• Division and/or local library or Information Center file	Original copy for year originated + 35; permanent on microfilm
• Other copies	2 months

7. Label Registration — Data and information for product application, etc., assembled for regulatory agency activities, technical support, etc.	**Retention Time**
• Research Department file copy	Until 5 years after product discontinued
• Product Development file copy	Until 5 years after product discontinued

8. Pilot Plant Scale Work — All original records of scientific or technical experimentation or investigation, such as log books, data sheets, etc. (bound notebooks should be treated as #3 above)	**Retention Time** Year originated + 10 or less if purpose served; review before destroying

9. Sample Recording Control (SRC) — Physical-chemical data of new research materials	**Retention Time**
• Original copy of sample announcement and updating or extending information in Research Information Center file	Year originated + 35
• Microfilm in Research Information Center file	Permanent
• Microfilm in other libraries and Information Center	Year originated + 50

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XIX. Shipping and Transportation

1. Bills of Lading	**Retention Time**
• Company copy (domestic) in responsible office file	Year originated + 6 and after tax audit
• Company copy (export) in responsible office file	Year originated + 6 and after tax audit
• Other (domestic or export) copies	Year originated + 6, or less if no longer useful
2. Claims for Damage — To shipments, to property and monetary	**Retention Time**
• Original claim card	Year originated + 6 and after tax audit
• Company copy in Distribution Department file	Until 3 years after completion of settlement
• Other copies	Until completion of settlement
3. Claims, Freight Charges — Over/Under Charges Under Legal Tariffs	**Retention Time**
• Original claim card	Current year + 6 and after tax audit
• Company copy in Distribution Department file	Until 3 years after completion of settlement
• Other copies	Until completion of settlement
4. Controlled Materials — Manufactured and shipped under government agency control	**Retention Time**
• Company copy of shipping record in responsible office file	As specified by law or regulation
5. Duty Drawback Claim — records concerning manufacture, sale, shipping of material from duty-paid raw materials	**Retention Time**
• Company copy in administrating office	Until 3 years after claim payment
6. Export Control Documents, Memoranda, Correspondences, Invitations to Bid, Book of Account, Restricted Trade or Boycott Documents	**Retention Time** 5 years
7. Freight Payment	**Retention Time**
• Company copy in Accounts Payable voucher file	Year originated + 6 and after tax
• Other copies	Year originated + 3, or less if no longer useful
8. Leases — Shipping, storing and transportation equipment – cars, trucks, barges, ships, containers, tanks, warehouses, tracks, etc.	**Retention Time**
• Company copy in Distribution Department File	Until 6 years after termination of lease*
• Law Department copy	Until 6 years after termination of lease, or less if no longer useful*
***Note:** See, however, item 12 under the "Contracts & Agreements" chapter, page 13.	
9. Operating Authorities — From federal, state, county and municipal agencies	**Retention Time**
• Company copy in Distribution Department File	Until 3 years after authority expires
• Other copies	Until authority expires
10. Rate-Route, Classification Negotiations — For establishment or adjustment — federal, state, county, municipal — of freight movements	**Retention Time**
• Company copy in Distribution Department File	Until 6 years after termination of movement
• Other copies	Until termination of movement, or less if no longer useful
11. Rate-Route File — Cards, master files, etc.	**Retention Time**
• Company copy in Distribution Department File	Until 3 years after superseded
• Other copies	Until superseded, or less if no longer useful

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12. Receiving Reports	**Retention Time**
• Company copy in Accounts Payable voucher file	Year originated + 6 and after tax audit
• Other copies	Year originated + 2, or less if no longer useful
13. Shipping Notices	**Retention Time**
• Company copy in Billing Department file	Year originated + 2
• Other copies	Year originated + 2, or less if no longer useful
14. Statutes and Regulations Governing Transportation, Also Opinions and Other Records of Guidance	**Retention Time**
• Company copy in Distribution Department File	Until 6 years after superseded
• Other copies	Until superseded, or less if no longer useful
15. Tariff Schedules — Interstate, state and municipal	**Retention Time**
• Company copy in Distribution Department file	Until 3 years after superseded
• Other copies	Until superseded, or less if no longer useful
16. Technical Data — Specifications and other information concerning products and raw materials – pertinent to distribution	**Retention Time**
• Distribution Department or other responsible group file	Until superseded
17. Transportation Equipment and Facility Records — Specifications, drawings, technical data, etc. — owned or leased equipment	**Retention Time**
• Company copy in Distribution Department file	Until 6 years after termination of equipment
• Other copies	Until termination of equipment, or less if no longer useful

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XX. Tax

1. Disqualifying Stock Disposition Cards	**Retention Time**
• Company copy in Tax Department file	Year originated + 5 and after tax audit
2. Federal/Corporate Income Tax — Copies of returns, agent reports, waivers of statute of limitations, work papers, etc.	**Retention Time**
• Company copy in Tax Department file	Year originated + 100
• Other copies	While useful only
3. Federal Lubricating Certificates	**Retention Time**
• Company copy in Tax Department file	Until terminated or superseded + 5
4. Federal Personal Income Tax Records — On Forms W-2, W-4, 1099 & related records	**Retention Time** Year originated + 6 and after tax audit
5. Federal & State Gasoline, Motor Fuel & Lubricating Oils Tax Returns	**Retention Time**
• Company copy in Tax Department or other originating office file	Year originated + 6
6. Federal Unemployment Tax Return	**Retention Time**
• Company copy in Tax Department file	Year originated + 10
7. FICA (Social Security) Records	**Retention Time**
• Company copy in Tax Department file	
◦ Detail	Year originated + 20
◦ Return	Year originated + 50
8. Inspection Fee Returns	**Retention Time**
• Company copy in Tax Department file	Year originated + 6
9. Real Estate & Personal Property Tax	**Retention Time**
• Company copy in Tax Department file	
◦ Returns	Year originated + 35
◦ Valuation data	Year originated + 35
◦ Tax receipts	Year originated + 35
• Other copies	While useful only
10. State & Use Tax Records	**Retention Time**
• Company copy in Tax Department file	
◦ Returns	Year originated + 25
◦ Tabulations	Year originated + 6
◦ Exemption Certificates	Expiration of exemption + 5 years
• Other copies	While useful only
11. State & Local Personal Income or Earnings Tax Records	**Retention Time** Year originated + 6
12. State Income & Franchise Tax Records — Returns & work papers	**Retention Time**
• Company copy in Tax Department file	Year originated + 30
• Other copies	While useful only
13. State Oil & Gas Production & Severance Tax Returns	**Retention Time**
• Company copy in Tax Department or other originating office file	Year originated + 25

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14. State Unemployment Tax Return	**Retention Time**
• Company copy in Tax Department file	Year originated + 50
15. Tax Opinions, Studies, Etc. — For acquisitions, mergers, employee benefit programs, pensions, etc.	**Retention Time**
• Company copy in Tax Department file	25 years from date of issuance
• Other copies & excerpts	While useful only
16. Tax Rulings & Opinions	**Retention Time**
• Company copy in Tax Department file	Date of issue + 25
• Other copies & excerpts	While useful only

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XXI. Sample Certification of Compliance Letter

Monsanto -[logo]

From: (Name-Location-Phone)

Sector or Foundation Team:

Date:

Subject: **RECORDS MANAGEMENT**

Reference:

To: R. William Ide III, Corporate Secretary

This is to confirm that all Company files of the above Sector or Foundation Team have been reviewed and are in compliance with the Corporate Records Management Manual.

_____

Sector or Foundation Team Leader or
applicable LSBT member

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XXI. Sample Request For Exception Letter

Monsanto [logo]

From: (Name-Location-Phone)

Sector or Foundation Team:

Date:

Subject: **RECORDS MANAGEMENT**

Reference:

To: R. William Ide III, Corporate Secretary

The following exceptions to the Corporate Records Management Policy are requested:

Sector or Foundation Team:

Description of Record(s):

Justification for Exception:

_____

Sector or Foundation Team Leader
or applicable LSBT member

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