LIKHITHA INFRASTRUCTURE LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

[*Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015*]

I BACKGROUND

SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 ("**Regulations**") require every Listed Company to formulate a policy on Preservation of Documents which has to be approved by the Board of Directors.

In this context the following policy has been framed by the Board of Directors ("**Board**") of Likhitha Infrastructure Limited ("**Company**") at its meeting held on March 31, 2019 with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation of the documents of the Company.

This Policy can be modified and/or amended with the approval of the Board of Directors only.

II OBJECTIVE OF THE POLICY

The objective of this Policy is to classify the documents, records and registers of the Company which are required:

(a) to be preserved permanently; and

(b) to be preserved for e period of not less than 8 (eight) years.

III DEFINITIONS

"**Documents**" refers to papers, notes, agreements, notices, advertisement, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

"**Electronic Record**" means the electronic record as defined under clause (t) of; sub –section (1) of section 2 of the Information Technology Act. 2000.

"**Electronic Form**" means on any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

"**Legal Hold**" refers to a direction from Legal to preserve certain data held by employees or databases. All retention periods under this Policy shall be suspended with respect to the Documents subject to Legal Hold and all documents subject to Legal Hold are to be preserved strictly in accordance with the Legal Hold instructions and shall not be altered, destroyed or deleted until Legal informs employees that the Legal Hold has ended.

"**Maintenance**" means keeping Documents, either physically or in Electronic Form.

"**Preservation**" means to keep in good order and to prevent from being altered, damaged or destroyed.

IV PRESERVATION OF DOCUMENTS

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made there under, the secretarial standards, the listing regulations and any other law, .rules, regulations as may be applicable to the Company from time to time.

(a) <u>Documents to be maintained permanently:</u>

The Company shall maintain the follows documents on a permanent basis:

(i) The original signed and stamped memorandum of association and the articles of association of the Company;

(ii) Minutes of general meetings, board meetings and various committee meetings;

(iii) Register of members along with index;

(iv) Foreign register of members, if any;

(v) Register of loans, guarantee, security and acquisition made by the Company;

(vi) Register of investments not held in its own name by the Company, if any;

(vii) Register of contracts-with related party and contracts and bodies etc. in which directors are interested;

(viii) Register of charges;

(ix) Registers of renewed and duplicate share certificates;

(x) Register of directors and KMP; and

(xi) Intellectual property documents shall include, but shall not be limited to copyrights, trademarks, patents, and industrial designs. Intellectual property rights that are owed by the Company shall be retained by the Company permanently.

(b) <u>Documents to be maintained for at least eight financial years:</u>

(i) Books of accounts together with the vouchers relevant to any entry in such books of accounts;

(ii) Register of debenture holders (including foreign register of debentures) or register for any other securities issued by the Company;

(iii) Copies of all annual returns

(iv) Disclosure of interest received from the Directors of the Company in the manner prescribed;

(v) Attendance registers, notices, notes on agenda and other related papers of general meetings, board meetings and various committee meetings;

(vi) Instrument creating a charge or modifying a charge, if any;

(vii) Changes to the memorandum of association and the articles of association, if any;

(viii) Register of deposits accepted or renewed, if any;

(ix) Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax authorities shall be -maintained for a period of 8 (eight) years or for a period of 8 (eight) years after a final order has been received with respect to any matter which was preferred for appeal, as the case may be;

(x) Employment/personnel record in case of employees of the Company;

(xi) Relevant marketing and sales documents;

(xii) Press releases; and

(xiii) Legal documents including but not limited to contracts, legal opinions pleadings, orders passed by any court or tribunal, judgments, interim orders, documents relating to cases pending in any Court or Tribunal or any other authority empowered to give a decision on any matter, awards, documents relating to property matters.

V MODE OF MAINTENANCE

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company.

All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under various rules and regulations.

VI DISPOSAL AND DESTRUCTION OF RECORDS

After expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both physical and Electronic Documents. The documents may be destroyed as follows:

(a) Recycle non-confidential paper records;

(b) Shred or otherwise render unreadable confidential paper records; or

(c) Delete or destroy electronically stored data.