

**LEARNFLUENCE EDUCATION LIMITED**

*(formerly known as Learnfluence Education Private Limited)*

**Registered Office Address:** D, D1, C & C1, 49/137, Ponnurunni, Vyttila, Ernakulam,  
Kerala, India, 682019.

**CIN: U80902KL2021PLC067702**

**Phone No.: +918714201555**

**Email ID: [directorsoffice@iiclakshya.com](mailto:directorsoffice@iiclakshya.com)**

Learnfluence Education Limited	<b>Version No.</b>	01
CIN: U80902KL2021PLC067702	<b>Prepared by</b>	Secretarial Department
<b>Registered Office:</b> D, D1, C & C1, 49/137, Ponnurunni, Vyttila, Ernakulam, , Kerala, India, 682019	<b>Effective date</b>	September 17, 2025
	<b>Last Amendment on</b>	-

**ARCHIVAL POLICY**

**(Regulation 9 and 30(8) of SEBI LODR Regulations)**

**A. BACKGROUND**

The Learnfluence Education Limited, (“**Company**”) website <https://learnfluenceedu.com/> contains information on its business and operations for information and awareness of stakeholders. The website is regularly updated and certain information and documents are archived periodically so as to be available on the website, whilst simultaneously keep it crisp and relevant.

Pursuant to Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI LODR Regulation**”), the content Archival Policy has been framed to provide guidelines for archival of records and documents as statutorily required.

**B. OBJECTIVE OF THE POLICY**

The purpose of establishing this Policy is to:

- (a) arrange documents and records in a manner that allows easy search and retrieval;
- (b) specify the retention period for different categories of documents;
- (c) ensure proper disposal of records that are no longer required;
- (d) comply with applicable legal and regulatory obligations.

Pursuant to Regulation 30 of the SEBI LODR Regulations, all the listed the Company shall disclose certain events or information prescribed therein to the Stock Exchange(s). Such disclosures shall also be made available on the Company’s website for certain period as statutorily required. This Policy shall be disclosed on the Company’s website <https://learnfluenceedu.com/> in order to inform the stakeholders to facilitate them to retrieve past information which is of a statutory nature for a period as discussed in the Policy.

The objective of this Policy is to disseminate equal, adequate and timely information to the shareholders through the website of the Company and to enable them to track the performance of the Company over regular intervals of time and provide sufficient information to enable investors to assess the current status of the Company.

### **C. ARCHIVAL OF INFORMATION**

All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI LODR Regulations will be hosted on the website of the Company under the section entitled “Investor Relations” for a period of five years and thereafter the same shall be archived so as to be available for retrieval for such period as may be decided by the Managing Director of the Company.

Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company.

This policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.

The information as statutorily required under the said regulations shall be hosted on the Company’s website for a minimum period of five (5) years and thereafter maintain this information under the archival section for a further period of at least five (5) years in the manner as deemed appropriate by the Company.

As per Regulation 9, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode. A list of documents and the time frame of their preservation is provided in **Annexure I**.

The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

All documents and records must be properly maintained in appropriate storage facilities commensurate with the size and nature of documents, which allow proper access and at the same time ensure protection from any loss or damage due to theft, fire, flood, termite etc. A comprehensive list of documents preserved, location of storage, access control shall be maintained by the respective HOD or Function Head.

### **D. GENERAL**

In case of any subsequent changes in the provisions of SEBI LODR Regulations or any other Regulations which make any of the clauses/provisions in this Policy inconsistent with the SEBI LODR Regulations, the provisions of such Regulations shall prevail over this Policy.

### **E. DESTRUCTION OF DOCUMENT**

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After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors. This applies to both physical and electronic documents. The destruction process shall be overseen by the concerned Head of Department (HOD) or Function Head responsible for the custody of such documents.

**F. AMENDMENT TO THE POLICY**

Any change in the Policy shall be approved by the Board of the Company. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and SEBI LODR Regulations, the provisions of Statutory Provisions shall prevail.

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<b>A. Secretarial Records</b>		
<b>Sr.</b>	<b>Record Type</b>	<b>Preservation period</b>
1.	Incorporation Certificate, Certificate of commencement of Business.	Permanent
2.	Memorandum /Articles of Association.	
3.	Statutory Registers	
4.	Register of Members	
5.	Index of Members	
6.	Statutory Forms except for routine compliance	
7.	Scrutinizers Reports	
8.	Common Seal Register	
9.	Minutes Books of Board, Committees and General Meetings	
10.	Applications and approvals for issuance and listing of securities	
11.	Statutory filings with Stock Exchanges, & SEBI.	
12.	Annual Returns and other Statutory Filings / returns	8 years from date of filing
13.	Attendance Registers – Board, Committees and General Meetings	8 Years
14.	Office copies of Notice of General Meetings and related papers	
15.	Office copies of Notice, Agenda, Notes on Agenda and other related papers of Board Meetings / Committee Meetings	

<b>B. Accounts and Finance</b>		
<b>Sr. No.</b>	<b>Record Type</b>	<b>Preservation period</b>
1.	Annual Audit Reports and Financial Statements	Permanent
2.	Books of Accounts, including financial statements, vouchers relevant for accounting records, invoices, expense records, bank statements, bank reconciliation statements etc. Ledgers and Vouchers,	8 years from the end of Financial Year or after completion of assessment under applicable law, whichever is later.
3.	Investment Records.	8 years

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4.	Production data, MIS, operating parameters, Purchase orders, annual rate contracts, quotations and comparative quotations, Bill of entry/bill of lading, shipping/ airway bills, Procurement policy, Other related documents.	8 years
5.	Final copies of marketing and sales documents, Sales & marketing policies, Debit Notes / credit notes, Credit appraisal / approval, Agreements with commission agents / depots, Collection advices / MIS.	8 years
6.	Annual Plans and Budgets	3 years after the budget year is closed.
7.	Insurance Master Policies and related documents	Permanent
8.	Insurance Policies for moveable / immoveable assets, vehicles, etc.	8 years from the date of expiry. However, in case of any claims pending in respect of such policies, the same shall be preserved till the settlement of such claims.
9.	Inspection / Surveyor Reports/ Claim Records	12 months after settlement of the claims.

**C. Tax Records**

Sr. No.	Record Type	Preservation period
1.	Tax Registration Documents under various tax laws / regulations.	8 years
2.	Tax Exemption and Related documents	
3.	Payment challans	
4.	Excise Invoices/Bills/Challans & other Records	8 years from the end of the Financial Year or Completion of assessment under the applicable law, whichever is later.
5.	Tax Deducted at Source Records	
6.	Income Tax Records	
7.	Service Tax Records	
8.	Returns & Assessment Records	

**D. Legal Files and Records**

Sr. No.	Record Type	Preservation period
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1.	Court Orders	Permanent
2.	Licenses and Permissions	
3.	Contracts, Agreements and Related Correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts.
4.	Legal Memoranda and Opinions including subject matter files	3 years after the close of matter.
5.	Litigation files	3 years after close of the Litigations.

**E. Property Records**

Sl. No.	Record Type	Preservation period
1.	Original Purchase and Sale Agreements / Deeds	Permanent
2.	Property Card, Ownership records issued by Government Authority	Permanent
3.	Intellectual Property Documents including but not limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company	Permanent.

**F. Project Records**

Sl. No.	Record Type	Preservation period
1.	Project Documents and Related correspondence (including any proposal of the Project and its approval), Documents of green field / brown field projects, Statistical information, analysis reports and other related documents	Permanent
2.	Purchase Contracts/Invoices/Challans etc. pertaining to projects.	8 years from the end of the financial year.

G. Correspondence and Internal Memo		
Sl. No.	Record Type	Preservation period
1.	Those pertaining to non-routine matters or having significant lasting consequences.	8 years
2.	Miscellaneous Correspondence and memoranda pertaining to routine matters e.g. Routine letters, notes that require no acknowledgement or follow-up such as inter office memo, letters for transmittal and plans for Meetings; Letters of general enquiry and replies that complete cycle of correspondence; Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.	2 years
3.	Drafts and preliminary versions of documents superseded by work paper and other transitory information	As long as it remains relevant
4.	Any other Document relating to the business of the Company	2 years or as long as it remains current.
H. Personnel Records		
Sl. No.	Record Type	Preservation period
1.	Documents relating to Payroll, Salary history, Bonus, Performance appraisals and Gratuity.	8 years
2.	Statutory Registers/Records/Returns	8 years
3.	Time office Records and Leave Cards	8 years
4.	Unclaimed Wages Records	8 years
5.	Miscellaneous / Employees Information Records	3 years after separation.
I. Information Technology		
Sl. No.	Record Type	Preservation period
1.	Documents relating to procurement of IT hardware, software and licenses etc	8 years
2.	Operations and user manual	
3.	Licenses and information security	Till 2 years after expiry or 8 years whichever is later

4.	Inventory of backup data	8 years
5.	Server logs	
6.	Disaster Recovery site logs	
7.	Electronic Mail	Permanent
	All E-mails from internal and external sources that are important and have significant impact and lasting consequences.  All E-mails from internal and external sources that are not important and have no significant impact and lasting consequences.	2 years
8.	Web page files	To be retained for a period of 5 years as specified in the Listing Regulations.  To be archived by the IT. Department with the support of the service provider for a period of 3years after the initial period of five years of live page.

Where the preservation period of Documents is not included in the above identified categories, such period shall be determined by the application of the general guidelines affecting Document preservation identified in this Policy, as well as any other pertinent factors.

Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective HOD or Function Head in writing.