



GOODLUCK INDIA LIMITED

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RECORDS AND ARCHIVES MANAGEMENT POLICY

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RECORDS AND ARCHIVES MANAGEMENT POLICY

GOODLUCK INDIA LIMITED

PURPOSE

The Board of Directors (“the Board”) of Goodluck India Limited (“the Company”), has adopted this Records and Archives Management Policy (“the Policy”) to establish the framework needed for effective preservation/ maintenance of documents and records of the Company required to be maintained under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Listing Regulations”) Should there be any inconsistency with the requirement of global policy of the Company, the requirements of the Listing Regulations shall prevail.

OBJECTIVE

The objective of this Policy is to ensure that the documents / records required to be prepared and disclosed to the stock exchanges pursuant to the Listing Regulations (“the Listing Records”), whether physically or in electronic form be preserved for a minimum period of 8 years from the date of completion of relevant transaction. Further, if any other applicable law requires the preservation of any of these Listing Records for a longer period or permanently, then those shall be preserved / maintained accordingly.

POLICY FOR PRESERVATION / MAINTENANCE

The Listing Records created in physical form shall be scanned and maintained in electronic form as well. The electronic communication shall be maintained on the Company server in year wise folders. Further, the safety of the Listing Records in electronic form is to be achieved as per the policy of the Company whereas the physical record shall be in the custody of the Company Secretary [or a record management company as may be approved by the Board from time to time].The Listing Records shall be preserved for a minimum period of 8 years from the date of completion of relevant transaction [and thereafter may be destroyed after due scrutiny by the Managing Director and / or the Company Secretary if those records are not required for, or were subject matter of any pending litigation/ dispute.

PLACE OF PRESERVATION / MAINTENANCE

The Listing Records shall be preserved / maintained at the Corporate Office of the Company [or a record management company as may be approved by the Board from time to time unless any other law requires it to be maintained at the Registered Office or any other place, in which case the same shall be kept at such place.

VERIFICATION OF RECORDS

The Company Secretary shall once in a year carry out the process of self verification in relation to preservation / maintenance of Listing Records.

RIGHT TO ACCESS / RETRIEVE

The Company Secretary and his subordinate (direct report) in the Secretarial Department shall have the right of access to the Listing Records.

GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- A. documents whose preservation shall be permanent in nature ;
- B. documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- (i). documents that needs to be preserved and retained permanently;
- (ii). documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;

(iii). documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.

(iv) where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I.

ARCHIVAL POLICY

The Company shall ensure that all the information disclosed on the Company’s website is maintained live and/or in archive for a period of 8 years.

MODES OF PRESERVATION

The Documents may be preserved in

- a) Physical form; or
- b) Electronic Form.

The official of the Company required to preserve the document, shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

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

The preserved documents must be accessible at all reasonable times with the secured access.

ROLE OF REGISTRAR AND TRANSFER AGENT

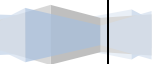
The Registrar and Transfer Agent of the Company shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained with them.

PERSON RESPONSIBLE

The Company Secretary shall be responsible for ensuring compliance under this Policy.

AMENDMENT

This Policy shall not be amended unless the amendment is approved by the Board of Directors or unless such amendment is required pursuant to change in the applicable law.



ANNEXURE I

Indicative List

A) PERMANENT PRESERVATION:

- a. Common Seal
- b. Minutes books of Board, General Meetings and Committee Meetings
- c. Statutory Registers
- d. License and Permissions
- e. Statutory Forms and disclosures except for routine compliance
- f. Scrutinizers' Reports
- g. Register of Members
- h. Index of Members
- i. any other documents as prescribed by law.

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Instrument creating a charge or modification
- h. Books of accounts, financial statements etc.
- i. Register of debenture holders or any other security holders
- j. any other documents as prescribed by law.