



# **INNOVANA THINKLABS LIMITED**

**(FORMERLY KNOWN AS “PCVARK SOFTWARE LIMITED”)**

## **PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY**

**(Pursuant to Regulation 9 and 30 (8) of SEBI (Listing and Disclosure Requirements) Regulations 2015)**

## 1. LEGAL FRAMEWORK

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

The policy has been framed in accordance with the Listing Regulations and duly approved by the Board of Directors of “**Innovana Thinklabs Limited**” (the ‘Company’).

## 2. OBJECTIVE OF THE POLICY

The main objective of the policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after the following due process for the same. This policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

## 3. DEFINITIONS

- i. “**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
- ii. “**Board of Directors**” or “**Board**” means the Board of Directors of “**Innovana Thinklabs Limited**”, as consulted from time to time.
- iii. “**Company**” shall mean “**Innovana Thinklabs Limited**”
- iv. “**Policy**” or “**This Policy**” means, “Archival Policy”.
- v. “**Preservation**” means to keep the documents preventing them from being altered, damaged or destroyed.
- vi. “**Website**” means website of the Company i.e. **www.innovanathinklabs.com**
- vii. “**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

#### **4. PRESERVATION OF DOCUMENTS**

The company shall preserve all the documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time. Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in two categories as below:

- a.) Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company.
- b.) Other documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions.

#### **5. INTERPRETATION**

Terms that have not been defined in this policy shall have the same meaning assigned to them under the Companies Act, 2013, SEBI Act, 1992 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### **6. DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such other mode under any instructions approved by the concerned person. Destruction of documents as a normal administrative practices will also be followed for the records which are duplicate/irrelevant/unimportant. It applied to both Physical and Electronic Documents.

#### **7. DISCLOSURE/AMENDMENTS**

This policy as amended from time to time shall be made available at the website of the Company at [www.innovanathinklabs.com](http://www.innovanathinklabs.com), the right to interpret/amend/modify this Policy vests in Board of Directors of the Company.

#### **8. ARCHIVAL POLICY**

Any disclosure of events or information which have been submitted by the Company to the stock exchange under Regulation 30 of the Listing Regulations will be uploaded on the website of the Company for the period of five years from the date of its disclosure of events or information.