

INNOVA CAPTAB LIMITED

ARCHIVAL POLICY

<i>Approving Authority</i>	<i>Board of Directors of the Company</i>
<i>Version</i>	<i>1.0</i>
<i>Adopted and Approved</i>	<i>19 June 2022</i>

Background

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) refers to an archival policy as per which, all events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Listing Regulations shall be hosted on the website of Innova Captab Limited (the “Company”) for a minimum period of five years and thereafter as per the archival policy of the Company.

This policy has been adopted and approved by Board of Directors at its meeting held on 19 June, 2022

Purpose

The purpose of this document is to formulate a policy for archival of the disclosures of information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations and hosting of such disclosures on the website of the Company.

Definitions

“**Applicable laws**” means securities laws defined under the Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

“**Archival**” means accumulation/storage of historical records on server/network or at a physical place.

“**Board**” means Board of Directors of the Company as constituted from time to time.

“**Company**” means Innova Captab Limited.

“**Company Secretary and Compliance Officer**” means the company secretary and compliance officer appointed by the Board.

“**Document(s)**” includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

“**Effective Date**” means the date on which such Policy shall become effective i.e. 19 June 2022

“**Managing Director**” means the managing director appointed by the Board and the shareholders of the Company under the Companies Act, 2013.

“**Policy**” means Company’s policy on archival of the disclosures made on its website, of information and events communicated to stock exchanges by the Company.

Words and expressions used and not defined in this Board Archival Policy shall have the meaning ascribed to them in the SEBI Listing Regulations, the Securities and Exchange Board of India Act, 1992, as amended, the Securities Contracts (Regulation) Act, 1956, as amended, the Depositories Act, 1996, as amended, or the Companies Act and rules and regulations made thereunder.

Archival Process

1. All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations will be hosted on the website of the Company under the section titled "Investor Relations" for a period of five years and thereafter the same shall be archived to be available for retrieval for such period as may be decided by the Managing Director of the Company.
2. Subsequently, any shareholder of the Company intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company. The Company Secretary shall respond to the request within 30 working days of receiving the request.

Review and Amendment

1. 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 by the Board of Directors of the Company.
2. In case of any amendment(s), clarification(s), circular(s), etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.

Interpretation

1. In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.

Communication of this Policy

This Policy shall also be disclosed on the website of the Company.

Amendments to the Policy

The Company is committed to continuously reviewing and updating our policies and procedures. Therefore, this policy is subject to modification. Any amendment of any provision of this policy shall be carried out by persons authorized by the Board in this regard.