

Date: 3 April, 2019

To,

The Manager

Listing Department
National Stock Exchange Limited
Exchange Plaza,
Bandra Kurla Complex,
Bandra (E), Mumbai- 400051

SYMBOL: INNOVANA – ISIN: INE403Y01018

Subject: Intimation of adoption of Code of Conduct for Insider Trading and Code of Fair Disclosure of Unpublished Price Sensitive Information

Ref: Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir,

Pursuant to the provisions of Regulation 8 (2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, this is to inform you that Code of Conduct for Insider Trading and Code of Conduct for Fair Disclosure of unpublished price sensitive information, to be effective from April 01, 2019 has been adopted by the Board of Directors of the Company.

The aforesaid amended policy will also be disseminated on the Company's website i.e. www.innovanathinklabs.com.

Kindly take the same on your record.

Thanking You,

For Innovana Thinklabs Limited
(Formerly known as PCVARK Software Limited)
CIN: L72900RJ2015PLC047363

Divya Badaya

Divya Badaya
Company Secretary and Compliance Officer



Plot No. D-41, Patrakar Colony,
Near Jawahar Nagar puliya,
Moti Dungri Vistar Yojna,
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