



INDIAN INFOTECH & SOFTWARE LTD.
INFORMATION TECHNOLOGY

CIN-L70100MH1982PLC027198
www.indianinfotechandsoftwareltd.com

Date: 31/07/2020

To,
The Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code: Scrip ID – 509051 (INDINFO)

Subject: Annual Secretarial Compliance Report for the year ended 31st March 2020

Dear Sir(s),

Pursuant to Regulation 24A of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, we are submitting herewith the Annual Secretarial Compliance Report for the year ended 31st March, 2020.

Please take the same on your record and acknowledge the receipt of the same.

Thanking You,

Yours Faithfully,
For Indian Infotech & Software Ltd

Sd/-
SAMIRAN HOWLADER
Director
DIN: 08390407



BRAJESH GUPTA & Co.

COMPANY SECRETARY IN PRACTICE

Add: I-74, LIG COLONY, INDORE (M.P.)-452007

Ph. No. +91756666512, email-id: brajesh.cs19@gmail.com

SECRETARIAL COMPLIANCE REPORT

(Under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

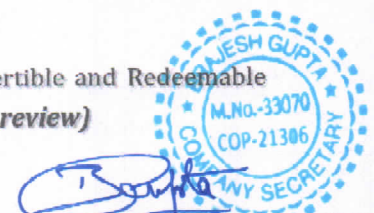
To,
Indian Infotech and Software Limited.
Unit No: 518, 5th Floor,
Anjani Complex Parera Hill Road,
Andheri (E) Mumbai - 400099

I Brajesh Gupta, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **Indian Infotech And Software Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification for the year ended **31st March, 2020** ("Review Period") in respect of compliance with the provisions of:
 - 1) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - 2) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- I. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- II. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company for the period under review)**
- III. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- IV. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(not applicable for the year under review)**
- V. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(not applicable for the year under review)**
- VI. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(not applicable for the year under review)**
- VII. Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(not applicable for the year under review)**



VIII. Other regulations as applicable and circulars/ guidelines issued thereunder and based on the above examination.

I hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

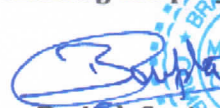
- Website of the Company is not functional as on the signing of this Report.
- The Company made delayed submission of Un-audited financial Result & Report of Reconciliation of share capital under regulation 76(1) for the Quarter ended on 31.12.2019.
- The Company made delayed submission of Share Holding Pattern for the Quarter ended on 30.09.2019.
- The company has not appointed Company Secretary as Compliance officer as per regulation 6 of SEBI (LODR) Regulation 2015.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.

(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	SEBI	in the matter of shell Companies	SEBI has issued show cause notice under section 11(1), (4) 11A and 11B of SEBI Act 1992 and called for personal hearing.	The Company has submitted its reply and appear before the SEBI Board through legal representative and the matter is still pending.
2	BSE	SEBI LODR Regulation 2015 compliance delay submission	BSE has sent Notice for clarification and payment of Penalty for non-compliance/delayed submission of SEBI LODR Regulation Compliances as stated above.	

For Brajesh Gupta & Co.
Practicing Company Secretary


M.No.-33070
CP No.-21306
Brajesh Gupta, Proprietor
Mem. No. ACS- 33070
C P No.: 21306

UDIN - A033070B000541589

Place: Indore
Date: 31/07/2020

Note: The Audit was conducted on quarterly basis and all the documents were obtained from the company except compliance for the quarter January to March 2020. Due to COVID-19 outbreak and the Government of India announcement complete 21 days lockdown which was further extended all the compliance documents for the quarter January to March 2020 were obtained through electronic mode and verified with requirements.