



RICHA SHUKLA, M.Com, ACS
Practicing Company Secretary

Address:

844/1, R. N. Tagore Road
Kolkata - 700 077,
West Bengal

(M): +91 9051502921

(O): +91 7003714214

sricha200@gmail.com

Secretarial compliance report for the year ended 31st March, 2019

I, **Richa Shukla, Practicing Company Secretary**, have examined:

- (a) all the documents and records made available to us and explanation provided by M/s **L C C Infotech Limited** (CIN: L72200WB1985PLC073196 and having Registered office at P- 16, C.I.T. ROAD, P S ENTALLY, KOLKATA - 700014, West Bengal)
- (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, 2019, in respect of compliance with the provisions of :

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) 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:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) 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 generally complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, subject to the following observations:-

The Company has been facing suspension from trading at BSE since 14th Feb, 2003. The Company was also suspended from trading at NSE on 19th May, 2019 in compliance to a circular issued by SEBI dated 12th February, 2016. Due to this and allied factors, the Company, during the period under review, couldn't comply or complied with delays, certain provisions of the SEBI (Listing Obligations & Disclosure Requirements) Regulation, 2015 along with such other regulations as may be applicable to it.

- (b) Subject to the aforesaid observation, 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 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 Stock Exchanges/ SEBI & other regulatory authorities	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	Fine/ Penalty imposed by NSE	Various	A fine/ Penalty of Rs. 5,96,121/- was imposed on the Company	The fine/ Penalty was duly paid by the Company on 17.05.2019.
2.	Trading Suspended by NSE on 19 th May, 2019	Failure to revoke suspension of BSE	Trading Suspended	Suspension continues as on 31.03.2019

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: N.A.

Place: Pune
Date : 29.05.2019



Richa Shukla
RICHASHUKLA
Practicing Company Secretary
M. No: 40547, C.P. No: 15080