



# Lee & Nee

Softwares (Exports) Ltd.

CIN : L70102WB1988PLC045587

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June 29 , 2021

To, The Secretary BSE Limited Phiroze Jeejeebhoy Towers Dalal Street Mumbai -400 001	To, The Secretary The Calcutta Stock Exchange Ltd. 7, Lyons Range Kolkata-700001
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Dear Sir /Madam,

**Subject: Submission of Annual Secretarial Compliance Report for the Year Ended 31<sup>st</sup> March 2021**

Please find enclosed herewith the Annual Secretarial Compliance Report Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, dated 28<sup>th</sup> June, 2021 for the Financial year 2020-21 issued by Mrs. Rasna Goyal, Practicing Company Secretary and the Company's Secretarial Auditor.

You are requested to take the same on record.

Thanking You,

Yours Truly,

For Lee & Nee Softwares (Exports) Ltd.

LEE & NEE SOFTWARES (EXPORTS) LTD

*Arpita Gupta*  
Director

Arpita Gupta  
(Director)

**SECRETARIAL COMPLIANCE REPORT OF  
LEE & NEE SOFTWARES (EXPORTS) LIMITED  
FOR THE YEAR ENDED 31<sup>st</sup> MARCH, 2021**

To,  
LEE & NEE SOFTWARES (EXPORTS) LTD  
14B, CAMAC STREET  
KOLKATA -700017

I, Rasna Goyal, have examined:

- (a) all the documents and records made available to me and explanation provided by LEE & NEE SOFTWARE (EXPORTS) LTD ("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 31<sup>st</sup> March, 2021 ("Review Period") 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; **(Not Applicable to the Company during the review period)**
- (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; **(Not Applicable to the Company during the review period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the review period)**



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the review period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the review period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018  
And Circulars/ Guidelines issued thereunder;

and based of 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:-

SR.No.	COMPLIANCE REQUIREMENT (REGULATIONS/ CIRCULARS / GUIDELINES INCLUDING SPECIFIC CLAUSE)	DEVIATIONS	OBSERVATIONS/ REMARKS OF THE PRACTICING COMPANY SECRETARY
	_____		

- (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 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.
	_____			

(d) The Listed entity has taken the following actions to comply with the observations made in previous reports:

SR.NO	OBSERVATIONS OF THE PRACTICING COMPANY SECRETARY IN THE PREVIOUS REPORTS	OBSERVATIONS MADE IN THE SECRETARIAL COMPLIANCE REPORT FOR THE YEAR ENDED.... (THE YEARS ARE TO BE MENTIONED)	ACTION TAKEN BY THE LISTED ENTITY, IF ANY	COMMENTS OF THE PRACTICING COMPANY SECRETARY ON THE ACTIONS TAKEN BY THE LISTED ENTITY
Not Applicable				

Place: Kolkata  
Date: 28<sup>th</sup> June, 2021

UDIN: F009096C000532071

*Rasna Goyal*  
**Signature**  
**RASNA GOYAL**  
(Name of Company Secretary in practice)  
Membership No. FCS 9096, C.P.No. 9209  
68 (New 1/72), Jessore Road,  
Diamond Arcade, Suit No. 301B,  
Shyamnagar, Kolkata- 700055



***NB: Due to COVID-19 travel restrictions, we are not able to physically verify the records, therefore we relied on the information as provided by the Company in electronic mode.***

General information about company	
Scrip Code*	517415
NSE Symbol	
MSEI Symbol	
ISIN	INE791B01014
Name of the listed entity	LEE AND NEE SOFTWARES (EXPORTS) LTD
Date of start of financial year	01-04-2020
Date of end of financial year	31-03-2021
Date of Report	28-06-2021
Whether any observations reported by the Secretarial Auditor	No
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.	Yes
Any actions taken against the listed entity/its promoters/directors/its material subsidiaries either by SEBI or by stock exchanges (including under the Standard operating procedures issued by SEBI through various circulars).	No
Is there any observation made in the previous report	No
Name of the Certifying Firm	Rasna Goyal
Name of the practicing Company Secretary issuing the report	Rasna Goyal
Membership Type	FCS
ACS/FCS No.	9096
CP No.	9209
Place	Kolkata
Date	29-06-2021

Regulations			
Sr No	Regulation	Applicability during the period under review (Yes/No)	Any Observation (Yes/No)
1	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Yes	No
2	Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018	No	No
3	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	Yes	No
4	Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018	No	No
5	Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014	No	No
6	Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008	No	No
7	Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013	No	No
8	Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	Yes	No
9	Specify any other regulation applicable to the Company		

