



Editorial

The Report of the Company Law Committee on further recategorization of certain criminal compoundable offences to civil wrongs of November 14th is a welcome step in promoting Ease of Doing Business.

[Read more...](#)

OPINION:

What is Hot in Company Law?



As many of you may be aware, we provide a free to use website that provides an integrated view of the Companies Act, LODR and IB code. [Read more...](#)

Compliance calendar

Due dates for Professional tax, Goods and Service Tax, Companies Act, 2013 among others has been captured for your ready reference. [View the list...](#)

Gist of Regulatory Changes in Companies Act, 2013, SEBI (LODR), 2015 and Insolvency & Bankruptcy Code, 2016 in the month of November, 2019



Seventeen Regulatory changes in Companies Act, 2013, SEBI (LODR), 2015 and Insolvency & Bankruptcy Code, 2016 were made in the month of November.

[View the list...](#)

Tech 4 Company Sec

General Data Protection Regulation for Company Secretaries (GDPR 4 CS)



By Shankar Jaganathan

Discretion is essential in dealing with both confidential information and personal information, with the former belonging to the professional domain and the later in the moral /social domain. [Read more...](#)

BUT: BLISS Useful Tips for the Month

BUT#95: [Store financial year related important documents in user defined folder](#)

BUT#96: [Store Voting Records of Circular Resolution received from Directors](#)

BUT#97: [Get bookmarks for Meeting Agenda Titles in Agenda/Minutes PDF download](#)

BUT#98: [Provision to circulate Meeting Agenda with Inline Attachments](#)

What's new in BLISS?

In BLISSPLUS and BLISSLISTED:

1. Bookmarks in Agenda PDF files
2. Inline attachment option
3. Preview and Edit function
4. Ease in accessing files uploaded in Past Records

In BLISS, BLISSPLUS and BLISSLISTED:

1. Report generation for all the Statutory Registers
2. Replicating Circular Resolutions
3. Call back of triggered Actions for deleted Agenda items

[Read more...](#)

Editorial

The Report of the Company Law Committee on further recategorization of certain criminal compoundable offences to civil wrongs of November 14th is a welcome step in promoting Ease of Doing Business. Its impact on enhancing compliance regime in the corporate world depends on the certainty with which violations are identified and promptly penalized. The simultaneous move to introduce www.mcacms.gov.in to automate the process of issuing show cause notice and capturing the response to the same is a welcome step. The two, combined can certainly enhance both the Ease of Doing Business and enhanced compliance in the corporate sector laying a strong foundation for sustained economic growth and prosperity by eliminating the risk for corporate scandals.

In the seventh article of our [Tech 4 Company Sec](#) series, we have covered **GDPR** (General Data Protection Regulation), a critical concept in the digital world of social and commercial interactions. Giving its potential for large disruptions with the huge penalties proposed, we believe Company Secretaries need to consciously consider the implications of this new Bill as they adopt automation in their companies and firms. Trust this article provides a starting point for their assessment.

Our other regular features –**What is Hot in Company Law, Gist of Changes in the Companies Act, 2013, SEBI (LODR), 2015 and Insolvency & Bankruptcy Code, 2016** and **Statutory Compliance Calendar** are also included in this Issue.

Please share your feedback on this newsletter with us at contact@cimplyfive.com. We look forward to your feedback with interest and as ever, strive to improve the quality of everything we do.

Happy reading,
Shankar Jaganathan
Editor of iComply
December 5, 2019

OPINION:

What is Hot in Company Law?

As many of you may be aware, we provide a free to use website that provides an integrated view of the Companies Act, LODR and IB code. Over the last three years, this site has generated good traction with 3500+ individuals registering for getting updates and attracts around 3000 users viewing around 6000 pages a day, every working day to be more precise. As professionals take a break during the weekend, the website viewership is also lower; more pronounced on Sundays, than on Saturdays.

Listing of the most viewed sections in the Companies Act for the month of November 2019 based on visitors to our free to use website www.ca2013.com.

Company Law Top 5 Chartbuster sections in November 2019

Rank Oct	Change in Rank	Rank Nov	Section reference	Section title
3	↑	1	188	Related party transactions
New	↑	2	135	Corporate Social Responsibility
2	↓	3	134	Financial Statement, Board's report, etc.
4	↔	4	186	Loan and investment by company
1	↓	5	130	Re-opening of accounts on court's or Tribunal's orders

Section 135 is the new entrant in the top 5 list. It replaced Section 139.

LODR Top 5 Chartbuster Regulations in November 2019

Rank Oct	Change in Rank	Rank Nov	Regulation reference	Regulation Title
1	↔	1	30	Disclosure of Events or Information
2	↔	2	33	Financial Results
New	↑	3	23	Related party transactions
4	↔	4	17	Board of Directors
New	↑	5	29	Prior Intimations

Regulation 23 and 29 are new entrants for the month. They replace Regulation 40 and 44.

IB Code Top 5 Chartbusters in November 2019

Rank Oct	Change in Rank	Rank Nov	Section reference	Section Title
1	↔	1	5	Definitions
3	↑	2	59	Voluntary liquidation of corporate persons
New	↑	3	9	Application for initiation of corporate insolvency resolution process by operational creditor
New New 2	↑ ↑ ↓	4 - -	7 30 12	Initiation of corporate insolvency resolution process by financial creditor Submission of resolution plan Time-limit for completion of insolvency resolution process
-	-	5	-	

Section 7, 9 and 30 are new entrants. They replaced Sections 21 and 23.

Tech 4 Company Sec**General Data Protection Regulation for Company Secretaries (GDPR 4 CS)**

By Shankar Jaganathan

Discretion is essential in dealing with both confidential information and personal information, with the former belonging to the professional domain and the later in the moral /social domain. Till recently, only breach of confidential information was in the legal domain attracting hefty penalties enforced by courts of law as they diluted business advantages.

However, in recent years, breach of personal information too has extended beyond the moral or social domain and entered the law courts, with its breach bringing companies like Facebook and Google to law courts facing suits for large damages of €3.9 billion and €3.7 billion respectively in Europe. Max Schrems, the Austrian privacy campaigner sued these

companies in May 2018 for using “all or nothing” choice by asking their users to check a small box for allowing them access to services. This he alleged was in clear violation of the European GDPR requirements that provides users control over the store or use of their personal information.

Data Protection in India

The advent of mobile connectivity in India combined with the wide-spread prevalence of social media, Internet banking and e-commerce has resulted in availability of personal information that can result in potential misuse by people accessing it. In India too, instances of misuse of personal information resulted in an amendment to the Information Technology Act, 2000, in 2008 to include two sections, 43A and 72A, both drafted with the intent of protecting misuse of personal information.

- Section 43A contains the provision for compensating the person whose data is misused. It requires those collecting the data to implement and maintain reasonable security practices and procedures to prevent misuse of sensitive personal data or information and provides compensation of a maximum of Rs. 5 crores to the person affected by its misuse, i.e. wrongful loss to the person or wrongful gain by the person misusing the data.
- Section 72A contains the provision for penalizing the person who has caused the misuse of data. It provides for imprisonment for a period up to three years and/or a fine up to Rs. 500,000/- to a person who causes wrongful loss or wrongful gain by disclosing personal information of another person, without their consent while providing services under the terms of lawful contract.

Following the global trends, India too has proposed the Bill “The Personal Data Protection Bill, 2018” which too protects personal data from being misused. In line with the European GDPR requirements, Indian law also provides for limiting the purpose at the time of collection, lawful

processing, processing personal data based on consent, right to confirmation and access, right to be forgotten, security safeguards in dealing with personal data and the designation of a Data Protection Officer who is responsible for ensuring data protection. The Bill also provides exemption from these regulations where data is used for research, archiving or statistical analysis and journalistic, personal and domestic purposes.

The penal provisions contained in the Bill are quite stiff and operate at two levels. At the lower level, the penalty may extend up to Rs.5 crores or 2% of the worldwide turnover in the previous financial year of the entity violating the bill and at the higher end, Rs.15 crores or 4% of the worldwide turnover.

GDPR for Company Secretaries

The Personal Data Protection Bill, 2018 defines 'personal data' as data about a natural person and hence it does not cover the data pertaining to legal entities like companies.

However, as the company stores data pertaining to natural persons, and includes data of personal nature capable of identifying natural person, Company Secretaries need to exercise caution in dealing with data pertaining to natural persons in the course of their work. Further where they store personal data, they or their IT team should ensure that the personal data stored by them have the privacy protected by design. At the highest level of protection for Personal Identifiable Information is **ISO 27018 Certification**.

We at CimplyFive are glad to share with you, that **BLISS** and its variants have **ISO 27018** certification with the scope "Protection of Personally Identifiable Information (PII) in BLISS and its variants hosted in the cloud environment." Company Secretaries using BLISS and its variants can be rest assured that the personal information stored by your company is privacy protected by design.

Board Leaders Integrated Software Solutions



BLISS is a Cloud hosted software that automates the routines, provides an e-repository, timely alerts and a real-time dashboard, all aimed at ensuring compliance and good corporate governance. By doing so, it provides complete peace of mind to the Board of Directors and assurance to professionals by providing them with real-time compliance status with respect to the Companies Act,2013

BLISSPLUS

An advanced variant of BLISS with multiple premium features like Directors view, facility to store past Secretarial records, automated compliance tracker for size based compliance under the Companies Act,2013

BLISS LISTED

An advanced variant of BLISSPLUS for Listed Companies with Companies Act,2013 and SEBI's LODR 2015 compliances integrated to provide a single point compliance automation, risk manager & e-repository for secretarial records including past secretarial records.

BLISSGLOBAL

BLISSGLOBAL for Global Corporate Secretarial teams which helps in handling compliances for companies incorporated across the world by providing Risk Management DashBoard, activity tracker and e-repository of secretarial records.

BLISSDOCS

An Android/IOS based Board app for Directors which provides secure access to Board documents on Tablets/mobile phones, enhancing Directors productivity and making the Board meetings efficient & effective



CAIRR is a free to use website from CimplyFive that provides at your fingertips, an integrated view of the Companies Act, 2013, IB Code, 2015 and LODR, 2015. The site and app is updated daily at 10AM for changes in the Act & Regulations. For more details, please visit www.ca2013.com

Compliance Calendar

December 7th	TDS payment for November
December 10th	Monthly return to be filed by the persons required to deduct TDS under the GST- GSTR 7
December 15th	Pay PF contribution for November
	ESIC payment for November
December 20th	GST Payment for November - GSTR 3B
	Professional Tax payment
December 25th	PF Return for month of November
December 31st	GST Annual Return GSTR-9 (2017-2018)
	Annual return by taxpayers opted for the Composition Scheme under GST for a particular financial year GSTR-9A (2017-2018)
	Reconciliation Statement & Certification GSTR-9C (2017-2018)

Gist of regulatory changes in Companies Act, 2013, SEBI (LODR), 2015, SEBI (PIT), 2015 and Insolvency & Bankruptcy Code, 2016 in the month of November, 2019

- **01.11.2019**

- [NSE to accept XBRL forms filed with MCA, under Regulation 34 of SEBI \(LODR\), 2015, aiding in elimination of duplication of efforts by Listed Entities](#)

To eliminate redundancy NSE now allows Listed Entities to upload the XBRL Form filed with MCA to comply with the provision to file Annual Report in XBRL mode under Regulation 34. NSE has also detailed out the steps in this connection in the circular.

- **05.11.2019**

- [SEBI Circular on Enhanced Due Diligence for Dematerialization of Physical Securities](#)

SEBI vide this circular has directed the Depositories and the listed companies / RTAs to implement the following enhanced due diligence process in order to augment the integrity of dematerialization requests:

1. All Listed companies or their RTAs shall provide data of their members holding shares in physical mode as on March 31, 2019, to the Depositories by December 31, 2019.
 2. Depositories shall capture the relevant details from the static database and put in place systems to validate dematerialization requests received after December 31, 2019.
 3. In case of mismatch of any details like name on the share certificate, name of the beneficial owner of demat account, the depository system shall generate an alert. For such instances of mismatch, additional documents shall be sought, namely:
 - i. Copy of Passport
 - ii. Copy of legally recognized marriage certificate
 - iii. Copy of gazette notification regarding change in name
 - iv. Copy of Aadhar Card
 4. For instances of complete mismatch of the details, the applicant may approach the Issuer company / RTA for establishing his ownership.
- **15.11.2019**

- [IBBI notifies sections pertaining to personal guarantors to Corporate Debtors](#)

Sections namely 2(e), 78 (except w.r.t fresh start process), 79, 94 to 187, 239(2)(g) to 239(2)(i), 239(2)(m) to 239(2)(zc) , 240(2)(zs) to 240(2)(zn) and 249, in so far as they relate to personal guarantors to Corporate Debtors, shall come into effect from 1st December, 2019.

- [IBBI notifies rules under IBC, 2016 for resolution of Personal Guarantors to Corporate Debtors](#)

Through introduction of Insolvency and Bankruptcy (Application to Adjudicating Authority for Bankruptcy Process for Personal Guarantors to Corporate Debtors) Rules, 2019 and Insolvency and Bankruptcy (Application to Adjudicating Authority for Insolvency Resolution Process for Personal Guarantors to Corporate Debtors) Rules, 2019, IBBI lays out the detailed procedure for applications to be filed by Personal Guarantor/Creditor to initiate the bankruptcy and insolvency process under the aforesaid Rules. The rules also specify the procedure for appointment of Insolvency Resolution Professional, along with formats for various forms and notices to be filed/issued during the resolution process. These rules shall come into effect from 1st December, 2019.

➤ [IBBI notifies rules under IBC, 2016 for resolution of Financial Service Providers](#)

Through introduction of Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019, IBBI lays out the insolvency proceedings procedure to be adopted in case of defaulting Financial Service Providers (FSPs). The rule indicates the constitution of Advisory Committee, who may advise the Administrator in-charge of the defaulting FSP, who would be appointed by the Adjudicating authority. The Adjudicating authority shall appoint the Administrator based on the proposal received from the Appropriate Regulator, in Form 1 as defined under the said Rules. The Administrator, upon submitting written consent in Form 2, shall then take control and custody of third-party assets or properties in custody or possession of the FSP. The Rule also provides for Moratorium and Resolution Plan time frames to be adhered with by the administrator.

● **18.11.2019**

➤ [The Companies \(Meetings of Board and its Powers\) Second Amendment Rules, 2019](#)

Rule 15 is amended to relax the monetary restrictions to enter into contracts or arrangements with Related Parties subject to passing a member's resolution. Accordingly, member resolution is not required for transactions like sale, purchase or supply of any goods or materials, leasing of property and availing or rendering of any services, if transaction value does not exceed 10% of the company's turnover and for selling or disposing of or buying property if transaction value does not exceed 10% of the company's net worth. The upper limits of 100 Crores and 50 Crores respectively on these Related Party Transactions is omitted.

➤ [Threshold limits and Appropriate Regulator notified for resolution of Financial Service Providers under IBC, 2016](#)

Central Government has notified that Non-banking finance companies (which include housing finance companies) with asset size of Rs.500 crore or more, as per last audited balance sheet, shall fall under the definition of Financial Service Provider specified in Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019. Further, RBI shall be the appropriate regulator under the said Rules.

● **19.11.2019**

[Labs established under Dept of Biotechnology added to Schedule VII dealing with CSR Contribution under the Companies Act, 2013](#)

As per this corrigendum, contribution to National Laboratories and Autonomous Bodies, established under the auspices Department of Biotechnology (DBT) would also be treated as CSR Contribution under clause (ix) of Schedule VII.

● **20.11.2019**

➤ [Detailed procedure on Bankruptcy Process for Personal Guarantors to Corporate Debtors introduced through Insolvency and Bankruptcy Board of India \(Bankruptcy Process for Personal Guarantors to Corporate Debtors\) Regulations, 2019](#)

Following the introduction of procedure for application to adjudicating authority for Bankruptcy Process for Personal Guarantors to Corporate Debtors, detailed procedure with respect to appointment of bankruptcy trustees, conduct of meetings and distribution of realised proceeds have been notified through the aforesaid regulation. Formats for Written Consent to act as Bankruptcy Trustee, Appointment of Proxy for voting on behalf of the creditor have been specified in the said notification along with schedules for Payment to be made to Bankruptcy Trustee and for Sale of Assets through Auction/Private Sale.

➤ [Detailed procedure on Insolvency Resolution Process for Personal Guarantors to Corporate Debtors introduced through Insolvency and Bankruptcy Board of India \(Insolvency Resolution Process for Personal Guarantors to Corporate Debtors\) Regulations, 2019](#)

Following the introduction of procedure for application to adjudicating authority for Insolvency Process for Personal Guarantors to Corporate Debtors, detailed procedure with respect to appointment of insolvency resolution professionals, conduct of meetings and devising of repayment plan have been notified through the aforesaid regulation. Formats for Written Consent to act as Resolution Professional, Submission of Claim by Creditors, Appointment of Proxy for voting on behalf of the creditor have been specified in the said notification.

- **21.11.2019**

[Disclosure of default in payment of interest/installments on Loans from Banks and Financial Institutions by Listed Entities with effect from 1st January, 2020](#)

SEBI mandates the disclosure by entities that have listed specified securities (equity and convertible securities), Non-Convertible Debt (NCDs), Non-Convertible Redeemable Preference Shares (NCRPS), in the specified formats, in accordance with the below time frames –

Any 'default', as defined in the said circular,-

- in case of loans including revolving facilities like cash credit, from banks / financial institutions, continuing beyond 30 days, shall be disclosed within 24 hours from the 30th day of such default
- in case of unlisted debt securities i.e. NCDs and NCRPS, the disclosure shall be made within 24 hours from the occurrence of the default

In addition to the disclosure made for each instance of default, the listed entities should also make quarterly disclosures, within 7 days from the end of each quarter, if on the last date of any quarter, there is any:

- loan including revolving facilities like cash credit from banks / financial institutions where the default continues beyond 30 days (or)
- outstanding debt security under default.

- **27.11.2019**

➤ **[General Circular extending the last date to file Form NFRA-2](#)**

MCA vide this Circular has extended the last date to file Form NFRA-2 (i.e., Annual Return to be filed by Auditor with the National Financial Reporting Authority) from 30th November to 90 days from the date of deployment of this form on the website of National Financial Reporting Authority.

➤ **[IBBI amends Insolvency and Bankruptcy Board of India \(Insolvency Resolution Process for Corporate Persons\) Regulations, 2016](#)**

Through this notification, following key provisions are amended in the aforesaid Regulation:-

- Guidelines for Voting by Authorised Representative, acting on behalf of Financial Creditors is inserted.
- Insolvency Resolution Plan to consider "restructuring of the corporate debtor, by way of merger, amalgamation and demerger", as one of the possible resolution measures in maximizing the value of assets of the Corporate Debtor while devising its resolution plan.
- Payment under Resolution Plan shall be paid on priority, only next to Operational Creditor, to Financial Creditors, who are eligible to vote under Section 21(2) of the IB Code, 2016 and didn't vote in favour of the resolution plan over the Financial Creditors who voted in favour of the resolution plan.
- Timeline and penalty for delayed filing of forms IP-1 (Pre-assignment), CIRP 1 (From Commencement of CIRP till Issue of Public Announcement), CIRP 2 (From Public Announcement till confirmation / replacement of IRP), CIRP 3 (From Appointment of RP till issue of Information Memorandum (IM) to Members of CoC), CIRP 4 (From Issue of IM till issue of RFRP), CIRP 5 (From Issue of RFRP till completion of CIRP), CIRP 6 (Event Specific filings specified in the said notification under IBC, 2016) shall be filed by the insolvency professional or interim resolution professional or resolution professional, as the case may be, in IBBI's electronic platform.
- Formats of Form B (Proof of Claim by Operational Creditors except Workmen and Employees) and Form H (Compliance Certificate) have been revised as specified in the said notification.

➤ **[Corrigendum to Insolvency and Bankruptcy \(Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority\) Rules, 2019](#)**

As per this Corrigendum, words "Financial Creditor" are replaced with "Appropriate Regulator" in Part-IV (Particulars of Default) of Form 1 of the said rule dealing with Application by Appropriate Regulator to Initiate Insolvency Resolution Process under the Code.

- **28.11.2019**

- [Extension of time for filing of Financial Statements for the FY 2018-19 for companies falling under UT of J&K and Ladakh jurisdiction](#)

Due date for filing of e-Forms AOC-4, AOC-4(CFS), AOC-4(XBRL), and MGT-7 by the companies falling under the jurisdiction of Union Territory of Jammu and Kashmir and Ladakh, has been extended from 30/11/2019 (for e-Forms AOC-4, AOC-4(CFS), AOC-4(XBRL) and 31/12/2019 (for e-form MGT-7) to 31/01/2020 without any levy of additional fee.

- [Due date for submission of Form PAS-6 on Half-yearly Reconciliation of Share Capital Audit Report by unlisted companies](#)

Due date for filing e-Form half-yearly return PAS-6 on reconciliation of share capital audit report under Rule 9A(8) of the Companies (Prospectus and Allotment of Securities) Rules, 2014, by unlisted companies for the half year ended 30/09/2019 has been extended from 29/11/2019 to 60 days from the date of deployment of the said form in MCA website.

- [Insolvency Professionals to act as Interim Resolution Professionals, Liquidators, Resolution Professionals and Bankruptcy Trustees \(Recommendation\) Guidelines, 2019](#)

This Guideline replaces 'the Insolvency Professionals to act as Interim Resolution Professionals and Liquidators (Recommendation) Guidelines, 2019' dated 14th May, 2019 and shall be effective from 1st January, 2020.

The revised guidelines intend to avoid administrative delays from the Insolvency Board in recommending the name of Insolvency Professional (IP) to Adjudicating Authority to be appointed as Interim Resolution Professionals, Liquidators, Resolution Professionals and Bankruptcy Trustees by providing for setting up a Panel of IPs.

This panel will be formed by the Board based on the expression of interest submitted by IPs in Form A, and have a validity of six months, after which a new panel will be constituted. The Adjudicating Authority may pick up any name for appointment from the Panel, where eligible IPs will be selected based on their score according to the volume of their ongoing assignment.

What's new in BLISS?

In BLISSPLUS and BLISSLISTED:

1. **Bookmarks in Agenda PDF files:** The Board Meeting Agenda Index or Agenda titles that is generated using token templates will now be available as bookmarks in PDF file. This feature helps in **navigating between agenda items easily**.
2. **Inline attachment option:** The users (i.e., the Secretarial team) now have an option to send the attachments/supporting documents for resolutions of the Board and the Sub-Committee Meetings by positioning it immediately after a particular Agenda item to which it relates or at the end of the Agenda document, when they share it with the Directors. This feature enables the director to **navigate to a specific resolution or attachment in a single click**.

Note: This feature is available only when Token templates are used to generate the Agenda.

3. **Preview and Edit function:** The users will now have the provision to see Notice of Shareholder Meeting and Minutes of Board and Sub-Committee Meeting as a single document and make edits, create multiple versions, add comments, print etc., in preview mode. The previewer will also have an option to either accept or reject the edits made to the document. Any version of the document created by the users can be finalized and updated to BLISS from preview mode. This feature **makes BLISS more useful and complete** for the secretarial team.
4. **Ease in accessing files uploaded in Past Records:** All the users will now be able to view the files from past records right on the browser instead of downloading it in their device for viewing. Further 'Viewer' will be restricted from downloading any files from Past Records module. This feature **enhances ease of access** to documents and at the same time enhances security by restricting download of company's confidential data.

In BLISS, BLISSPLUS and BLISSLISTED:

1. **Report generation for all the Statutory Registers:** This module will enable the user to generate a report in excel format as on a particular date and for selected fields from the Statutory registers maintained in BLISS. This feature **enhances the productivity** of the Secretarial team.

2. **Replicating Circular Resolutions:** Now the user can replicate the Circular Resolutions of Board and Sub-Committees by a click of button both for the same company and from one company to another. This feature **eliminates duplication and enhances productivity** of the Secretarial team.
3. **Call back of triggered Actions for deleted Agenda items:** BLISS can now disable the Registers, Returns and Action Trackers that is triggered on finalizing an agenda when the respective agenda item to which the related triggers is deleted. This feature helps in handling compliances for exceptional cases wherein an agenda item is not removed and thereby **makes BLISS comprehensive**.

About CimplyFive

Vision

Leverage research and technology to eliminate procedural non-compliance risk for entities regulated by the Indian Companies Act, 2013.

Mission

Provide a cost-effective, secure web-based, menu driven, subscription services that provides curated resolutions, timely alerts and informative dashboards to free the management bandwidth for pursuing business goals



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