



**AKC STEEL INDUSTRIES LTD.**



# Annual Report 2020-2021

**AKC STEEL INDUSTRIES LIMITED****CORPORATE INFORMATION**

- BOARD OF DIRECTORS** : Mr. Mukesh Chand Bansal, Non-executive Director  
Mr. Ashok Kumar Bansal, Wholetime Director  
Mr. Manav Bansal, Non-executive Director  
Mr. Bhal Chandra Khaitan, Independent Director  
Ms. Shyanthi Dasgupta, Independent Woman Director  
Mr. Bharat Kumar Nadhani, Independent Director
- BANKERS** : Yes Bank Ltd.  
State Bank of India
- COMPANY SECRETARY** : Ms Debolina Karmakar
- STATUTORY AUDITORS** : M/s. S. Jaykishan & Co.  
Chartered Accountants
- SECRETARIAL AUDITORS** : Mr. Santosh Kumar Tibrewalla  
Practising Company Secretary
- REGISTERED OFFICE** : 'Lansdowne Towers'  
2/1A, Sarat Bose Road,  
4th Floor, Kolkata: 700 020  
Tel: (033) 4060 4444  
Fax: (033) 2283 3322  
Email: [contact@akcsteel.com](mailto:contact@akcsteel.com)  
Web: [www.akcsteel.com](http://www.akcsteel.com)
- REGISTRAR & SHARE  
TRANSFER AGENT** : M/s. Maheshwari Datamatics Pvt. Ltd.  
23 R.N. Mukherjee, 5th Floor,  
Kolkata - 700 001  
Phone: (033) 2243-5029/5809  
Fax : (033) 22484787  
Email: [mdpldc@yahoo.com](mailto:mdpldc@yahoo.com)
- MACHINE SHOP/STOCKYARD** : Plot No. 42, 43A, Block-D,  
Autonagar Yard,  
Visakhapatnam: 530 012  
Andhra Pradesh  
Tel: (0891) 2511 595

## **DIRECTORS' REPORT TO THE MEMBERS**

Dear Members,

Your Directors hereby presents you the **48th (Forty Eighth) Annual Report** on the business and operations of your Company along with the audited accounts of the Company fur the year ended 31st March 2021:

### **FINANCIAL RESULTS**

(Rs in lakhs)

Particulars	Financial Year 2020-21	Financial Year 2019-20
Revenue from Operations	576.88	321.12
Other Income	104.16	110.47
Profit for the Year before Interest, Depreciation & Tax	497.48	269.80
Interest	15.61	26.35
Depreciation	63.06	70.01
Profit / (Loss) Before Taxation	418.81	173.44
Provision for Tax	117.96	23.33
Income Tax adjustments	(1.56)	0.33
Gratuity /Leave Provisions	-	-
Provision for Tax-Deferred Tax	(1.61)	13.88
Net Profit / (Loss) for the Year	304.02	135.90
Balance of Profit for the Previous Year	465.34	329.44
Balance available for appropriation	769.36	465.34
Additional Depreciation	-	-
Balance carried forward to next year	769.36	465.34

### **RESULTS OF OPERATIONS**

Revenue from operations of the Company for FY 2020-21 stood at Rs. 681.04 Lakhs against revenue of Rs. 431.60 Lakhs as reported during the previous year. The EBIDTA has been increased to Rs. 497.48 Lakhs against an EBIDTA of Rs. Rs. 269.80 Lakhs as compared to previous year. The net profit after tax during the year was Rs.304.02 Lakhs as against a net profit of Rs. 135.90 Lakhs in the previous Year. In the current year under review the turnover of your Company has increased due to increase in machining work on various jobs.

Your Company is focusing mainly on various machining jobs, i.e. Milling, Turning, Sawing of various products for the Engineering industries. The Company also proposes to add further equipment to match the growing demand of its services in the future which will boost its topline in the coming years.

### **DIVIDEND**

Your Directors do not recommend any dividend for the financial year 2020-21 and kept the retained earnings for the benefit of the Company and enhance the value of the shares of the Company.

Your Company has already transferred equity shares to Investor Education Protection Fund (IEPF) of those shareholders, who had not claimed dividend for a period of 7 years with effect from the F.Y. 2009-10, as per the IEPF Rules notified by the Central Govt. from time to time. Your Company also in the process to transfer the equity shares of those shareholders, who had not claimed dividend for a period of 7 years with effect from the F.Y. 2010-11, as per the IEPF Rules notified by the Central Govt. from time to time.

The Register of Members and Share Transfer Books of the Company will remain closed from **Tuesday, 21st September, 2021 to Monday, 27th September, 2021** (both days inclusive) for the purpose of the Annual General Meeting.

### **SHARE CAPITAL**

The paid up equity capital as on March 31, 2021 was Rs. 415.00 Lakhs comprising of 41,50,000 equity shares of Rs.10/- each. Your Company has not issued any equity shares, equity shares with differential rights, Sweat equity shares, Employees' Stock Options and did not purchase its own shares. Hence there is no information to be provided as required under Rule 4(4), Rule 8(13), Rule 12(9) and Rule 16(4) of the Companies (Share Capital and Debentures) Rules, 2014 and Section 62 of the Companies Act 2013, respectively.

**FINANCE**

The company continues to focus on judicious management of its Working Capital, Receivables, Inventories and other working capital parameters were kept under strict check through continuous monitoring.

**DEPOSITS**

Your Company has not accepted any deposits during the year, no deposits remained unpaid or unclaimed as at the end of the year 31st March, 2021 and there was no default in repayment of deposits or payment of interest thereon during the year within the meaning of Section 73 of the Companies Act, 2013 and the Companies (Acceptance of Deposits) Rules, 2014.

**TRANSFER TO RESERVE**

The Company has not transferred any amount to the General Reserves for the financial year ended 31st March, 2021.

**PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS:**

During the period under review, the Company has not given any loans/ guarantees/ made investment.

**INTERNAL FINANCIAL CONTROLS**

The Company has implemented and evaluated the Internal Financial Controls which provide a reasonable assurance in respect of providing financial and operational information, complying with applicable statutes and policies, safeguarding of assets, prevention and detection of frauds, accuracy and completeness of accounting records.

The Company has in place an adequate and robust system for internal financial controls commensurate with the size and nature of its business. Internal control systems are integral to the Company's corporate governance policy and no reportable material weaknesses were observed in operations.

The Audit Committee of the Company evaluated the adequacy of internal financial control. During the year such controls were tested with reference to financial statements and no reportable material weakness in the formulation or operations were observed. The Statutory Auditors of the Company conducted audit on the Company's internal financial control over financial reporting and the report of the same is annexed with Auditor's Report.

**CORPORATE SOCIAL RESPONSIBILITY INITIATIVES**

The present financial position of the Company does not mandate the implementation of CSR activities pursuant to the provisions of Section 135 and Schedule VII of the Companies Act, 2013.

**EXTRACT OF ANNUAL RETURN**

The details forming part of the copy of the Annual Return of the Company as provided under section 92(3) of the Companies Act, 2013 and Rule 12 of the Companies (Management and Administration) Rules, 2014 in Form MGT-9 is attached to this report and marked as 'Annexure - A' and is available at the website of the Company.

**NUMBER OF MEETINGS OF THE BOARD**

The Board of Directors met 4 (Four) times during the year and the maximum interval between two meetings did not exceed 120 days. The intervening gap between the meetings was within the period prescribed under the Companies Act, 2013 and the SEBI Listing Regulations. The details of the number of meetings of the Board held during the financial year 2020-21 is detailed in this report.

**ENERGY CONSERVATION, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO**

Information in accordance with the provisions of Section 134(3)(m) of the Companies Act, 2013, read with rule 8(3) of the Companies (Accounts) Rules, 2014 regarding conservation of energy, technology absorption are not required to be given as the operation of unit has been closed since the year 2012. There is no foreign exchange earnings and outgo during the year under review. The Company has not undertaken any Research & Development activities during the year under review.

**DIRECTORS' RESPONSIBILITY STATEMENT**

As required by Section 134(3) (c) & 134 (5) of the Companies Act, 2013 your Directors state that:

- (a) in the preparation of the annual accounts for the year ended 31st March, 2021, the applicable accounting standards have been followed with proper explanation relating to material departures, if any;

- (b) the accounting policies adopted in the preparation of the annual accounts have been selected and applied consistently except as otherwise stated in the Notes to Financial Statements and reasonable and prudent judgments and estimates have been made so as to give a true and fair view of the state of affairs of the Company at the end of the Financial Year 2020-21 and of the profit for the year ended 31st March, 2021;
- (c) proper and sufficient care has been taken for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013, for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;
- (d) the annual accounts for the year ended 31st March, 2021, have been prepared on a going concern basis;
- (e) proper internal financial controls were in place and that the internal financial controls were adequate and were operating effectively;
- (f) proper systems to ensure compliance with the provisions of all applicable laws were in Place and were adequate and operating effectively.

#### **DECLARATION BY INDEPENDENT DIRECTORS**

The Company has received necessary declaration from each Independent Director of the Company under Section 149 (7) of the Companies Act, 2013 that the Independent Directors of the Company meet with the criteria of their Independence laid down in Section 149 (6) of the Companies Act, 2013 and Regulation 16(1)(b) of SEBI Listing Regulation.

#### **COMPANY'S POLICY ON DIRECTORS' APPOINTMENT AND REMUNERATION**

Pursuant to provisions of Section 178 of the Companies Act, 2013 and the SEBI (LODR), Regulations, 2015, the Board of Directors of the Company, based on the recommendation of the Nomination and Remuneration Committee, has formulated a Remuneration Policy.

The remuneration policy of the Company, inter alia, includes the aims and objectives, principles of remuneration, guidelines for remuneration/sitting fees to Executive Directors and Non-Executive Directors, fixed and variable components in the remuneration package, criteria for identification of the Board Members and appointment of senior management.

#### **RELATED PARTY TRANSACTIONS**

All transactions entered with related parties during the financial year 2020-21 are on arm's length basis and were in the ordinary course of business and hence not falling under the provisions of Section 188 of the Companies Act, 2013 except for lease of property which is not in ordinary course of business for which necessary approvals from the Members had been taken earlier. There have been no other materially significant related party transactions with the Company's Promoters, Directors and others as defined in Section 2(76) of the Companies Act, 2013, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which may have potential conflict with the interest of the Company at large.

The necessary disclosures regarding the transactions as required in Form AOC 2 are given in the notes to accounts. The Company has also formulated a policy on dealing with the Related Party Transactions and necessary approval of the Audit Committee and Board of Directors were taken wherever required in accordance with the Policy. The Company has not entered into any specific contract with related parties.

#### **RISK MANAGEMENT**

Your Company has built a robust risk management framework over the years. The Company has a robust Risk Management framework to identify, evaluate business risks, and opportunities. This framework seeks to minimize adverse impact on the business objectives and enhance the Company's competitive advantage. The framework also defines the risk management approach across the enterprise at various levels. Risk Management forms an integral part of the Company's planning process.

#### **BOARD EVALUATION & CRITERIA FOR EVALUATION**

Pursuant to the provisions of the Companies Act, 2013 and SEBI (LODR) Regulations, 2015 the Board carried out an annual performance evaluation of its own performance, the individual Directors as well as the working of the Committees of the Board. The performance evaluation of the Independent Directors was carried out by the entire Board. The performance evaluation of the Chairman and the Non- Independent Directors was carried out by Independent Directors. Details of the same are given in the Report on Corporate Governance annexed hereto.

**DIRECTORS AND KEY MANAGERIAL PERSONNEL****I) Directors-Retirement by Rotation**

In accordance with the provisions of the Act and the Articles of Association of the Company, Mr. Manav Bansal (DIN: 00103024), retires by rotation from the Board at the ensuing Annual General Meeting and being eligible, offers himself for re-appointment.

**II) Appointment/ Re-appointment of Directors/ Executive Director**

The present terms of appointment of Mr. Ashok Kumar Bansal (DIN: 00283193) as Whole-Time Director had expired on 30th September, 2020. Based on the recommendation of the Nomination & Remuneration Committee (NRC) and pursuant to the performance evaluation and extensive involvement in the business and affairs of the Company, the Board of Directors at its meeting held on 12th November, 2020 has re-appointed Mr. Ashok Kumar Bansal as Whole-Time Director with effect from 1st October, 2020 for a period of 5 (Five) years pursuant to the of Sections 196, 197 and 198 read with Schedule V and all other applicable provisions of the Companies Act, 2013, the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 and Securities Exchange Board of India (Listing Obligation and Disclosure Requirements), Regulations, 2015 (including any statutory modification(s) or re-enactment thereof, for the time being in force) subject to the approval of members by special resolution in the ensuing Annual General Meeting ("AGM") of the Company.

The profile and particulars of experience, attributes and skills of the appointed/re-appointed / rotational Directors are disclosed in the Notice convening the ensuing AGM. In view of the provisions of Section 203 of the Companies Act, 2013, Mr. Ashok Kumar Bansal, Wholetime Director and Mr. R. Jagadeeswara Rao, Chief Financial Officer (CFO) & Ms. Debolina Karmakar, Company Secretary were identified and designated as Wholetime Key Managerial Personnel.

During the year under review, there was no change in the composition of the Board of Directors. None of the Directors of the Company are disqualified as per section 164(2) of the Companies Act, 2013 and rules made thereunder. The Directors have also made necessary disclosures to the extent as required under provisions of section 184(1) as applicable.

During the year under review, Mr. Harjeet Singh has resigned from the post of Company Secretary & Compliance Officer w.e.f. from 10.02.2021 and Ms. Debolina Karmakar has been appointed as a Company Secretary & Compliance Officer w.e.f. 03.03.2021 in place of the outgoing Company Secretary.

**DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS OR COURTS OR TRIBUNALS IMPACTING THE GOING CONCERN STATUS AND COMPANY'S OPERATIONS IN FUTURE**

No significant and material order has been passed by the regulators, courts, tribunals impacting the going concern status and company's operations in future.

**MATERIAL CHANGES THAT MAY AFFECT THE FIANANCIALS OF THE COMPANY**

There is no material changes made during the year that will affect the financial position of the Company except the matter of non-renewal of Lease with Visakhapatnam Post Trust (VPT) which was duly mentioned in earlier Annual Report (2018-19) as VPT has forcibly taken over and locked the Factory including the plant , machinery and other moveable assets and inventories on 13th March, 2019. The said matter has been sub-judice with the High Court at Amaravati, Andhra Pradesh. The Company has already filed two nos. of Writ Petitions one is to maintain status quo and another to prohibit the VPT to auction the plant & machinery of the Company lying in the factory. The Company has recently filed interlocutory application with the Hon'ble High Court to restrain VPT to move the materials lying inside the locked factory.

**VIGIL MECHANISM/WHISTLE BLOWER POLICY**

In compliance with provisions of Section 177(9) of the Companies Act, 2013 and SEBI Listing Regulation, 2015, the Company has framed a Vigil Mechanism/Whistle Blower Policy to deal with unethical behavior, actual or suspected fraud or violation of the company's code of conduct or ethics policy, if any. The Vigil Mechanism/Whistle Blower Policy has also been uploaded on the website of the Company and is available at <https://www.akcsteel.com/whistle-blower-policy.pdf>

The Audit committee oversees the vigil mechanism and the persons who avail the mechanism are encouraged to escalate to the level of the Audit Committee for any issue of concerns impacting and compromising with the interest of the Company and its stakeholders in any way. This policy also allows the direct access to the Chairperson of the Audit Committee.

**DETAILS RELATING TO REMUNERATION OF DIRECTORS, KEY MANAGERIAL PERSONNEL AND EMPLOYEES**

Disclosure pertaining to remuneration and other details as required under Section 197(12) of the Companies



Act, 2013 read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 is marked as 'Annexure - B' which is annexed hereto and forms part of the Directors' Report.

#### **PARTICULARS OF EMPLOYEES**

As required under provisions of the Companies Act, 2013 and Rule 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, particulars of the employees concerned forms a part of the Directors' Report. Having regard to the provisions of Section 136 of the Companies Act, 2013, the Annual Report excluding the aforesaid information is being sent to the members of the Company. Any member interested in obtaining such particulars may write to the Company Secretary of the Company.

#### **COMPANY'S WEBSITE**

The website of your Company, [www.akcsteel.com](http://www.akcsteel.com), has been designed to present the Company's businesses up-front on the home page. All the mandatory information and disclosures as per the requirements of the Companies Act, 2013 and Companies Rules 2014 and as per the Listing agreement has been uploaded. The site carries a comprehensive database of information including the Financial Results of your Company, Shareholding pattern, Director's & corporate profile, details of Board Committees, Corporate Policies and business activities of your Company.

#### **AUDITORS & AUDITORS' REPORT**

##### **Statutory Auditors:**

The present Statutory Auditors, M/s. S. Jaykishan & Co., Chartered Accountants (Registration No. 309005E), continued to hold the office of Auditors until conclusion of Forty Ninth Annual General Meeting of the Company to be held in the year 2022. The notes on financial statement referred to in the Auditor's Report are self-explanatory and do not call for any further comments/explanation. The Statutory Auditors have not reported any incident of fraud to the Audit Committee of the Company in the year under review.

##### **Secretarial Auditors:**

In terms of Section 204 of the Companies Act, 2013 and the rules there under, the Board had appointed Mr. Santosh Kumar Tibrewalla, Practising Company Secretary (FCS 3811) to conduct Secretarial Audit of the Company for the Financial Year 2021-22. The Secretarial Audit Report for the Financial Year 2020-21 as provided by them is annexed to this Report, vide 'Annexure C'. The Report is self-explanatory and do not call for any further comments.

#### **CORPORATE GOVERNANCE**

Your Company has initiated, by providing the shareholders, to avail the option of receiving online the requisite documents i.e. notices, annual reports, disclosures and all other communications, by registering their e-mail Ids. For the success of 'Green Initiative' as per MCA circular no. 17/2011 & No. 18/2011.

The Company continues to comply with the requirements of SEBI Listing Regulations, 2015 regarding Corporate Governance. The Report on Corporate Governance together with a certificate from Mr. S. K. Tibrewalla, Practising Company Secretary (FCS 3811) regarding Compliance of Conditions of Corporate Governance, certification by M.D/CEO and CFO and the Management Discussion & Analysis Report are attached herewith which form part of this Annual Report.

#### **STOCK EXCHANGE LISTING**

The Equity Shares of your Company are listed on the Calcutta Stock Exchange Ltd. and the applicable annual listing fees have been paid to the Stock Exchange till financial year 2021-22.

#### **CODE OF CONDUCT**

The Code of Conduct for Directors, KMPs and Senior Executive of the Company is already in force and the same has been placed on the Company's website: [www.akcsteel.com](http://www.akcsteel.com).

#### **CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING**

In terms of the Regulation 8 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 your Company has adopted Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and the same is also placed on the Company's website: [www.akcsteel.com](http://www.akcsteel.com).

#### **MANAGEMENT DISCUSSION AND ANALYSIS REPORT**

The global growth contraction for 2020 is estimated at -3.5 percent, 0.9 percentage point higher than projected in the previous forecast (reflecting stronger-than-expected momentum in the second half of 2020) while the United Nations mid-2021 World Economic Situation and Prospects report pointed to the rapid vaccine rollout in a few large economies led by the U.S. and China and an increase in global trade in merchandise and

manufactured goods that has already reached its pre-pandemic level. The ongoing pandemic, COVID-19 has triggered the deepest global recession in Centuries.

As per United Nations forecast vaccination is probably the last resort to curb the pandemic as well as the number one issue to put the world economy on a steady path of recovery But it will become a lengthy time to get the entire population vaccinated. Day by day the pandemic is showing deadlier with new variants of Covid-19. The entire world is traumatized with the pandemic. While the ultimate outcome is still uncertain, the pandemic will result in contractions across the vast majority of emerging market and developing economies. It will also do lasting damage to labor productivity and potential output. COVID-19 has delivered an enormous global shock, leading to steep recessions in many countries.

India has implemented the most stringent nationwide lockdown measures in the world, bringing industrial operations to a standstill. Construction activity was halted entirely at the end of March, 2020 and recovery is expected to remain slow due to the slow return of labour. Supply chain disruption coupled with slower demand recovery will hit the automotive sector hard.

After a brief lull in 2020 pushed by the pandemic and the lockdown that affected all industries, the Indian steel industry is expected to bounce back to a robust growth phase in 2021. Steel is regarded as an essential commodity as it is the backbone of the manufacturing industry. Recovery in demand is already visible in the construction, automobile, and white goods segments. This is expected to continue in the first half of 2021 as pent-up demand will also be met.

The Company has exposure to variety of financial risks, i.e. credit risk, liquidity risk and market risk. The Company's primary risk management focus is to minimise potential adverse effects of market risk on its financial performance. The Company's risk management assessment and policies and processes are established to identify and analyse the risks faced by the Company, to set appropriate risk limits and controls, and to monitor such risks and compliance with the same. Risk assessment and management policies and processes are reviewed regularly.

#### **INTERNAL CONTROL SYSTEMS AND THEIR ADEQUACY**

The Company has put in place a proper and adequate system of internal controls, to ensure the safeguarding of assets and their usage, maintenance of proper records, adequacy and reliability of operational information is commensurate with the size, scale and complexity of its operations. The internal control is supplemented by an extensive audit by internal and external audit teams and periodic review by the top management, Audit Committee and Board of Directors. Internal audit department evaluates legal and compliance issues and supports in assessment of Internal Control Systems and identification of other important issues as a powerful tool for risk control and governance.

#### **HUMAN RESOURCES MANAGEMENT AND INDUSTRIAL RELATIONS**

Encouraging cordial working relation and maintaining good industrial relations have been the philosophy and endeavour of the HR Department. On the whole, industrial relation scenario has been good. Statutory compliances related to labour laws have been followed with due emphasis. There is a continuous effort for better Human Resource (HR) service delivery in order to better serve the customers with simpler well executed processes with proper use of technology. The organization has a mechanism to provide employees with feedback on a continuous basis. Based on the organization's strategic plan, HR planning processes map the capacity of the organization. The knowledge, skills and abilities of the employees are identified.

#### **DISCLOSURES AS PER APPLICABLE ACT, LISTING AGREEMENT AND SEBI LODR REGULATIONS, 2015:**

**i) Composition of Audit Committee:**

The Board has constituted the Audit Committee under the Chairmanship of Mr. Bhal Chandra Khaitan. Complete details of the Committee are given in the Corporate Governance Report, attached as Annexure to this Board's Report.

**ii) Post Balance Sheet events:**

There is no such event to be mentioned

**iii) Subsidiaries, Associates or Joint Ventures:**

Your Company does not have any subsidiaries, associates or joint ventures, during the year under review.

**iv) Evaluation of the Board's Performance:**

The Nomination and Remuneration Committee of the Board of Directors had laid down the criteria for evaluation of its own performance, the Directors individually as well as the evaluation of working of its various Committee(s).



**Evaluation Criteria :**

AUTHORITY FOR EVALUATION	TARGET PERSON FOR EVALUATION
<b>Nomination and Remuneration Committee (NRC)</b>	<b>All Directors (Individually), Board and Committees</b>
<b>Independent Directors' Meeting (IDs)</b>	<b>a. Non - Independent Directors ( Non- IDs);</b> <b>b. Chairperson (taking into account the views of executive &amp; Non-executive Directors);</b> <b>c. Board as a Whole ; and</b> <b>d. Committees of Board.</b>
<b>Board of Directors ( BOD)</b>	<b>Independent Directors (excluding participation of the ID being evaluated)</b>

During the year under review, the Board, in compliance with the Companies Act, 2013 and applicable Regulations of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, has continued to adopt formal mechanism for evaluating its performance and as well as that of its Committees and individual Directors, including the Chairman of the Board. The exercise was carried out through a structured evaluation process covering various aspects of the Boards functioning such as composition of the Board & Committees, experience & competencies, performance of specific duties & obligations, governance issues etc. A Separate exercise was carried out to evaluate the performance of individual Directors including the Board, as a whole and the Chairman, WTD who were evaluated on parameters such as their participation, contribution at the meetings and otherwise, independent judgements, safeguarding of minority shareholders interest, etc.

The evaluation of the Independent Directors was carried out by the entire Board and that of the Chairman and the Non-Independent Directors were carried out by the Independent Directors in their separate meeting held on 25th August, 2020.

The Directors were satisfied with the evaluation results, which reflected the overall engagement of the Board and its Committees with the Company.

**v) Nomination, Remuneration and Evaluation Policy:**

The Company on recommendation of its Nomination & Remuneration Committee has laid down a Nomination, Remuneration and Evaluation Policy, in compliance with the provisions of the Companies Act, 2013 read with the Rules made therein and the SEBI (LODR) Regulations, 2015. The details about formulation and framework have been mentioned in the Report of Corporate Governance.

**APPRECIATION**

The Board of Directors sincerely thanks and wishes to place on record its appreciation of the Government of India, State Governments of West Bengal & Andhra Pradesh, Promoters of the Company, Lenders and the Employees of the Company for their whole-hearted co-operation and unstinted support. The Directors want to express their deep-felt thanks and best wishes to all the shareholders for the continued support and the trust they have reposed in the Management. The Directors look forward to a better future and further growth of your Company.

**Registered Office:**

'Lansdowne Towers'  
4th Floor, 2/1A, Sarat Bose Road  
Kolkata - 700 020

Date: 13th August, 2021

**For and on behalf of the Board  
for AKC Steel Industries Ltd.**

Sd/-

**Ashok Kumar Bansal**

Whole Time Director  
(DIN : 00283193)

Sd/-

**Manav Bansal**

Director  
(DIN : 00103024)

**ANNEXURE-A TO DIRECTORS' REPORT**

Form No. MGT-9

**EXTRACT OF ANNUAL RETURN**

as on the financial year ended on March 31, 2021

[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the Companies (Management and Administration) Rules, 2014]

<b>I. REGISTRATION AND OTHER DETAILS</b>	
i) CIN	L27109WB1957PLC023360
ii) Registration Date	20-02-1957
iii) Name of the Company	<b>A K C Steel Industries Limited</b>
iv) Category / Sub-Category of the Company	Public Company / Limited by shares
v) Address of the Registered office and contact details	2/1A, Sarat Bose Road, Lansdowne Towers, 4th Floor, Kolkata-700020 Tel: +91 33 40604444 Fax: +91 33 22833322 Email: contact@akcsteel.com
vi) Whether listed company	Yes
vii) Name, Address and Contact details of Registrar and Transfer Agent, if any	<b>Maheshwari Datamatics Private Limited</b> 23,R.N. Mukherjee Road, 5th Floor Kolkata-700001 Tel: 033 22482248, 2243 5029 Fax: +91 33 2248 4787
<b>II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY</b> All the business activities contributing 10% or more of the total turnover of the company	As per Attachment A
<b>III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES</b>	As per Attachment B
<b>IV. SHARE HOLDING PATTERN (EQUITY SHARE CAPITAL BREAKUP AS PERCENTAGE OF TOTAL EQUITY)</b>	
i) Category-wise Share Holding	As per Attachment C
ii) Shareholding of Promoters	As per Attachment D
iii) Change in Promoters' Shareholding	As per Attachment E
iv) Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holders of GDRs and ADRs)	As per Attachment F
v) Shareholding of Directors and Key Managerial Personnel	As per Attachment G
<b>V. INDEBTEDNESS</b> Indebtedness of the Company including interest outstanding/accrued but not due for payment	As per Attachment H
<b>VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL</b>	
A. Remuneration to Managing Director, Whole-time Directors and/or Manager	As per Attachment I
B. Remuneration to other directors	As per Attachment J
C. Remuneration to Key Managerial Personnel other than MD/MANAGER/WTD	As per Attachment K
<b>VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES</b>	As per Attachment L

**ATTACHMENT - A****II. PRINCIPAL BUSINESS ACTIVITES OF THE COMPANY**

All the business activities contributing 10% or more of the total turnover of the company are given below :-

Sl. No.	Name and Description of main products / services	NIC Code of the Product service	% to total turnover of the company
1.	Steel	2714/2715	100

**ATTACHMENT - B****III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES**

Sl. No.	Name and Address of the Company	CIN I GLN	Holding / Subsidiary / Associate	% of Shares held	Applicable Section
N.A.					

ATTACHMENT-C

IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

i) Category-wise Share Holding

Category of Shareholders	No of Shares held at the beginning of the year [As on 01/Apr/2020]				No of Shares held at the end of the year [As on 31/Mar/2021]				% change during the Year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual/ HUF	745154	0	745154	17.9555	745154	0	745154	17.9555	0.0000
b) Central Govt									
c) State Govt(s)									
d) Bodies Corp.	2360100	0	2360100	56.8699	2360100	0	2360100	56.8699	0.0000
e) Banks/Fi									
f) Any other									
Sub-total (A)(1)	3105254	0	3105254	74.8254	3105254	0	3105254	74.8254	0.0000
(2) Foreign									
a) NRIs - Individuals									
b) Other - Individuals									
c) Bodies Corp.									
d) Banks/FI									
e) Any other									
Sub-total (A)(2)	0	0	0	0.0000	0	0	0	0.0000	0.0000
Total shareholding of Promoter A) = (A)(1)+(A)(2)	3105254	0	3105254	74.8254	3105254	0	3105254	74.8254	0.0000
B. Public Shareholding									
1. Institutions									
a) Mutual Funds									
b) Banks/FI	0	100	100	0.0024	0	100	100	0.0024	0.0000
c) Central Govt									
d) State Govt(s)									
e) Venture Capital Funds									
f) Insurance Companies									
g) FIs									
h) Foreign Venture Capital Funds									
i) Others (specify)									
Alternate Investment Funds									
Foreign Portfolio Investors									
Provident Funds / Pension Funds									
Qualified Foreign Investor									
Sub-total(B)(1):-	0	100	100	0.0024	0	100	100	0.0024	0.0000
2. Non-Institutions									
a) Bodies Corp.									
i) Indian	13930	342235	356165	8.5823	13930	342235	356165	8.5823	0.0000
ii) Overseas									
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	86347	404460	490807	11.8267	86647	404160	490807	11.8267	0.0000
ii) Individual shareholders holding nominal share capital in excess of Rs. 1 lakh	0	17100	17100	0.4120	0	17100	17100	0.4120	0.0000
c) Others (Specify)									
Non Resident Indians	200	0	200	0.0048	200	0	200	0.0048	0.0000
Qualified Foreign Investor									
Custodian of Enemy Property									
Foreign Nationals									
Clearing Members									
Trusts	0	700	700	0.0169	0	700	700	0.0169	0.0000
Foreign Bodies-D R									
Foreign Portfolio Investors									
NBFCs registered with RBI									
Employee Trusts									
Domestic Corporate Unclaimed Shares Account									
Investor Education and Protection Fund Authority	179674	0	179674	4.3295	179674	0	179674	4.3295	0.0000
Sub-total(B)(2):-	280151	764495	1044646	25.1722	280451	764195	1044646	25.1722	0.0000
Total Public Shareholding (B)=(B)(1)+ (B)(2)	280151	764595	1044746	25.1746	280451	764295	1044746	25.1746	0.0000
C. Shares held by Custodian for GDRs & ADRs	-	-	-	-	-	-	-	-	-
Grand Total (A+B+C)	3385405	764595	4150000	100.0000	3385705	764295	4150000	100.0000	0.0000

## ATTACHMENT - D

## IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

## ii) Shareholding of Promoters-

Sl No	Shareholder's Name	Shareholding at the beginning of the year [As on 01/Apr/2020]			Shareholding at the end of the year [As on 31/Mar/2021]			% change in share holding during the year	PAN
		No. of shares	% of total shares of the Company	% of shares Pledged/encumbered to total shares	No. of Shares	% of total shares of the Company	% of shares Pledged/encumbered to total shares		
1	CONCAST STEELS AND ALLOYS LIMITED	1200100	28.9181	0.0000	1200100	28.9181	0.0000	0.0000	AACCC0335M
2	BEEKAY STEEL INDUSTRIES LIMITED	1160000	27.9518	0.0000	1160000	27.9518	0.0000	0.0000	AABCB3205A
3	SURESH CHAND BANSAL	184105	4.4363	0.0000	184105	4.4363	0.0000	0.0000	AECPB6323F
4	MUKESH CHAND BANSAL	171080	4.1224	0.0000	171080	4.1224	0.0000	0.0000	AGLPB9454G
5	BHAWANI BANSAL	88769	2.1390	0.0000	88769	2.1390	0.0000	0.0000	AEGPB7219G
6	VIKAS BANSAL	66750	1.6084	0.0000	66750	1.6084	0.0000	0.0000	AEQPB2455N
7	MANAV BANSAL	61550	1.4831	0.0000	61550	1.4831	0.0000	0.0000	AEIPB4176N
8	INDU BANSAL	49200	1.1855	0.0000	49200	1.1855	0.0000	0.0000	AEBPB8626G
9	GAUTAM BANSAL	48350	1.1651	0.0000	48350	1.1651	0.0000	0.0000	AEIPB4968A
10	ARUNA BANSAL	48250	1.1627	0.0000	48250	1.1627	0.0000	0.0000	AEBPB4565L
11	B.L.BANSAL & SONS HUF	25100	0.6048	0.0000	25100	0.6048	0.0000	0.0000	AABHB9962P
12	SARIKA BANSAL	2000	0.0482	0.0000	2000	0.0482	0.0000	0.0000	AJUPS9119H
	<b>TOTAL</b>	<b>3105254</b>	<b>74.8254</b>	<b>0.0000</b>	<b>3105254</b>	<b>74.8254</b>	<b>0.0000</b>	<b>0.0000</b>	

## ATTACHMENT - E

## IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

## iii) Shareholding of Promoters

## (iii) Change in Promoters' Shareholding

Sl No.	Name	Shareholding at the beginning of the year [as on 01.04.2020]		Cumulative Shareholding during the year [as on 01.04.2020 to 31.03.2021]	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	At the beginning of the year	3105254	74.8254	-	-
	Date wise Increase /Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease	No change			
	At the end of the year	3105254	74.8253	3105254	74.8253

## ATTACHMENT - F

## iv) Shareholding Pattern (Equity Share Capital Breaking as percentage of Total Equity)

Shareholding Pattern of top ten Shareholders (Other than Directors, Promoters and Holders of GDRs and ADRs):

Sl No	Shareholder's Name	Shareholding at the beginning of the year [As on 01/Apr/2020] end of the year [31/Mar/2021]		Cumulative Shareholding during the year [01/Apr/2020 to 31/Mar/2021]		PAN
		No. of shares	% of total shares of	No. of Shares of the Company	% of total shares of the Company	
1	KAMLESH MERCANTILE CREDIT PVT LTD 01-04-2020 31-03-2021	240000 240000	5.7831 5.7831	240000	5.7831	AABCK1465D
2	JEWEL MOULDERS & HOLDINGS PVT LTD 01-04-2020 31-03-2021	60000 60000	1.4458 1.4458	60000	1.4458	AAACJ6404G
3	RITESH PROJECTS PVT LTD 01-04-2020 31-03-2021	40000 40000	0.9639 0.9639	40000	0.9639	AADCR6224M
4	RITESH JINDAL 01-04-2020 31-03-2021	17750 17750	0.4277 0.4277	17750	0.4277	AALHR9753C
5	INDRA KUMAR BAGRI 01-04-2020 31-03-2021	12570 12570	0.3029 0.3029	12570	0.3029	ADVPB8503F
6	3 A FINANCIAL SERVICES LTD 01-04-2020	11760	0.2834			AACCD2767L

SI No	Shareholder's Name	Shareholding at the beginning of the year [As on 01/Apr/2020] end of the year [31/Mar/2021]		Cumulative Shareholding during the year [01/Apr/2020 to 31/Mar/2021]		PAN
		No. of shares	% of total shares of	No. of Shares of the Company	% of total shares of the Company	
7	28/08/2020 - Transfer	-11760	0.2834	0	0.0000	ABQPV6862Q
	30/09/2020 - Transfer	12310	0.2966	12310	0.2966	
	31-03-2021	12310	0.2966	12310	0.2966	
8	JAYESH KANTILAL VORA	2900	0.0699	2900	0.0699	R00790
	01-04-2020	2900	0.0699			
	31-03-2021	2900	0.0699			
9	RAJESH MUKTILAL PALDIWAL	2700	0.0651	2700	0.0651	K00478
	01-04-2020	2700	0.0651			
	31-03-2021	2700	0.0651			
10	KAMLA B LULLA	2500	0.0602	2500	0.0602	IN300708 10656671
	01-04-2020	2500	0.0602			
	31-03-2021	2500	0.0602			
	INVESTOR EDUCATION AND PROTECTION FUND AUTHORITY MINISTRY OF CORPORATE AFFAIRS	179674	4.3295	179674	4.3295	
	01-04-2020	179674	4.3295			
	31-03-2021	179674	4.3295			

\*Not in the list of Top 10 shareholders as on 01/04/2020 The same has been reflected above since the shareholder was one of the Top 10 shareholders as on 31/03/2021.

#Ceased to be in the list of Top 10 shareholders as on 31/03/2021. The same is reflected above since the shareholder was one of the Top 10 shareholders as on 01/04/2020.

#### ATTACHMENT - G

#### iv) Shareholding Pattern (Equity Share Capital Breaking as percentage of Total Equity)

##### (v) Shareholding of Directors and Key Managerial Personnel :

SI. No	Name of the Director	Date	Reason	Shareholding at the beginning of the year (01.04.2020)		Cumulative Shareholding during the year (As on 31.3.2021)	
				No. of Shares	% of total Shares of the Company	No. of Shares	% of total Shares of the Company
1	Shri Ashok Kumar Bansal	01.04.2020	At the beginning of the year	Nil	N.A.	Nil	N.A.
		31.03.2021	At the end of the year	Nil	N.A.	Nil	N.A.
2	Shri Mukesh Chand Bansal	01.04.2020	At the beginning of the year	171080	4.12	171080	4.12
		31.03.2021	At the end of the year	171080	4.12	171080	4.12
3	Shri Manav Bansal	01.04.2020	At the beginning of the year	61550	1.48	61550	1.48
		31.03.2021	At the end of the year	61550	1.48	61550	1.48
4	Shri Bhal Chandra Khaitan	01.04.2020	At the beginning of the year	Nil	N.A.	Nil	N.A.
		31.03.2021	At the end of the year	Nil	N.A.	Nil	N.A.
5	Shri Bharat Kumar Nandhani	01.04.2020	At the beginning of the year	Nil	N.A.	Nil	N.A.
		31.03.2021	At the end of the year	Nil	N.A.	Nil	N.A.
6	Mrs. Shyanthi Dasgupta	01.04.2020	At the beginning of the year	Nil	N.A.	Nil	N.A.
		31.03.2021	At the end of the year	Nil	N.A.	Nil	N.A.
<b>B</b>	<b>KEY MANAGERIAL PERSONNEL (KMP) :</b>						
1	Shri Ashok Kumar Bansal (WTD)	01.04.2020	At the beginning of the year	Nil	N.A.	Nil	N.A.
		31.03.2021	At the end of the year	Nil	N.A.	Nil	N.A.
2	Shri R Jagadeeswara Rao (CFO)	01.04.2020	At the beginning of the year	Nil	N.A.	Nil	N.A.
		31.03.2021	At the end of the year	Nil	N.A.	Nil	N.A.
3	Shri Harjeet Singh* (outgoing CS)	01.04.2020	At the beginning of the year	Nil	N.A.	Nil	N.A.
		10.02.2021*	At the end of the year	Nil	N.A.	Nil	N.A.
4	Ms. Debolina Karmakar#	01.04.2020	At the beginning of the year	NA	NA	NA	NA
		31.03.2021	At the end of the year	Nil	NA	Nil	NA

\*Has resigned on 10.02.2021

#Debolina Karmakar appointed on 03.03.2021

## ATTACHMENT - H

## V. INDEBTNESS

Indebtness of the company including interest outstanding or accrued but not due for payment (In Rs)

	Secured Loans Excluding Deposits	Unsecured Loans	Deposits	Total Indebtness
Indebtness at the beginning of the financial year				
i. Principal Amount as on 01.04.2020	0	2,23,45,519	0	2,23,45,519
ii. Interest due but not paid	0	0	0	0
iii. Interest accrued but not due as on 31.03.2020	0	0	0	0
TOTAL (i+ii+iii)	0	2,23,45,519	0	2,23,45,519
Change indebtiness during the financial year				
ADDITION	0	0	0	0
REDUCTION	0	(1,34,48,683)	0	(1,34,48,683)
Exchange Difference	0	0	0	0
Net Change	0	(1,34,48,683)	0	(1,34,48,683)
Indebtness at the end of the financial year 31.03.2021				
i.Principal Amount	0	88,96,836	0	88,96,836
ii. Interest due but not paid	0	0	0	0
iii. Interest accrued but not due as on 31.03.2021	0	0	0	0
TOTAL (i+ii+iii)	0	88,96,836	0	88,96,836

## ATTACHMENT - I

## (VI) DETAILS OF REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL :

A. Remuneration to Managing Director, Whole-time Directors and/or Manager : (Rs. In Lakhs)

Sl. No.	Particulars of Remuneration	Mr. Ashok Kumar Bansal (Whole-time Director)
1.	Gross salary	
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	3.00
	(b) Value of perquisites U/S 17(2) of the Income-tax of the Act, 1961	-
	(c) Profits in lieu of salary under section 17(3) of the Income- tax Act, 1961	-
2.	Stock Option	-
3.	Sweat Equity	-
4.	Commission	-
	- as % of profit	-
	- others	-
5.	Others, please specify	-
	<b>Total (A)</b>	3.00

## ATTACHMENT - J

## (VI) DETAILS OF REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

B. Remuneration to other directors :

1. Independent Directors :

Particulars of Remuneration	Shri Bhal Chandra Khaitan	Shri Bharat Kumar Nadani	Smt. Shyanthi Dasgupta (Sengupta)	Total Amount (Rs. In Lakhs)
- Fee for attending board / committee meetings	0.18	0.20	0.20	0.58
- Commission	-	-	-	-
- Others	-	-	-	-
<b>Total (B)(1)</b>	0.18	0.20	0.20	0.58

2. Other Non-Executive Directors

Particulars of Remuneration	Name of Director		Total Amount (Rs in Lakhs)
	Shri Mukesh Chand Bansal	Shri Manav Bansal	
- Fee for attending board/ committee meetings	0.18	0.24	0.42
- Commission	-	-	-
- Others	-	-	-
<b>Total (B)(2)</b>	0.18	0.24	0.42
<b>Total (B)=(B1)+(B2) = Rs 1.00 lakhs</b>			



**ATTACHMENT- K****(VI) DETAILS OF REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL****(iv) Remuneration to Key Managerial Personnel other than MD/Manager/WTD :**

Sl. No.	Particulars of Remuneration	Mr. Ashok Kumar Bansal (Whole Time Director)	Mr. Harjeet Singh (Company Secretary) *	Mr. R Jagadeeswara Rao (Chief Financial Officer)	Ms Debolina Karmakar (Company Secretary#)	Total Amount (in Lakhs)
1.	Gross salary					
	(a) Salary as per provisions contained in section 7(1) of the Income-tax Act, 1961	3.00	2.71	7.37	0.28	13.36
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	-	-	-	-	-
2.	Stock Option	-	-	-	-	-
3.	Sweat Equity	-	-	-	-	-
4.	Commission					
	- as % of profit	-	-	-	-	-
	- others	-	-	-	-	-
5.	Others, please specify	-	-	-	-	-
	<b>Total</b>	<b>3.00</b>	<b>2.71</b>	<b>7.37</b>	<b>0.28</b>	<b>13.36</b>

\* Resigned from the position of Company Secretary and KMP w.e.f. 10.02.2021.

# Appointed to the position of Company Secretary and KMP w.e.f. 03.03.2021.

**ATTACHMENT - L****(VII) DETAILS OF PENALTIES / PUNISHMENT / COMPOUNDING OF OFFENCES :**

There were no penalties, punishment or compounding of offences during the year ended March 31, 2021.

## ANNEXURE - B TO THE DIRECTORS REPORT

**DETAILS PERTAINING TO REMUNERATION AS REQUIRED UNDER SECTION 197(12) OF THE COMPANIES ACT, 2013 READ WITH RULE 5(1) OF THE COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014**

i) The percentage increase in remuneration of each Director, Chief Financial Officer and Company Secretary during the financial year 2020-21, the ratio of the remuneration of each Director to the median remuneration of the employees of the Company for the financial year 2020-21 and the comparison of remuneration of each Key Managerial Personnel (KMP) against the performance of the Company are as under:

SI No.	Name of Director/ KMP and Designation	Remuneration of Director/ KMP for financial year 2020-21 (Rs. in lakhs)	% increase in Remuneration in the financial year 2020-21	Ratio of remuneration of each Director/ to median remuneration of employees
1	Mr. Ashok Kumar Bansal (Whole Time Director)	3.00	Nil	1.24:1
2	Mr. R. Jagadeeswara Rao (Chief Financial Officer)	7.37	Nil	3.05:1
3	Mr. Harjeet Singh (Company Secretary)*	2.71	NIL	1.12:1
4	Ms. Debolina Karmakar (Company Secretary)#	0.28	N.A.	N.A.

\* Resigned w.e.f. 10.02.2021

# Appointed w.e.f. 03.03.2021

Note: No other Director other than the Whole time Director received any remuneration other than sitting fees during the financial year 2020-21.

- ii) The median remuneration of employees of the Company during the financial year was Rs. 2.42 Lakhs  
 iii) In the financial year, there was increase of 7.76 % in the median remuneration of employees;  
 iv) There were 16 permanent employees on the rolls of Company as on March 31, 2021.  
 v) Average percentage increase made in the salaries of the employees other than the managerial personnel in the financial year 2020-21 was 8.14 % whereas there was least change in the managerial remuneration of Wholetime Director for the financial year  
 vi) It is hereby affirmed that the remuneration paid during the year ended 31st March, 2021 as per the Remuneration Policy of the Company.

vii) List of top 10 (Ten) Employees of AKC Steel Industries Limited for FY 2020-21

SI No.	Name	Designation	Qualification	Date of Commencement of Employment	Age	Remuneration 2019-20	Experience (In Yrs)	Last employment held
1	Ramisetti Jagadeeswara Rao	CFO	B.COM	01/7/2015	54	737288	29	Beekay Steel Industries Ltd
2	Prasanta Porel	Senior Supervisor - Machine Shop	Diploma	16/8/2012	37	301018	8	
3	Golagani Srinivasa Rao	Manager - Accounts	B.Com	01/5/2015	43	293669	15	
4	Ranjan Kumar Paul	Officer - Quality Control - Machine Shop	B.A	16/08/2012	47	238944	8	
5	Kshirod Kumar Patnaik	Yard Incharge	B.A	01/07/2002	50	77639	13	
Employees for part of the FY 2020-21								
6	Harjeet Singh*	Company Secretary	B.Com (H), ACS, LLB	05/08/2019	31	326598	4	Indian Base MetalsCo Ltd
7	Ms Debolina Karmakar#	Company Secretary	B.Com (H) ACS, M.Com	05/03/2021	25	28064	2	Balmer Lawrie & Co. Ltd.

\* Resigned w.e.f. 10.02.2021

# Appointed w.e.f. 03.03.2021

**ANNEXURE - C TO THE DIRECTORS REPORT**  
**SECRETARIAL AUDIT REPORT**  
**FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2021**  
**MR - 3**

[Pursuant to section 204(1) of the Companies Act, 2013 and rule No.9 of the Companies  
(Appointment and Remuneration Personnel) Rules, 2014]

**To,**  
**The Members,**  
**A K C Steel Industries Ltd.**  
Lansdowne Towers, 4th Floor,  
2/1A, Sarat Bose Road,  
Kolkata - 700 020

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by M/s. A K C Steel Industries Ltd. (hereinafter called 'the Company') bearing CIN: L27109WB1957PLC023360. Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the M/s A K C Steel Industries Limited's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on 31st March, 2021, has complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by AKC Steel Industries Limited ('the Company') for the financial year ended on 31st March, 2021, **to the extent Acts / provisions of the Acts applicable**, according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'), to the extent applicable:-
  - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
  - (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
  - (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
  - (d) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;
  - (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
  - (f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
  - (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
  - (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 and
  - (i) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (vi) I further report that, having regards to compliance system prevailing in the Company and on examination of the relevant documents and records in pursuance thereof, on test check basis and on representation made by the Company and its officers for compliances under other applicable Acts, laws and Regulations to the Company, the Company has complied with the laws applicable to the Company.

I have also examined compliance with the applicable clauses of the following:

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India
- (ii) The Listing Agreements entered into by the Company with the Calcutta Stock Exchange Ltd.

During the period under review, the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above.

**I further report that -**

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. There is no change in the composition of the Board of Directors during the period under review and the composition of Board of Directors of the Company is in conformity with the provision of the Act.

Adequate notice is given to all Directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

Majority decision is carried through while the dissenting members' views, if any, are captured and recorded as part of the minutes.

**I further report that** there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines except certain delays in compliance in other applicable laws to the Company.

**I further report that** during the audit period the Company has no other reportable specific events, actions having a major bearing on the Company's affairs in pursuance of the laws, regulations, guidelines, standards, etc. referred to above.

None of the Directors in any meeting dissented on any resolution and hence there was no instance of recording any dissenting member's view in the minutes.

**I further report that** subject to our observation above there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

Place: Kolkata  
Date: 09/08/2021

sd/-  
**Santosh Kumar Tibrewalla**  
Practicing Company Secretary  
Membership No.3811  
Certificate of Practice No. 3982  
PRC No. 1346/2021  
UDIN F003811C000758356

**ANNEXURE TO THE DIRECTORS' REPORT**  
**REPORT ON CORPORATE GOVERNANCE**

**COMPANY'S PHILOSOPHY ON CORPORATE GOVERNANCE**

We at AKC Steel believe in being transparent and commit ourselves to adherence of good corporate governance at all times. The Company adheres to the highest standards of business ethics, compliance with all statutory and legal requirements and commitment to transparency in business dealings. The code of conduct highlights corporate governance as the corner stone for sustained management performance, for serving all the stakeholders. Your Company is committed to protect the rights of its shareholders, conducting its business in a fair and transparent manner to achieve long term growth to enhance shareholders value and also value of other stakeholders. It is also imperative that the Company disclose timely, adequate and accurate information regarding its financials and performance. The Company maintains a high degree of transparency in all its dealings with stakeholders through sustained disclosures.

The report containing the details of Corporate Governance systems and processes at AKC Steel Industries Ltd. that is in accordance with the SEBI (LODR), Regulations, 2015 of the Listing Agreement with the Calcutta Stock Exchange Limited (CSE) is as follows :

The Board of Directors of the Company (**'the Board'**) governs the Company and deliberately creates a culture of leadership to provide a long-term vision to improve the quality of governance. The Board has adopted Guidelines to fulfill its corporate governance responsibility towards its stakeholders. These guidelines provide for the composition and role of the Board and ensure that the Board will have the necessary authority and processes in place to review and evaluate the Company's operations. Therefore, the Board has adopted various codes and policies, i.e. code of conduct, code of conduct for prohibition of Insider Trading, Vigil Mechanism and Whistle Blower Policy, Policy on Materiality of Related Party Transactions etc., to carry out its duties and responsibilities in a fair and ethical manner.

**BOARD OF DIRECTORS**

**a) Composition and category of Directors as on 31st March, 2021**

The Board has a combination of Executive & Non-Executive & Independent Directors on the Board and are in accordance with the Corporate Governance Practices. The Board Comprised of 6 (Six) Directors as on 31st March, 2021 out of which 3 (Three) are Independent Directors including 1 (One) Independent Woman Director and two are Promoter Non-Executive and one is Wholetime Director.

Name of the Director	Category	No. of Directors	Designation	% to total no. of Directors
Mr. Ashok Kumar Bansal	Non-Promoter	1	Whole Time Director	17
Mr. Mukesh Chand Bansal Mr. Manav Bansal	Promoter	2	Non-Executive Director	33
Mr. Bhal Chandra Khaitan Mr. Bharat Kumar Nadhani*	Non- Executive	3	Independent Directors	50
Ms. Shyanthi Sengupta	Non - Executive		Independent Woman Director	
<b>TOTAL</b>		<b>6</b>		<b>100</b>

The numbers of Independent Directors are 3 (three) including an Independent Woman Director which is in compliance with the SEBI Listing Regulation. All Independent Directors are professionals, experienced and competent Directors with specialization from various fields having wide range of skills and expertise in industry, finance, accounts, banking, insurance, management, technology and other allied fields of the Company which helps the Board for good decision making thereby ensuring the best interest of all the stakeholders of the Company. The Board reviews its policies and strategies from time to time to ensure that it remains aligned with the business requirements as well as are in the best interest of the stakeholders. All Independent Directors meet with the criteria of independence as prescribed both under sub-section (6) of Section 149 of the Companies Act 2013 and SEBI Listing Regulations, 2015.

Your Board holds a diverse and highly professional, experienced and competent Directors having knowledge and expertise in diverse fields which enables them to carry on their responsibilities and business effectively.

The Board of Directors at its meeting held on 12th November, 2020 has re-appointed Mr. Ashok Kumar Bansal as Wholetime Director for a period of 5 years w.e.f. 1st October, 2020 subject to the approval of the Members at the ensuing General Meeting.

The Directors of the Company are appointed by the shareholders at General Meetings. 1/3rd of such Directors are liable to retire by rotation, if eligible, generally offer themselves for re-election, in accordance with the provisions of Section 152 of the Companies Act, 2013 and that of the Articles of Association of the Company.

b) Board Meetings:

Attendance of each Director at Board Meeting and attendance at the last Annual General Meeting held on 26.09.2020 and Number of other Directorship and Chairmanship/ Membership of Committee of each Director in various Companies are as under:

Category	Name of Director	Designation	Date of Joining the Board	No. of Board Meetings held	No. of Board Meetings attended	Attendance at the last AGM held on 26.09.2020	No. of Directorship in other Indian Public Ltd. Cos.*	No. of other Chairmanship(s)/ Membership(s) of Audit/ Stakeholder Committees in other Indian Public Ltd. Cos. as on 31st March, 2021**	
								Chairmanship(s)	Membership(s)
Executive Director	Mr. Ashok Kumar Bansal	Wholetime Director	30.01.1999	4	1	Yes	Nil	Nil	Nil
<b>Non-Executive Directors</b>									
Promoter Director	Mr. Mukesh Chand Bansal	Non-Executive Director	08.05.1999	4	4	Yes	2	1	1
Promoter Director	Mr. Manav Bansal	Non-Executive Director	30.01.1999	4	4	YES	2	Nil	3
Independent Directors	Mr. Bhal Chandra Khaitan	Independent Director	29.12.2005	4	4	Yes	3	2	3
	Mr. Bharat Kumar Nadhani	Independent Director	12.08.2019	4	4	Yes	1	1	3
	Mrs. Shyanthi Dasgupta	Independent Woman Director	31.03.2015	4	4	YES	1	Nil	2

\* Excludes Directorships in Private Limited Companies, Foreign Companies and Companies under Section 8 of the Companies Act, 2013.

\*\*Only two Committees viz. the Audit Committee and the Stakeholder Relationship Committee are considered for this purpose.

The list of Companies where the persons are Directors and the category of Directorship are as follows:

Name of the Director	Name of the Listed Entity where the person is a Director	Category of Directorship
Mr. Ashok Kumar Bansal	NIL	N.A.
Mr. Mukesh Chand Bansal	1. Beekay Steel Industries Ltd	Managing Director
Mr. Manav Bansal	1. Beekay Steel Industries Ltd	Wholetime Director & CFO
Mr. Bhal Chandra Khaitan	1. Beekay Steel Industries Ltd 2. Super Forgings & Steels Ltd 3. Technical Associates Infrapower Limited	Non-Executive Independent Director
Mr. Bharat Kumar Nadhani	1. Beekay Steel Industries Ltd	Non-Executive, Independent Director
Mrs. Shyanthi Sengupta	1. Beekay Steel Industries Ltd	Non-Executive, Independent Director

During the year under review, the Board of Directors of the Company met 4 (Four) times on 29.06.2020, 25.08.2020, 12.11.2020 and 12.02.2021. The maximum gap between two Board Meetings did not exceed 120 (one hundred and twenty) days in terms of Regulation 17 (2) of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Standards and the provision of the Companies Act, 2013.

None of the Directors on the Board is a member of more than 10 committees and Chairman of more than 5 committees as specified in the SEBI (LODR), Regulations, 2015 of the Listing Agreement across all the Companies in which he/ she is a Director. The necessary disclosures regarding committee positions have been made by the Directors.

c) Board Committees, Meetings and Procedures:

The Board is entrusted with the responsibility of looking after work of the management and performance of the Company.



The Board of Directors of the Company oversees the overall functioning of the Company. The Directors plays a fiduciary role in reviewing and guiding corporate strategy, major plans of action, annual budgets and business plans, setting performance objectives, monitoring implementation and corporate performance, so as to ensure that Board act in good faith, with due diligence and care, and in the best interest of the shareholders. The Wholetime Director and promoter Directors are entrusted with wide range of functions from operation, marketing & administration and duly assisted by the Chief Executive Officer, Company Secretary including Senior Managerial Personnel in overseeing the functional matters of the Company. The Board provides and evaluates the strategic direction of the Company, management policies and their effectiveness and ensures that the long-term interests of the stakeholders are being served.

The Board has constituted Four Standing Committees to look after the operation of the Company within a given framework, namely, Audit Committee, Stakeholders Relationship Committee, Nomination & Remuneration Committee & Share Transfer Committee. A strategy meet of the Board of Directors is generally held at appropriate intervals to formulate, evaluate and approve the business strategy of the Company. The meeting focuses on strategic goals, financial management policies, management assurances and control aspects and the growth plan of the Company and compliance management.

The meetings are usually held at the Company's Registered Office at "Lansdowne Towers", 4th Floor, 2/1A, Sarat Bose Road, Kolkata - 700 020. A minimum of four Board Meetings are held every year. Dates for the Board Meetings in the ensuing quarter are decided well in advance and communicated to the Directors alongwith the agenda items and necessary documents & information were provided to all Directors beforehand to make able the Board of Directors to take proper decision. The Board is also provided with Audit Committee observations on the internal audit findings and matters required to be included in the Director's Responsibility Statement. The Company Secretary is the Secretary to all the above Committees of the Board.

**Expertise & Skills of the Board of Directors**

The Board of Directors of the Company are required to uphold ethical standards of integrity and probity and are required to have expertise, experience and core knowledge in the sectors relevant for the growth of the Company.

The Board members of the Company are holding requisite skills, expertise and competencies that allow them to make effective contribution to the Board and its Committees.

The Board has identified the following skills/expertise/ competencies fundamental for the effective functioning of the Company which are currently available with the Board:

<b>Finance</b>	Leadership in Corporate/ business finance is an important and inevitable function and efficient financial management is crucial for success and sustenance. It results in proficiency in financial management, procurement and utilisation of funds and controlling the financial activities and management of financial resources.
<b>Strategy &amp; Planning</b>	Appreciation of long-term trends, strategic choices and experience in guiding and leading management teams to make decisions in uncertain environments.
<b>Global Business</b>	Understanding, of global business dynamics, across various geographical markets with an understanding of industry verticals, regulatory jurisdictions, economic conditions, cultures and a broad perspective on global market opportunities.
<b>Leadership</b>	Leadership experience leads to maximize efficiency and to achieve Company goals by understanding the opportunities and threats, processes, strategic planning and risk management and discussing the financial performance and long-term growth.
<b>Procurement, Sales &amp; Marketing</b>	Experience in procurement of raw materials, production aspects, marketing technical aspect of production, quality control, purchase management and developing strategies to grow sales and market share, build brand awareness and enhance Company reputation.
<b>Governance</b>	Experience in developing governance practices, serving the best interests of all stakeholders, maintaining board and management accountability, building long-term effective stakeholder engagements, driving corporate ethics and values and observing appropriate governance practices.
<b>Administration</b>	Leadership in administration of a Company, results in long-term growth by planning, organising, directing and controlling the operations, creating rules and regulations and making decisions towards achieving a common goal or objective of the Company.

**d) Separate Meeting of Independent Directors**

The Independent Directors of the Company meet once in a year informally through a Meeting called Independent Directors Meeting. This meeting is conducted in an informal and flexible manner to enable the Independent Directors to discuss matters pertaining to the affairs of the Company and put forth their views to the Chairman and Managing Director.

During the year under review, the Independent Directors met on 25th August 2020, inter alia, to discuss:

- 1 Evaluation of the performance of Non-Independent Directors and the Board of Directors as a whole;
- 1 Review the performance of the Chairperson of the Company, taking into account the views of Executive Directors and Non-Executive Directors; and
- 1 Evaluation of the quality, content and timelines of flow of information between the Management and the Board that is necessary for the Board to effectively and reasonably perform its duties.

The performance of the Chairperson of the Company, taking into account the views of executive Directors and non-executive Directors; and The Independent Directors also reviewed the quality, content and timeliness of the flow of

information between the Management and the Board and its Committees which is necessary to effectively and reasonably perform and discharge their duties.

**e) Shares held by non-executive Directors**

The shareholdings of Non-Executive Directors are given hereunder:-

Name of Director	Category	No. of Shares held as on 31-03-2021	% to total share Capital
Mr. Mukesh Chand Bansal	Non-Executive	171080	4.12
Mr. Manav Bansal	(Promoter Director)	61550	1.48
Mr. Bhal Chandra Khaitan	Non-Executive	Nil	NA
Mr. Bharat Kumar Nadhani	(Independent Director)		
Mrs. Shyanthi Dasgupta	Non-Executive (Independent Woman Director)		

**f) Familiarization Programme imparted to Independent Directors**

Familiarization Program for Independent Directors aims to provide insights into the Company to enable the Independent Directors to understand its business in-depth and contribute significantly to the Company. As required under Regulation 25 of the SEBI LODR Regulations, the Company has familiarized Independent Directors with their roles, rights and liabilities in the Company, nature of the industry in which the Company operates, business models, updates and developments including various measures and other relevant information pertaining to the Company's business through familiarization programmes. Details of the familiarisation programmes of the Company have been disclosed on the Company's website: [www.akcsteel.com](http://www.akcsteel.com).

All new Directors (including Independent Directors) inducted to the Board are given a formal orientation. The familiarization programme for our Directors is customised to suit their individual interests and area of expertise. This enables the Directors to get a deep understanding of the Company, its people, values and culture and facilitates their active participation in overseeing the performance of the Management.

**Code of Conduct**

The Company has framed Code of Conduct for the Directors and Senior Management of the Company. The Directors and Senior Management have affirmed compliance of the said Code of Conduct as on 31st March, 2021. The Code is displayed on the Company's website: [www.akcsteel.com](http://www.akcsteel.com).

In pursuance of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 1992 (as amended), the Board has approved the 'Code of Conduct for prevention of Insider Trading' and entrusted the Audit Committee to monitor the compliance of the code.

**Vigil Mechanism Whistle Blower Policy**

In compliance with provisions of Section 177(9) of the Companies Act, 2013 and Regulation 22 of amended SEBI LODR Regulation, the Company has framed a Vigil Mechanism Whistle Blower Policy to deal with unethical behavior, actual or suspected fraud or violation of the company's code of conduct or ethics policy, if any. The Vigil Mechanism/Whistle Blower Policy has also been uploaded on the website of the Company.

Commitment towards highest moral and ethical standards in the conduct of business is of utmost importance to the Company. The Audit committee oversees the vigil mechanism and the persons who avail the mechanism are encouraged to escalate to the level of the Audit Committee for any issue of concerns impacting and compromising with the interest of the Company and its stakeholders in any way. This policy also allows the direct access to the Chairperson of the Audit Committee and makes protective disclosures about the unethical behavior, actual or suspected fraud or violation.

**BOARD COMMITTEES**

**AUDIT COMMITTEE**

The primary function of the Audit Committee is to assist the Board of Directors in fulfilling its oversight responsibilities by reviewing the financial reports and other financial information provided by the Company to any Government Body or to the investors or the public; the company's system of internal controls regarding finance, accounting and legal compliances that Management and the Board have established.

The Audit Committee reviews the financial accounting policies, adequacy of internal control systems before submission to the Board and interacts with the statutory auditors and internal auditors, review of observations of auditors and to ensure compliance of internal control systems, authority for investigation and access for full information and external professional advice for discharge of the functions delegated to the Committee by the Board. Senior Executives and functional heads are invitees to the committee meetings. All the members of the Committee are financially literate.

Audit Committee of the Board comprises three Directors and all are non-executive Directors out of which two are Independent Directors & one is Non-Executive Director. The composition of the Audit Committee meets the requirements as per Section 177 of the Companies Act, 2013 and SEBI (LODR), Regulations, 2015. The Company Secretary is the Secretary of the Committee.

4 (Four) meetings of the Audit Committee were held during the financial year ended 31st March, 2021 on 29.06.2020, 25.08.2020, 12.11.2020 & 12.02.2021 as against the minimum requirement of four meetings.

Composition of the Audit Committee and attendance of the members at Committee meetings as on 31st March 2021 are as follows:

Name of the Members	Category	No. of Meetings Held	No. of Meetings Attended	Attendance (%)
Mr. Bhal Chandra Khaitan	Non- Executive -Independent Director -Chairman	4	4	100
Mr. Manav Bansal	Non- Executive Director- Member	4	4	100
Mr. Bharat Kumar Nadhani	Non- Executive -Independent Director -Member	4	4	100

The Company Secretary acts as the Secretary to the Committee. The internal auditor reports functionally to the Audit Committee. The Audit Committee meetings are usually held at Company's Registered Office and the Wholetime Director/ Non-Executive Directors and Senior Management of the Company also attend the meetings as invitees whenever required to address concerns raised by the Committee Members.

The terms of reference of Audit Committee are as per Section 177 of the Companies Act, 2013 and as per SEBI LODR Regulation, 2015.

The scope of the Audit Committee, inter alia, includes:

- a) Review of the Company's financial reporting process, the financial statements and financial/risk management policies;
- b) Review of the adequacy of the internal control systems and finance of the internal audit team ;
- c) Discussions with the management and the external auditors, the audit plan for the financial year and joint post-audit and review of the same;
- d) Recommendation for appointment, remuneration & terms of appointment of Auditors, etc.

The terms of reference of Audit Committee are as per Section 177 of the Companies Act, 2013 and Reg 18(3) of SEBI (LODR), Regulations, 2015. The broad terms of reference of Audit Committee are:

The present terms of reference / scope and function of the Audit Committee are as follows:

1. Oversight of the Company's financial reporting process and the disclosure of its financial information to ensure that the financial statement is correct, sufficient and credible;
2. Recommendation for appointment, remuneration and terms of appointment of auditors of the Company;
3. Approval of payment to statutory auditors for any other services rendered by the statutory auditors;
4. Reviewing, with the management, the annual financial statements and auditor's report thereon before submission to the board for approval, with particular reference to:
  - a. Matters required to be included in the Director's Responsibility Statement to be included in the Board's report in terms of clause (c) of sub-section 3 of section 134 of the Companies Act, 2013;
  - b. Changes, if any, in accounting policies and practices and reasons for the same ;
  - c. Major accounting entries involving estimates based on the exercise of judgment by management;
  - d. Significant adjustments made in the financial statements arising out of audit findings ;
  - e. Compliance with listing and other legal requirements relating to financial statements ;
  - f. Disclosure of any related party transactions ;
  - g. Qualifications in the draft audit report.
5. Reviewing, with the management, the quarterly financial statements before submission to the Board for approval ;
6. Reviewing, with the management, the statement of uses / application of funds raised through an issue (public issue, rights issue, preferential issue, etc.), the statement of funds utilized for purposes other than those stated in the offer document / prospectus / notice and the report submitted by the monitoring agency monitoring the utilization of proceeds of a public or rights issue, and making appropriate recommendations to the Board to take up steps in this matter;
7. Review and monitor the auditor's independence and performance, and effectiveness of audit process;
8. Approval or any subsequent modification of transactions of the Company with related parties;
9. Scrutiny of inter-corporate loans and investments;
10. Valuation of undertakings or assets of the Company, wherever it is necessary;
11. Evaluation of internal financial controls and risk management systems;
12. Reviewing, with the management, performance of statutory and internal auditors, adequacy of the internal control systems;
13. Reviewing the adequacy of internal audit function, if any, including the structure of the internal audit department, staffing and seniority of the official heading the department, reporting structure coverage and frequency of internal audit;
14. Discussion with internal auditors of any significant findings and follow up there on;
15. Reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the Board;
16. Discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post-audit discussion to ascertain any area of concern;

17. To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non-payment of declared dividends) and creditors;
18. To review the functioning of the Whistle Blower mechanism;
19. Approval of appointment of Chief Financial Officer (i.e. the whole-time Finance Director or any other person heading the finance function or discharging that function) after assessing the qualifications, experience and background, etc. of the candidate;
20. Reviewing the utilization of loans/or advances from/investment by the holding Company in the subsidiary exceeding ₹ 100 crore or 10% of the asset size of the subsidiary, whichever is lower including existing loans/advances/investments. Examining the financial statement and the auditor's report thereon;
21. Monitoring the end use of funds raised through public offers and related matters;
22. Carrying out any other function as is mentioned in the terms of reference of the Audit Committee.
23. To review -
  - Ø Management discussion and analysis of financial condition and results of operations;
  - Ø Statement of significant related party transactions, submitted by the management;
  - Ø Management letters/letters of internal control weaknesses issued by the Statutory Auditors;
  - Ø Internal audit reports relating to internal control weaknesses, etc.
  - Ø Secretarial audit report relating to suspected fraud or irregularity or a failure of compliance of any legislation.
  - Ø Review the appointment, removal and terms of remuneration of the chief internal auditor.

The Audit Committee is empowered to investigate any activities within its terms of reference, seek information from employees, obtain outside legal or other professional advice or secure attendance of outside experts of relevant field as and when necessitated. The Audit Committee also reviews such matters as referred to it by the Board.

#### **NOMINATION & REMUNERATION COMMITTEE**

The terms of reference and constitution of the Nomination & Remuneration Committee (NRC) are compliance with Section 178 of the Companies Act, 2013 and pursuant to Regulation 19 and Part D of Schedule II of SEBI LODR Regulations, 2015. The Committee has formulated the criteria for evaluation of the Board and Non-Independent Directors includes framing of specific remuneration package of Executive Directors and sitting fees for Non-Executive Directors etc. and approval of remuneration to the managerial personnel as per the Company's policy on the same.

The terms of reference of the Nomination & Remuneration Committee are as follows:

- i. To identify persons who are qualified to become Directors and who may be appointed in the Senior management in accordance with the criteria laid down and to recommend to the Board their appointment, terms of appointment and/or removal;
- ii. To formulate a criteria for determining the qualification, positive attitudes, independence of a Director and evaluation of Independent Directors and the Board;
- iii. To evaluate every Directors performance;
- iv. To recommend to the Board a policy, relating to the remuneration for the Directors, key managerial persons and other employees;
- v. To ensure that the level of composition of remuneration is reasonable and sufficient to attract, retain and motivate directors of the quality required to run the Company successfully;
- vi. To ensure that the relationship of remuneration to performance is clear and meets the appropriate performance benchmarks;
- vii. To ensure that the remuneration to directors, key managerial personnel and senior management involves a balance between fixed and incentive pay reflecting short and long term performance objectives appropriate to the working of the company and its goals;
- viii. To devise a policy on Board diversity.
- ix. To identify persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down and recommend to the board their appointment and removal.
- x. To ensure whether to extend or continue the term of appointment of the Independent Director, on the basis of the report of performance evaluation of Independent Directors.
- xi. To recommend to the board, all remuneration, in whatever form, payable to senior management.
- xii. To carry out any other function as is mandated by the Board of Directors of our Company or prescribed by the Listing Agreement, as amended, from time to time.
- xiii. To invite any employee or such document as it may deem fit for exercising of its functions
- xiv. To obtain such outside or professional advice as it may consider necessary to carry out its duties.

The Committee comprises of three Directors , two Non-Executive Independent Directors and one Non Executive Director. During the year under review Two meetings of the Committee were held on 12th November 2020 and 12th February, 2021. Composition of the Nomination & Remuneration Committee and attendance of the members at Committee meetings as on 31st March 2021 are as follows:

Name of the Members	Category	No. of Meetings Held	No. of Meetings Attended	Attendance (%)
Mr. Bharat Kumar Nandhani#	Non- Executive -Independent Director -Chairman	2	2	100
Mr. Mukesh Chand Bansal	Non- Executive Director -Member	2	2	100
Mrs Shyanthi Dasgupta	Non- Executive -Independent Woman Director -Member	2	2	100

# He has been appointed as a Chairman of Nomination and Remuneration Committee w.e.f. 29-06-2020.

The Board decided and fixes the powers and roles of the Committee from time to time.

The Company follows the policy to fix remuneration of Managing Director/ Whole Time Director by taking into account the financial position of the Company, trend in the Industry, qualification, experience, past performance and past remuneration of the respective Directors in the manner to strike a balance between the interest of the Company and the Shareholders.

#### Performance Evaluation:

During the year, the Board has carried out an annual evaluation of its own performance, performance of the Directors, as well as the evaluation of the working of its Committees. The objective of the board evaluation includes improvement in the effectiveness of board, Committees and individual Directors, to enhance their strengths and to overcome the short comings, the evaluation process focuses on various issues facing the Company and their prioritization, quality of deliberations at board and Committee meetings, review of specific issues of importance dealt during the evaluation period.

The process of Board Evaluation broadly comprises of following:

- Ø The board evaluates the performance of the Independent Directors excluding the Directors being evaluated.
- Ø The Nomination and Remuneration Committee evaluates the performance of each Director with respect to the responsibility as entrusted on him/her.
- Ø The Independent Directors evaluates the performance of the Non- Independent Directors including the Chairperson of the Company taking into account the views of the Executive and Non-Executive Directors and the Board as a whole.
- Ø Performance Evaluation of the various Committee of the Board.

#### Performance evaluation criteria for Independent Directors:

The following criteria may assist in determining how effective the performances of the Independent Directors have been:

- Ø Leadership & Managerial abilities.
- Ø Contribution to the corporate objectives & plans.
- Ø Communication of expectations & concerns clearly with subordinates.
- Ø Obtaining adequate, relevant & timely information from external sources.
- Ø Review & approval of strategic & operational plans of the Company, its objectives and budgets.
- Ø Regular monitoring of corporate results against projection.
- Ø Identification, monitoring & mitigation of significant corporate risks.
- Ø Assessment of policies, structures & procedures followed in the Company and their significant contribution to the same.
- Ø Direct, monitor & evaluate KMPs, senior officials.
- Ø Regularity in attending meetings of the Company and inputs therein.
- Ø Review & Maintenance of corporation's ethical conduct.
- Ø Ability to work effectively with rest of the Board of Directors.
- Ø Commitment to the promotion of equal opportunities, health and safety in the workplace.

#### Remuneration to Directors:

##### Remuneration Policy /Criteria

i) **Executive Directors** : The Company follows the policy to fix remuneration to Whole Time Director by taking into account the financial position of the Company, trend in the Industry, qualification, experience, past performance and past remuneration of the respective Directors in the manner to strike a balance between the interest of the Company and the Shareholders. The Whole Time Director of the Company is appointed on contractual basis, on terms approved by the shareholders. Their remuneration comprises salary, allowances, commission and perquisites etc.

ii. **Non-Executive Directors** : The Non-executive Directors (including Independent Directors) are paid compensation by way of sitting fees on uniform basis. The sitting fees payable to the Non-Executive Directors is based on the number of meetings of the Board & other Committees of the Board attended by them. The Company pays sitting fees at the rate of Rs. 2000/- for each meeting of the Board and Committees attended by them.

iii. **KMPs & Senior Management Personnel** : The Board on the recommendation of the NRC fix the remuneration payable to the Key Managerial Personnel and Senior Management Personnel. The criteria also oversees the industry trend, quality and experience of the personnel. These factors not only contributes to the Company but makes their job satisfaction. The details of remuneration paid /payable to the Wholetime Director and Sitting Fees paid/ payable to Non-Executive Directors are given hereunder:-



Name of Directors	Remuneration Paid/Payable for the year ended 31st March, 2021				Service Terms		
	Salary (Rs.)	Bonus	Benefits (Rs.)	Sitting Fees (Rs.) (Rs.)	Pay Scale per Month	Period	Effective From
Mr. Ashok Kumar Bansal	3,00,000	--	--	--	25,000	5 Years	01-10-2020
Mr. Mukesh Chand Bansal	--	--	--	18,000	--	--	--
Mr. Manav Bansal	--	--	--	24,000	--	--	--
Mr. Bhal Chand Khaitan	--	--	--	18,000	--	--	--
Mr. Bharat Kumar Nadhani	--	--	--	20,000	--	--	--
Ms. Shyanthi Dasgupta	--	--	--	20,000	--	--	--

**Notes :**

1. The Company has not entered into any other pecuniary relationship or transactions with the Non-Executive Directors.
2. The Notice period and severance fees are not applicable to the Executive Director of the Company.

**STAKEHOLDERS RELATIONSHIP COMMITTEE**

The terms of reference and constitution of the Stakeholders Relationship Committee (SRC) are in compliance with the provisions of the Companies Act, 2013 and pursuant to Regulation 20 and Part D of Schedule II of SEBI LODR Regulations, 2015.

The main tasks of Stakeholders Relationship Committee is to look into redressing of shareholders' and investors grievances like non transfer / transmission of Shares, non- receipt of declared Dividend, Balance Sheet, dematerialization & re-materialization of Shares, etc. The Company has registered with SCORES of SEBI for Redressal of Investors' Grievances on-line.

The terms of reference and constitution of the SRC are in compliance with the provisions of the Companies Act, 2013 and pursuant to Regulation 20(4) and Part D of Schedule II of SEBI LODR Regulations, 2015.

The Board has also modified the scope of the Committee to align it with and SEBI (LODR), Regulations, 2015, which is as follows:

- 1) To review the reports submitted by the Registrars and Share Transfer Agents of the Company at Half yearly intervals.
- 2) To interact periodically and as & when required with the Registrars and Share Transfer Agents to ascertain and look into the quality of the Company's Shareholders/ Investors grievance redressal system and to review the report on the functioning of the said Investor grievances redressal system.
- 3) To consider and resolve the grievances of the security holders of the company.
- 4) To periodically report to the Board about serious concerns if any.
- 5) To follow-up on the implementation of suggestions for improvement.

The terms of reference of the SRC are as follows:

1. To resolve the grievances of the security holders of the listed entity.
2. To review measures taken for effective exercise of voting rights by shareholders.
3. To review adherence to the service standard adopted by the company in respect of services rendered by Registrar & Share Transfer Agent (RTA)
4. To review measures taken by the company for reducing quantum of unclaimed dividends
5. To ensure timely receipt of dividend warrants/annual report/statutory notices by the shareholders of the company.

The SRC comprises of 3 Directors out of whom one is Independent Director & Mr. Mukesh Chand Bansal is the Chairman of the Committee. The Committee comprises of the following Directors:

4 (Four) meetings of the SRC were held during the financial year ended 31st March, 2021 on 29.06.2020, 25.08.2020, 12.11.2020 & 12.02.2021. The composition and attendance details of the Committee for the year ended 31st March, 2021 are given hereunder:

Name of Directors	Category	No. of Meetings Held	Attended
Mr. Mukesh Chand Bansal	Non-Executive Director (Promoter)-Chairman	4	4
Mr. Manav Bansal	Non - Executive Director (Promoter) -Member	4	4
Mrs. Shyanthi Dasgupta	Non-Executive - Independent Woman Director - Member	4	4

The Company Secretary is the Secretary of the Committee.

The Company Secretary was the Compliance Officer for complying with the requirements of SEBI Regulations and SEBI (LODR), Regulations, 2015. Her address and contact details are as given below:

Address : Lansdowne Towers, 4th Floor, 2/1A, Sarat Bose Road, Kolkata-700020

Phone : 033-4060 4444

Fax : 033-2283 3322

Email : contact@akcsteel.com/rksahoo@beekaygroup.co.in

Number of complaints from members received and resolved during the period under review and pending as on 31-03-2021 are as follows:



**Shareholders' Complaints**

The numbers of shareholders'/ investors' complaints received, resolved/ replied and pending during the year under review are as under:

Nature of complaints	Received	Resolved/ Replied	Pending
Non-receipt of share certificates	Nil	Nil	Nil
Non-receipt of annual reports	Nil	Nil	Nil
Others	Nil	Nil	Nil
Total	Nil	Nil	Nil

No request for Share transfer remains pending for registration for more than 15 days except in one case which is delayed beyond 15 days. No complaint / query is received by the Company during the financial year and no complaint is pending as on 31st March, 2021.

**Securities and Exchange Board of India ('SEBI') Complaints Redress System ("SCORES") :**

As per the SEBI directive, the investors desirous of making complaints pertaining to the listed Companies has to be made electronically and sent through SCORES and the Companies or their appointed Registrar & Share Transfer Agent (R&TA/ STA) are required to view the pending complaints and submit 'Action Taken Report' ('ATRs') along with necessary documents electronically in SCORES. Further, there is no need to file any physical ATRs with SEBI. **The Company is already registered under SCORES to efficiently and effectively redress the investors/shareholders complaints in time.**

**SHARE TRANSFER COMMITTEE**

The Board has modified the scope of the Committee to align it with the SEBI LODR Regulations, 2015 and in compliance with the provisions of the Companies Act, 2013. The functions of the Share Transfer Committee ( STC) includes approval of share transfers and transmissions taking actions and any other matter(s) out of and incidental to these functions and such other acts assigned by the Board.

During the period under review there are no meetings of the share transfer committee were held.

The Share Transfer Committee comprises of 3 Directors and the Chairman of the Committee is Non-executive Director. The Composition of the Committee are as follows:

Name of Directors	Category
Mukesh Chand Bansal	Non-Executive Director -Chairman
Bhal Chandra Khaitan	Non-Executive - Independent Director - Member
Manav Bansal	Non - Executive Director -Member

Generally, the meetings of the Committee are held whenever necessary for transfer / transmission of shares, issue of duplicate share certificates, change of name/status, transposition of names, sub-division/ consolidation of share certificates, de-materialisation/ re-materialisation of shares, etc.

The Company Secretary was acting as the Secretary to the Committee.

As at 31st March, 2021, total 33,85,705 nos. of equity shares constitutes 81.5832 % (previous year - 33,85,405 nos. of equity shares - 81.5760%) of the Company's equity shares are held in dematerialized form.

**GENERAL BODY MEETINGS**

**Date, Time and Location where last three Annual General Meeting held:**

Year and Time	Type of Meeting	Date & Time of Meeting	Venue	If Special Resolution(s)
2019-20	47th AGM	26-09-2020 at 11.30 A.M.	Through Video Conferencing ("VC")/ other Audio Visual Means (OAVM)	No
2018-19	46th AGM	21-09-2019 at 10.30 A.M.	'ROTARY SADAN', S.S. Hall, 94/2, Chowringhee Road, Kolkata - 700 020	Yes
2017-18	45th AGM	28-09-2018 at 4.00 P.M.	'ROTARY SADAN', S.S. Hall, 94/2, Chowringhee Road, Kolkata - 700 020	Yes

**a) Extraordinary general meeting**

No extraordinary general meeting of the members was held during the year 2017-18, 2018-19, 2019-20 & 2020-21.

No Special Resolution was passed through Postal Ballot Meeting during the financial year 2017-18, 2018-19 & 2019-20.

No special resolution proposed to be transacted at the ensuing Annual General Meeting is required to be passed by Postal Ballot in terms of Section 110 of the Companies Act, 2013 and Rules made thereunder in view of the amendment made in Section 110 by Companies (Amendment) Act, 2017 which inter alia provides that 'any item proposed to be transacted by Postal Ballot may be transacted at the general meeting by a Company provided that the Company is providing facility of e-voting to its members under section 108 of the Companies Act, 2013'.

In compliance with section 108 of the Companies Act, 2013 read with rule 20 of the Companies (Management and Administration) Rules, 2014 and Regulation 44 of SEBI (LODR) Regulations, 2015 Members of the Company were provided with the facility to cast their vote electronically through the e-voting services provided by CDSL, on all resolutions set forth in the Notice of 48th Annual General Meeting. Members were also given options to cast their vote electronically in that Annual General Meeting.

**Details of Directors seeking appointment / re-appointment**

The Details of Directors seeking appointment / re-appointment as required under SEBI (LODR), Regulations, 2015 and Secretarial Standard 2 as issued by the Institute of Company Secretaries of India with the Stock Exchanges) is given in annexure to the notice which forms part of this Report.

**MEANS OF COMMUNICATION**

The quarterly, half yearly & yearly results of the Company are also published in the prescribed format within 48 hours of the conclusion of the meetings of the Board in both English and Bengali Newspapers.

The unaudited / audited quarterly & half yearly financial results as approved by the Board of Director at its meeting are furnished to the stock Exchanges where the Company's shares are listed within the prescribed time-frame of the close of every quarter together with limited review report and yearly audited results alongwith Auditors Report as provided by the Auditors in compliance with SEBI (LODR) Regulations, 2015 and are published in leading newspapers in India which include 'Business Standard' and 'Arthik Lipi' and in leading regional/vernacular languages in Bengali within 48 hours of conclusion of Board Meeting. The results are also displayed on the Company's website "[www.akcsteel.com](http://www.akcsteel.com)".

**Website:** The Company's web site is [www.akcsteel.com](http://www.akcsteel.com) where the quarterly / annual results and other statutory & non-statutory information are displayed.

No presentation has been made to Institutional Investors or Analysts

**GENERAL INFORMATIONS FOR MEMBERS:****a. Annual General Meeting :**

(Date, Time & Venue)

Date: 27.09.2021 , Monday

Time : 11.00 A.M

Venue : Deemed to be held at Registered office (through VC / OAVM)

**b. Date of Book Closure :** 21.09.2021 to 27.09.2021 (Both days inclusive) - For AGM**c. Financial Year & Calendar :** April'20- March'21

Financial Year 2021-22

Unaudited Results for the quarter ending 30th June, 2021

- By middle of August, 2021

Unaudited Results for the quarter ending 30th Sept., 2021

- By middle of November, 2021

Unaudited Results for the quarter ending 31st Dec., 2021

- By middle of February, 2022

Audited Annual Accounts for 2021-22

- By end of May 2022

Annual General Meeting for the year Ending 31st March, 2022

- Middle of Sept, 2022

**d. Dividend payment :** The Board have not recommended any Dividend on Equity Shares for the financial year ended on 31st March, 2021.**Details Of Unclaimed & Unpaid Dividend**

There are no further unpaid and unclaimed dividend lying in the Unpaid Dividend Account. The Company has not declared dividend since the financial year 2011-12.

**TRANSFER OF EQUITY SHARES TO INVESTOR EDUCATION & PROTECTION FUND AUTHORITY**

In terms of the provision of Section 124(6) of the Companies, Act 2013 read with Rule 6 of the Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Amendment Rules, 2017, ('IEPF Rules), all the underlying shares in respect of which dividend has not been paid or claimed for seven consecutive years or more is required to be transferred by the Company to the Demat Account of the Investor Education and Protection Fund Authority ('**IEPF Authority**') subject to the condition that such shares shall not be transferred if the beneficial owner has encashed any dividend during the last seven years.

The Company has transferred 179674 equity shares to the Investor Education and Protection Fund Authority whose dividends were unpaid & unclaimed for the financial year 2009-10. The Company is in the process to transfer the equity shares to the Investor Education and Protection Fund Authority whose dividends were unpaid & unclaimed for the financial year 2010-11.

As per the Investor Education & Protection Fund (IEPF) Rules the detailed list of shareholders whose shares were transferred to IEPF are updated in the website of the Company ([www.akcsteel.com](http://www.akcsteel.com)) for your reference.

**e. Listing & Delisting :**

The equity shares of your Company continues to be listed on The Calcutta Stock Exchange Ltd. (CSE), Kolkata. The Company has paid annual listing fees for the financial year 2021-22 to The Calcutta Stock Exchange (CSE).

The name and address of the Stock Exchange and the Company's Stock Code are given below.

The Calcutta Stock Exchange Ltd.: 7, Lyons Range, Kolkata - 700 001.

Stock Code: 10011019

**f. Market price Data**

Monthly High/ Low price during the Financial Year 2020-21 at the Calcutta Stock Exchange Ltd. depicting liquidity of the Equity Shares is given hereunder:

Month	Share Price High / Low	Month	Share Price High / Low
April, 2020	No Trading	October,2020	No Trading
May, 2020	-----do-----	November,2020	-----do-----
June, 2020	-----do-----	December,2020	-----do-----
July, 2020	-----do-----	January,2021	-----do-----
August, 2020	-----do-----	February,2021	-----do-----
September, 2020	-----do-----	March,2021	-----do-----

Note: 'No Trading' in the Stock Exchange due to non-functional of trading platform of the CSE

**g. Performance in comparison**

No comparison to broad based indices such as BSE Sensex / CRISIL to broad based indices, Index, etc. could be drawn since there is no trading in the Calcutta Stock Exchange during the financial year.

**h. Registrar and Share Transfer Agent: M/s. Maheshwari Datamatics Pvt. Ltd.**

23, R.N Mukherjee Road, 5th Floor, Kolkata - 700001.  
Phone Nos. 91-33-2243-5029 / 5809, 2248-2248 Fax No. 91-33-2248-4787,  
E-Mail - mdpldc@yahoo.com  
Website : www.mdpl.in  
Contact Person:- Mr Choubey / Mr Patra

**i. Shares Transfer System :**

Share Transfer assignment has been given to the Registrars and Share Transfer Agents. The Shares Transfer Committee is empowered to approve the Share transfers. Transfer Committee Meeting is held as and when required.

The Share Transfers/ transmissions, issue of duplicate certificate etc. are endorsed by Directors / Executives / Officers as may be authorised by the Transfer Committee. Requests for transfers received from members and miscellaneous correspondence are processed/ resolved by the Registrars within stipulated time.

**j. Distribution of Share as on 31st March, 2021 :**

Share Limit Notional Value of (Rs.)		No of Live Accounts	Percentage	Total No. of Share	Percentage of Shares
From	To				
1	5000	2383	94.0039	351497	8.4698
5001	10000	93	3.6686	69355	1.6712
10001	20000	37	1.4596	53290	1.2841
20001	30000	4	0.1578	10300	0.2482
30001	40000	Nil	N.A.	Nil	N.A.
40001	50000	Nil	N.A.	Nil	N.A.
50001	100000	Nil	N.A.	Nil	N.A.
100001	Above	18	0.7101	3665558	88.3267
<b>Grand Total</b>		<b>2535</b>	<b>100.0000</b>	<b>4150000</b>	<b>100.0000</b>

**k. Share Holding Pattern as on 31st March, 2021:**

Category	No. of Shares	Percentage of Holding
Promoters & Associates	3105254	74.8254
Mutual Funds & UTI	--	--
Banks, Financial Institutions, Insurance		
Companies (Central/ State Govt, Institutions, Govt. Institutions)	100	0.0024
FIs	--	--
Private Bodies Corporates	356165	8.5823
Investor Education & Protection Fund Authority(IEPF)	179674	4.3295
Indian Public	507907	12.2387
Trust	700	0.0169
NRIs / OCBs	200	0.0048
<b>Total</b>	<b>4150000</b>	<b>100.00</b>

**l. Dematerialisation of Shares:** 33,85,705 nos. of equity shares constitutes 81.58 % (previous year - 33,85,705 - - 81.58 %) of the total paid up equity share capital are held in dematerialized form with Central Depository Services (India) Ltd. (CDSL) and National Securities Depository Ltd. (NSDL) as on 31-03-2021.

**Code No. allotted by NSDL and CDSL:**

The Company's shares are activated for dematerialization with Central Depository Services (India) Ltd. (CDSL) and National Securities Depository Ltd. (NSDL).

Under the Depository System, the International Securities Identification Number (ISIN) of the Company's Shares is **INE169D01019**.

**m. Outstanding Instruments:**

The Company has not issued any GDRs / ADRs / Warrants or any convertible Instrument.

As such, there is no impact on Equity of the Company.

- n. **Machine Shop/Stockyard** : Plot No. 42, 43A, Block-D, Autonagar Yard, Visakhapatnam: 530 012  
Andhra Pradesh  
Tel: (0891) 2511 595
- o. **Address for Correspondence:**  
AKC Steel Industries Ltd., 'Lansdowne Towers', 4th Floor, 2/1A, Sarat Bose Road, Kolkata 700 020. Phone Nos. (0 33) 4060 4444, Fax No: (033) 2283 3322
- p. **Compliance Officer:**  
Company Secretary,  
AKC Steel Industries Ltd.  
'Lansdowne Towers' 4th Floor,  
2/1A, Sarat Bose Road, Kolkata: 700 020,  
Phone Nos. (033) 4060 4444, Fax No: (033) 2283 3322

**OTHER DISCLOSURES :  
DISCLOSURES**

- a) **Disclosures on materially significant related party transactions i.e. transactions of the Company of material nature, with its promoters, Directors or the management, their subsidiaries or relatives, etc. that may have potential conflict with the interests of listed entity at large :**  
All transactions entered into with related parties as defined under the Act and SEBI LODR Regulations 2015 during the financial year were in the ordinary course of business. No related party transactions of materially significant nature were entered into by the Company with its promoters, the Directors or the management, their subsidiaries/associates or relatives, etc. which could conflict with the interests of the Company.  
None of the transactions with any of the related parties were in conflict with the interest of the Company.
- b) **Details of non-compliance by the Listed Entity, penalties, strictures imposed on the Listed Entity by Stock Exchange(s) or Securities and Exchange Board of India or any Statutory Authority, on any matter related to the capital markets, during the last three years :**  
The Company has complied with various rules and regulations prescribed by the Stock Exchange, Securities and Exchange Board of India or any other Statutory Authority on any matter related to the capital markets during last five years. No penalty or strictures have been imposed by them on the Company during the last five financial years.
- c) **Vigil Mechanism / Whistle Blower Policy :**  
The Company has adopted a whistle blower policy and has established the necessary vigil mechanism for employees and directors to report concerns about unethical behavior. No person has been denied access to the Chairman of the Audit Committee. The said policy has been also put up on the website of the Company.
- d) **Details of compliance with mandatory requirements and adoption of non-mandatory requirements of the Corporate Governance :**  
The Company has complied with all the applicable mandatory requirements of the applicable Regulations of SEBI (LODR) Regulations, 2015 and has adopted the following non-mandatory requirements of the aforesaid clause :-  
**Reporting of Internal Auditor :** The Internal Auditors reports directly to the Audit Committee.  
The Company has taken cognizance of other non - mandatory requirements as set out in applicable Regulations of SEBI (LODR) Regulations, 2015 and shall consider adopting the same at an appropriate time.
- e) **Policy for determining 'material' Subsidiary:**  
The Company does not have any material non-listed Indian Subsidiary as defined in Regulation 16 and 24 of SEBI (LODR), Regulations, 2015. **The Company is the associate Company of Beekay Steel Industries Ltd. in terms of the provision of Section 2(26) of the Companies Act, 2013.**
- f) **Web link where policy on dealing with related party transactions :**  
Policy on dealing with related party transaction is displayed at the website of the Company [www.akcsteel.com](http://www.akcsteel.com)
- g) **Disclosures of commodity price risks and commodity hedging activities :**  
The Company is not associated with hedging activities.
- h) **Accounting Treatment in preparation of financial statement :**  
The Company has followed the guidelines of accounting standards as prescribed by the Institute of Chartered Accountants of India in preparation of financial statement.
- i) **Certification from Company Secretary :**  
As required under the provisions of Schedule V of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, a certificate from a Company Secretary in Practice have been received stating that none of the Directors on the Board of the Company have been debarred or disqualified from being appointed or continuing as Directors of companies by the Board/ Ministry of Corporate Affairs or any such statutory authority.
- j) **CEO / CFO certification :**  
The CEO / CFO certification as required under Regulation 17(8) of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 is annexed hereto which forms part of this report.
- k) **Details of Material Changes affecting the financial position of the Company**  
There is no material changes made during the year that will affect the financial position of the Company except the matter of non-renewal of Lease with Visakhapatnam Port Trust (VPT) which was duly mentioned in the last annual report ( 2018-19). The said matter has been sub-judice with the AP High Court.

**DISCLOSURE OF NON-COMPLIANCE OF ANY REQUIREMENT OF CORPORATE GOVERNANCE REPORT OF SUB-PARAS AS DETAILED ABOVE, WITH REASONS THEREOF :**

There is no non-compliance of any requirement of Corporate Governance Report of sub-paras as detailed above, thus no explanations need to be given.

**DISCLOSURE OF THE EXTENT TO WHICH THE DISCRETIONARY REQUIREMENTS AS SPECIFIED IN PART E OF SCHEDULE II HAVE BEEN ADOPTED:**

- a. Office to Non-Executive Chairperson: There is no need to maintain separate office by Chairperson of the Company since it has already provided office to the Chairperson at the Registered Office of the Company.
- b. Your Company is also under process of updating its system for sending a half-yearly declaration of financial performance including summary of the significant events in last six months to each household of shareholders.
- c. The financial statement of your Company is continued to be with unmodified audit opinion.
- d. Separate posts of Chairperson & CEO: The Company do not have separate persons as Chairperson and CEO during the period under review.
- e. The Internal Auditors report directly to the Audit Committee.

**DISCLOSURES OF THE COMPLIANCE WITH CORPORATE GOVERNANCE REQUIREMENTS SPECIFIED IN REGULATION 17 TO 27 AND CLAUSES (B) TO (I) OF SUB - REGULATION (2) OF REGULATION (46)**

The Company is in compliance with the requirements of aforesaid Regulations.

**ANNEXURE TO THE DIRECTORS' REPORT****Compliance Certificate by Wholetime Director/CEO and Chief Financial Officer(CFO) of the Company**

To,  
**The Board of Directors,**  
AKC Steel Industries Ltd.,  
'Lansdowne Tower',  
2/1A, Sarat Bose Road,  
**Kolkata - 700 020.**

Dear Sirs,

In terms of applicable Regulations of SEBI (LODR), Regulations, 2015 We, Ashok Kumar Bansal, Wholetime Director / CEO and R. Jagadeeswara Rao, CFO, Certify that:

1. We have reviewed financial statements and the cash flow statements for the financial year 2020-21 and to our best of knowledge, belief and information -
  - i) these statements do not contain any materially untrue statement or omit any material fact or contain statement that might be misleading ;
  - ii) these statement together present a true and fair view of the Company's affairs and are in compliance with existing accounting standards, applicable laws and regulations.
2. To the best of knowledge, belief and information, no transaction entered into by the Company during the financial year 2020-21 are fraudulent, illegal, or violative of the Company's Code of Conduct.
3. We accept responsibility for establishing and maintaining internal controls and that we have evaluated the effectiveness of the internal control systems of the Company and we have disclosed to the Auditors and the Audit Committee, deficiencies in the design or operation of internal controls which we are aware and we have taken and propose to take requisite steps to rectify the deficiencies, if any.
4. We have indicated to the Auditors and the Audit Committee :
  - i) significant changes in internal control during the financial year ;
  - ii) significant changes in accounting policies during the year and that the same have been disclosed in the notes to the financial statements ; and
  - iii) that we have not come across any instances of significant fraud and the involvement therein of the management or an employee having significant role in the Company's internal control system over financial reporting.

We further declare that all the Board members and Senior management personnel have affirmed compliance of Code of Conduct for the year 2020-21.

Place : Kolkata  
Dated : 13th August, 2021

For **AKC Steel Industries Ltd.**

Sd/-

**Ashok Kumar Bansal**  
Wholetime Director  
(DIN: 00283193)

For **AKC Steel Industries Ltd.**

Sd/-

**R Jagadeeswara Rao**  
CFO

**ANNEXURE TO THE DIRECTORS' REPORT****Declaration for Compliance with the Code of Conduct of the Company as per Regulations 26 (3) of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015**

I, Ashok Kumar Bansal, Wholetime Director of M/s. AKC Steel Industries Ltd. declare that as of 31st March, 2021 all the Board Members and Senior Management Personnel have affirmed compliance with the Code of Conduct of the Company.

For **AKC Steel Industries Ltd.**

Place : Kolkata  
Dated : 13th August, 2021

Sd/-  
**Ashok Kumar Bansal**  
Wholetime Director  
(DIN:00283193)

**ANNEXURE TO THE DIRECTORS' REPORT****CERTIFICATE OF COMPLIANCE OF CORPORATE GOVERNANCE AS REQUIRED UNDER REGULATION 34(3) READ WITH SCHEDULE V OF SEBI (LISTING OBLIGATIONS & DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

To

The Members of  
M/S. AKC STEEL INDUSTRIES LTD.  
'Lansdowne Towers', 4th Floor,  
2/1A, Sarat Bose Road,  
Kolkata – 700 020.

I have examined the Compliance of Corporate Governance of M/s. AKC Steel Industries Limited for the financial year 2020-21, as stipulated under applicable regulations of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Listing Agreement entered into by the said Company with the Stock Exchanges.

The Compliance of conditions of Corporate Governance is responsibility of the Management. My examination was limited to a review of the procedures and implementation thereof, adopted by the Company for ensuring compliance with conditions of the Corporate Governances. It is neither an audit nor an expression of opinion on the financial statements of the Company.

In my opinion and to the best of my information and according to the explanation given to me, I certify that the Company has generally complied with the condition of Corporate Governance as stipulated under applicable Regulations of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

I further state that such compliance is neither an assurance as to the future viability of the Company nor the efficiency or effectiveness with which the management has conducted the affairs of the Company.

Place: Kolkata

Date: 13th August, 2021

Sd/-  
**(SANTOSH KUMAR TIBREWALLA)**  
Practising Company Secretary  
Membership No. : 3811  
Certificate of Practice No. : 3982.  
PR No. : 1346/2021  
UDIN : F003811C000778486



**INDEPENDENT AUDITOR'S REPORT  
TO THE MEMBERS OF AKC STEEL INDUSTRIES LIMITED**

**Report on the Audit of the Ind AS Financial Statements**

**Opinion**

We have audited the accompanying Ind AS financial statements of A K C Steels industries Limited ("the Company"), which comprise the Balance sheet as at March 31 2021, the Statement of Profit and Loss, including the statement of Other Comprehensive Income, the Cash Flow Statement and the Statement of Changes in Equity for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information. In our opinion and to the best of our information and according to the explanations given to us, the aforesaid Ind AS financial statements give the information required by the Companies Act, 2013, as amended ("the Act") in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2021, its profit including other comprehensive income, its cash flows and the changes in equity for the year ended on that date.

**Basis for Opinion**

We conducted our audit of the Ind AS financial statements in accordance with the Standards on Auditing (SAs), as specified under section 143(10) of the Act. Our responsibilities under those Standards are further described in the 'Auditor's Responsibilities for the Audit of the Ind AS Financial Statements' section of our report. We are independent of the Company in accordance with the 'Code of Ethics' issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Act and the Rules thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Ind AS financial statements.

**Information Other than the Financial Statements and Auditor's Report Thereon**

The Company's Board of Directors is responsible for the other information. The other information comprises the information included in the Annual report and Board's report, but does not include the standalone Ind AS financial statements and our auditor's report thereon.

Our opinion on the Ind AS financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the Ind AS financial statements, our responsibility is to read the other information and, in doing so, consider whether such other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

**Responsibility of Management for the Ind AS Financial Statements**

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these Ind AS financial statements that give a true and fair view of the financial position, financial performance including other comprehensive income, cash flows and changes in equity of the Company in accordance with the accounting principles generally accepted in India, including the Indian Accounting Standards (Ind AS) specified under section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and the design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the Ind AS financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the Ind AS financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

The Board of Directors are also responsible for overseeing the Company's financial reporting process.

**Auditor's Responsibilities for the Audit of the Ind AS Financial Statements**

Our objectives are to obtain reasonable assurance about whether the Ind AS financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these Ind AS financial statements.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- o Identify and assess the risks of material misstatement of the Ind AS financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- o Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.

- o Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- o Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- o Evaluate the overall presentation, structure and content of the Ind AS financial statements, including the disclosures, and whether the Ind AS financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

Materiality is the magnitude of misstatements in the financial statement that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the standalone financial statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the financial statements.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

#### REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

- 1) As required by 'the Companies (Auditor's Report) Order, 2016, issued by the Central Government of India in terms of sub-section (11) of section 143 of the Act (hereinafter referred to as the "Order"), and on the basis of such checks of the books and records of the Company as we considered appropriate and according to the information and explanations given to us, we give in the Annexure-I, a statement on the matters specified in paragraphs 3 and 4 of the Order.
- 2) As required by Section 143(3) of the Act, we report that:
  - a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
  - b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
  - c) The Balance Sheet, the Statement of Profit and Loss including statement of Other Comprehensive Income, Cash Flow Statement and Statement of Changes in Equity dealt with by this Report are in agreement with the books of account.
  - d) In our opinion, the aforesaid Ind AS financial statements comply with the Accounting Standards specified under Section 133 of the Act, read Companies (Indian Accounting Standard) Rules, 2015 as amended.
  - e) On the basis of the written representations received from the directors as on March 31, 2021 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2021 from being appointed as a director in terms of Section 164(2) of the Act.
  - f) With respect to the adequacy of the internal financial controls over financial reporting of the company and the operating effectiveness of such controls, refer to our separate report in Annexure-II;
  - g) In our opinion, the managerial remuneration for the year ended March 31, 2021 has been paid / provided by the Company to its directors in accordance with the provisions of section 197 read with Schedule V to the Act;
  - h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:
    - i. The Company has disclosed the impact of pending litigations on its financial position in its Ind AS financial statements -Refer Notes 35 to the IndAS financial statements;
    - ii. The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
    - iii. There is no amount required to be transferred to the Investor and Protection Fund during the year ended March 31, 2021.

For **S.JAYKISHAN**

Chartered Accountants

Firm's Registration Number: 309005E

Sd/-

**Harish Patwari**

Partner

Membership Number: 065738

Date: 29th June 2021

UDIN:21065738AAAAABR6831

Place: Kolkata

## ANNEXURE-I TO INDEPENDENT AUDITORS' REPORT

**To The Independent Auditor's Report of even date to the members of AKC Steel Industries Limited on the financial statements as of and for the year ended March 31, 2021.**

- i.
  - a) According to the information and explanations given to us, the Company has maintained proper records showing full particulars, including quantitative details and situation of property, plant and equipments.
  - b) As explained to us, property, plant and equipments have been physically verified by the management at regular intervals during the year and no material discrepancies were noticed on such verification. In our opinion, the periodicity of physical verification is reasonable having regard to the size of the Company and the nature of its property, plant and equipments.
  - c) According to the information and explanations given by the management, the title deeds of immovable properties, included in property, plant and equipment are held in the name of the Company.
- ii. In our opinion and according to the information and explanations given to us, the physical verification of inventory has been conducted by the management at reasonable intervals and no material discrepancies were noticed.
- iii. On the basis of examination of records and according to the information and explanations given to us, the Company has during the year not granted any loans, secured or unsecured to companies, firms, Limited Liability Partnerships or other parties covered in the register maintained under section 189 of the Act. Accordingly, clause iii (a), (b), (c) of the Order are not applicable to the Company and hence not commented upon.
- iv. In our opinion and according to the information and explanations given to us, the Company has not granted any loans, investments, guarantees and security during the year that would attract provisions of Section 185 of the Act. The Company has complied with the provisions of Section 186 of the Act with respect to loans given. The Company has not provided any guarantee and security under the provisions of Section 186 of the Act.
- v. The Company has not accepted any deposits from the public. Accordingly, the provisions of clause 3(v) of the Order are not applicable to the Company and hence not commented upon.
- vi. We have broadly reviewed the books of account maintained by the Company pursuant to the rules made by the Central Government for the maintenance of cost records under section 148(1) of the Companies Act, 2013, related to the manufacture, and are of the opinion that prima facie, the specified accounts and records have been made and maintained. We have not, however, made a detailed examination of the same.
- vii.
  - a) According to the information and explanations given to us and on the basis of our examination of the records of the Company, amounts deducted/accrued in the books of account in respect of undisputed statutory dues, including provident fund, income-tax, goods and services tax, duty of customs, cess and other material statutory dues have been regularly deposited during the year by the Company with the appropriate authorities.
  - b) According to the information and explanations given to us, no undisputed amounts payable in respect of provident fund, goods and services tax, duty of customs, cess and other material statutory dues were in arrears as at 31st March 2021 for a period of more than six months from the date they became payable.
  - c) According to the information and explanations given to us, there are no dues of Income Tax, Sales Tax, Goods and Services Tax, Value added Tax, service tax and Custom duty which have not been deposited with the appropriate authorities on account of any dispute, except for the following:

Statute	Nature of due	Period to Which the Amount Relates	Forum where dispute is Pending	Amount
The Central Sales Tax Act, 1956	Sales Tax	2010-11	Sales Tax Appellate Tribunal, Hyderabad	1,30,713/-
	Sales Tax	01/2009 to 03/2011	Appellate Joint Commissioner (CT), Visakhapatnam	14,29,207/-
	Sales Tax	2015-16	Commercial Tax Department Integrated Check Post, BV Palem, Thada	95,458-

- viii. In our opinion and according to the information and explanations given to us, the company has not defaulted in repayment of loans or borrowings to any financial institution, banks, government or dues to debenture holders during the year.
- ix. The Company has not raised any money way of initial public offer or further public offer during the year. According to the information and explanations given to us, the term loans raised by the company have been utilized for the purpose for which they were obtained.
- x. Based upon the audit procedures performed for the purpose of reporting the true and fair view of the financial statements and according to the information and explanations given by the management, we report that no fraud by the company or on the company by the officers and employees of the Company has been noticed or reported during the year.

- xi. According to the information and explanations given to us, managerial remuneration during the year has been paid or provided in accordance with the approvals as per section 197, read with Schedule V of the Companies Act, 2013.
- xii. In our opinion and according to the information and explanations given to us, the Company is not a Nidhi Company. Accordingly, paragraph 3(xii) of the Order is not applicable.
- xiii. According to the information and explanations given by the management, transactions with the related parties are in compliance with section 177 and 188 of Companies Act, 2013 where applicable and the details have been disclosed in the notes to the financial statements, as required by the applicable accounting standards.
- xiv. According to the information and explanations given to us, the Company has not made any preferential allotment or private placement of shares/debentures during the year under review and accordingly clause (xiv) of the order is not applicable.
- xv. According to the information and explanations given to us and the records of the company examined by us, the Company has not entered into non-cash transactions with directors or persons connected with him. Accordingly, paragraph 3(xv) of the Order is not applicable.
- xvi. According to the information and explanations given to us and on the basis of review on an overall basis, the Company is not engaged in financing activity and hence is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934.

For **S.JAYKISHAN**

Chartered Accountants

Firm's Registration Number: 309005E

Sd/-

**Harish Patwari**

Partner

Membership Number: 065738

Date: 29th June 2021

UDIN:21065738AAAABR6831

Place: Kolkata

## ANNEXURE-II TO THE INDEPENDENT AUDITOR'S REPORT

### Report on the Internal Financial Controls under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 ("the Act")

We have audited the internal financial controls over financial reporting of A K C Steels industries Limited ("the Company") as of 31 March 2021 in conjunction with our audit of the Ind AS financial statements of the Company for the year ended on that date.

#### Management's Responsibility for Internal Financial Controls

The Company's management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls over Financial Reporting issued by the Institute of Chartered Accountants of India ('ICAI'). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

#### Auditors' Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the "Guidance Note") and the Standards on Auditing, issued by ICAI and deemed to be prescribed under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.

#### Meaning of Internal Financial Controls over Financial Reporting

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorisations of management and directors of the company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorised acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

#### Inherent Limitations of Internal Financial Controls Over Financial Reporting

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting to future periods are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

#### Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31 March 2021, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

For **S.JAYKISHAN**

Chartered Accountants

Firm's Registration Number: 309005E

Sd/-

**Harish Patwari**

Partner

Membership Number: 065738

Date: 29th June 2021

UDIN:21065738AAAABR6831

Place: Kolkata

## STATEMENT OF ASSETS AND LIABILITIES AS AT 31ST MARCH 2021

(Amount in Rs.)

S.N	Particulars	Note No.	31 March 2021	31 March 2020
<b>I</b>	<b>ASSETS</b>			
	<b>1) NON-CURRENT ASSETS</b>			
	(a) Property, plant and equipment	3	9,02,85,434	9,32,39,817
	(b) Non Current Tax Assets (Net)	4	35,63,737	79,33,694
			9,38,49,172	10,11,73,511
	<b>2) CURRENT ASSETS</b>			
	(a) Inventories	5	46,39,169	42,70,856
	(b) Financial assets			
	(i) Trade receivables	6	1,07,49,068	42,32,334
	(ii) Cash and cash equivalents	7	53,57,033	5,35,879
	(iii) Loans	8	1,25,00,000	-
	(iv) Other financial assets	9	26,62,026	26,09,585
	(c) Other current assets	10	80,94,203	68,35,620
			4,40,01,497	1,84,84,275
	Assets held for sale		-	-
	<b>TOTAL</b>		<b>13,78,50,669</b>	<b>11,96,57,786</b>
<b>II</b>	<b>EQUITY AND LIABILITIES</b>			
	<b>1) EQUITY</b>			
	(a) Equity share capital	11	4,15,00,000	4,15,00,000
	(b) Other equity	12	7,75,93,243	4,71,90,868
			11,90,93,243	8,86,90,868
	<b>2) NON- CURRENT LIABILITIES</b>			
	(a) Financial liabilities			
	(i) Borrowings	13	50,00,000	1,70,00,000
	(ii) Deferred Tax Liability (Net)	14	12,20,986	13,78,530
			62,20,986	1,83,78,530
	<b>3) CURRENT LIABILITIES</b>			
	(a) Financial liabilities			
	(i) Trade payables	15	46,46,975	40,81,186
	(ii) Other financial liabilities	16	58,30,303	70,12,247
	(b) Other Current Liabilities	17	14,39,132	8,79,021
	(c) Provisions	18	6,20,030	6,15,934
			1,25,36,440	1,25,88,388
	<b>TOTAL</b>		<b>13,78,50,669</b>	<b>11,96,57,786</b>

The accompanying notes form an integral part of these financial statements

For and on behalf of the Board of Directors

In terms of our report of even date attached  
For **S.Jaykishan**  
Chartered Accountants  
FRN. 309005E

Sd/-

**Harish Patwari**  
Partner

Membership No.: 065738  
Dated: The 29th day of June, 2021  
Place: Kolkata  
UDIN : 21065738AAAABR6831

Sd/-  
**R. Jagadeeswara Rao**  
CFO

Sd/-  
**Debolina Karmakar**  
Company Secretary  
(Membership No.: A62738)

Sd/-  
**Ashok Kumar Bansal**  
Whole Time Director  
(DIN: 00283193)

Sd/-  
**Manav Bansal**  
Director  
(DIN: 00103024)



## STATEMENT OF PROFIT AND LOSS FOR THE YEAR ENDED 31ST MARCH, 2021

(Amount in Rs.)

S.N	Particulars	Note No.	31 March 2021	31 March 2020
I	Revenue From Operations	19	5,76,88,120	3,21,12,727
II	Other Income	20	1,04,16,223	1,10,47,341
<b>III</b>	<b>Total Revenue (I + II)</b>		<b>6,81,04,342</b>	<b>4,31,60,068</b>
<b>IV</b>	<b>EXPENSES:</b>			
	Purchases of Traded Goods/ Process Scrap- Metal Swarf		3,18,857	13,44,168
	Changes in inventories of Process Scrap- Metal Swarf and Trading Goods	21	-3,23,607	-7,24,157
	Employee benefits expense	22	37,08,012	40,98,980
	Finance costs	23	15,61,491	26,35,356
	Depreciation and amortisation expense	3	63,05,939	70,00,792
	Other expenses	24	1,46,52,898	1,14,61,420
	<b>Total expenses</b>		<b>2,62,23,589</b>	<b>2,58,16,558</b>
<b>V</b>	<b>PROFIT/ (LOSS) BEFORE TAX (III-IV):</b>		<b>4,18,80,753</b>	<b>1,73,43,509</b>
<b>VI</b>	<b>Tax expenses</b>			
	Current Tax		70,34,995	28,94,979
	Tax expense relating to earlier years		(145954)	8,432
	MAT Credit (Entitlement)/ Availed		47,60,774	(561854)
	Deferred Tax		(161408)	13,87,813
	Provision for Gratuity			
<b>VII</b>	<b>PROFIT/(LOSS) FOR THE YEAR (V - VI)</b>		<b>3,03,92,346</b>	<b>1,36,14,139</b>
VIII	OTHER COMPREHENSIVE INCOME			
	A. (i) Items that will not be reclassified to profit or loss			
	(a) Remeasurements of defined benefit liability/ (asset)		13,891	(33369)
	(ii) Income taxes on items that will not be reclassified to profit or loss		(3864)	9,283
	B. (i) Items that will be reclassified to profit or loss			
	(ii) Income taxes on items that will be reclassified to profit or loss			
	<b>TOTAL OTHER COMPREHENSIVE INCOME, NET OF TAXES</b>		<b>10,027</b>	<b>-24,086</b>
<b>IX</b>	<b>TOTAL COMPREHENSIVE INCOME/ (LOSS) FOR THE YEAR (VII + VIII)</b>		<b>3,04,02,373</b>	<b>1,35,90,053</b>
	Earnings per Equity Share [Nominal Value of Share - Rs. 10/-]			
	Basic & Diluted		7.33	3.27

The accompanying notes form an integral part of these financial statements

**For and on behalf of the Board of Directors**

In terms of our report of even date attached  
For **S.Jaykishan**  
Chartered Accountants  
**FRN. 309005E**

Sd/-

**Harish Patwari**

**Partner**

**Membership No.: 065738**

**Dated: The 29th day of June, 2021**

**Place: Kolkata**

**UDIN : 21065738AAAABR6831**

Sd/-  
**R. Jagadeeswara Rao**  
CFO

Sd/-  
**Debolina Karmakar**  
Company Secretary  
(Membership No.: A62738)

Sd/-  
**Ashok Kumar Bansal**  
Whole Time Director  
(DIN: 00283193)

Sd/-  
**Manav Bansal**  
Director  
(DIN: 00103024)

**CASH FLOW STATEMENT FOR THE YEAR ENDED 31ST MARCH 2021**

(Amount in Rs.)

Particulars	Year ended 31/03/2021		Year ended 31/03/2020	
	Amount	Amount	Amount	Amount
<b>A. Cash flow from operating activities</b>		<b>4,18,80,753</b>		<b>1,73,43,509</b>
Net Profit / (Loss) before extraordinary items and tax				
Adjustments for:				
Depreciation and amortisation	63,05,939		70,00,792	
(Profit)/Loss on sale of Fixed assets	-		-46,436	
Finance costs	15,61,491		26,35,356	
Provisions	17,987	78,85,417	91,644	96,81,356
Operating profit / (loss) before working capital changes		4,97,66,170		2,70,24,865
Changes in working capital:				
Adjustments for (increase) / decrease in operating assets:				
Inventories	(3,68,312)		7,20,678	
Trade receivables	(65,16,733)		26,81,649	
Financial and Other Assets	(13,11,024)		3,43,115	
Adjustments for increase / (decrease) in operating liabilities:				
Trade payables	5,65,791		(1,51,79,099)	
Financial and Other Liabilities	(6,21,833)		(48,16,000)	
	(82,52,111)		(1,62,49,659)	
Cash generated from operations		4,15,14,059		1,07,75,206
Net income tax (paid) / refunds		(72,79,858)		(12,36,131)
<b>Net cash flow from / (used in) operating activities (A)</b>		<b>3,42,34,201</b>		<b>95,39,076</b>
<b>B. Cash flow from investing activities</b>				
Capital expenditure on fixed assets		(33,51,556)		(19,01,912)
Loan given		(1,25,00,000)		
Proceeds from sale of fixed assets	-	-		3,24,000
Net cash flow from / (used in) investing activities (B)		(1,58,51,556)		(15,77,911)
<b>C. Cash flow from financing activities</b>				
Repayment of Non Current borrowings	(1,20,00,000)		(70,00,000)	
Unpaid dividend transferred to Investor Education & Protection Fund	--		--	
Finance cost	(15,61,491)		(26,35,356)	
<b>Net cash flow from / (used in) financing activities (C)</b>		<b>(1,35,61,491)</b>		<b>(96,35,356)</b>
<b>Net increase / (decrease) in Cash and cash equivalents (A+B+C)</b>		<b>48,21,154</b>		<b>(16,74,192)</b>
Cash and cash equivalents at the beginning of the year		5,35,879		22,10,071
<b>Cash and cash equivalents at the end of the year</b>		<b>53,57,033</b>		<b>5,35,879</b>

**Notes:**

- Statement of Cash Flows has been prepared under the indirect method as set out in Ind AS 7 specified under section 133 of the Companies Act, 2013.
- Figures in brackets indicate cash outflows.

**For and on behalf of the Board of Directors**

In terms of our report of even date attached  
For **S.Jaykishan**  
Chartered Accountants  
**FRN. 309005E**

Sd/-

**Harish Patwari**  
Partner

Membership No.: 065738

Dated: The 29th day of June, 2021

Place: Kolkata

UDIN : 21065738AAAABR6831

Sd/-  
**R. Jagadeeswara Rao**  
CFO

Sd/-  
**Debolina Karmakar**  
Company Secretary  
(Membership No.: A62738)

Sd/-  
**Ashok Kumar Bansal**  
Whole Time Director  
(DIN: 00283193)

Sd/-  
**Manav Bansal**  
Director  
(DIN: 00103024)

**STATEMENT OF CHANGES IN EQUITY****A. EQUITY SHARE CAPITAL**

(Amount in Rs.)

Particulars	Numbers	Amount
<b>Balance as at 31 March 2019</b>	4,500,000	45,000,000
Changes in equity share capital during 2019-20	-	-
<b>Balance as at 31 March 2020</b>	4,500,000	45,000,000
Changes in equity share capital during 2020-21	-	-
<b>Balance as at 31 March 2021</b>	4,500,000	45,000,000

**B. OTHER EQUITY**

For the year ended 31 March 2019

(Amount in Rs.)

	Reserves and Surplus		Total
	Retained Earnings	Capital Reserve	
<b>Balance as at 1 April 2019</b>	32,944,147	656,671	33,600,818
Profit /(Loss) for the year	13,614,139	-	13,614,139
Other comprehensive income	(24,086)	-	(24,086)
<b>Balance as at 31 March 2020</b>	<b>46,534,200</b>	<b>656,671</b>	<b>47,190,871</b>

For the year ended 31 March 2021

(Amount in Rs.)

	Reserves and Surplus		Total
	Retained Earnings	Capital Reserve	
<b>Balance as at 1 April 2020</b>	46,534,200	656,671	47,190,871
Profit /(Loss) for the year	30,392,346	-	30,392,346
Other comprehensive income	10,027	-	10,027
<b>Balance as at 31 March 2021</b>	<b>76,936,573</b>	<b>656,671</b>	<b>77,593,244</b>

The accompanying notes form an integral part of these financial statements.

**For and on behalf of the Board of Directors**

In terms of our report of even date attached  
For **S.Jaykishan**  
Chartered Accountants  
**FRN. 309005E**

Sd/-

**Harish Patwari**  
Partner

Membership No.: 065738

Dated: The 29th day of June, 2021

Place: Kolkata

UDIN : 21065738AAAABR6831

Sd/-  
**R. Jagadeeswara Rao**  
CFO

Sd/-  
**Debolina Karmakar**  
Company Secretary  
(Membership No.: A62738)

Sd/-  
**Ashok Kumar Bansal**  
Whole Time Director  
(DIN: 00283193)

Sd/-  
**Manav Bansal**  
Director  
(DIN: 00103024)

## NOTES TO FINANCIAL STATEMENT FOR THE YEAR ENDED 31ST MARCH, 2021

### 1 Company Overview

AKC Steel Industries Limited ("the Company") is a listed company incorporated in India on 20th February, 1957 having its registered office at 2/1A, Sarat Bose Road, Lansdowne Towers, 4 Floor, Kolkata-700020. The Company is principally engaged in the business of trading and machining iron and steels.

The Companies' equity shares are listed on the Calcutta Stock Exchange since 18th October, 1973.

The financial statements for the year ended March 31, 2021 were authorised and approved for issue by the Board of Directors on June 29, 2021.

### 2. Basis of preparation

#### a) Statement of Compliance

These financial statements are prepared in accordance with the provisions of the Companies Act, 2013 ('Act') (to the extent notified) and Indian Accounting Standards (Ind AS) under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair values. The Ind AS are prescribed under section 133 of the Act read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 (as amended).

Accounting policies have been consistently applied except where a newly issued accounting standard is initially adopted or a revision to an existing standard requires a change in the accounting policy hitherto in use.

#### b) Functional and presentation currency

The financial statements are presented in Indian Rupees ('Rs') which is Company's presentation currency. The functional currency of the Company is also Indian Rupees ('Rs').

#### c) Basis of measurement

The financial statements have been prepared on historical cost convention on the accrual basis, except for the following items:

- (i) Certain financial assets and financial liabilities measured at fair value;
- (ii) Employee's defined benefit plan as per actuarial valuation.

Fair value is the price that would be received on the sale of an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date under current market conditions, regardless of whether that price is directly observable or estimated using another valuation technique. In determining the fair value of an asset or a liability, the Company takes into account the characteristics of the asset or liability if market participants would take those characteristics into account when pricing the asset or liability at the measurement date.

#### d) Use of judgments and estimates

In preparing these financial statements, management has made judgements, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates.

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized prospectively.

Critical accounting judgements and key sources of estimation uncertainty: Key assumptions-

#### i) Useful lives of Property, plant and equipment:

The Company uses its technical expertise along with historical and industry trends for determining the economic life of an asset/component of an asset. The useful lives are reviewed by management periodically and revised, if appropriate. In case of a revision, the unamortised depreciable amount is charged over the remaining useful life of the assets.

#### (ii) Fair value measurement of financial instruments:

When the fair values of financial assets and financial liabilities recorded in the balance sheet cannot be measured based on quoted prices in active markets, their fair value is measured using certain valuation techniques. The inputs to these models are taken from observable markets where possible, but where this is not feasible, a degree of judgement is required in establishing fair values. Judgements include considerations of inputs such as liquidity risk, credit risk and volatility.

#### (iii) Defined benefit plans:

The cost of the defined benefit plan includes gratuity and the present value of the gratuity obligation are determined using actuarial valuations using projected unit credit method. An actuarial valuation involves making various assumptions that may differ from actual developments in the future. These include the determination of the discount rate, future salary increases and mortality rates. Due to the complexities involved in the valuation and its long-term nature, a defined benefit obligation is highly sensitive to changes in these assumptions. All assumptions are reviewed at each reporting date.

#### (iv) Recognition and measurement of provisions and contingencies:

Provision is towards known contractual obligation, litigation cases and pending assessments in respect of taxes, duties and other levies, if any, in respect of which management believes that there are present obligations and the settlement of such obligations are expected to result in outflow of resources, to the extent provided for.

#### e) Measurement of fair values

A number of the Company's accounting policies and disclosures require the measurement of fair values, for both financial and non-financial assets and liabilities.

The Company has an established control framework with respect to the measurement of fair values.

The management regularly reviews significant unobservable inputs and valuation adjustments.

" Fair values are categorized into different levels in a fair value hierarchy based on the inputs used in the valuation techniques as follows.

- **Level 1:** quoted prices (unadjusted) in active markets for identical assets or liabilities.
  - **Level 2:** inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices).
  - **Level 3:** inputs for the asset or liability that are not based on observable market data (unobservable inputs).
- When measuring the fair value of an asset or a liability, the Company uses observable market data as far as possible. If the inputs used to measure the fair value of an asset or a liability fall into different levels of the fair value hierarchy, then the fair value measurement is categorized in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement.

The Company recognises transfers between levels of the fair value hierarchy at the end of the reporting period during which the change has occurred.

### 3. Significant accounting policies

#### a) Operating Cycle

All assets and liabilities have been classified as current or non-current as per the Company's normal operating cycle and other criteria set out in the Schedule III to the Companies Act, 2013 and Ind AS 1 – Presentation of Financial Statements based on the nature of products and the time between the acquisition of assets for processing and their realisation in cash and cash equivalents.

#### b. Financial instruments

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

##### i. Financial Assets

###### Initial recognition and measurement

All financial assets are recognised initially at fair value plus, in the case of financial assets not recorded at fair value through profit or loss, transaction costs that are attributable to the acquisition of the financial asset. Trade receivables are initially measured at transaction price. Regular way purchase and sale of financial assets are accounted for at trade date.

###### Subsequent measurement

For purposes of subsequent measurement, financial assets are classified in three categories:

- Amortised cost
- Fair value through other comprehensive income (FVTOCI)
- Fair value through profit or loss (FVTPL)

Financial assets are not reclassified subsequent to their initial recognition, except if and in the period the Company changes its business model for managing financial assets.

Financial assets at amortised cost

A financial asset is measured at amortised cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

The effective interest rate (EIR) amortisation is included in finance income in the profit or loss.

Financial assets at FVTOCI

A financial asset is measured at FVTOCI if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Financial assets included within the FVTOCI category are measured initially as well as at each reporting date at fair value. Fair value movements are recognized in the other comprehensive income (OCI).

Financial assets at FVTPL

A financial asset which is not classified in any of the above categories are measured at FVTPL.

Financial assets included within the FVTPL category are measured at fair value with all changes recognised in the Statement of Profit & Loss.

###### Other equity investments

All other equity investments are measured at fair value, with value changes recognised in Statement of Profit and Loss, except for those equity investments for which the Company has elected to present the value changes in 'Other Comprehensive Income'.

###### Derecognition

The Company derecognizes a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the financial asset and the transfer qualifies for derecognition under Ind AS 109.

##### ii. Financial liability

###### Initial recognition and measurement

Financial liabilities are initially recognised at fair value plus any transaction cost that are attributable to the acquisition of the financial liabilities except financial liabilities at fair value through profit or loss which are initially measured at fair value.

###### Subsequent measurement

For purposes of subsequent measurement, financial liabilities are classified in following categories:

- Financial liabilities through profit or loss (FVTPL)

- Financial liabilities at amortised cost

#### **Financial liabilities through FVTPL**

A financial liability is classified as at FVTPL if it is classified as held-for-trading, or it is a derivative or it is designated as such on initial recognition. Financial liabilities at FVTPL are measured at fair value and net gains and losses, including any interest expense, are recognised in profit or loss.

#### **Financial liabilities at amortised cost**

Other financial liabilities are subsequently measured at amortised cost using the effective interest method. Interest expense and any gain or loss on derecognition are recognised in profit or loss.

Interest bearing loans and borrowings are subsequently measured at amortised cost using the EIR method. Gains and losses are recognised in profit or loss when the liabilities are derecognised as well as through the EIR amortisation process. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximates fair value due to the short maturity of these instruments.

#### **Derecognition**

A financial liability (or a part of a financial liability) is derecognized from the Company's Balance Sheet when the obligation specified in the contract is discharged or cancelled or expires.

#### **ii. Offsetting of financial instruments**

Financial assets and financial liabilities are offset and the net amount presented in the balance sheet when, and only when, the Company currently has a legally enforceable right to set off the amounts and it intends either to settle them on a net basis or to realise the asset and settle the liability simultaneously.

#### **c) Property, Plant and Equipment**

##### **I. Recognition and measurement**

Items of property, plant and equipment are measured at cost, which includes capitalised borrowing costs, less accumulated depreciation and accumulated impairment losses, if any. The cost of an item of property, plant and equipment comprises its purchase price, including import duties and non-refundable purchase taxes, after deducting trade discounts and rebates, any directly attributable cost of bringing the item to its working condition for its intended use and estimated costs of dismantling and removing the item and restoring the site on which it is located. Borrowing costs directly attributable to the acquisition or construction of those qualifying property, plant and equipment, which necessarily take a substantial period of time to get ready for their intended use, are capitalised.

If significant parts of an item of property, plant and equipment have different useful lives, then they are accounted for as separate components of property, plant and equipment.

Assets retired from active use and held for disposal are stated at the lower of their net book value and net realisable value and shown under 'Other current assets'.

A fixed asset is eliminated from the financial statements on disposal or when no further benefit is expected from its use and disposal. Any gain or loss on disposal of an item of property, plant and equipment is recognised in profit or loss.

Expenses incurred relating to project, net of income earned during the project development stage prior to its intended use, are considered as pre - operative expenses and disclosed under Capital Work - in - Progress.

##### **II. Subsequent expenditure**

Subsequent expenditure is capitalized only when it is probable that the future economic benefits associated with the expenditure will flow to the Company. Ongoing repairs and maintenance are expensed as incurred.

##### **IV. Depreciation and amortisation**

Depreciation and amortisation for the year is recognised in the Statement of Profit and Loss.

Depreciation on fixed assets are provided on Written down value method over the useful lives of assets, at the rates and in the manner specified in Part C of Schedule II of the Act.

Freehold land is not depreciated.

Depreciation methods, useful lives and residual values are reviewed at each financial year end and adjusted as appropriate.

##### **d) Intangible Assets**

Intangible assets with finite useful lives that are acquired separately are carried at cost less accumulated amortisation and any accumulated impairment losses. Amortisation is recognised on a straight-line basis over their estimated useful lives. An intangible asset is derecognised on disposal, or when no future economic benefits are expected from use or disposal. Estimated useful life of the Computer Software is 5 years.

##### **e) Impairment**

###### **i. Impairment of financial instruments: financial assets**

Expected credit losses are recognized for all financial assets subsequent to initial recognition other than financials assets in FVTPL category.

For financial assets other than trade receivables, as per Ind AS 109, the Company recognises 12 month expected credit losses for all originated or acquired financial assets if at the reporting date the credit risk of the financial asset has not increased significantly since its initial recognition. The expected credit losses are measured as lifetime expected credit losses if the credit risk on financial asset increases significantly since its initial recognition. The Company's trade receivables do not contain significant financing component and loss allowance on trade receivables is measured at an amount equal to life time expected losses i.e. expected cash shortfall.

The impairment losses and reversals are recognised in Statement of Profit and Loss.

###### **ii. Impairment of non-financial assets**



The Company's non-financial assets are reviewed at each reporting date to determine whether there is any indication of impairment. For impairment testing, assets that do not generate independent cash inflows are grouped together into cash-generating units (CGUs). Each CGU represents the smallest Company of assets that generates cash inflows that are largely independent of the cash inflows of other assets or CGUs. If any such indication exists the recoverable amount of an asset or CGU is estimated to determine the extent of impairment, if any. When it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the CGU to which the asset belongs.

An impairment loss is recognised in the Statement of Profit and Loss to the extent, asset's carrying amount exceeds its recoverable amount. The recoverable amount is higher of an asset's fair value less cost of disposal and value in use. Value in use is based on the estimated future cash flows, discounted to their present value using pre-tax discount rate that reflects current market assessments of the time value of money and risk specific to the assets.

The impairment loss recognised in prior accounting period is reversed if there has been a change in the estimate of recoverable amount.

**f) Employee Benefits**

**i. Short-term employee benefits**

The undiscounted amount of short term employee benefits expected to be paid in exchange for the services rendered by employees are recognised as an expense during the period when the employees render the services.

**ii. Defined contribution plans**

A defined contribution plan is a post-employment benefit plan under which the Company makes specified monthly contributions towards Provident Fund. The Company's contribution is recognised as an expense in the Statement of Profit and Loss during the period in which the employee renders the related service.

**iii. Defined benefit plans**

The Company pays gratuity to the employees whoever has completed five years of service with the Company at the time of resignation. The gratuity is paid @15 days salary for every completed year of service as per the Payment of Gratuity Act 1972.

The liability in respect of gratuity and other post-employment benefits is calculated using the Projected Unit Credit Method and spread over the period during which the benefit is expected to be derived from employees' services.

Re-measurement of defined benefit plans in respect of post-employment are charged to the Other Comprehensive Income.

**Amendment to Ind AS 19 - Plan Amendment, Curtailment or Settlement**

The Ministry of Corporate Affairs issued amendments to Ind AS 19, 'Employee Benefits', in connection with accounting for plan amendments, curtailments and settlements requiring an entity to determine the current service costs and the net interest for the period after the remeasurement using the assumptions used for the remeasurement; and determine the net interest for the remaining period based on the remeasured net defined benefit liability or asset. The adoption of amendment to Ind AS 19 did not have any material impact on the standalone financial statements of the Company.

**g) Provisions (other than for employee benefits)**

Provisions are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation.

If the effect of the time value of money is material, provisions are discounted using a current pre-tax rate that reflects, when appropriate, the risks specific to the liability. When discounting is used, the increase in the provision due to the passage of time is recognised as a finance cost.

**h) Revenue Recognition**

Revenue is recognised to the extent it is probable that the economic benefits will flow to the company and the revenue can be reliably measured, regardless of when the payment is being made. Revenue is measured at the fair value of the consideration received or receivable, taking into account contractually defined terms of payment and excluding taxes or duties collected on behalf of the government.

**i) Leases**

**The Company is the lessor/lessee**

The Company has entered into long term lease with the term of more than twelve months with low value leases. For these long term and low value leases, the Company recognises the lease receipts/ payments as an income/ expense in the Statement of Profit and Loss on a straight line basis over the term of lease.

**Transition**

Effective April 01, 2019, the Company adopted Ind AS 116 "Leases" and applied the standard to all lease contracts existing on April 01, 2019 using the retrospective with cumulative effect method of initially applying the standard recognised at the date of initial application without any adjustment to opening balance of retained earnings. The Company did not have any material impact on the financial statements on application of the above standard.

**j) Recognition of dividend income, interest income or expense**

Dividend income is recognised in profit or loss on the date on which the Company's right to receive payment is established.

Interest income or expense is recognised using the effective interest method.

**k) Income tax**

Income tax expense comprises of current and deferred tax. Current tax and deferred tax is recognized in the statement

of profit or loss except to the extent that it relates to a business combination, or items recognized directly in equity or in OCI.

**i. Current tax**

The present value of obligation is determined based on the actuarial valuation using the Projected Unit Credit Method as on 31st March, 2020 which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation. The Company's gratuity expense is recognized under the head – "Employee Benefit Expense."

**ii. Deferred tax**

Deferred tax is recognised on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period. The carrying amount of Deferred tax liabilities and assets are reviewed at the end of each reporting period.

**l) Borrowing costs**

Borrowing costs are interest and other costs incurred in connection with the borrowing of funds. Borrowing costs directly attributable to acquisition or construction of an asset which necessarily take a substantial period of time to get ready for their intended use are capitalised as part of the cost of that asset. Other borrowing costs are recognised as an expense in the period in which they are incurred.

Where there is an unrealised exchange loss which is treated as an adjustment to interest and subsequently there is a realised or unrealised gain in respect of the settlement or translation of the same borrowing, the gain to the extent of the loss previously recognised as an adjustment is recognised as an adjustment to interest.

**m) Earnings per Share**

Basic earnings per share is calculated by dividing the net profit or loss for the period attributable to equity shareholders by the weighted average number of equity shares outstanding during the period.

For the purpose of calculating diluted earnings per share, the net profit or loss for the period attributable to equity shareholders and the weighted average number of shares outstanding during the period are adjusted for the effects of all dilutive potential equity shares.

**n) Inventory**

Inventories are measured at the lower of cost and net realisable value. The Process Scrap- Metal Swarf generated during the machining process are valued at Net Realisable value. Net realisable value is the estimated selling price in the ordinary course of business, less the estimated costs of completion and selling expenses.

**3 Property, Plant and Equipment**

Particulars	Land	Building	Plant & Machinery	Motor Vehicles	Furniture	Office Equipments	Computer	Total
<b>Cost or deemed cost (Gross carrying amount)</b>								
As on 31st March 2019	4,03,41,860	7,59,16,922	3,65,78,746	2,66,937	9,81,879	22,93,730	42,93,543	16,06,73,617
Additions	-	-	18,79,430	-	-	14,600	7,882	19,01,912
Disposals	-	-	-	-	-	-	-	-
<b>As on 31st March 2020</b>	<b>4,03,41,860</b>	<b>7,59,16,922</b>	<b>3,84,58,176</b>	<b>2,66,937</b>	<b>9,81,879</b>	<b>23,08,330</b>	<b>43,01,425</b>	<b>16,25,75,529</b>
Additions	-	-	32,07,530	-	-	24,459	1,19,567	33,51,556
Disposals	-	-	-	-	-	-	-	-
<b>As on 31st March 2021</b>	<b>4,03,41,860</b>	<b>7,59,16,922</b>	<b>4,16,65,706</b>	<b>2,66,937</b>	<b>9,81,879</b>	<b>23,32,789</b>	<b>44,20,992</b>	<b>16,59,27,085</b>
<b>Accumulated Depreciation/ Amortisation</b>								
<b>As on 31st March 2019</b>	-	<b>3,18,60,727</b>	<b>2,28,06,425</b>	<b>2,31,775</b>	<b>9,35,770</b>	<b>22,12,062</b>	<b>42,88,161</b>	<b>6,23,34,920</b>
Charge for the year	-	41,37,641	27,96,147	9,103	11,938	38,264	7,698	70,00,792
Adjustments on Disposal	-	-	-	-	-	-	-	-
<b>As on 31st March 2020</b>	-	<b>3,59,98,368</b>	<b>2,56,02,572</b>	<b>2,40,879</b>	<b>9,47,708</b>	<b>22,50,326</b>	<b>42,95,859</b>	<b>6,93,35,712</b>
Charge for the year	-	37,46,888	24,59,894	6,747	8,847	30,386	53,177	63,05,939
Adjustments on Disposal	-	-	-	-	-	-	-	-
<b>As on 31st March 2021</b>	-	<b>3,97,45,257</b>	<b>2,80,62,466</b>	<b>2,47,625</b>	<b>9,56,555</b>	<b>22,80,712</b>	<b>43,49,035</b>	<b>7,56,41,650</b>
<b>Carrying amounts (net)</b>								
As on 31st March 2019	4,03,41,860	4,40,56,195	1,37,72,321	35,162	46,109	81,668	5,382	9,83,38,697
As on 31st March 2020	4,03,41,860	3,99,18,553	1,28,55,604	26,058	34,171	58,004	5,566	9,32,39,817
As on 31st March 2021	4,03,41,860	3,61,71,665	1,36,03,240	19,312	25,324	52,077	71,957	9,02,85,434

**Note :**

Plant and machinery does not include the value of rolls and sale proceed of rolls having being depreciated at 100% in the year of acquisition has been credited to profit and loss as sale of discarded assets for the year 2019-2020.

**NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED 31ST MARCH, 2021**

	31 March 2021 Amount (Rs)	31 March 2020 Amount (Rs)
<b>4 Non Current Tax Assets (Net)</b>		
Advance Tax, TDS, TCS and MAT Credit	1,96,56,325	1,69,91,287
Provision for Income Tax	(1,60,92,588)	(90,57,593)
<b>Total</b>	<b>35,63,737</b>	<b>79,33,694</b>
<b>5 Inventories</b>		
(At lower of cost and net realisable value)		
Process Scrap- Metal Swarf	18,42,857	11,02,800
Trading Goods	2,83,233	6,99,682
Other Scrap	68,200	68,200
Consumable Stores	24,44,879	24,00,174
<b>Total</b>	<b>46,39,169</b>	<b>42,70,856</b>
(i) The mode of valuation of inventories has been stated in Note 3 (n)		
(ii) Cost of inventory recognised as expense		
Changes in inventories of Finished Goods and Trading Goods Stores and Spares		
<b>6 Trade Receivables</b>		
Unsecured, considered good	1,07,49,068	42,32,334
<b>Total</b>	<b>1,07,49,068</b>	<b>42,32,334</b>
<b>7 Cash And Cash Equivalent</b>		
Cash in hand (As certified by the management)	1,50,031	2,48,515
Balances with banks In current accounts	52,07,002	2,87,364
<b>Total</b>	<b>53,57,033</b>	<b>5,35,879</b>
<b>8 Loans</b>		
Loan (Unsecured, considered good)	1,25,00,000	-
<b>Total</b>	<b>1,25,00,000</b>	<b>-</b>
<b>9 Other Financial Assets (Current)</b>		
To parties other than related parties		
Deposit	23,55,621	23,58,680
Gratuity ( Under group gratuity scheme with LIC)	1,27,945	1,27,945
Advance To Staff	1,78,460	1,22,960
<b>Total</b>	<b>26,62,026</b>	<b>26,09,585</b>
<b>10 Other Current Assets</b>		
Advances other than Capital Advance		
Balances with government authorities	1,21,843	61,733
Amount paid under protest	56,18,876	43,86,559
Other Advances (Prepaid Expense, Advance to Supplier, and others)	23,43,788	23,74,966
Interest Receivable -Electricity Deposit	9,696	12,363
<b>TOTAL</b>	<b>80,94,203</b>	<b>68,35,620</b>

**NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED 31ST MARCH, 2021**

	31 March 2021 Amount (Rs)	31 March 2020 Amount (Rs)
<b>11 Equity Share Capital</b>		
<b>Authorised</b> 45,00,000 (PY 45,00,000) Equity shares of Rs. 10/- each with voting rights	<b>45,000,000</b>	<b>45,000,000</b>
<b>Issued, Subscribed and Paid-up</b> 41,50,000 (PY 41,50,000) Equity shares of Rs. 10/- each with voting rights	41,500,000	41,500,000
	<b>41,500,000</b>	<b>41,500,000</b>

a) There has been no movement in shares during the year 2019-2020 and 2020-2021.

b) Terms/Rights attached to equity shares

The Company has Equity Shares having par value of Rs. 10/- per share. Each holder of Equity Shares is entitled to one vote per share. Holders of Equity Shares are entitled to dividend, in proportion to the paid up amount, proposed by Board of Directors subject to approval of the shareholders in the ensuing Annual General Meeting. In the event of liquidation of the Company, the holders of Equity Shares will be entitled to receive the remaining assets of the company, after distribution of all preferential amounts, in proportion to their shareholding.

c) Details of shareholders holding more than 5% shares in the Company

	31-03-2021		31-03-2020	
	No. of Shares	% holding	No. of Shares	% holding
<b>Equity shares of Rs 10 each fully paid</b>				
Concast Steels & Alloys limited	1,200,100	28.92%	1,200,100	28.92%
Beekay Steel Industries Limited	1,160,000	27.95%	1,160,000	27.95%
Kamlesh Mercantile Credit Pvt. Ltd.	240,000	5.78%	240,000	5.78%

**12 Other equity**

Below are the components of other equity:

	1st April 2020	Movement during the year	31st March 2021	1st April 2019	Movement during the year	31st March 2020
Retained Earnings	4,65,34,199	3,04,02,373	7,69,36,572	3,29,44,146	1,35,90,053	4,65,34,199
Capital Reserve	6,56,671	-	6,56,671	6,56,671	-	6,56,671
<b>Total</b>	<b>4,71,90,870</b>	<b>3,04,02,373</b>	<b>7,75,93,243</b>	<b>3,36,00,817</b>	<b>1,35,90,053</b>	<b>4,71,90,870</b>

**Retained Earnings:** It comprise of accumulated profit/ (loss) of the Company.

The movement of Rs. (3,04,02,373) [31st March 2020: Rs. 1,35,90,053] was on account of profit/ (loss) incurred by the Company.

**Capital Reserve:** Revaluation reserve created earlier on revaluation of Property, Plant and Equipment has been transferred to Capital Reserve.

	31 March 2021 Amount (Rs)	31 March 2020 Amount (Rs)
<b>13 Borrowings (Non Current)</b>		
<b>Rupee Term Loan</b>		
From Bodies Corporate (unsecured)	5,000,000	17,000,000
	<b>5,000,000</b>	<b>17,000,000</b>

Unsecured Loan from body corporates, repayable after 3 years carrying interest at the rate of 12% p.a to 13% p.a.

**NOTES TO THE FINANCIAL STATEMENTS  
FOR THE YEAR ENDED 31ST MARCH, 2021**

	31 March 2021 Amount (Rs)	31 March 2020 Amount (Rs)		
<b>14 Deferred Tax Liabilities on account of :</b>				
- Property, Plant & Equipment	13,75,675	15,15,214		
	<b>13,75,675</b>	15,15,214		
Deferred Tax Assets on account of :				
- Provision for employee benefits	1,54,688	1,36,684		
	<b>1,54,688</b>	1,36,684		
Net Deferred Tax (Assets)/Liabilities	<b>12,20,986</b>	13,78,530		
<b>Movement in deferred tax liabilities / assets balances</b>				
	3/31/2020	Recognised in Profit or Loss	Recognised in OCI	3/31/2021
Deferred tax liabilities				
- Property, Plant & Equipment, Invest- ment Properties & Intangible assets	15,15,214	(1,39,540)	-	13,75,675
<b>Total deferred tax liabilities</b>	<b>15,15,214</b>	<b>(1,39,540)</b>	-	<b>13,75,675</b>
Deferred tax Assets				
- Provision for employee benefits	1,36,684	21,868	(3,864)	1,54,688
<b>Total deferred tax assets</b>	<b>1,36,684</b>	<b>21,868</b>	<b>(3,864)</b>	<b>1,54,688</b>
<b>Net Deferred tax (assets)/liabilities</b>	<b>13,78,530</b>	<b>(1,61,408)</b>	<b>3,864</b>	<b>12,20,986</b>
<b>15 Trade Payables</b>				
<b>Dues to Micro And Small Enterprises (as per the intimation received from vendors)</b>				
a. Principal and interest amount remaining unpaid				
b. Interest due thereon remaining unpaid				
c. Interest paid by the Company in terms of Section 16 of the Micro, Small and Medium Enterprises Development Act, 2006, along with the amount of the payment made to the supplier beyond the appointed day				
d. Interest due and payable for the period of delay in making payment (which have been paid but beyond the appointed day during the period) but without adding interest specified under the Micro, Small and Medium Enterprises Act, 2006				
e. Interest accrued and remaining unpaid				
f. Interest remaining due and payable even in the succeeding years, until such date when the interest dues as above are actually paid to the small enterprises				
<b>Dues to Others</b>				
Trade Payables				
- For Expenses	4,646,975			4,081,186
	<b>4,646,975</b>			<b>4,081,186</b>
<b>16 Other Financial Liabilities (Current)</b>				
Interest Accrued and due	38,96,836			53,45,519
Creditors for Capital goods	16,42,217			16,15,948
Salary & Wages Payable	2,91,250			50,780
Cheques Overdrawn	-			-
<b>Total</b>	<b>58,30,303</b>			<b>70,12,247</b>
The present value of obligation is determined based on the actuarial valuation using the Projected Unit Credit Method as on 31st March, 2021 which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation. The Company's gratuity expense is recognized under the head – "Employee Benefit Expense"				
<b>17 Other Current Liabilities</b>				
Statutory Liabilities	11,38,939			6,48,838
Advance From Customers	3,00,193			2,30,183
<b>Total</b>	<b>14,39,132</b>			<b>8,79,021</b>

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

	31 March 2021 Amount (Rs)	31 March 2020 Amount (Rs)
<b>18 Provisions</b>		
<b>Provision for Employee Benefit</b>		
Provision for Gratuity	5,56,033	4,91,317
Provision for Leave Pay	63,997	1,24,617
<b>Total</b>	<b>6,20,030</b>	<b>6,15,934</b>
<b>19 Revenue from operations</b>		
Sale of Products		
Process Scrap- Metal Swarf	2,13,83,915	74,17,118
Traded Goods	4,39,620	14,19,535
Other Operating Revenue	3,58,64,585	2,32,76,074
<b>Total</b>	<b>5,76,88,120</b>	<b>3,21,12,727</b>
<b>20 Other Income</b>		
Interest Income	47,759	13,737
Interest on Income Tax Refund	-	2,10,841
Other non operating income*	1,03,68,464	1,08,22,763
<b>Total</b>	<b>1,04,16,223</b>	<b>1,10,47,341</b>
*Other non operating income include:		
Rent Charges	1,02,76,212	1,02,76,212
Facility Management Charges	-	5,00,115
Profit on redemption of mutual fund (short term)	92,252	-
Profit on Sale of Property, Plant and Equipments	-	46,436
<b>Total</b>	<b>1,03,68,464</b>	<b>1,08,22,763</b>
<b>21 Change in Inventories of Finished Goods and Stock In Trade</b>		
<b>Inventories at the end of the year:</b>		
Process Scrap- Metal Swarf	18,42,857	11,02,800
Trading goods	2,83,233	6,99,682
	<b>21,26,090</b>	<b>18,02,482</b>
<b>Inventories at the beginning of the year:</b>		
Process Scrap- Metal Swarf	11,02,800	2,58,365
Trading goods	6,99,682	8,19,960
	18,02,482	10,78,325
<b>Net (increase) / decrease</b>	<b>(3,23,607)</b>	<b>(7,24,157)</b>
<b>22 Employee Benefit Expenses</b>		
Salaries and wages	31,85,732	33,90,348
Contributions to provident and other funds	2,63,938	3,44,035
Gratuity	78,607	68,945
Staff welfare expenses	1,79,735	2,95,652
<b>Total</b>	<b>37,08,012</b>	<b>40,98,980</b>
<b>23 Finance Cost</b>		
Interest expense on:		
Unsecured Loan from Body Corporate	15,61,491	26,35,356
<b>Total</b>	<b>15,61,491</b>	<b>26,35,356</b>



**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

	31 March 2021 Amount (Rs)	31 March 2020 Amount (Rs)
<b>24 Other Expenses</b>		
Power and fuel	15,79,884	16,20,728
Stores Consumption	60,57,339	34,62,651
Rent	1,50,000	40,800
Repairs and maintenance	5,74,931	5,32,717
Insurance	33,401	71,747
Rates & Taxes	1,38,185	2,93,528
Director's Remuneration	3,00,000	3,00,000
Director's Meeting Fees	1,02,000	1,26,000
Telephone & Mobile Expenses	43,410	53,023
Travelling & Conveyance	66,893	70,551
Coolie & Cartage	66,600	60,822
Printing & Stationery	61,381	1,19,797
Freight & Forwarding	3,32,895	1,55,406
Vehicle Maintenance	12,620	18,802
Legal & Professional	12,36,000	15,42,815
Postage & Telegram Charges	-	94,195
Security Service Charges	5,30,758	4,42,728
Miscellaneous Expenses	3,00,883	4,70,085
Machining Charges	29,85,718	18,97,025
Payment to Auditors		
- Audit Fees	50,000	50,000
- Other Work	30,000	38,000
<b>Total</b>	<b>1,46,52,898</b>	<b>1,14,61,420</b>
<b>25 Income and Deferred Taxes (net)</b>		
<b>A. Amount recognised in profit or loss</b>		
<b>Current tax</b>		
Current period	70,34,995	28,94,979
MAT Credit (Entitlement)/ Availed	47,60,774	(5,61,854)
Changes in respect of current income tax of previous year	(1,45,954)	8,432
<b>A</b>	<b>1,16,49,815</b>	<b>23,41,557</b>
<b>Deferred tax</b>		
Attributable to-		
Origination and reversal of temporary differences	(1,61,408)	13,87,813
<b>B</b>	<b>(1,61,408)</b>	<b>13,87,813</b>
<b>Tax expense reported in the Standalone Statement of Profit and Loss [(A)+(B)]</b>	<b>1,14,88,407</b>	<b>37,29,370</b>
<b>B. Income tax recognised in other comprehensive income</b>		
<b>Deferred tax</b>		
On items that will not be reclassified to profit or loss		
- Remeasurements of defined benefit plans	(3,864)	9,283
Income tax expense reported in the Standalone Statement of Profit and Loss	<b>(3,864)</b>	<b>9,283</b>

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

	31 March 2021 Amount (Rs)	31 March 2020 Amount (Rs)
<b>C. Reconciliation of effective tax rate for the year ended 31 March 2020</b>		
Profit/(Loss) before tax (a)	4,18,80,753	1,73,43,509
Income tax rate as applicable (b)	27.82%	27.82%
Calculated taxes based on above, without any adjustments for deductions [(a) x (b)]	1,16,51,226	48,24,964
Permanent tax differences due to:		
Effect of expenses that are not deductible in determining taxable profit	-	-
	<b>1,16,51,226</b>	<b>48,24,964</b>
<b>Tax effect of:</b>		
Adjustments in prior year taxes	(1,45,954)	8,432
Tax impact for difference in depreciation as per books and depreciation as per IT Act	(1,39,540)	(2,84,631)
Deferred tax assets not recognized as realization is not probable		
Others	1,22,675	(8,19,395)
	<b>1,14,88,407</b>	<b>37,29,370</b>

**26 Contingent Liabilities**

Particulars	Financial Year	Forum	Amount	Case No./ Remarks
Non Agricultural Land Tax	2007-08	Honorable High Court of Andhra Pradesh	3,41,185/-	Visakhapatnam Mandel Revenue Office has levied Rs. 3,41,185/- (previous Year Rs. 3,41,185/-) up to Financial Year 2007-08 as Non- Agricultural Land Tax on Factory Land. The Company paid Rs. 2,66,765/- (Previous Year Rs. 2,66,765/-) and filed an appeal which is pending before Hon'ble High Court of Andhra Pradesh.
Arbitration award	01.04.1983 to 01.04.1995	Honorable High Court of Andhra Pradesh	15,22,347/-	The company has received arbitration award to pay Rs. 15,22,347/- (Previous Year Rs. 15,22,347/-) being enhanced lease rent for the period from 01.04.1983 to 01.04.1995 levied by Visakhapatnam Port Trust. The company has filed an appeal before the Hon'ble High Court of Andhra Pradesh challenging the said arbitration award. If the judgement goes in favour of Visakhapatnam Port Trust, the company is liable to pay Rs. 15,22,347/- (Previous Year Rs. 15,22,347/-) along with interest @ 18% p.a.

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

Particulars	Financial Year	Forum	Amount	Case No./ Remarks
Electricity	Sep 1991 to Feb 1992	Honorable High Court of Andhra Pradesh	25,17,925/-	EPDC OF AP LTD (APSEB), Visakhapatnam issued demand notice towards charge for short billing during the period Sep, 1991 to Feb 1992 amounted to Rs. 25,17,925/- (Previous Year Rs. 25,17,925/-). The Company has paid Rs. 12,00,000/- (Previous Year Rs. 12,00,000/-) and filed an appeal before the Honorable High Court of Andhra Pradesh. In the facts and circumstances of the case, the High Court categorically stated that the dispute has to be decided by the electrical inspector within a period of 8 weeks only from the date of receipt of the original order of the high court dated 17.11.2001. The copy of the order was obtained from Andhra Pradesh High Court with a request to direct the APSEB (APEPDCL) to pay the amount held by them with interest.
Sales Tax	2010-11	Sales Tax Appellate Tribunal, Hyderabad	1,30,713/-	While the goods are in Transit from RINL to Beekay Special Steel on A/c sales of the unit on 24.02.11, the Deputy Commercial Tax officer, Dwarka nagar circle verified the documents relating to sales and came to conclusion that materials transporting to customer with our valid documents were not proper and levied VAT 4% (Rs.1,30,713/-) and one time penalty equal to VAT amount of Rs. 130713/-. The unit has taken Rs. 1,30,713 as input credit and on penalty of Rs. 1,30,713/- the unit has gone for appeal before the Appellate Tribunal, Visakhapatnam on 24.08.2011.
Sales Tax	01/2009 to 03/2011	Appellate Deputy Commissioner (CT) Visakhapatnam	28,73,840/-	The Commercial tax Officer, Visakhapatnam issued a demand notice to the company for payment of 30,25,133/- towards input credit excess taken on sales to SEZ units and conversion job work for others. The company has paid Rs.3,78,142/- towards 12.5% tax on 30,25,133/- and appealed before ADC on 27.3.2014, The ADC in his order no. 120, dt 17.07.2014, partly remanded partly dismissed. The company has paid Rs.4,30,748/- on 29.03.2014, and Rs.6,20,317/- paid on 10.10.2014. (Total amount paid Rs.14,29,207/- UNDER PROTEST and filed for stay peption before Addl Commissioner (CT) legal HYD and the addl commissioner dismissed the stay petition vide order no.15, dt 14.09.2015. The CTO vide order no. 75209, ddt 27.7.2017 passed the effectual orders and declared ITC excess claimed as Rs. 28,73,843/-. The matter is pending with Appellate Joint Commissioner, Vijayawada. The amount of 15,426/- has been paid in the year 2020-21 via DD no. 431619/17.12.2020

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

Particulars	Financial Year	Forum	Amount	Case No./ Remarks
Sales Tax	01/2009 to 03/2011	Appellate Deputy Commissioner (CT) Visakhapatnam	1,44,463/-	The CTO, Visakhapatnam issued a demand notice to the company towards penalty on input credit excess taken on Rs. 30,25,133/- vide CTO order no.FORM VAT 305, dt 27.11.2012, (10% penalty on Rs.30,25,133/- ) Rs. 3,02,513/- The Appellate Deputy Commissioner, passed order vide order no.121, dt 14.07.2014, remanded back the appeal to Commercial Tax Officer. Accordingly as per the directives of Addl Deputy Commissioner, the CTO has revised the excess ITC claimed from 30,25,133/- to 14,44,633/- and the applicable penalty arrived as 1,44,463/-. The Company has paid Rs.18,060/- and gone for appeals before Appellate Joint Commissioner, Vijayawada on leavy of penalty by CTO in his order no.75867, dt 07.08.2017. The Company lost the case Commissioner and filed an appeal with the tribunal, after payment of Rs. 54,175. Total payment under protest stands at Rs. Rs. 72,235.The amount of 90,288/- has been paid in the year 2020-21 via DD no. 431621/17.12.2020
Sales Tax	04/2011 to 07/2012	Appellate Deputy Commissioner (CT) Visakhapatnam	21,08,894/-	The cross audit conducted by CTO, suryabagh circle, Visakhapatnam for the period from April 2011 to July 2012 and issue a demand notice to the company against sales to SEZ units & on conversion job work. The company has paid Rs. 10,87,719/- UNDER PROTEST upto 31.03.2015. and the disputed tax is in appeals before the appellate tribunal (CT), Visakhapatnam.The amount of Rs 10,21,175/- has been paid in the year 2020-21 via DD no. 431620/17.12.2020.
Sales Tax	04/2011 to 07/2012	Appellate Deputy Commissioner (CT) Visakhapatnam	2,10,890/-	Against the VAT assessment order passed by the CTO, for the year April 2011 to July 2012, penalty on ITC Excess claimed by the company, vide order dated 26.10.2016, The company has paid Rs.26,362/- on 18.01.2017, and filed an appeal before Appellate Deputy Commissioner, on 20.01.2017. The ADC has dismissed our appeals vide order no.ADC 1882, dt 25.04.2017. Again the company has paid Rs.79,100/- on 01.08.2017(Total paid 50% of the liability) and filed appeals before the Appellate Tribunal on 03.08.2017 and the appeal is pending for hearing.The amount of 1,05,428/- has been paid in the year 2020-21 via DD no. 431618/17.12.2020.
Sales Tax	2015-16	Commercial Tax Department, Integrated Check Post, BV Palem, Thada	94,458/-	While the goods are in Transit to the customers the assessing authorities of Integrated Check Post, BV Palem, Thada, Andhra Pradesh, had objected the waybill issued by the company due to some technical reasons on 25.03.2016. and passed order towards penalty and compound fee equal to tax liability. The Company has received the order on 30.03.2016 and filing an appeal before additional deputy commission (CT), Visakhapatnam in the month of May 2016.

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

**27 Employee Benefits**

**Statement of Assets and Liabilities for defined benefit obligation**

(Amount in Rs.)

	Leave Encashment		Gratuity	
	31 March 2021	31 March 2020	31 March 2021	31 March 2020
<b>Net defined benefit asset - Gratuity Plan</b>	-	-	-	-
Net defined benefit obligation - Gratuity Plan	(63,997)	(1,24,617)	(5,56,033)	(4,91,317)
<b>Total employee benefit liabilities</b>	<b>(63,997)</b>	<b>(1,24,617)</b>	<b>(5,56,033)</b>	<b>(4,91,317)</b>
Non-current	(21,343)	(69,870)	(3,921)	(45,096)
Current	(42,654)	(54,747)	(5,52,112)	(4,46,221)

**Defined contribution**

Contribution to Defined Contribution Plan, recognized as expense for the period is as under:

(Amount in Rs.)

	<u>31 March 2021</u>	<u>31 March 2020</u>
Employer's Contribution to Provident and Other Funds	2,63,938	3,44,035

**Defined benefits - Gratuity**

The Company's gratuity benefit scheme for its employees in India is a defined benefit plan (unfunded).

The Company provides for gratuity from employees in India as per the Payment of Gratuity Act, 1972. Employees who are in continuous service for a period of 5 years are eligible for gratuity. The amount of gratuity payable on retirement/ termination is the employees last drawn basic salary per month computed proportionately for 15 days salary multiplied for the number of years of completed service.

The present value of obligation is determined based on the actuarial valuation using the Projected Unit Credit Method as on 31st March, 2020 which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation. The Company's gratuity expense is recognized under the head – "Employee Benefit Expense"

These defined benefit plans expose the Company to actuarial risks, such as interest rate risk, liquidity risk, salary escalation risk and regulatory risk.

**Inherent risk**

The plan is defined benefit in nature which is sponsored by the Company and hence it underwrites all the risk pertaining to the plan. In particular, this exposes the Company, to actuarial risk such as adverse salary growth, change in demographic experience, inadequate return on underlying plan assets. This may result in an increase in cost of providing these benefits to employees in future. Since the benefits are lump sum in nature, the plan is not subject to longevity risk.

The following tables analyze present value of defined benefit obligations, expense recognised in statement of Profit and Loss, actuarial assumptions and other information.

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

**Reconciliation of the net defined benefit (asset) liability**

**(i) Reconciliation of present value of defined benefit obligation**

(Amount in Rs.)

	Leave Encashment		Gratuity	
	31 March 2021	31 March 2020	31 March 2021	31 March 2020
(a) Balance at the beginning of the year	1,24,617	1,01,918	4,91,317	3,89,003
(b) Current service cost	33,630	28,681	45,197	39,381
(c) Interest cost	8,474	5,317	33,410	29,564
(d) Actuarial (gains) / losses				
- financial assumptions	-	4,466	-	34,655
- experience adjustment	(1,02,724)	48,150	(13,891)	(1,286)
(e) Benefits paid	-	(63,915)	-	-
<b>Balance at the end of the year</b>	<b>63,997</b>	<b>1,24,617</b>	<b>5,56,033</b>	<b>4,91,317</b>
<b>(ii) Reconciliation of present value of plan assets</b>				
(a) Balance at the beginning of the year	-	-	-	-
(b) Interest income	-	-	-	-
(c) Remeasurements due to:				
Actual return on plan asset less interest on plan asset	-	-	-	-
(d) Contributions by the employer	-	63,915	-	-
<b>(e) Benefits paid</b>	<b>-</b>	<b>(63,915)</b>	<b>-</b>	<b>-</b>
Balance at the end of the year	-	-	-	-
<b>(iii) Net Asset / (Liability) recognised in the Balance Sheet</b>				
Present value of defined benefit obligation	(63,997)	(1,24,617)	(5,56,033)	(4,91,317)
Fair value of plan assets	-	-	-	-
<b>Net defined benefit obligations in the Balance Sheet</b>	<b>(63,997)</b>	<b>(1,24,617)</b>	<b>(5,56,033)</b>	<b>(4,91,317)</b>
<b>(iv) Expense recognised in Statement of Profit and Loss</b>				
Current service cost	33,630	28,681	45,197	39,381
Interest cost	8,474	5,317	33,410	29,564
Expected return on plan assets	-	-	-	-
Immediate recognition of (gain)/ loss on other long term employee benefits	(1,02,724)	52,616	-	-
<b>Amount charged to Statement of Profit and Loss</b>	<b>(60,620)</b>	<b>86,614</b>	<b>78,607</b>	<b>68,945</b>
<b>(v) Remeasurements recognised in other comprehensive income</b>				
Actuarial loss (gain) arising on defined benefit obligation from				
- financial assumptions	-	4,466	-	34,655
- experience adjustment	(1,02,724)	48,150	(13,891)	(1,286)
Actual return on plan assets	-	-	-	-
Less : Interest on plan assets	-	-	-	-
Immediate recognition of (gain)/ loss on other long term employee benefits	1,02,724	(52,616)	-	-
<b>Amount recognised in other comprehensive income</b>	<b>-</b>	<b>-</b>	<b>(13,891)</b>	<b>33,369</b>



**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

**Reconciliation of the net defined benefit (asset) liability**

	Leave Encashment		Gratuity	
	31 March 2021	31 March 2020	31 March 2021	31 March 2020
<b>(vi) Maturity profile of defined benefit obligation</b>				
Within the next 12 months	-	-	58,082	45,197
Between 1 and 5 years	34,998	77,989	66,952	67,076
Between 5 and 10 years	1,39,197	1,83,088	7,33,580	5,49,464
More than 10 years	2,33,001	3,51,976	12,50,570	9,52,057
<b>(vii) Sensitivity analysis</b>				
Defined benefit obligation on discount rate plus 100 basis points	(3,910)	(5,503)	(47,457)	(42,767)
Defined benefit obligation on salary growth rate plus 100 basis points	4563	6,393	53,954	48,811
Defined benefit obligation on discount rate minus 100 basis points	4603	6,449	54,394	49,210
Defined benefit obligation on salary growth rate minus 100 basis points	(4,011)	(5,641)	(48,659)	(43,848)
<b>(viii) Actuarial assumptions</b>				
Discount rate	6.80%	6.80%	6.80%	6.80%
Expected rate of salary increase	5.00%	5.00%	5.00%	5.00%
Retirement age (years)	58	58	58	58
Assumptions regarding future mortality experience are set in accordance with the published rates under Indian Assured Lives Mortality (2006-08).				
<b>(ix) Weighted average duration of defined benefit obligation</b>	10 Years	10 Years	10 Years	10 Years

**28 Earnings per shares**

**Basic earnings per share**

The calculation of basic earnings per share is based on the profit attributable to ordinary shareholders and a weighted average number of ordinary shares outstanding and calculated as follows:

	For the year ended 31 March	
	2021	2020
<b>Profit attributable to ordinary shareholders (basic and diluted)</b>		
Profit after Tax attributable to Equity Shareholders (Rs.)	3,04,02,373	1,35,90,053
Weighted average number of ordinary shares (basic and diluted)		
Weighted average number of ordinary shares	41,50,000	41,50,000
Earnings/ (Loss) per share		
Basic EPS of Rs. 10 each	7.33	3.27
Diluted EPS of Rs. 10 each	7.33	3.27

**29 Related Party Disclosures**

**(A) Enterprise under common control with whom transactions have taken place during the year**

Beekay Steel Industries Ltd  
B P Spring & Engg Co (P) Ltd

**(B) Key Managerial Personnel and their relatives**

Ashok Bansal  
Manav Bansal  
Mukesh Chand Bansal- Non-Execuive Director (Promoter)

**NOTES TO THE FINANCIAL STATEMENT  
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The following transactions were carried out with related parties in the ordinary course of business.

(Amount in Rs.)

Nature of Transactions	Transaction for the year ended		Balance at the year	
	31/03/2021	31/03/2020	31/03/2021	31/03/2020
<b>(A) Enterprise under common control</b>				
Sundry Debtors- Beekay Steel Industries Ltd	-	-	85,01,002	64,05,702
<b>Current Liabilities</b>				
Creditors -Beekay Steel Industries Ltd	-	-	11,86,494	53,03,503
Sales (Goods) - Beekay Steel Industries Ltd	11,33,838	-	-	-
Sales (Capital Goods) - B P Spring & Engg Co (P) Ltd	-	3,82,320	-	-
Sales (Capital Goods) - Beekay Steel Industries Ltd	-	-	-	-
Purchase (Goods, Service, Stores, Spares & Capital goods)- Beekay Steel Industries Ltd	15,62,329	3,84,798	-	-
Conversion/ Machining charges received- Beekay Steel Industries Ltd	1,97,64,022	79,79,997	-	-
Rent Received & Electricity - Beekay Steel Industries Ltd	1,24,73,634	1,21,25,930	-	-

**Compensation of Key Management Personnel of the Company**

Key Management Personnel Compensation comprised the following :

Nature of transaction	Year ended 31 March 2021	Year ended 31 March 2020
Short-term employee benefits	300,000	300,000
Other long-term benefits (Refer Note below)	*	*
Total Compensation paid to key management personnel	300,000	300,000

\* As the future liability for gratuity and compensated encashment is provided on an actuarial basis for the Company as a whole, the amount pertaining to the key management personnel is not ascertainable and, therefore, not included above.

All decisions relating to the remuneration of the directors are taken by the board of directors of the Company, in accordance with shareholder approval, wherever necessary.

**Terms and conditions of transactions with related parties**

The purchase from related party are made in the ordinary course of business and on terms equivalent to those that prevail in arm's length transactions. Outstanding balances at the year-end are unsecured and settlement occurs in cash.

**30 Financial instruments and related disclosures**

**30.1 Fair values vs carrying amounts**

The following table shows fair values of financial assets and liabilities, including their levels in financial hierarchy, together with the carrying amounts shown in the statement of financial position. The table does not include fair value information for financial assets and financial liabilities not measured at fair value if the carrying amount is a reasonable approximation of fair value.

(Amount in Rs)

	Note No.	As at 31st March 2021		As at 31st March 2020	
		Carrying amount	Fair value Level 3	Carrying amount	Fair value Level 3
<b>Financial assets:</b>					
Trade receivables	6	1,07,49,068	-	42,32,334	-
Cash and cash equivalents	7	53,57,033	-	5,35,879	-
Other financial assets	9	26,62,026	-	26,09,585	-
<b>Financial liabilities:</b>					
Borrowings	13	50,00,000	-	1,70,00,000	-
Trade payables	15	46,46,975	-	40,81,186	-
Other financial liabilities	16	58,30,303	-	70,12,247	-

## NOTES TO THE FINANCIAL STATEMENT FOR THE YEAR ENDED 31ST MARCH 2021

### 30.2 Fair value measurement

The fair values of the financial assets and liabilities are included at the amount at which the instrument could be exchanged in a current transaction between willing parties, other than in forced or liquidation sale.

The Company has established the following fair value hierarchy that categorises the value into 3 levels. The inputs to valuation techniques used to measure fair value of financial instruments are:

**Level 1:** The hierarchy uses quoted (adjusted) prices in active markets for identical assets or liabilities.

**Level 2:** The fair value of financial instruments that are not traded in an active market is determined using valuation techniques which maximise the use of observable market data and rely as little as possible on company specific estimates. If all significant inputs required to fair value an instrument are observable, the instrument is included in Level 2.

**Level 3:** If one or more of the significant inputs is not based on observable market data, the instrument is included in Level 3.

The management assessed that trade receivables, cash and cash equivalent, other bank balances, trade payable and other financial assets and liabilities approximate their carrying amounts largely due to the short term maturities of these instruments.

### 30.3 Financial risk management

The Company has exposure to the following risks arising from financial instruments:

- (i) Credit risk
- (ii) Liquidity risk
- (iii) Market risk

#### Risk management framework

The Company's principal financial liabilities comprises of borrowings, trade and other payables. The main purpose of these financial liabilities is to finance the Company operations. The Company's principal financial assets include trade and other receivables and cash and cash equivalents that derive directly from its operations.

The Company's activities expose it to a variety of financial risks, including market risk, credit risk and liquidity risk. The Company's primary risk management focus is to minimise potential adverse effects of market risk on its financial performance. The Company's exposure to credit risk is influenced mainly by the individual characteristic of each customer and the concentration of risk from the top few customers. The Company's risk management assessment and policies and processes are established to identify and analyse the risks faced by the Company, to set appropriate risk limits and controls, and to monitor such risks and compliance with the same. Risk assessment and management policies and processes are reviewed regularly to reflect changes in market conditions and the Company's activities.

This note presents information about the Company's exposure to each of the above risks, the Company's objectives, policies and processes for measuring and managing risk.

#### (i) Credit risk

Credit risk is the risk of financial loss of the Company if a customer or counterparty to a financial instrument fails to meet its contractual obligations, and arises principally from the Company receivables from customers. Credit arises when a customer or counterparty does not meet its obligations under a financial instrument or customer contract, leading to a financial loss. The Company is exposed to credit risk from its operating activities (primarily trade receivables) and from its financing/investing activities, including deposits with bank and financial guarantees. The Company has no significant concentration of credit risk with any counterparty. The carrying amount of financial assets represent the maximum credit risk exposure.

#### Trade receivable

The risk management committee has established a credit policy under which each new customer is analysed individually for creditworthiness before the Company's standard payment and delivery terms and conditions are offered. The Company's review includes external ratings, if they are available, financial statements, credit agency information, industry information and in some cases bank references.

#### Exposure to credit risks

The Company's exposure to credit risk is influenced mainly by the individual characteristics of each customer. However management also considers the factors that may influence the credit risk of its customer base, including the default risk associated with the industry. Details of concentration percentage of revenue generated from top customer and top five customers are stated below :

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

Particulars	Year ended 31 March 2021		Year ended 31 March 2020	
	%	Amount (Rs)	%	Amount (Rs)
Revenue from top customer	36.23%	2,08,97,860	50.88%	1,63,38,015
Revenue from top five customers	93.01%	5,36,53,089	91.98%	2,95,35,797

Trade receivables are primarily unsecured and are derived from revenue earned from customers. Credit risk is managed through credit approvals, establishing credit limits and by continuously monitoring the creditworthiness of customers to which the Company grants credit terms in the normal course of business. As per simplified approach, the Company makes provision of expected credit loss on trade receivables using a provision matrix to mitigate the risk of default payments and makes appropriate provisions at each reporting date whenever is for longer period and involves higher risk.

**(ii) Liquidity risk**

Liquidity risk is defined as the risk that the Company will not be able to settle or meet its obligations on time or at reasonable price. Prudent liquidity risk management implies maintaining sufficient cash and marketable securities and the availability of funding through an adequate amount of credit facilities to meet obligations when due. The Company's finance team is responsible for liquidity, funding as well as settlement management. In addition, Processes and policies related to such risks are overseen by senior management. Management monitors the Company's liquidity position through rolling forecasts on the basis of expected cash flows.

The Company's approach to managing liquidity is to ensure, as far as possible, that it will have sufficient liquidity to meet its liabilities when they are due, under both normal and stressed conditions, without incurring unacceptable losses or risking damage to the Company's reputation.

**Exposure to liquidity risk**

The table below provides details regarding the remaining contractual maturities of financial liabilities at the reporting date based on contractual undiscounted payments

31 March 2021	Less than 1 year	1-5 years	> 5 years	Total
Borrowings	-	50,00,000	-	50,00,000
Trade payables	46,46,975	-	-	46,46,975
Other financial liabilities	58,30,303	-	-	58,30,303

  

31 March 2020	Less than 1 year	1-5 years	> 5 years	Total
Borrowings	-	17,00,000	-	17,00,000
Trade payables	4,081,186	-	-	4,081,186
Other financial liabilities	7,007,478	-	-	7,007,478

**(iii) Market risk**

Market risk is the risk of loss of future earnings, fair value or future cash flows that may result from a change in the price of a financial instrument. The value of a financial instrument may change as a result of changes in the interest rates and other market changes that effect market risk sensitive instruments. Market risk is attributable to all market risk sensitive financial instruments including investments, receivables, payables and borrowings.

**(a) Interest rate risk**

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Company exposure to the risk of changes in market interest rates related primarily to the Company's short term borrowing with floating interest rates. The Company constantly monitors the credit markets and rebalances its financing strategies to achieve an optimal maturity profile and financing cost.

**Exposure to interest rate risk**

The interest rate profile of the Company's interest bearing financial instruments at the end of the reporting period are as follows:

Particulars	31 March 2021	31 March 2020
<b>Fixed rate instruments</b>		
Financial assets	1,25,00,000	-
Financial liabilities	50,00,000	1,70,00,000
	<b>50,00,000</b>	<b>1,70,00,000</b>
<b>Variable rate instruments</b>		
Financial assets	-	-
Financial liabilities	-	-

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR ENDED 31ST MARCH 2021**

**Sensitivity analysis**

Fixed rate instruments that are carried at amortised cost are not subject to interest rate risk for the purpose of sensitive analysis.

**Cash flow sensitivity analysis for variable rate instruments**

A reasonably possible change of 100 basis points in variable rate instruments at the reporting dates would have increased or decreased profit or loss by the amounts shown below.

**(b) Equity price risk**

The Company is not exposed to equity risks arising from equity investments. The Company have not made any equity investments.

**(c) Currency risk**

The Company does not have currency risks since it is not exposed to any foreign currency transaction.

**31 Capital management**

The Company's management objective are :

- to ensure the Company's ability to continue as a going concern
- to provide an adequate return to shareholders by pricing products commensurately with the level of risk.

The Company monitors capital on the basis of carrying amount of equity including retained earnings as presented on the face of Balance Sheet. The Company manages the capital structure and makes adjustments to it in the light of changes in economic conditions and the risk characteristics of the underlying assets. There is no change in the overall capital risk management strategy as compared to the last year.

The Company monitors capital using debt-equity ratio, which is total debt less investments divided by total equity.

Particulars		31 March 2021	31 March 2020
<b>Total debt (Bank and other borrowings)</b>	<b>A</b>	<b>50,00,000</b>	<b>1,70,00,000</b>
Equity	B	11,90,93,243	8,86,90,868
Liquid investments including bank deposits	C	53,57,033	5,35,879
Debt to Equity (A / B)		0.04	0.19
Debt to Equity (net) [(A-C) / B]		(0.00)	0.19

In addition the Company has financial covenants relating to the banking facilities that it has taken from all the lenders like interest service coverage ratio, Debt to EBITDA, current ratio etc. which is maintained by the Company.

**32** Certain balances of Financial/ non financial assets and liabilities, Trade Receivables, Trade Payables are subject to confirmation.

**33** The earstwhile factory of the company at Malkapuram post, Vishakapatnam – 530011, in the State of Andhra Pradesh, was on leasehold plot of land obtained from Vishakapatnam Port Trust (VPT). The said plot was obtained on two leases which expired on 10/12/2007. The lease was not renewed by VPT and the possession was taken by the said Port Trust, including the company's assets viz. Plant & machinery, equipment, furniture, which were lying in the factory premises on the date the Port Trust took possession. The company has filed a writ petition in the High Court of Andhra Pradesh at Amravati which is pending conclusion by the Hon'ble Court, in order to obtain the possession of its various assets lying at the earstwhile factory premises. As per the said writ petition the value of the said Assets have been claimed to be atleast Rs. 15 Crores.

**34** Previous Year's figures have been regrouped / re-arranged, wherever considered necessary to confirm to this year's classification.

**For and on behalf of the Board of Directors**

In terms of our report of even date attached

For **S.Jaykishan**  
Chartered Accountants  
**FRN. 309005E**

Sd/-  
**Harish Patwari**  
Partner

**Membership No.: 065738**  
**Dated: The 29th day of June, 2021**  
**Place: Kolkata**  
**UDIN : 21065738AAAABR6831**

Sd/-  
**R. Jagadeeswara Rao**  
CFO

Sd/-  
**Debolina Karmakar**  
Company Secretary  
(Membership No.: A62738)

Sd/-  
**Ashok Kumar Bansal**  
Whole Time Director  
(DIN: 00283193)

Sd/-  
**Manav Bansal**  
Director  
(DIN: 00103024)

# BOOK POST



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