

SEPTEMBER 05, 2020

RSTL/2020

To,
BSE Limited
Compliance Department,
Phiroze Towers, Dalal Street,
Mumbai- 400001, Maharashtra
(Security Code: 540082 , Security Id: RSTL)

Respected Sir/Madam,

Sub: Submission of Annual Report for F. Y.2019-20

With reference to captioned subject and pursuant to Regulation 34 of SEBI (LODR) Regulation, 2015, we hereby submit 19th Annual Report for FY 2019-20 of the Company.

Kindly take the same on Record.

Yours Sincerely

For **RIDDHI STEEL AND TUBE LIMITED (CIN: L27106GJ2001PLC039978)**

Rajesh Mittal

RAJESHKUMAR R MITTAL
MANAGING DIRECTOR
DIN: 00878934
PLACE: AHMEDABAD





Annual Report 2019-20



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INFORMATION OF THE COMPANY

BOARD OF DIRECTORS

NAME	DESIGNATION	DIN
RAJESHKUMAR RAMKUMAR MITTAL	Managing Director	00878934
PREETI MITTAL RAJESHKUMAR	Director & CFO	01594555
PARAS KUMARPAL SHAH	Independent Director	07438621
SAURIN SHAILESH SHAH	Independent Director	07438637
KIRANKUMAR MUSHADDILAL AGARWAL	Independent Director	08105221

COMPOSITION OF AUDIT COMMITTEE, STOCK HOLDER RELATIONSHIP COMMITTEE & NOMINATION AND REMUNERATION COMMITTEE

PARAS K. SHAH	Chairman
KIRANKUMAR M. AGARWAL	Member
MR. SAURIN S. SHAH	Member

REGISTERED OFFICE

83/84, Village Kamod, Piplaj-Pirana Road, Ahmedabad 382427

E-mail: info@riddhitubes.com

Website: <http://www.riddhitubes.com>

STATUTORY AUDITOR
M/s Jigar Shah and Associates
Chartered Accountants
Ahmedabad

SECRETARIAL AUDITOR
Mr. Siddharth N. Maniar
Practicing Company Secretary
Ahmedabad

INTERNAL AUDITOR
M/s C. P. SHAH & Co.
Chartered Accountants
Ahmedabad

COST AUDITOR
M/s. Mayur C. Undhad & Co.
Cost Accountants
Ahmedabad

CORPORATE IDENTIFICATION NUMBER (CIN):

L27106GJ2001PLC039978
Scrip Code: RSTL/540082
ISIN : INE367U01013

REGISTRAR & TRANSFER AGENT

Karvy Fintech Private Limited
Hyderabad, India
Tel: +91-40-67162222
Website: www.karisma.karvy.com
SEBI Registration No: INR000000221

NOTICE of 19th Annual General Meeting

NOTICE is hereby given that the 19th Annual General Meeting of the Company “RIDDHI STEEL AND TUBE LIMITED” (CIN: L27106GJ2001PLC039978) will be held on Monday September 28, 2020 at 12.00 Noon. at the deemed premises of Registered office of the company at 83/84, Village Kamod, Piplaj-Pirana Road, Ahmedabad 382427, through Video Conferencing (VC)/Other Audio Visual Means (OAVM), without the physical presence of the Members at a common venue to transact the following business:

ORDINARY BUSINESS

1. To receive, consider and adopt Audited Financial Statements for the Financial Year ended on 31st March, 2020 together with the Reports of the Board of Directors and Auditors thereon.
2. To Re-appoint a Director Mrs. Preeti Mittal (DIN 01594555) who retires by rotation and being eligible offers herself for Re-appointment.

SPECIAL BUSINESS

3. To Re-appointment of Mr. Rajeshkumar Ramkumar Mittal (DIN 00878934) as Managing Director

To consider and, if thought fit to pass with or without modification(s), the following resolution as a **Special Resolution:**

“RESOLVED THAT pursuant to the provisions of Section 196, 197 ,203 and any other applicable provisions of the Companies Act, 2013 (“Act”) and the rules made there under, as amended from time to time, read with Schedule V to the Act, and Articles of Association of the Company and subject to the such consents and permissions as may be required , approval of Members of the Company be and is hereby accorded to re-appoint Mr. Rajeshkumar Ramkumar Mittal as Managing Director of the Company for a period of 5 (five) Years with effect from 8th January 2021, upon the terms and conditions set out in the Explanatory Statement annexed to the Notice convening this meeting (including remuneration to be paid in the event of loss or inadequacy of profits in any financial year during the period of 3 years from the date of his appointment), with liberty to the Board of Directors of the Company (hereinafter referred to as “the Board” (which term shall be deemed to include any Committee of the Board constituted to exercise its powers, including the powers conferred by this Resolution) to alter and vary terms and conditions of the said appointment in such manner as may be agreed to between the Board and Mr. Rajeshkumar Ramkumar Mittal ;

“RESOLVED FURTHER THAT the Board be and is hereby authorized to take such steps as may be necessary for obtaining necessary approvals - statutory, contractual or otherwise, in relation to the above and to settle all matters arising out of and incidental thereto and to sign and execute deeds, applications, documents and writings that may be required, on behalf of the Company and generally to do all such other acts, deeds, matters and things as may be necessary, proper, expedient or incidental for giving effect to this Resolution.”

4. Ratification of Remuneration to Cost Auditor:

To ratify the remuneration of the Cost Auditors for the Financial Year ending on 31st March, 2021 and in this regard to consider and, if thought fit, to pass the following resolution as an **Ordinary Resolution:**

“RESOLVED THAT pursuant to provisions of section 148(3) of the Companies Act, 2013 and Rules made thereunder, approval of the members be and is hereby accorded for the ratification of remuneration of ₹22,000/- (Rupees Twenty Two Thousand Only) plus taxes, out-of-pocket, travelling and living expenses payable to M/s. Mayur C. Undhad & Co., Cost Accountants (firm registration no. 103961) appointed by the Board of Directors as Cost Auditor of the Company for the financial year 2020-21.”

For and on behalf of the Board
For **Riddhi Steel and Tube Limited**

RajeshKumar Mittal
Managing Director
DIN 00878934

Date: September 03, 2020
Place: Ahmedabad

NOTES:

1. In view of the global outbreak of the Covid-19 pandemic, the Ministry of Corporate Affairs ('MCA') has vide its General Circular No. 20/2020 dated 5th May 2020 read with General Circulars Nos. 14/2020 dated 8th April 2020 and 17/2020 dated 13th April 2020 (collectively referred to as 'MCA Circulars') permitted the holding of the Annual General Meeting ('AGM') through Video Conferencing (VC)/Other Audio Visual Means (OAVM), without the physical presence of the Members at a common venue. In compliance with the provisions of the Companies Act, 2013 ('Act'), Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') and MCA Circulars, the AGM of the Company is being held through VC/OAVM.
2. The Statement setting out material facts pursuant to section 102 of the Companies Act, 2013, which sets out details relating to business for item no. 3 & 4 and the relevant details, pursuant to 36(3) of the SEBI Listing Regulations and Secretarial Standard on General Meetings issued by the Institute of Company Secretaries of India, in respect of Director seeking re-appointment at this AGM is annexed.
3. PURSUANT TO THE PROVISIONS OF THE ACT, A MEMBER ENTITLED TO ATTEND AND VOTE AT THE AGM IS ENTITLED TO APPOINT ONE OR MORE PROXIES TO ATTEND AND VOTE INSTEAD OF HIMSELF/HERSELF AND THE PROXY NEED NOT BE A MEMBER OF THE COMPANY. Since this AGM is being held pursuant to the MCA Circulars through VC/OAVM, physical attendance of Members has been dispensed with. Accordingly, the facility for appointment of proxies by the Members will not be available for this AGM and hence the Proxy Form, Attendance Slip and Route Map for the AGM are not annexed to this Notice. However Corporate members appointed under Section 113 of the Companies Act, 2013 shall send their authorized representatives to attend the meeting are requested to send to the Company a certified copy of the Board Resolution authorizing their representative to attend and vote on their behalf at the meeting.
4. Members, Proxies and Authorised Representatives are requested to carry to the meeting, the attendance slips enclosed herewith duly completed and signed mentioning therein details of their DP ID and client ID/ Folio No.
5. In case of Joint-holders attending the meeting, only such joint holder who is higher in the order of names will be entitled to vote.
6. The related Explanatory Statement pursuant to Section 102 of the Companies Act, 2013 ("Act") setting out material facts concerning the business under Item no. 4 of the Notice, is annexed hereto.
7. The Company's Registrar & Share Transfer Agents (RTA) are:
Karvy Fintech Private Limited.
Karvy Selenium Tower B, Plot Nos. 31 & 32 Financial District
Nanakramguda, Serilingampally Mandal, Hyderabad - 500032
Phone: +91 040 67162222 Email: kishore.bv@karvy.com | Website: www.karvyfintech.com
All the correspondence with regard to transfer of shares etc. shall be addressed to them directly.
8. The Register of Members and Share Transfer Books will remain closed from 21st September 2020 to 28th September 2020 (both days inclusive) for the purpose of 19th AGM and enforcement thereof.
9. As per Notification issued by Ministry of Corporate Affairs dated 19th of March, 2015 with reference to the Companies (Management and Administration) Rules, 2014, Companies covered under Chapter XB and XC as per SEBI (ICDR) Regulation, 2009 will be exempted from E-Voting provisions. Your Company is covered under Chapter XB and listed on SME platform of BSE Limited. Therefore Company is not providing E-Voting facility to its members.
10. Pursuant to the provision of Section 72 of the Companies Act, 2013, members can avail facility for nomination in respect of shares held by them. All the members are holding shares in electronic

form are, therefore, requested to contact their respective Depository Participant for availing this facility.

11. Members are requested to bring their copy of Annual Report and the Attendance Slip which is duly completed and signed, mentioning therein details of their DP ID and Client ID / Folio No. with them at the Annual General Meeting as a measure of economy as the same will not be supplied again at the meeting.
12. All documents mentioned in the accompanying notice are open for inspection at the registered office of the Company between 10 am to 5 pm on all working days except Saturday and Sunday up to and including the date of this Annual General Meeting.
13. To support the 'Green Initiative' in the Corporate Governance taken by the Ministry of Corporate Affairs, to contribute towards the Greener Environment and to receive all documents, Notices, including Annual Reports and other communications of the Company, investors should register their Email Address with RTA if shares are held in physical mode or with the depository participants if the shares held in electronic mode.
14. Electronic Copy of the Notice of the 19th Annual General Meeting (AGM) along with Attendance slip, Proxy Form, and Annual report for F.Y. 2019-20, is being sent to all the members whose email ids are registered with the Company/ Depository Participant(s)/ RTA for communication purposes, unless any member has requested for a physical copy of the same.

For members who have not registered their email address, may send request to the Company's investor email id: compliance@riddhitubes.com. Members are requested to please note that all the queries should be given in writing to the company at compliance@riddhitubes.com before 48 hours of the annual general meeting.

15. Members may also note that the notice of the 19th AGM and the Annual Report for the Financial year 2019-20 will also be available on the Company's website www.riddhitubes.com. The physical copy of the aforesaid documents will be available at the Company's registered office in Ahmedabad for inspection during normal business hours on all working days except Saturday, upto and including the date of AGM.
16. Members are requested to notify any change in their postal/ mail or email address: To their depository participants (DP's) in respect of the shares held in demat form to the Registrar and Share Transfer Agent (RTA), aforesaid mentioned address.
17. Members may please note that no gifts, gift coupons, or cash in lieu of gifts will be distributed at meeting.
18. The Securities and Exchange Board of India (SEBI) has mandated the submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in electronic form are, therefore, requested to submit their PAN to their Depository Participants with whom they are maintaining their Demat accounts. Members holding shares in physical form can submit their PAN to the Company.
19. The Company has appointed CA Chetan Shah, Practicing Chartered accountant to act as the Scrutinizer for the meeting.
20. The attendance of the Members attending the AGM through VC/OAVM will be counted for the purpose of reckoning the quorum under Section 103 of the Companies Act, 2013.
21. The relevant details, as required under Regulation 36(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), of the person seeking appointment or re-appointment as Director under Item No. 3 & 4 of the Notice are provided hereunder;

Name of Director	Mrs. Preeti Mittal	Mr. Rajeshkumar Mittal
Date of Birth	January 23, 1973	August 02, 1966
Nationality	Indian	Indian
Qualifications	Bachelor of Arts from Kurukshetra University	Commerce Graduate
Expertise in Specific functional areas	She is associated with Company since last 12 years. She has experience in the business and industry and looks after operations of the company.	Have experience of more than more than 2 decade. He is responsible for the overall growth and development of Company and for taking all key decisions in consultation with the Board.
Disclosure of relationships between directors inter-se;	Mrs. Preeti Mittal is wife of Mr. Rajeshkumar Mittal who is acting in capacity of Managing Director in the Company	Mrs. Rajeshkumar Mittal is husband of Mrs. Preeti Mittal who is acting in capacity of Director & CFO in the Company
Date of Appointment on Board	Original date of appointment as director: 04/07/2002 Date of appointment at current designation as director: 08/01/2016 Date of Designation as CFO: 09/01/2016	Original date of appointment as director: 16/10/2006 Date of appointment at current designation as Managing Director: 08/01/2016
Names of listed entities in which the person also holds the directorship and the membership of Committees of the board;	Nil	Nil
Memberships/Chairpersonships of committees of Board	No Memberships / Chairmanships of Committees of other Companies	
Shareholding in the Company	29,69,004	4,77,350

22. INSTRUCTIONS FOR SHAREHOLDERS ATTENDING THE AGM THROUGH VC/OAVM ARE AS UNDER

- The attendance of the Members attending the AGM through VC/OAVM will be counted for the purpose of reckoning the quorum under Section 103 of the Companies Act, 2013.
- The helpline number regarding any query / assistance for participation in the AGM through VC/ OAVM is +91 99 7844 3815 or can mail at compliance@riddhitubes.com
- All Members whose name appears in the record date will be provided with a facility to attend the AGM through VC/OAVM. Shareholders may access the same at <https://rb.gy/dfjnz9> after login/signing up. The login Id and Password is shared in the Email to the members of the Company in the mail body. Any person, who acquires shares of the Company and becomes a Member of the Company after sending of the Notice and holding shares as of the record date, may obtain the User ID and Password by sending a request at helpdesk compliance@riddhitubes.com. The Member has to type login Id and Password and can participate through the same.
- Shareholders are encouraged to join the Meeting through Laptops for better experience.
- Further shareholders will be required to allow Camera and use Internet with a good speed to avoid any disturbance during the meeting.
- Please note that Participants Connecting from Mobile Devices or Tablets or through Laptop connecting via Mobile Hotspot may experience Audio/Video loss due to Fluctuation in their respective network. It is therefore recommended to use Stable Wi-Fi or LAN Connection to mitigate any kind of aforesaid glitches.
- Shareholders who would like to express their views/ask questions during the meeting may register themselves as a speaker by sending their request in advance atleast **7 days prior to meeting** mentioning their name, demat account number/folio number, email id, mobile number at compliance@riddhitubes.com. The shareholders who do not wish to speak during the AGM but have queries may send their queries in advance **7 days prior to meeting** mentioning their name, demat account number/folio number, email id, mobile number at compliance@riddhitubes.com. These queries will be replied to by the company suitably by email.

**Annexure to Notice Explanatory Statement.
(Pursuant to Section 102(1) of the Companies Act, 2013)**

Item No. 3

The Company had appointed Mr. Rajeshkumar Ramkumar Mittal as Managing Director of the Company for a period of five years from 8th January 2016 post approval of members. The tenure of Mr. Rajeshkumar Mittal comes to an end on 7th January 2021. The Members had subsequently approved the said appointment and terms of his remuneration.

Mr. Rajeshkumar Mittal is currently the Managing Director and Promoter of our Company. He is a commerce graduate. He is an energetic and enthusiastic entrepreneur and is having experience more than 20 years of experience in the business and industry. He is responsible for the overall growth and development of our Company and for taking all key decisions in consultation with the Board. He has been on the board of our Company since March 22, 2013. Based on his vast experience and on recommendation of the Nomination and Remuneration Committee and subject to the approval of the Members, approved the re-appointment of Mr. Rajeshkumar Mittal as Managing Director for further period of five years post completion of his present term in January 2021.

Mr. Rajeshkumar Mittal is not disqualified from being appointed as a Director in terms of Section 164 of the Companies Act 2013 and has given his consent to act as Managing Director of the Company. Mr. Rajeshkumar Mittal satisfies all conditions as set out in Section 196 (3) and Part –I of Schedule V of the act for being eligible for his appointment. approval of the shareholders of the Company. Further your board has approved that in any financial year the Company has no profits or inadequate profits then his remuneration, perquisites and other allowances shall be governed and regulated by the limits prescribed in Section II of Part II of Schedule V to the said Act, as may be amended from time to time.

The main terms and conditions for the re-appointment of Mr. Rajeshkumar Mittal as Managing Director (MD), are as follows:

I. Period - From 8th January 2021 to 7th January 2026

II. A. Remuneration

a) Salary:

Up to Rs. 6,00,000 p.a. subject to section 197(1) limiting the quantum of remuneration payable to one managing director or whole time director or manager shall not exceed 5% of the net profits of the company and if there is more than one such director remuneration shall not exceed 10% of the net profits to all such directors and manager taken together.

b) Benefits, Perquisites & Allowances:

Details of Benefits, Perquisites and Allowances are as follows:

- (i) Reimbursement of hospitalisation and major medical expenses incurred as per Rules of the Company (this includes mediclaim insurance premium).
- (ii) Car facility as per Rules of the Company.
- (iii) Telecommunication facility as per Rules of the Company.
- (v) Personal accident insurance as per the rules of company.
- (vi) Other perquisites and allowances like Leave Travel Concession/Allowance,
- (vii) Any other expense incurred for the purpose of conducting the business of the Company.

III. Nature of Duties –

The MD shall devote his whole time and attention to the business of the Company and carry out such duties as may be entrusted to him by the Board from time to time and separately communicated to him and such powers as may be assigned to him, subject to superintendence, control and directions of the Board in connection with and in the best interests of the business of the Company.

IV. The office as a director of the Company pursuant to Section 152(6) of the Companies Act, 2013 shall be liable to retire by rotation in an annual general meeting.

Mr. Rajeshkumar Mittal holds 4,29,350 equity shares of the face value of ₹10/- each in the Company and is not related to the other Directors or Key Managerial Personnel of the company except Mrs Preeti Rajeshkumar Mittal director & CFO of the Company who is wife of Mr. Rajeshkumar Mittal.

This Explanatory Statement may also be considered as the requisite abstract under Section 190 of the Companies Act 2013 setting out the terms and conditions of appointment of Mr. Rajeshkumar Mittal as the Managing Director of the Company.

Item No. 4

In terms of the provisions of Section 148 of the Companies Act, 2013 and based on the recommendation of the Audit Committee, the Board of Directors had approved the appointment and remuneration of M/s Mayur C. Undhad & Co., Cost Accountants (Firm Registration No. 103961) as the Cost Auditors of the Company for the financial year 2020-21 at remuneration of Rs.22,000/- (Rupees Twenty Two Thousand only) plus Service Tax & re-imbusement of out-of-pocket expenses for conducting the audit of the cost accounting records of the Company for issuing the compliance report on cost accounting records maintained.

Section 148(3) of the Companies Act, 2013 read with Rule 14(a) of the Companies (Audit and Auditors) Rules, 2014 ("the Act") requires the Board to appoint an individual, who is a cost accountant in practice or a firm of cost accountants in practice, as cost auditor on the recommendations of the Audit committee, which shall also recommend remuneration for such cost auditor and such remuneration shall be considered and approved by the Board of Directors and ratified subsequently by the shareholders.

Accordingly, the members are requested to ratify the remuneration payable to the Cost Auditors for audit of cost records of the Company for the financial year 2018-19 as set out in the resolution for the aforesaid services to be rendered by them.

None of the Directors and Key Managerial Personnel of the Company or their relatives are concerned or interested, financially or otherwise, in the resolution.

The Board of Directors recommends the Resolution set out at Item No. 4 of the Notice for approval by the Members to be passed as an Ordinary Resolution.

For and on behalf of the Board

For **Riddhi Steel and Tube Limited**

RajeshKumar Mittal

Managing Director (DIN 00878934)

Date: September 03, 2020

Place: Ahmedabad

Directors Report

To,
The Members
Riddhi Steel and Tube Limited
83/84, Village Kamod, Piplaj-Pirana Road,
Ahmedabad - 382427, Gujarat.

Your Directors are pleased to present their 19th Boards Report with the Audited Financial statements for the year ended on 31st March, 2020.

Financial summary or highlights of performance of the Company:

Particulars	(Amt in ₹.)	
	2019-20	2018-19
Revenue from Operations	2,91,68,67,826	3,76,53,97,393
Other Income	1,21,73,570	1,82,99,600
Total Income from Operations (Net)	2,92,90,41,396	3,78,36,96,993
Profit/(Loss) before Depreciation and Tax	18,56,95,553	21,09,17,656
Less: Finance Cost	11,34,29,589	11,77,63,979
Less: Depreciation	3,67,23,880	3,51,21,407
Profit/(Loss) before Tax and Extra Ordinary Items	3,55,42,084	5,80,32,270
Less: Extra Ordinary Items	-	-
Less: Current Tax	74,00,000	1,80,00,000
Deferred Tax	(24,79,332)	(97,34,072)
Prior Period Tax	-	-
Profit/(Loss) After Tax	3,06,21,416	4,97,66,342
Balance Carried to Balance Sheet	3,06,21,416	4,97,66,342
Paid up Capital	82902520	82902520
Earnings Per Share	3.69	6.00
Reserves and Surplus	36,97,65,849	33,91,44,432

The total income from operations (net) of the Company for the year under review is ₹ **2,92,90,41,396** as compared to ₹ **3,78,36,96,993** in the previous year. Profit after taxation stood at ₹ **3,06,21,416** as compared to Profit after taxation of ₹ **4,97,66,342** in the previous year.

Dividend:

With a view to conserve resources and expansion of business, your Directors have thought it prudent not to recommend any dividend for the financial year under review.

Transfer to reserves:

The Company has transferred of ₹ 3,06,21,416 (Profit for the current year) in Reserve and Surplus.

Change In Nature Of Business:

During the year, your Company has not changed its business or object and continues to be in the same line of business as per main object of the Company.

Share Capital:

The Paid up equity capital as on March 31, 2020 was ₹ 8,29,02,520 during the year under review. The Company has not issued any shares with differential rights as to dividend, voting or otherwise.

Deposits:

The Company has neither accepted nor renewed any deposits within the meaning of Companies (Acceptance of Deposits) Rules, 2014.

Directors Responsibility Statement:

In terms of Section 134(5) of the Companies Act, 2013, in relation to the audited financial statements of the Company for the year ended 31st March, 2020, the Board of Directors hereby confirms that:

- I. In the preparation of the annual accounts, the applicable accounting standards had been followed along with proper explanation relating to material departures.
- II. The Directors had selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the company at the end of the financial year and of the profit or loss of the Company for that period.

III. The Directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safe guarding the assets of the Company and for preventing and detecting fraud and other irregularities.

IV. The Directors had prepared the annual accounts on a going concern basis and that the directors had laid down internal financial control to be followed by the company and that such internal financial control is adequate and were operating effectively.

V. The directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

Internal Financial Controls

Adequate internal control systems commensurate with the nature of the Company's business, its size, and complexity of its operations are in place and have been operating satisfactorily. Internal control systems comprising policies and procedures are designed to ensure reliability of financial reporting, timely feedback on achievement of operational and strategic goals, compliance with policies, procedure, applicable laws and regulations and that all assets and resources are acquired economically, used efficiently and adequately protected.

Corporate Social Responsibility (CSR)

Since the Company's net worth does not exceed Rs. 500 crores or Company's turnover does not exceed Rs. 1000 crores or the Company's net profit does not exceed Rs. 5 crore in any financial year, hence the provisions of section 135 of the Companies Act, 2013 are not applicable.

Details of the Directors and Key Managerial Personnel:

During the year under review following were the changes during there was no change in Board of Directors.

DIRECTORS AS ON APRIL 01, 2019	RAJESHKUMAR MITTAL	PREETI MITTAL	PARAS SHAH	SAURIN SHAH	KIRANKUMAR AGARWAL
	Managing Director	DIRECTOR & CFO	Independent Director	Independent Director	Independent Director
DIRECTORS AS ON MARCH 31, 2020	RAJESHKUMAR MITTAL	PREETI MITTAL	PARAS SHAH	SAURIN SHAH	KIRANKUMAR AGARWAL
	Managing Director	DIRECTOR & CFO	Independent Director	Independent Director	Independent Director

Further none of the Directors of the Company are disqualified under sub-section (2) of Section 164 of the Companies Act, 2013. In accordance with the provisions of Section 152 and other applicable provisions if any of the Companies Act 2013 read with the Companies (Appointment and Qualification of Directors) Rules 2014 (including and statutory modification(s) or re-enactment(s) thereof for the time being in force) Mrs. Preeti Mittal, Director is liable to retire by rotation at the ensuing Annual General Meeting (AGM) and being eligible, have offered herself for re-appointment. Further Mr. Rajeshkumar Mittal who has been on the board of our Company since March 22, 2013 was designated as Managing director for a period of 5 (five) Years with effect from 8th January 2016. The tenure of Mr. Rajeshkumar Mittal is ending on January 07, 2021, your company has proposed the re-appointment on recommendation of the Nomination and Remuneration Committee and subject to the approval of the Members in the ensuing AGM for further period of five years post completion of his present term in January 2021. Further during the year under review Mr. Devansh Gala has ceased to be the Company Secretary and Compliance officer w.e.f February 28, 2020.

Independent Directors:

As per Schedule IV of the Companies Act 2013 a separate meeting of Independent Directors without the attendance of Non- Independent Directors to discuss the agenda items as required under the Companies Act 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015. The Independent Directors reviewed the performance of non-independent directors and the Board as whole reviewed the performance of the Chairperson of the Company taking into account the views of executive and non-executive directors and assessed the quality quantity and timeliness of flow of information between the Company Management and the Board that is necessary for the Board to effectively and reasonably perform their duties. The Independent Directors expressed their satisfaction with overall functioning and implementations of their suggestions. The Company has received necessary declaration from each independent director under Section 149 (7) of the act that they meet the criteria of independence laid down in Section 149 (6) of the act

Meeting of the Company

Regular meetings of the Board are held at least once in a quarter. Additional Board meetings are convened, as and when require,

During the year under review, following meetings were held **Meeting of Board of Directors**

Sr no	Date of Meeting	RAJESHKUMAR MITTAL	PREETI MITTAL	PARAS SHAH	SAURIN SHAH	KIRANKUMAR AGARWAL
		Managing Director	DIRECTOR & CFO	Independent Director	Independent Director	Independent Director
1.	01/04/2019	√	√	√	√	√
2.	10/05/2019	√	√	√	√	√
3.	18/06/2019	√	√	√	√	√
4.	04/09/2019	√	√	√	√	√
5.	14/11/2019	√	√	√	√	√
6.	19/12/2019	√	√	√	√	√
7.	02/03/2020	√	√	√	√	√

**Meeting of Committees:
Audit Committee Meeting**

Sr no	Date of Meeting	PARAS SHAH Independent Director	SAURIN SHAH Independent Director	KIRANKUMAR AGARWAL Independent Director
		Chairperson	Member	Member
1.	10/05/2019	√	√	√
2.	18/06/2019	√	√	√
3.	04/09/2019	√	√	√
4.	14/11/2019	√	√	√
5.	02/03/2020	√	√	√

Nomination and Remuneration Committee:

The company has adopted Nomination and Remuneration Policy which is placed on the website.

Sr no	Date of Meeting	PARAS SHAH Independent Director	SAURIN SHAH Independent Director	KIRANKUMAR AGARWAL Independent Director
		Chairperson	Member	Member
1.	10/05/2019	√	√	√
2.	04/09/2019	√	√	√
3.	02/03/2020	√	√	√

Stakeholder Relationship Committee Meeting:

Sr no	Date of Meeting	PARAS SHAH Independent Director	SAURIN SHAH Independent Director	KIRANKUMAR AGARWAL Independent Director
		Chairperson	Member	Member
1.	10/05/2019	√	√	√
2.	04/09/2019	√	√	√
3.	14/11/2019	√	√	√
4.	02/03/2020	√	√	√

Meeting of Independent Director:

Sr no	Date of Meeting	PARAS SHAH	SAURIN SHAH	KIRANKUMAR AGARWAL
1.	02/03/2020	√	√	√

General Meeting:

Type of meeting	Date of meeting	RAJESHKUMAR MITTAL	PREETI MITTAL	PARAS SHAH	SAURIN SHAH	KIRANKUMAR AGARWAL
Extra Ordinary General Meeting (EGM)	05/06/2019	√	√	√	√	√
Annual General Meeting (AGM)	30/09/2019	√	√	√	√	√

Evaluation of Performance of Board:

The Board adopted a formal mechanism for evaluating its performance 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 Board functioning such as composition of the Board & committees, experience & competencies, performance of specific duties & obligations, contribution at the meetings and otherwise, independent judgment, governance issues etc.

Statutory Auditors:

M/s. Jigar Shah and Associates (FRN 128263W) were appointed as the auditors of the company up to the 18th Annual General Meeting (AGM) of the company from the conclusion of 18th AGM till the conclusion of 6th AGM ie 23rd AGM. The requirement for the annual ratification of the auditor's appointment at the AGM has been omitted pursuant to the Companies (Amendment) Act 2017 made effective from May 07, 2018. During the year, the statutory auditors have confirmed that they satisfy the independence criteria required under the Companies Act 2013 and Code of ethics issued by the Institute of Chartered Accountants of India

The Notes to the financial statements referred in the Auditors Report are self-explanatory and therefore do not call for any comments under Section 134 of the Companies Act 2013.

The Auditors' Report does not contain any qualification reservation or adverse remark. The Auditors' Report is enclosed with the financial statements in this Annual Report.

Reporting of frauds:

There was no instance of fraud during the year under review, which required the Statutory Auditors to report to the Audit Committee and / or Board under Section 143(12) of the Act and the rules made there under.

Internal Auditor:

Pursuant to the provision of section 138 of the Companies Act, 2013 and the Companies (Accounts) Rules, 2014, the Company has re-appointed M/s C.P. Shah and Co., Chartered Accountants, Proprietor – Chetan P. Shah as an Internal Auditor of the Company for the Financial Year 2020-21 by the Board of Directors, upon recommendation of the Audit committee.

Cost Auditor:

In terms of provisions of Section 148 of the Companies Act, 2013, Mayur Chhaganbhai Undhad, Cost Accountants, Ahmedabad, were appointed as Cost Auditor of the Company for the financial year 2019-20 by the Board as recommended by the Audit Committee and they have offered themselves for reappointment for the Financial year 2020-21. The members are requested in ensuring AGM to ratify the remuneration of the Mayur Chhaganbhai Undhad for FY 2020-21.

Annexures to Directors Report:**Management Discussion and Analysis:**

The Management Discussion and Analysis Report on the operations of the Company have been provided in a separate section which forms part of this Annual Report. The report on Management Discussion and Analysis is annexed to this Report as "Annexure-A".

Particulars of Employees and Related Disclosures:

Disclosure with respect to remuneration of Directors and employees as required under Section 197 of the Companies Act, 2013 read with Rule 5 (1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 forms part of the Board's Report under "Annexure – B", Details of employee remuneration as required under provisions of Section 197 of the Companies Act, 2013 and Rule 5 (2) and 5 (3) of Rules are available at the Registered Office of the Company.

Extracts of Annual Return

Pursuant to Section 92(3) of the Companies Act, 2013 read with Rule 12(1) of companies (Management and Administration) Rules, 2014, the extract of Annual Return in the prescribed form i.e. Form MGT-9 is annexed herewith as "**Annexure – C**", which forms part of the annual report. The Company has also placed a copy of Annual Return of the Company on its website www.riddhitubes.com

Secretarial Auditor:

Pursuant to the provisions of Section 204 of the Companies Act, 2013 and the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, the Board of Directors based on the recommendations of Audit Committee have appointed M/s. Siddharth N Maniar a Practicing Company Secretary in Practice based in Ahmedabad to undertake the Secretarial Audit of the Company for the financial year ended 31st March, 2020 and further the Secretarial Auditor has offered themselves for reappointment for the financial year 2020-21. The Secretarial Audit Report for the financial year 2019-20 does not contain any qualification, reservation or adverse remark. The Secretarial Audit Report is annexed here to as "**Annexure-D**" and forms part of this Report.

Secretarial Auditor's Observations in Secretarial Audit Report:

There is a qualification, reservation or adverse remarks or disclaimer made by the auditors in their report .

Remark	Explanation by Board
No Company Secretary in the Company during the period 28/02/2020 to 31/03/2020 according to Section 203 of Companies Act, 2013 read with Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014	The Company Secretary & Compliance officer of the Company has resigned from the respective post and company has also issued Advertisement and for appointment of new CS. Company is searching for proper candidate.

Certificate Of Non-Disqualification Of Directors:

Company is listed under SME listed and Pursuant to Regulation 34(3) and Schedule V Para C clause (10) (i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 is not applicable to the Company. However, there are no directors as on March 31, 2020 who are disqualified under the Companies Act 2013.

Material Changes and Commitments Affecting the Financial Position of the Company:

There are no material changes and commitments affecting the financial position of the company have occurred between the ends of the financial year of the company.

Business responsibility report:

The Business Responsibility Report as stipulated under Regulation 34(2) (f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 is not applicable to the Company for the FY ended 31st March, 2020.

Investor Services:

The Company and its Registrar, M/s. Karvy Fintech Private Limited, who is looking after the physical as well as Demat work and also shareholders correspondence in terms of SEBI direction for having a common Registrar and Share Transfer Agent, endeavored their best to service the Investors satisfactorily. Your Company has constituted a Committee comprising of 3 Independent Directors of the Company to redress the Investor grievances.

Particulars of Contracts and Arrangements with Related Party:

The Company has not entered into related party transactions as per Section 188 of the Companies Act 2013.

Subsidiary, Associate or Joint Company:

Your Company does not have any subsidiaries, joint ventures and associate companies.

Vigil Mechanism / Whistle Blower Policy:

The Company has formulated Whistleblower Policy in conformity with the provisions of Section 177 (9) of the Companies Act, 2013 and Listing Regulations to provide a mechanism for any concerned person of the company to approach the Ethics Counselor/ Chairman of the Audit Committee of the Company for the purpose of dealing with instance of fraud and mismanagement, if any and also ensure that whistleblowers are protected from retribution, whether within or outside the organization.

Details of Loan, Guarantee and Investment by the Company:

Details of Loans, Guarantees and Investments covered under the provisions of Section 186 of the Companies Act, 2013 are given in the notes to the Financial Statements.

Report on Corporate Governance:

Your Company is listed on SME Exchange, and as on Financial Year ending 31st March 2020, the provisions relation to Corporate Governance is not applicable to the Company under Regulation 15(2)(b) of SEBI (Listing Obligation Disclosure Requirements) Regulation 2015.

Research & Development

The Company believes that technological obsolescence is a reality. Only progressive research and development will help us to measure up to future challenges and opportunities. We invest in and encourage continuous innovation. During the year under review, expenditure on research and development is not significant in relation to the nature size of operations of your Company.

Prevention of Insider Trading:

In January 2015, SEBI notified the SEBI (Prohibition of insider trading) Regulations, 2015 which came into with effect from 15th May, 2015. Pursuant there to, the Company has formulated and adopted a new Code for Prevention of Insider Trading. The Company has adopted a Code of Conduct for Prevention of Insider Trading with a view to regulate trading in securities by the Directors and designated employees of the Company. The Code requires pre-clearance for dealing in the Company's shares and prohibits the purchase or sale of Company shares by the Directors and the designated employees while in possession of unpublished price sensitive information in relation to the Company and during the period when the Trading Window is closed. The Board is responsible for implementation of the Code. All Directors and the designated employees have confirmed compliance with the Code.

Transfer of Unclaimed Dividend To Investor Education And Protection Fund:

In terms of Section 125 of the Companies Act, 2013 and other applicable provisions, if any, of the Companies Act, 2013 including any statutory modifications or re-enactments thereof, there was no unpaid/unclaimed dividend declared paid last year.

Insurance:

The Company has taken adequate insurance cover on all movable and immovable assets to recover various types of risks.

Policies:

The Company has formulated various policies as required under various Rules and Regulations duly approved by the Board.

Risk Management:

Apart from normal business risk, no major risk is foreseen that in the opinion of the Board may threaten the existence of the Company. During the Year, the Board has decided that Audit Committee shall identify risk, assess, monitor, review and report the risk engaged in the business and shall also carry out the role of Risk Management.

Conservation of Energy, Technological Absorption, Foreign Exchange Earnings & Outgo:

(a) Conservation of energy:

- Steps taken/ impact on Conservation of energy,

The Company has continued its efforts to improve energy efficiency from time to time. The Company has already installed Solar Panel at factory to generate and use the electricity in the Factory.

(b) Technology Absorption:

No new technology is absorbed by the company as company is equipped in well manner with all the required technologies and machineries that it requires in order to have smooth functioning of business operations.

(c) Foreign exchange Earnings and Outgo:

- Foreign Exchange earned in terms of actual Inflows during the year - Nil

- Foreign Exchange outgo during the year in terms of actual Outflows – Nil

DISCLOSURE AS PER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

The Company always endeavors to create and provide an environment to its employees and external individuals engaged with the Company that is free from discrimination and harassment including

sexual harassment. During the year, under review there were no incidences of sexual harassment reported and received.

Secretarial Standard:

During the year under review the company had complied with SS-1 & SS-2 Secretarial Standard on Meetings of The Board Of Directors & Secretarial Standard on General Meetings respectively.

Disclosures:

Your Directors state that no disclosure or reporting is required in respect of the following items as there were no transactions on these items during the year under review:

- I. Details relating to deposits covered under Chapter V of the Act.
- II. Issue of equity shares with differential rights as to dividend, voting or otherwise.
- III. Issue of shares (including sweat equity shares) to employees of the Company under any scheme.
- IV. No significant or material orders were passed by the Regulators or Courts or Tribunals which impact the going concern status and Company's operations in future.

Acknowledgement:

The Board of Directors also wish to place on record their gratitude and appreciation to all the Members and Stakeholders for their trust and confidence shown in the Company.

For Riddhi Steel and Tube Limited

RajeshKumar Mittal

Preeti R. Mittal

Managing Director

DIN : 00878934

Date: September 03, 2020

Place: Ahmedabad

Director & CFO

DIN : 01594555

Date: September 03, 2020

Place: Ahmedabad

Management Discussion and Analysis Annexure A

SPECIAL NOTE ON CORONAVIRUS PANADEMIC

By mid of March 2020, the outbreak of Coronavirus (COVID-19) pandemic has been rapidly spreading throughout the world, including India causing significant disturbance and slowdown of economic activity. Looking at current situation the company does not predict any significant effect of Covid-19 on profitability. The Company is continuously monitoring the situation and taking necessary actions in response to the developments, to minimize the impact on the business of the Company.

***Introduction:**

India was the world's second-largest steel producer with production standing at 111.2 million tonnes (MT) in 2019. The growth in the Indian steel sector has been driven by domestic availability of raw materials such as iron ore and cost-effective labour. Consequently, the steel sector has been a major contributor to India's manufacturing output.

The Indian steel industry is modern with state-of-the-art steel mills. It has always strived for continuous modernisation of older plants and up-gradation to higher energy efficiency levels.

Indian steel industry is classified into three categories - major producers, main producers and secondary producers.

Market Size:

India's finished steel consumption grew at a CAGR of 5.2 per cent during FY16-FY20 to reach 100 MT. India's crude steel and finished steel production increased to 108.5 MT and 101.03 MT in FY20P, respectively.

Export and import of finished steel stood at 8.24 MT and 6.69 MT, respectively, in FY20P.

Investments:

Steel industry and its associated mining and metallurgy sectors have seen major investments and developments in the recent past.

According to the data released by Department for Promotion of Industry and Internal Trade (DPIIT), the Indian metallurgical industries attracted Foreign Direct Investment (FDI) to the tune of US\$ 13.40 billion in the period April 2000–March 2020.

Some of the major investments in the Indian steel industry are as follows:

- In March 2020, Arcelor Mittal Nippon Steel India (AM/NS) acquired Bhandar Power plant in Hazira, Gujarat from Edelweiss Asset Reconstruction Company.
- In February 2020, GFG Alliance acquired Adhunik Metaliks and its arm Zion Steel for Rs 425 crore (US\$ 60.81 million), marking its entry into the Indian steel market.
- For FY20, JSW Steel set a target of supplying around 1.5 lakh tonnes of TMT Rebars to metro rail projects across the country.
- In December 2019, Arcelor Mittal completed the acquisition of Essar Steel at Rs 42,000 crore (US\$ 6.01 billion) and formed a joint venture with Nippon Steel Corporation.
- JSW Steel has planned a US\$ 4.14 billion capital expenditure programme to increase its overall steel output capacity from 18 million tonnes to 23 million tonnes by 2020.
- Ministry of Steel plans to invest US\$ 70 million in the eastern region of the country through accelerated development of the sector.
- The production capacity of SAIL is expected to increase from 13 MTPA to 50 MTPA in 2025 with total investment of US\$ 24.88 billion.
- Tata Steel has decided to increase the capacity of its Kalinganagar integrated steel plant from 3 million tonnes to 8 million tonnes at an investment of US\$ 3.64 billion.

Government Initiatives:

Some of the other recent Government initiatives in this sector are as follows:

- Government introduced Steel Scrap Recycling Policy to reduce import.
- An export duty of 30 per cent has been levied on iron ore[^] (lumps and fines) to ensure supply to domestic steel industry.

- Government of India's focus on infrastructure and restarting road projects is aiding the demand for steel. Also, further likely acceleration in rural economy and infrastructure is expected to lead to growth in demand for steel.
- The Union Cabinet, Government of India approved the National Steel Policy (NSP) 2017, as it intend to create a globally competitive steel industry in India. NSP 2017 envisage 300 million tonnes (MT) steel-making capacity and 160 kgs per capita steel consumption by 2030-31.
- The Ministry of Steel is facilitating setting up of an industry driven Steel Research and Technology Mission of India (SRTMI) in association with the public and private sector steel companies to spearhead research and development activities in the iron and steel industry at an initial corpus of Rs 200 crore (US\$ 30 million).
- The Government of India raised import duty on most steel items twice, each time by 2.5 per cent and imposed measures including anti-dumping and safeguard duties on iron and steel items.

Road ahead:

The National Steel Policy, 2017 envisage 300 million tonnes of production capacity by 2030-31. The per capita consumption of steel has increased from 57.6 kgs to 74.1 kgs during the last five years. As per Indian Steel Association (ISA), steel demand will grow by 7.2 per cent in 2019-20 and 2020-21. Huge scope for growth is offered by India's comparatively low per capita steel consumption and the expected rise in consumption due to increased infrastructure construction and the thriving automobile and railways sectors. *Source: <https://www.ibef.org/industry/steel.aspx>

Discussion On Financial Performance With Respect To Operational Performance

The Company's financial performance for the year ended 31st March, 2020 is summarized below:

Particulars	31.03.2020 (Amt in ₹)	31.03.2019 (Amt in ₹)
Revenue from Operations	2,91,68,67,826	3,76,53,97,393
Other Income	1,21,73,570	1,82,99,600
Total Income from Operations (Net)	2,92,90,41,396	3,78,36,96,993
Profit/(Loss) before Depreciation and Tax	18,56,95,553	21,09,17,656
Less: Finance Cost	11,34,29,589	11,77,63,979
Less: Depreciation	3,67,23,880	3,51,21,407
Profit/(Loss) before Tax and Extra Ordinary Items	3,55,42,084	5,80,32,270
Less: Extra Ordinary Items	-	-
Less: Current Tax	74,00,000	1,80,00,000
Deferred Tax	(24,79,332)	(97,34,072)
Prior Period Tax	-	-
Profit/(Loss) After Tax	3,06,21,416	4,97,66,342
Balance Carried to Balance Sheet	3,06,21,416	4,97,66,342
Paid up Capital	82902520	82902520
Earnings Per Share	3.69	6.00
Reserves and Surplus	36,97,65,849	33,91,44,432

Key Financial Ratios

The Key Financial Ratios during Financial Year 2020 vis-à-vis Financial Year 2019 are as below:

Particulars	Financial Year 2019-20	Financial Year 2018-19
Debtors Turnover	5.23	6.17
Inventory Turnover	9.67	8.50
Current Ratio	1.98	2.08
Interest Coverage Ratio	1.96	2.09
Debt Equity Ratio	2.19	2.45
Operating Profit Margin	5.11%	4.67%
Net Profit Margin	1.05%	1.32%
Return on Net Worth	6.76%	11.79%

Return on net worth % has been decreased as in the current financial year 2019-20, profit after tax has decreased as compared to previous financial year

For Riddhi Steel and Tube Limited

RajeshKumar Mittal

Preeti R. Mittal

Managing Director

DIN : 00878934

Date: September 03, 2020

Place: Ahmedabad

Director & CFO

DIN : 01594555

Date: September 03, 2020

Place: Ahmedabad

Annexure-B

Information Pursuant To Section 197 Of The Companies Act, 2013 Read With Rule 5(1) Of The Companies (Appointment And Remuneration Of Managerial Personnel) Rules, 2014

- I. The ratio of the remuneration of each director to the median employee's remuneration for the Financial year and such other details as prescribed are as given below:

Name	Ratio
Rajesh Ramkumar Mittal (Managing Director)	6.61
Preeti Rajesh Mittal (Chief Financial Officer)	5.95

- II. For this purpose, sitting fees paid to the directors has not been considered as remuneration. The percentage increase in remuneration of each director, Chief Financial Officer, Company Secretary or Manager, if any, in the financial year

Name	Designation	% of Increase
Rajesh Ramkumar Mittal	Managing Director	No Increase
Preeti Rajesh Mittal	Director / CFO	No Increase

- III. The number of permanent employees on the rolls of company: 24

- IV. Comparison of the each remuneration of the KMP against the performance of the Company:

Name	Remuneration of KMP (Rs. Lacs)	Performance of the Company – PAT as on 31st March, 2020 (Rs. lacs)
Rajesh Ramkumar Mittal	6.00 P.A	306.21
Preeti Rajesh Mittal	5.40 P.A	

- V. The key parameters for any variable component of remuneration availed by the directors: There is no variable component in the remuneration of the Key Managerial Personnel.

- VI. If remuneration is as per the remuneration policy of the company: Yes

For Riddhi Steel and Tube Limited

RajeshKumar Mittal

Preeti R. Mittal

Managing Director

DIN : 00878934

Date: September 03, 2020

Place: Ahmedabad

Director & CFO

DIN : 01594555

Date: September 03, 2020

Place: Ahmedabad

**Annexure - C
Form MGT-9
Extract of Annual Return**

As on Financial Year Ended 31st March, 2020
[Pursuant To Section 92(3) Of The Companies Act, 2013 And Rule 12(1) Of The
Companies (Management and Administration) Rules, 2014]

I. Registration and Other Details:

I.	CIN	L27106GJ2001PLC039978
II.	Registration Date	07/09/2001
III.	Name of the Company:	RIDDHI STEEL AND TUBE LIMITED
IV.	Category/ Sub- category of Company	Public Company Limited by Shares/ Non-Government Company
V.	Address of the Registered office and contact details:	83/84, Village - Kamod, Piplaj Pirana Road, Post - Aslali, Ahmedabad Gujarat 382427 India. Tel: +91-079-29700922/923. E-mail: compliance@riddhitubes.com Website: http://www.riddhitubes.com /
VI.	Whether Listed Company	Yes
VII.	Name, Address and Contact details of Registrar and Transfer Agent, if any	Karvy Fintech Private Limited Karvy Selenium Tower B, Plot Nos. 31 & 32 Financial District Nanakramguda, Serilingampally Mandal, Hyderabad - 500032 Phone: +91 040 67162222 Email: kishore.bv@karvy.com Website: Www.Karisma.Karvy.Com SEBI Registration No: INR000000221

II. Principal Business Activities of the Company:

All the business activities contributing 10% or more of the total turnover of the company shall be stated:

Sr. No.	Name and Description of main products / services	NIC Code of the Product / service	% to total turnover of the company
i.	Manufacture of tubes, pipes and hollow profiles and of tube or pipe fittings of cast iron / cast-steel	24311	100

III. Particulars of holding, subsidiary and associate companies – Nil

I. Share Holding Pattern (Equity Share Capital Breakup As Percentage Of Total Equity):

(I) Category – Wise Share Holding

Sr	Category of Share Holder	No. Of Shares Held At The Beginning Of	No. Of Shares Held At The End Of The	%
----	--------------------------	--	--------------------------------------	---

no		The Year				Year				Change During The Year
		Demat	Physical	Total	% Of Total Shares	Demat	Physical	Total	% Of Total Shares	
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII)	(VIII)	(IX)	(X)	(XI)
(A)	PROMOTER AND PROMOTER GROUP									
1	INDIAN									
(a)	Individual /HUF	5748632	0	5748632	69.34	5748632	0	5748632	69.34	0.00
(b)	Central Government/State Government(s)	0	0	0	0	0	0	0	0	
(c)	Bodies Corporate	0	0	0	0	0	0	0	0	
(d)	Financial Institutions / Banks	0	0	0	0	0	0	0	0	
(e)	Others	0	0	0	0	0	0	0	0	
	Sub-Total A(1) :	5748632	0	5748632	69.34	5748632	0	5748632	69.34	0.00
2	FOREIGN									
(a)	Individuals (NRIs/Foreign Individuals)	0	0	0	0	0	0	0	0	
(b)	Bodies Corporate	0	0	0	0	0	0	0	0	
(c)	Institutions	0	0	0	0	0	0	0	0	
(d)	Qualified Foreign Investor	0	0	0	0	0	0	0	0	
(e)	Others	0	0	0	0	0	0	0	0	
	Sub-Total A(2) :	0	0	0	0	0	0	0	0	
	Total A=A(1)+A(2)	5748632	0	5748632	69.34	5748632	0	5748632	69.34	0.00
(B)	PUBLIC SHAREHOLDING									
1	INSTITUTIONS									
(a)	Mutual Funds /UTI	0	0	0	0	0	0	0	0	
(b)	Financial Institutions /Banks	0	0	0	0	0	0	0	0	
(c)	Central Government / State Government(s)	0	0	0	0	0	0	0	0	
(d)	Venture Capital Funds	0	0	0	0	0	0	0	0	
(e)	Insurance Companies	0	0	0	0	0	0	0	0	
(f)	Foreign Institutional Investors	0	0	0	0	0	0	0	0	
(g)	Foreign Venture Capital Investors	0	0	0	0	0	0	0	0	
(h)	Qualified Foreign Investor	0	0	0	0	0	0	0	0	
(i)	Others	0	0	0	0	0	0	0	0	
	Sub-Total B(1) :	0	0	0	0	0	0	0	0	
2	NON-INSTITUTIONS									
(a)	Bodies Corporate	936066	261620	1197686	14.45	364675	261620	626295	7.55	-47.71
(b)	Individuals								0.00	

	(i) Individuals holding nominal share capital up to Rs.1 lakh	314934	0	314934	3.80	331325	0	331325	4.00	5.20
	(ii) Individuals holding nominal share capital in excess of Rs.1 lakh	981000	0	981000	11.83	1581000	0	1581000	19.07	61.16
(c)	Others								0.00	
	CLEARING MEMBERS	45000	0	45000	0.54	0	0	0	0.00	-100.00
	NRI NON-REPATRIATION	3000	0	3000	0.04	3000	0	3000	0.04	0.00
(d)	Qualified Foreign Investor	0	0	0	0.00	0	0	0	0.00	
	Sub-Total B(2) :	2280000	261620	2541620	30.66	2280000	261620	2541620	30.66	0.00
	Total B=B(1)+B(2):	2280000	261620	2541620	31	2280000	261620	2541620	30.66	0.00
	Total (A+B):	8028632	261620	8290252	100.00	8028632	261620	8290252	100.00	0.00
(C)	Shares held by custodians, against which									
	Depository Receipts have been issued									
1	Promoter and Promoter Group									
2	Public	0	0	0	0	0	0	0	0	
	GRAND TOTAL (A+B+C) :	8028632	261620	8290252	100	8028632	261620	8290252	100	0.00

(ii) Shareholding of Promoters

	Name Of Shareholder	No. Of Shares Held At The Beginning Of The Year I.E 01.04.2019			No. Of Shares Held At The End Of The Year I.E 31.03.2020			% Change During The Year
		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	Rajesh Mittal	477350	5.75	-	477350	5.75	-	-
2	Preeti Mittal	2969004	35.81	-	2969004	35.81	-	-
3	Rajesh Mittal HUF	546502	6.59	-	546502	6.59	-	-
4	Riddhi Mittal	341238	4.12	-	341238	4.12	-	-
5	Rajat Mittal	1414538	17.06	-	1414538	17.06	-	-

(iii) Change In Promoters' Shareholding (Please Specify, If There Is No Change)

Sr. No.	Shareholder's Name	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. Of shares	% of total shares of the company	No. Of shares	% of total shares of the company
1.	At the Beginning of the Year	5748632	69.34	5748632	69.34

2.	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity Etc.) :	-	-	-	-
3.	At the end of the year	5748632	69.34	5748632	69.34

IV. Shareholding Pattern Of Top Ten Shareholders (Other Than Directors, Promoters And Holders Of GDR And ADR):

Name of Top 10 Shareholders	Date	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. Of shares	% of total shares of the company	No. Of shares	% of total shares of the company
1. Mayur Babubhai Patel					
At the beginning of the year	01-04-2019	423000	5.1	423000	5.10
Date wise Increase / Decrease in shareholding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc.):	NO CHANGES				
At the end of the year	31-03-2020			423000	5.10
2. Vivid Offset Printers Private Limited					
At the beginning of the year	01-04-2019	282000	3.40	282000	3.40
Purchase	05-04-2019	36,000	0.43	3,18,000	3.84
Sale	10-05-2019	-9000	-0.11	3,09,000	3.73
Purchase	17-05-2019	9000	0.11	3,18,000	3.84
Purchase	07-06-2019	6000	0.07	3,24,000	3.91
Sale	14-06-2019	-24000	-0.29	3,00,000	3.62
Sale	21-06-2019	-39000	-0.47	2,61,000	3.15
Sale	05-07-2019	-33000	-0.40	2,28,000	2.75
Sale	15-11-2019	-3000	-0.04	2,25,000	2.71
Sale	22-11-2019	-21000	-0.25	2,04,000	2.46
Sale	17-01-2020	-9000	-0.11	1,95,000	2.35
Sale	24-01-2020	-3000	-0.04	1,92,000	2.32
At the end of the year	31-03-2020			1,92,000	2.32
3. Advance Multitech Limited					
At the beginning of the year	01-04-2019	211620	2.55	211620	2.55

Date wise Increase / Decrease in shareholding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus /sweat equity etc.):	NO CHANGES				
At the end of the year	31-03-2020			211620	2.55
4. # Nimmi Chandiramani					
At the beginning of the year	01-04-2019	180000	0.04	180000	0.04
Purchase	29-06-2019	6000	0.07	186000	
Sale	05-07-2019	3000	0.04	189000	
Sale	08-01-2020	-189000	-2.28	0	
At the end of the year	31-03-2020			0	0.00
5. Ways Vinimay Private Limited					
At the beginning of the year	01-04-2019	165000	1.99	165000	1.99
Purchase	07-06-2019	-3000	-0.04	162000	1.95
Sale	29-06-2019	-9000	-0.11	153000	1.85
Sale	05-07-2019	-9000	-0.11	144000	1.74
Sale	10-01-2020	-81000	-0.98	63000	0.76
At the end of the year	31-03-2020			63000	0.76
6. Darshan Orna Limited					
At the beginning of the year	01-04-2019	168000	2.03	168000	1.59
Sale	12-04-2019	-6000	-0.07	162000	1.95
Sale	19-04-2019	-15000	-0.18	147000	1.77
Sale	10-05-2019	-6000	-0.07	141000	1.70
Sale	17-05-2019	-36000	-0.43	105000	1.27
Sale	24-05-2019	-18000	-0.22	87000	1.05
Sale	31-05-2019	-6000	-0.07	81000	0.98
Sale	07-06-2019	-6000	-0.07	75000	0.90
Sale	17-01-2020	-67029	-0.81	7971	0.10
Purchase	24-01-2020	25029	0.30	33000	0.40
Purchase	31-01-2020	30000	0.36	63000	0.76
At the end of the year	31-03-2020			63000	0.76
7. # Jhaveri Trading And Investment Private Limited					
At the beginning of the year	01-04-2019	138000	1.66	138000	1.66
Sale	12-04-2019	-3000	-0.04	135000	1.63
Sale	19-04-2019	-6000	-0.07	129000	1.56
Sale	07-06-2019	-102000	-1.23	27000	0.33
Sale	21-06-2019	-27000	-0.33	0	0.00
At the end of the year	31-03-2020			0	0.00

8. IL and FS Securities Services Limited					
At the beginning of the year	01-04-2019	60000	0.72	60000	0.72
Date wise Increase / Decrease in shareholding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc.):	NO CHANGES				
At the end of the year	31-03-2020			60000	0.72
9. Harsh Naresh Jain					
At the beginning of the year	01-04-2019	54000	0.65	54000	0.65
Date wise Increase / Decrease in shareholding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc.):	NO CHANGES				
At the end of the year	31-03-2020			54000	0.65
10. # ASE Capital Markets Limited.					
At the beginning of the year	01-04-2019	36000	0.43	36000	1.59
Purchase	05-04-2019	9000	0.11	45000	0.54
Purchase	12-04-2019	6000	0.07	51000	0.62
Sale	19-04-2019	3000	0.04	54000	0.65
Sale	26-04-2019	-54000	-0.65	0	0.00
At the end of the year	31-03-2020			0	0.00
11. * Meenadevi Kamleshkumar Jain					
At the beginning of the year	01-04-2019	0	0.00	0	0.00
Purchase	14-06-2019	60000	0.72	60000	0.72
Purchase	28-06-2019	66000	0.80	126000	1.52
At the end of the year	31-03-2020			126000	1.52
12. * Ayush Kamleshkumar Jain					
At the beginning of the year	01-04-2019	0	0.00	0	0.00
Purchase	13-06-2019	60000	0.72	60000	0.72
Purchase	05-07-2019	63000	0.76	123000	1.48
At the end of the year	31-03-2020			123000	1.48
13. * Pushpa Kishorilal Agarwal					
At the beginning of the year	01-04-2019	0	0.00	0	0.00
Purchase	14-06-2019	48000	0.58	48000	0.58
Purchase	21-06-2019	36000	0.43	84000	1.01
Purchase	22-11-2019	33000	0.40	117000	1.41
Sale	13-03-2020	-3000	-0.04	114000	1.38
At the end of the year	31-03-2020			114000	1.38
14. * Vivek Agarwal					

At the beginning of the year	01-04-2019	0	0.00	0	0.00
Purchase	21-06-2019	72000	0.87	72000	0.87
At the end of the year	31-03-2020			72000	0.87
15. * Nishit Chandulal Joshi					
At the beginning of the year	01-04-2019	0	0.00	0	0.00
Purchase	10-05-2019	21000	0.25	21000	0.25
Purchase	17-05-2019	27000	0.33	48000	0.58
Purchase	24-05-2019	6000	0.07	54000	0.65
At the end of the year	31-03-2020			54000	0.65

*Not in the list of top 10 shareholders as on 01-04-2019. The same has been reflected above since the shareholder was one of the top 10 shareholders as on 31-03-2020

#Ceased to be in the list of top 10 shareholders as on 31-03-2020. The same is reflected above since the shareholder was one of the top 10 shareholder as on 01-04-2019.

V. Indebtedness (Indebtedness of the Company Including Interest Outstanding / Accrued But Not Due For Payment)

Particulars	Secured Loans Excluding Deposits	Unsecured Loans	Deposits	Total Indebtness
Indebtedness at the beginning of the financial year	-	-	-	-
Principal Amount	72,50,82,353	31,01,57,166	-	1,03,52,39,519
Interest due but not paid			-	
Interest accrued but not due			-	
Total (i+ii+iii)	72,50,82,353	31,01,57,166	-	1,03,52,39,519
Change in Indebtedness during the financial year			-	
Addition	2,23,16,700	0		
Reduction	0	(66292065)	-	
Net Change	2,23,16,700	(6,62,92,065)	-	(4,39,75,365)
Indebtedness at the end of the financial year			-	
Principal Amount	74,73,99,053	24,38,65,101	-	99,12,64,154
Interest due but not paid			-	
Interest accrued but not due			-	
Total (i+ii+iii)	74,73,99,053	24,38,65,101	-	99,12,64,154

VI. Remuneration of Directors And Key Managerial Personnel

A. Remuneration To Managing Director, Whole-Time Directors, Other Non-Executive Director And / Or Manager :

Sr. No.	Particulars of Remuneration	Name of MD/WTD/Manager/other Executive Director		Total Amount (in Rs.)
		Rajesh Mittal (M.D.)	Preeti Mittal (C.F.O.)	
1.	Gross salary	6,00,000	5,40,000	11,40,000
	(a) Salary as per provisions contained in Section 17(1) of the Income-tax Act, 1961	6,00,000	5,40,000	11,40,000
	(b) Value of perquisites u/s 17(2) of the Income tax Act, 1961	0	0	0
	(c) Profits in lieu of salary under Section 17(3) of the Income tax Act, 1961	0	0	0
2.	Stock Option	0	0	0
3.	Sweat Equity	0	0	0
4.	Commission as % of profit	0	0	0
5.	Other Allowances	0	0	0
	TOTAL (A)	6,00,000	5,40,000	11,40,000

B. Remuneration to Other Directors:

Sr. No.	Name of Director	Particulars of Remuneration			Total Amount (in Rs.)
		Fee for attending board/ committee meetings	Commission	Others, please specify	
1.	Independent Directors				
	Paras K Shah	-	-	-	-
	Kirankumar Agarwal	-	-	-	-
	Saurin S Shah	-	-	-	-
	Total	-	-	-	-
2.	Non – Executive Director	-	-	-	-
	Total (2)	-	-	-	-
	TOTAL (1+2)	-	-	-	-
	Overall ceiling as per the Act	One Lac per Board / Committee Meeting			

C. Remuneration To Other Key Managerial Personnel:

Sr. No.	Particulars of Remuneration	Nikhil Vadera- CS	Devansh Gala - CS	Total Amount (in Rs.)

1.	Gross salary	0.26 Lacs#	2.35 Lacs*	2.35 Lacs
	(a) Salary as per provisions contained in Section 17(1) of the Income-tax Act, 1961			
	(b) Value of perquisites u/s 17(2) of the Income tax 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		-	-
5.	Other Allowances		-	-
	TOTAL (A)		3.00 Lacs	3.00 Lacs

from 01/04/2019 to 10/06/2019

* from 10/06/2019 to 28/02/2020

II. Penalties / Punishment/ Compounding of Offences: Nil

For Riddhi Steel and Tube Limited

RajeshKumar Mittal

Preeti R. Mittal

Managing Director

DIN : 00878934

Date: September 03, 2020

Place: Ahmedabad

Director & CFO

DIN : 01594555

Date: September 03, 2020

Place: Ahmedabad

Annexure- D
Form No. MR-3
SECRETARIAL AUDIT REPORT

For the Financial Year ended 31.03.2020

[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,
RIDDHI STEEL AND TUBE LIMITED

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by RIDDHI STEEL AND TUBE LIMITED (hereinafter called the Company). The 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 Company books, papers, 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/our opinion, the company has, during the audit period covering the financial year ended on March 31, 2020 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, forms and returns filed and other records maintained by the Company for the financial year ended on March 31, 2020 according to the provisions of:

- i. The Companies Act, 2013 (the Act) and the rules made there under.
 - ii. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under.
 - iii. The Depositories Act, 1996 and the Regulations and Bye-laws Framed there under.
 - iv. The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') :
 - i. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
 - ii. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992.
 - iii. 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.
- V. Other laws specifically applicable to the company as per the representation given by the Company**

Sr. No.	Name of the Act
1	Water(Prevention and Control of Pollution) Act, 1974
2	Air (Prevention and Control of Pollution) Act, 1981
3	Factories Act, 1948
4	The Payment of Wages Act, 1936
5	The Minimum Wages Act, 1948
6	Employees' State Insurance Act, 1948
7	The Employees' Provident Funds and Miscellaneous Provisions Act, 1952
8	The Payment of Bonus Act, 1965
9	The Payment of Gratuity Act, 1972
10	The Contract Labour (Regulation & Abolition) Act, 1970

11	The Child Labour (Prohibition & Regulation) Act, 1986
12	The Industrial Employment (Standing Order) Act, 1946
13	The Employee Compensation Act, 1923
14	The Apprentices Act, 1961
15	Equal Remuneration Act, 1976
16	The Employment Exchange (Compulsory Notification of Vacancies) Act, 1956
17	Complied with Clause 55A/76 with respect to the Reconciliation of share capital audit

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

Secretarial Standards issued by The Institute of Company Secretaries of India.

The Listing Agreements entered into by the Company with BSE Limited (SME Platform) Stock Exchange; During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned. I/we 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. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions 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 are captured and recorded as part of the minutes.

No Company Secretary & Compliance Officer in the Company during the period 28/02/2020 to 31/03/2020 according to Section 203 of Companies Act, 2013 read with Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 & Regulation 6(1) of SEBI ((LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015.

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.

Date: 3rd September, 2020
Place: Ahmedabad
UDIN No : A011080B000634120

For, Siddharth N. Maniar
Company Secretaries

SIDDHARTH MANIAR
(Proprietor) ACS NO. : 11080 COP NO. : 3560

This Report is to be read with my letter of even date which is annexed as Annexure A and forms an integral part of this report.

Annexure – A

To,

RIDDHI STEEL AND TUBE LIMITED

My report of even date is to be read along with this letter.

- I. Maintenance of Secretarial record is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on my audit;
- II. I have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in Secretarial records. I believe that the process and practices, I followed provide a reasonable basis for my opinion;
- III. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company;
- IV. Where ever required, I have obtained the Management representation about the Compliance of laws, rules and regulations and happening of events etc.
- V. The Compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedure on test basis;
- VI. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Date: 3rd September 2020
Place: Ahmedabad
UDIN No : A011080B000634120

For, Siddharth N. Maniar
COMPANY SECRETARIES

SIDDHARTH MANIAR
(Proprietor)
ACS NO. : 11080
COP NO. : 3560

INDEPENDENT AUDITORS' REPORT

To,
The Members
RIDDHI STEEL AND TUBE LIMITED

Report on Financial Statements

We have audited the accompanying financial statements of **RIDDHI STEEL AND TUBE LIMITED** (“the Company”), which comprises Balance Sheet as at 31st March 2020, the Statement of Profit and Loss, Statement of changes in equity and the statement of Cash flow Statement for the year ended, and a Summary of significant accounting policies and other explanatory information.

Opinion

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India;

- a) In the case of the Balance Sheet, of the state of affairs of the Company as at March 31, 2020;
- b) In the case of the Statement of Profit and Loss, of the **Profit** for the year ended on that date;
- c) the case of the Cash Flow Statement , of the Cash Flow for the year ended on that date;

Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies Act, 2013. Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the 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 Companies Act, 2013 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 opinion.

Key Audit Matter

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

OTHER INFORMATION

The company's board of the director is responsible for the preparation of the other information, the other information comprises of the information included in the management discussion and analysis, board's report including annexures to board's reports, business responsibility report, corporate governance and shareholder's information but does not include the standalone financial statements and our auditor's report there on. Our opinion on the standalone financial statement does not cover the other information and we do not express any form of assurance, conclusion thereon. In connection with our audit of the standalone financial statements our responsibility is to read the other information and in doing so consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated. On the basis of work we have performed, we conclude that there are no material misstatements.

Management's Responsibility for the Financial Statements

The Company's Board of Directors is responsible for the matters stated in Section 134(5) of the Companies Act, 2013 (“the Act”) with respect to the preparation of these financial statements that give a true and fair view of the financial position and financial performance of the Company in accordance with the accounting principles generally accepted in India, including the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.

This responsibility also includes maintenance of adequate accounting records in accordance with the provision 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 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 financial Statements that give a true and fair view and are free from materials misstatement, whether due to fraud or error.

In preparing the 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.

Auditor's Responsibility

Our responsibility is to express an opinion on these standalone financial statements based on our audit.

We have taken into account the provision of the Act, the accounting and auditing standards and matters which are required to be included in the audit report under the provisions of the Act and the Rules made there under and the Order issued under section 143(11) of the Act.

We conducted our audit in accordance with the Standards on Auditing specified under Section 143(10) of the Act. Those Standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and the disclosures in the financial statements. The procedure selected depends on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessment, the auditor considers internal financial control relevant to the Company's preparation of the financial statements that give a true and fair view in order to design audit procedures that are appropriate in the circumstances. An audit also includes evaluating the appropriateness of the accounting policies used and the reasonableness of the accounting estimates made by the Company's Directors, as well as evaluating the overall presentation of the financial statements.

We are also responsible to 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 entity's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in the auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify the opinion. Our conclusions are based on the audit evidence obtained up to the date of the auditor's report. However, future events or conditions may cause an entity to cease to continue as a going concern

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the financial statements.

Materiality is the magnitude of misstatements, that the economic decisions of a reasonably knowledgeable user of the 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 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.

From the matters communicated to those charged with governance, we determine those matters that were of most significance in the audit of the standalone financial statements of the current period and therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse

consequences of doing so we would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditor's Report) Order, 2016 (the Order) issued by the Central Government in terms of Section 143 (11) of the Act, we enclosed in the annexure A, a statement on matters specified in paragraph 3 & 4 of the said order.
2. As required by Section 143 (3) of the Act, based on our Audit 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 purpose 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 and the Cash flow Statement dealt with by this Report are in agreement with the books of account.
 - d) In our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014, except specified in accounting policies attached with financial statements.
 - e) In our opinion there are no observations or comments on the financial transactions, which may have an adverse effect on the functioning of the Company.
 - f) On the basis of the written representations received from the directors as on 31st March 2020 and taken on record by the Board of Directors, we report that none of the directors is disqualified as on 31st March 2020 from being appointed as a directors in terms of section 164(2) of the Act.
 - g) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, Report on the Internal Financial Controls under Clause (1) of Sub-section 3 of section 143 of the companies Act, 2013 ("the Act")- is enclosed an annexure B to this report.
 - 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. As informed to us the Company does not have any pending litigations which would impact its financial position.
 - ii. The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
 - iii. There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.

For, JIGAR SHAH & ASSOCIATES
Chartered Accountants
Firm Reg. No.: 128263W

Date: 31.07.2020
Place: Ahmedabad

CA JIGAR M SHAH
Proprietor
M. NO.: 075778
UDIN : 20075778AAAAFT2597

**ANNEXURE A– Report under the Companies (Auditor’s Report) Order, 2016
Referred to in of our report of even date**

In terms of the information and explanations sought by us and given by the company and the books and records examined by us in the normal course of audit and to the best of our knowledge and belief, we state that: -

1. In respect of Fixed Assets:

- (a) The Company has maintained proper records showing full particulars including quantitative details and situation of Fixed Assets on the basis of available information.
- (b) As per the information and explanations given to us, the management at reasonable intervals during the year in accordance with a programme of physical verification, physically verified the fixed assets and no material discrepancies were noticed on such verification as compared to the available records.
- (c) The Company does not hold the immovable property. Therefore the provisions of Clause 3(i) (c) of the said Order are not applicable to the Company.

2. In respect of Inventories :

As explained to us, the inventory has been physically verified at reasonable intervals during the year by the management. In our opinion, the frequency of verification is reasonable. No material discrepancies were noticed on physical verification during the year.

3. In respect of Loans and Advances granted during the year:

- (a) The Company has not granted unsecured loan to wholly owned subsidiary company covered in the register maintained under section 189 of the Act. In our opinion and according to the information and explanation given to us, the terms and condition of loans are not prejudicial to the company’s interest, having regards to management’s representation that the loans are given to such parties considering the company’s economic interest and long term trade relationship with such parties.
- (b) In respect of loans granted to parties covered in the register maintained under section 189 of the Companies Act, 2013, loans are repayable on demands and are interest free. Management has not demanded repayment of loan. Accordingly, there has been default on the part of the parties to whom the money has been lent.

4. Loans, Investments & Guarantees:

According to information and explanation given to us, the company has not granted any loans or made any investments, or provided any guarantees or security to the parties covered under section 185 and 186 of the Companies Act, 2013. Therefore, the provisions of clause 3(iv) of the said order not applicable to the company.

5. In our opinion and according to the information and explanations given to us, the Company has not accepted any deposits in contravention of Directives issued by Reserve Bank of India and the provisions of section 73 to 76 or any other relevant provisions of the Act and the rules framed there under, where applicable . No order has been passed by the Company Law Board or National Company Law Tribunal or Reserve Bank of India or any court or any other tribunal.

6. In our opinion and according to the information and explanations given to us, the Company has maintained proper cost records as prescribed under section 148(1) of the Act.

7. In respect of statutory dues:

- (a) According to the records of the company the company is generally regular in depositing with appropriate authorities undisputed statutory dues including provident fund, investor education protection fund, employees’ state insurance, income tax, sales tax, wealth tax, service tax, custom duty, excise duty, Cess and other material statutory dues applicable to it.
- (b) According to the information and explanations given to us, no undisputed amounts payable in respect of income tax, wealth tax, Service Tax, GST, sales tax, custom duty, excise duty and Cess were in arrears, as at 31-Mar-2020 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 sales tax, income tax, custom duty, wealth tax, excise duty and Cess which have not been deposited on account of any dispute.

8. Based on our audit procedures and according to the information and explanations given to us, we are of the opinion, the company has not defaulted in repayment of dues to a financial institution, bank, Government or dues to debenture holders.
9. The company has not raised moneys by way of initial public offer or further public offer (including debt instrument) and term loans.
10. Based upon the audit procedures performed and according to the information and explanations given to us, no fraud by the company or any fraud on the company by its officers or employees has been noticed or reported during the course of our audit that causes the financial statements to be materially misstated.
11. The Managerial remuneration has been paid or provided in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Companies Act.
12. The company is not a Nidhi Company hence this clause is not applicable.
13. Based upon the audit procedures performed and according to the information and explanations given to us, All transactions with related parties are in compliance with sections 177 and 188 of Companies Act, 2013 where applicable and the details have been disclosed in the Financial statements etc. as required by the applicable accounting standards.
14. The company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review.
15. The company has entered into non-cash transactions with directors or persons connected with him and the provision of section 192 of Companies Act, 2013 has been complied with.
16. The company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934.

For, JIGAR SHAH & ASSOCIATES
Chartered Accountants
Firm Reg. No.: 128263W

Date: 31.07.2020
Place: Ahmedabad

CA JIGAR M SHAH
Proprietor
M. NO.: 075778
UDIN : 20075778AAAAFT2597

ANNEXURE-B TO THE INDEPENDENT AUDITOR'S REPORT OF EVEN DATE ON THE STANDALONE FINANCIAL STATEMENTS OF

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 **RIDDHI STEEL AND TUBES LIMITED** as of 31-Mar-2020 in conjunction with our audit of the standalone 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. 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 authorizations of management and directors of the company; and
- (3) Provide reasonable assurance regarding prevention or timely detection of unauthorized 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-Mar-2020.

For, JIGAR SHAH & ASSOCIATES
Chartered Accountants
Firm Reg. No.: 128263W

Date: 31.07.2020
Place: Ahmedabad

CA JIGAR M SHAH
Proprietor
M. NO.: 075778
UDIN : 20075778AAAAFT2597

STANDALONE BALANCE SHEET
As at March 31, 2020

Particulars	Note No.	As at 31.03.2020	As at 31.03.2019
<u>EQUITY AND LIABILITIES</u>			
(1) Shareholders' Funds			
(a) Share Capital	1	8,29,02,520	8,29,02,520
(b) Reserves & Surplus	2	36,97,65,849	33,91,44,432
(2) Share Application Money Pending Allotment		-	-
(3) Non-Current Liabilities			
(a) Long-Term Borrowings	3	46,91,83,986	52,66,14,199
(b) Deferred Tax Liabilities (Net)		5,56,694	30,36,026
(4) Current Liabilities			
(a) Short-Term Borrowings	4	52,20,80,168	50,86,25,320
(b) Trade Payables	5	6,70,84,476	5,74,82,981
(c) Other Current Liabilities	6	1,24,20,766	1,84,59,265
(d) Short-Term Provisions	7	74,08,233	1,83,02,054
Total		1,53,14,02,691	1,55,45,66,797
<u>II ASSETS</u>			
(1) Non-Current Assets			
(a) Fixed Assets			
(i) Tangible Assets	8	28,97,44,811	26,52,17,707
(ii) Intangible Assets		-	-
(iii) Capital Work in Progress	8(A)	3,47,06,513	3,47,06,513
(2) Current Assets			
(a) Inventories	9	30,15,65,774	44,28,55,688
(b) Trade Receivables	10	57,59,49,991	65,25,54,204
(c) Cash and Cash Equivalents	11	7,84,01,546	74,17,533
(d) Short-Term Loans and Advances	12	25,10,34,056	15,18,15,151
Total		1,53,14,02,691	1,55,45,66,797
Significant Accounting Policies	20		
Additional Notes to Financial Statement	21		

As per our report of even date attached
For, Jigar Shah & Associates
Chartered Accountants
Firm Registration No : 128263W

For and on behalf of the Board

Jigar Shah
Membership No.: 075778
UDIN: 20075778AAAFT2597
Place: Ahmedabad
Date: 31/07/2020

Rajeshkumar R Mittal
Managing Director
DIN:00878934
Place: Ahmedabad
Date: 31/07/2020

Preeti R Mittal
Director & CFO
DIN:01594555
Place: Ahmedabad
Date: 31/07/2020

STATEMENT OF PROFIT AND LOSS
For the year ended March 31, 2020

Particulars	Note No.	For the year ended 31.03.2020	For the year ended 31.03.2019
(I) REVENUE			
Revenue from Operations	13	2,91,68,67,826	3,76,53,97,393
Other Income	14	1,21,73,570	1,82,99,600
(II) Total Revenue		2,92,90,41,396	3,78,36,96,993
(III) EXPENSES			
Cost of Material Consumed	15	2,65,42,14,317	3,44,51,26,697
(Increase) / Decrease in Stock	16	(41,96,968)	4,56,14,247
Employee Benefits Expense	17	1,43,92,429	1,47,01,159
Financial Charges	18	11,34,29,589	11,77,63,979
Administrative and Selling Expenses	19	7,89,36,065	6,73,37,234
Depreciation and Amortisation expense	8	3,67,23,880	3,51,21,407
(IV) Total Expenses		2,89,34,99,312	3,72,56,64,723
(V) Prior Period Items			-
(VI) Profit / (Loss) Before Exceptional items and Tax (II-IV)		3,55,42,084	5,80,32,270
(VII) Exceptional items		-	-
(VIII) Profit/(Loss) before Taxes - PBT (VI-VII)		3,55,42,084	5,80,32,270
(IX) Tax Expense:			
Current tax		74,00,000	1,80,00,000
Deferred tax		(24,79,332)	(97,34,072)
Prior Income Tax			-
(X) Profit/(Loss) for the period after tax		3,06,21,416	4,97,66,342
(XI) Earnings per share			
- Basic EPS		3.69	6.00
- Diluted EPS		3.69	6.00
- Nominal value of shares		10.00	10.00
Significant Accounting Policies	20		
Additional Notes to Financial Statement	21		

As per our report of even date attached
For, Jigar Shah & Associates
Chartered Accountants
Firm Registration No : 128263W

For and on behalf of the Board

Jigar Shah
Membership No.: 075778
UDIN: 20075778AAAAFT2597
Place: Ahmedabad
Date: 31/07/2020

Rajeshkumar R Mittal
Managing Director
DIN:00878934
Place: Ahmedabad
Date: 31/07/2020

Preeti R Mittal
Director & CFO
DIN:01594555
Place: Ahmedabad
Date: 31/07/2020

CASH FLOW STATEMENT

Cash Flow Statement for the year ended on March 31,2020

Particulars	Note	For The Year ended 31st	For The Year ended 31st
		March 31,2020	March 31,2019
		Rupees	Rupees
Cash Flows From Operating Activities			
Net Profit/(Loss) before Tax		35542084	58032270
Adjustments for:			
Depreciation & Amortisation		36723880	35121407
Finance Charges		113429589	117763979
Profit on Sale of Property, Plant & Equipments			(351221)
Interest Income		(10135820)	(15588123)
Operating Profit/(Loss) before Working Capital Changes		175559733	194978312
Movement in Working Capital:			
(Increase)/Decrease in Inventories		141289914	(96723490)
(Increase)/Decrease in Trade Receivables		76604213	(106648870)
(Increase)/Decrease in Short Term Loans and Advances		(97718905)	(3886432)
Increase/(Decrease) in Trade Payables		9601494	(43533956)
Increase/(Decrease) in Other Current Liabilities		(6038499)	8071489
Increase/(Decrease) in Short Term Provisions		(18293821)	302054
Increase/(Decrease) in Short Term Borrowing			96437083
Direct Taxes Paid (Advance Tax & TDS)		(1500000)	(15966482)
Net cash flow from/(used in) operating activities	(A)	279504130	33029708
Cash Flows From Investments Activities			
Purchase of Fixed Assets (Property, Plant & Equipment)		(61386154)	(35870930)
Proceeds From Sale Of Fixed Assets		135171	575000
Interest Income		10135820	15588123
Net cash flow from/(used in) investing activities	(B)	(51115163)	(19707807)
Cash Flows From Financing Activities			
Proceeds from Equity Share Capital		-	-
Proceeds from Long Term Borrowings (Net)		(57430213)	(117763979)
Proceeds from Short Term Borrowings		13454848	110301147
Finance Cost		(113429589)	-
Net cash generated/ (used in) financing activities	(C)	(157404954)	(7462832)
Net increase/(decrease) in cash and cash equivalents	(A+B+C)	70984013	5859069
Cash and cash equivalents at beginning of the year		7417533	(1558464)
Cash and cash equivalents at end of the year		78401546	7417533
Notes:			
Components of cash and cash equivalents:		As at	As at
		March 31,2020	March 31,2019
Cash on hand		1080311	1356811
Balances with banks:			
In current account		75095249	5051647
In deposit accounts		2225987	1009075
Cash and Cash Equivalents		78401546	7417533

As per our report of even date attached
For, Jigar Shah & Associates
Chartered Accountants
Firm Registration No : 128263W

For and on behalf of the Board

Jigar Shah
Membership No.: 075778
UDIN: 20075778AAAFT2597
Place: Ahmedabad
Date: 31/07/2020

Rajeshkumar R Mittal
Managing Director
DIN:00878934
Place: Ahmedabad
Date: 31/07/2020

Preeti R Mittal
Director & CFO
DIN:01594555
Place: Ahmedabad
Date: 31/07/2020

NOTES TO FINANCIAL STATEMENTS FOR THE YEAR ENDED MARCH 31, 2020

NOTE NO. 01 - SHARE CAPITAL

Amt in ₹.

Particulars	As at 31.03.2020		As at 31.03.2019	
Authorised Shares				
85,00,000 Equity Shares of Rs.10/- each	8,50,00,000	8,50,00,000	8,50,00,000	8,50,00,000
Issued, Subscribed and Paid up shares				
82,90,252 Equity Shares of Rs.10/- each fully paid up	8,29,02,520	8,29,02,520	8,29,02,520	8,29,02,520
a. Reconciliation of the Shares outstanding at the beginning and at the end of the reporting period:				
	Nos.	Rupees	Nos.	Rupees
Equity Shares:				
At the beginning of the period	8,29,02,52	8,29,02,520	8,29,02,52	8,29,02,520
Shares Issued during the year as fully paid	-	-	-	-
Outstanding at the end of the period	8,29,02,52	8,29,02,520	8,29,02,52	8,29,02,520

b. Details of Shareholders holding more than 5% shares in the company:

Particulars	As at 31.03.2020		As at 31.03.2019	
	No. of Shares	%	No. of Shares	%
Equity Shares of Rs.10/- each fully paid				
Mr. Rajesh R Mittal HUF	5,46,502	6.59%	5,46,502	6.59%
Smt. Preeti R. Mittal	29,69,004	35.81%	29,57,004	35.81%
Mr. Rajat R Mittal	14,14,538	17.06%	14,14,538	17.06%
Mr. Rajesh R Mittal	4,77,350	5.76%	4,29,350	5.76%
Mr. Mayur B Patel	4,23,000	5.10%	4,23,000	5.10%

NOTE NO. 02 - RESERVES & SURPLUS

Amt in ₹.

Particulars	As at 31.03.2020	As at 31.03.2019
Share Premium		
Balance as per the last financial statement	1,35,00,000	1,35,00,000
Add: Amount transferred to share premium account	6,55,20,000	6,55,20,000
Less: Amount transferred From share premium account		-
Closing Balance	7,90,20,000	7,90,20,000
Surplus / (deficit) in the Statement of Profit and Loss		
Balance as per the last financial statement	26,01,24,432	21,03,58,090
Add: Profit for the period	3,06,21,416	4,97,66,342
Less: Depreciation in respect of Assets whose useful life is over		-
Add: DTA in respect of Assets whose useful life is over		-
Closing Balance	29,07,45,849	26,01,24,432
Total of Reserves and Surplus	36,97,65,849	33,91,44,432

NOTE NO. 03 - LONG TERM BORROWINGS

Amt in ₹.

Particulars	As at 31.03.2020	As at 31.03.2019
Secured Loan:		
From Term Loan Account	21,71,98,491	20,68,83,352
From Kotak Mahindra Prime Ltd	17,50,589	33,41,108
From ICICI Bank Loan	8,46,858	10,45,711
From HDFC Bank Loan	55,22,947	51,86,862

	22,53,18,885	21,64,57,033
Unsecured Loan:		
From Directors	9,57,75,212	2,62,84,816
From Shareholders, Relative & Others	14,80,89,889	28,38,72,350
	24,38,65,101	31,01,57,166
Total	46,91,83,986	52,66,14,199

NOTE NO. 4 SHORT TERM BORROWINGS

Amt in ₹.

Particulars	As at 31.03.2020	As at 31.03.2019
Secured Loan:		
From Bank Cash Credit A/C (Secured against Movable And Immovable Property & Personal guarantee of Promoters.)	52,20,80,168	50,86,25,320
Total	52,20,80,168	50,86,25,320

NOTE NO. 05 - TRADE PAYABLES

Amt in ₹

Particulars	As at 31.03.2020	As at 31.03.2019
Creditors For Goods & Expenses	3,47,61,693	2,42,86,092
Creditors For Capital Goods	3,23,22,783	3,31,96,890
Total	6,70,84,476	5,74,82,981

NOTE NO. 06 - OTHER CURRENT LIABILITIES

Amt in ₹

Particulars	As at 31.03.2020	As at 31.03.2019
Advance From Customers	1,08,61,670	1,59,95,002
Statutory Liabilities	15,31,943	24,39,545
Other Liabilities	27,153	24,718
Total	1,24,20,766	1,84,59,265

NOTE NO. 07 - SHORT TERM PROVISIONS

Amt in ₹

Particulars	As at 31.03.2020	As at 31.03.2019
Provision For Income Tax	74,00,000	1,80,00,000
Unpaid Expenses	8,233	12,215
Provision For Bonus and Leave	-	2,89,839
Total	74,08,233	1,83,02,054

NOTE NO. 08 : TANGIBLE ASSETS:

Sr. No	Particulars	Rate	Cost			Depreciation				Net Book Value		
			As at 01.04.2019	Additions	Deletions	As at 31.03.2020	Up to 31.03.2019	For the year	Depreciation in respect of Assets whose useful life is over	Up to 31.03.2020	As at 31.03.2020	As at 31.03.2019
1	Factory Building	10.00 %	7,74,94,162	22,59,990		7,97,54,152	3,89,79,273	37,73,789	-	4,27,53,062	3,70,01,090	3,85,14,889
2	Furnitures & Fixtures	18.10 %	8,01,548	70,526		8,72,074	7,57,104	14,657	-	7,71,761	1,00,313	44,444
3	Plants & Machineries	13.91 %	37,12,96,911	5,89,09,211	1,35,171	43,00,70,951	18,80,04,407	2,82,96,674	-	21,63,01,081	21,37,69,870	18,32,92,503
4	Cooling Set	13.91 %	1,71,000			1,71,000	1,24,341	6,485	-	1,30,826	40,174	46,659
5	Office Equipments	13.91 %	14,74,835	11,264		14,86,099	11,33,589	1,33,717	-	12,67,306	2,18,793	3,41,246
6	Electrical Fittings	13.91 %	97,00,593			97,00,593	88,77,982	2,17,813	-	90,95,795	6,04,798	8,22,611
7	Computer & Peripherals	40.00 %	19,83,428	1,35,163		21,18,591	13,97,451	2,18,088	-	16,15,539	5,03,052	5,85,977
8	Motor Cars	25.89 %	2,38,57,976	-	-	2,38,57,976	1,26,81,256	21,98,208	-	1,48,79,464	89,78,512	1,11,76,720
9	Air Conditioners	13.91 %	4,95,230	-		4,95,230	4,39,299	3,774	-	4,43,073	52,157	55,931
10	Scooter	25.89%	4,47,397			4,47,397	3,80,234	18,723	-	3,98,957	48,440	67,163
11	Crane	13.91 %	96,64,918			96,64,918	67,97,655	3,98,549	-	71,96,204	24,68,714	28,67,263
12	Roll Set	13.91 %	32,65,279			32,65,279	24,01,016	1,30,460	-	25,31,476	7,33,803	8,64,263
13	office Building		17844523	0		1,78,44,523	40,17,331	13,12,943		53,30,274	1,25,14,249	13827192

14	Land		12710846			1,27,10,846	-			-	1,27,10,846	12710846
	TOTAL		53,12,08,646	6,13,86,154	1,35,171	59,24,59,629	26,59,90,938	3,67,23,880	-	30,27,14,818	28,97,44,811	26,52,17,707

NOTE NO. 08(A) : CAPITAL WORK IN PROGRESS:

Sr. No.	Particulars	Rate	Cost			Depreciation				Net Book Value		
			As at 01.04.2019	Additions	Deletions	As at 31.03.2020	Up to 31.03.2019	For the year	Deductions	Up to 31.03.2020	As at 31.03.2020	As at 31.03.2019
1	Factory Building	N.A.	31,45,403	-	-	3145403					3145403	31,45,403
2	Plant & Machinery	N.A.	3,15,61,110	-	-	31561110					31561110	3,12,62,002
3	Office Building	N.A.	-	-	-	0					0	-
	TOTAL		3,47,06,513	-	-	3,47,06,513					3,47,06,513	3,44,07,405

NOTE NO. 09 – INVENTORIES**Amt in ₹**

Particulars	As at 31.03.2020	As at 31.03.2019
Raw material	14,94,15,444	29,54,40,048
Store & Spares (Including Oil Lubricants)	70,55,101	70,55,561
Semi Finished Goods(Including Scrap)	4,06,23,387	7,97,11,776
Finished Stock	10,44,71,842	6,06,48,303
Total	30,15,65,774	44,28,55,688

NOTE NO. 10 - TRADE RECEIVABLES**Amt in ₹.**

Particulars	As at 31.03.2020	As at 31.03.2019
Sundry Debtors	65,25,54,204	54,59,05,334
Total	65,25,54,204	54,59,05,334

NOTE NO. 11 - CASH AND CASH EQUIVALENTS**Amt in ₹**

Particulars	As at 31.03.2020	As at 31.03.2019
Cash on Hand:		
Cash on hand	10,80,311	13,56,811
Balances with Banks:		
On Current Account With Banks:	7,50,95,249	50,51,647
In Fixed Deposit	22,25,987	10,09,075
Total	7,84,01,546	74,17,533

NOTE NO. 12 - SHORT TERM LOANS AND ADVANCES**Amt in ₹.**

Particulars	As at 31.03.2020	As at 31.03.2019
Security Deposit (Unsecured, Considered good):		
Torrent Power	31,87,293	24,48,239
Electricity Deposits (B)	-	-
BSE Deposits	8,89,200	8,89,200
Tender Deposits	5,07,920	5,07,920
Other deposits	6,70,200	18,25,200
Balances With Government Authority:		
TDS & TCS Receivables	47,62,511	42,38,027
Service Tax Receivable	5,31,114	5,31,114
Excise Duty	6,06,836	6,06,836
Income Tax	2,01,20,412	1,76,20,021
GST Tax Receivable	3,23,05,710	2,84,84,274
Value Added Tax Receivable	42,476	11,160
Other Loans and Advances (Unsecured, Considered good):		
Advances to Suppliers	67,60,037	94,45,575
Advances for Capital Goods	28,15,588	27,70,723
Advances to Staff	7,74,842	6,78,534
Interest Receivable (Torrent Power) and FDR	1,63,894	1,37,713
Prepaid Insurance	1,98,004	2,57,260
Prepaid Listing Fees	41,726	71,726
Prepaid Processing Charges	21,63,099	32,13,514
Trade Discount Receivable	10,38,89,037	1,78,72,203
L.C Margin and Interest Receivable	89,881	34,681
Loans & Advances	2,20,858	5,58,19,751
Prepaid Stamp Charges	6,59,81,001	43,51,480.00
Total	43,12,417.00	15,18,15,151

NOTE NO. 13 - REVENUE FROM OPERATION**Amt in ₹**

Particulars	2019-20	2018-19
Sale of Products:		
Net Sales (Domestic):	2,49,78,85,596	3,21,74,71,865
	2,49,78,85,596	3,21,74,71,865
Add:		

Excise Duty	-	-
Value Added Tax/Central Sales Tax/GST Tax	41,89,82,230	54,79,25,528
Total	2,91,68,67,826	3,76,53,97,393

NOTE NO. 14 - OTHER INCOME

Amt in ₹.

Particulars	2019-20	2018-19
Interest Income	1,01,35,820	1,55,88,123
Kasar Income & Sundry Write off	12,644	(6,145)
Vat Refund/Margin Money Refund/GST	2,19,553	-
Foreign Exchange Gain or Loss	12,57,715	23,06,339
Profit on Sale Of Car	2,89,329	3,51,221
Other Income	2,58,509	60,062
Total	1,21,73,570	1,82,99,600

NOTE NO. 15 - COST OF MATERIAL CONSUMED

Amt in ₹.

Particulars	2019-20	2018-19
Raw Material		
Opening Stock	29,54,40,048	15,43,12,311
Add: Purchase	2,25,89,88,957	3,56,15,39,643
Less: Closing Stock	15,04,24,187	29,54,40,048
	2,40,40,04,819	3,42,04,11,906
Store & Tools (Including Oil & Lubricants)		
Opening Stock	70,55,561	58,45,561
Add: Purchase	24,97,38,477	2,59,24,791
Less: Closing Stock	65,84,540	70,55,561
	25,02,09,498	2,47,14,791
Total	2,65,42,14,317	2,38,84,39,409

NOTE NO. 16 - INCREASE/(DECREASE) IN STOCK

Amt in ₹.

Particulars	2019-20	2018-19
Opening Stocks of Semi Finished Goods	7,97,11,776	4,78,13,254
Less: Closing Stock of Semi Finished Goods (Including Scrap)	4,38,76,086	7,97,11,776
	3,58,35,690	(3,18,98,522)
Opening Stocks of Finished Goods	6,06,48,303	13,81,61,072
Less: Closing Stock of Finished Goods	10,06,80,961	6,06,48,303
	(4,00,32,658)	7,75,12,769
Total	(41,96,968)	4,56,14,247

NOTE NO. 17 - EMPLOYEE BENEFITS EXPENSE

Amt in ₹.

Particulars	2019-20	2018-19
Salary and Bonus and Leave	1,12,87,899	1,19,03,848
Staff Welfare Expense	17,75,457	15,03,418
Contribution to PF, EPF, ESIC, Etc.	1,89,073	1,53,893
Remuneration to Directors	11,40,000	11,40,000
Total	1,43,92,429	1,47,01,159

NOTE NO. 18 - FINANCIAL CHARGES

Amt in ₹.

Particulars	2019-20	2018-19
Interest Expenses		
Interest On Term Loan	2,04,47,484	2,20,44,429
Interest On Bank OD	6,21,41,876	5,61,43,658
Interest On LC		
Interest On Depositors & Bill Discounted And Others	2,86,51,123	3,79,24,043
Other Borrowing Cost		

Bank Charges, Commission and Processing Charges	21,89,106	16,51,849
ILC Charges		-
Total	11,34,29,589	11,77,63,979

NOTE NO. 19 - ADMINISTRATIVE AND SELLING EXPENSES

Amt in ₹

<i>Particulars</i>	2019-20	2018-19
Audit Fees	2,65,000	-
Advertisement Expenses	42,500	68,800
Commission On Sales	10,15,999	1,42,549
Donation Exp	9,43,415	4,48,411
Misc.Expenses	37,51,984	25,27,918
Central Sales Tax	70,84,402	-
Excise Expenses	5,15,550	-
Demrage Charges	20,02,494	12,14,701
Loading & Unloading Charges	1,35,25,492	9,18,411
Transport Charges	2,52,64,093	1,17,59,085
Power Consumption	35,57,771	2,60,43,334
Wages Charges	1,05,126	32,73,839
Interest on IT,Cst,Vat,Tds & Other	(13,99,200)	4,480
Income Tax Expenses	5,93,597	(8,89,891)
Insurance Expenses	37,51,984	7,46,673
Lease Rent	43,000	43,000
Legal & Professional Fees	18,04,396	24,31,810
Security Charges	12,74,691	10,77,169
Labour Charges	5,42,991	4,41,605
Labour Contract Charges	92,93,379	66,76,231
Licence Fees	35,778	98,490
Municipal Tax	6,26,263	6,77,673
Petrol Expenses and Conveyance	1,52,831	1,44,718
Postage & Courier Expenses	1,42,045	1,20,719
Printing & Stationary Expenses	2,50,058	3,28,819
Repair & Maintance	5,49,713	5,26,518
GST Exp/Vat	2,24,000	26,59,230
Stamping and Stampduty Expenses	11,84,000	11,88,440
Telephone Expenses	2,13,472	2,20,820
Testing Fees	46,800	60,745
Travelling Expenses	52,16,787	41,05,638
Value Added Tax	12,638	2,12,398
Listing Fees	55,000	64,902
Total	7,89,36,065	6,73,37,234

20. SIGNIFICANT ACCOUNTING POLICIES

A. CORPORATE INFORMATION:

Riddhi Steel & Tube Limited ('the Company') is a listed limited Company incorporated in India. The registered office of the Company is located at 83/84, Village-Kamod, Piplaj, Pirana Road, Aslali, Ahmedabad - 382 427, Gujarat, India. The Company is engaged in activity of manufacturing/dealing/trading of Steel and tube pipes.

B. SIGNIFICANT ACCOUNTING POLICIES

(i). BASIS OF PREPARATION:

These financial statements have been prepared in accordance with the Generally Accepted Accounting Principles in India ('Indian GAAP') to comply with the Accounting Standards specified under Section 133 of the Companies Act, 2013, read with Rule 7 of the Companies (Accounts) Rules, 2014 and the relevant provisions of the Companies Act, 2013. The financial statements have been prepared under the historical cost convention on accrual basis, the Companies (Accounting Standards) Amendment Rules 2016 and the relevant provisions of the Companies Act, 2013. Accounting Policies have been consistently applied by the company.

(ii). USE OF ESTIMATES:

The preparation of the financial statements in conformity with the generally accepted accounting principles requires estimates and assumptions to be made that affect the reported amount of assets and liabilities on the date of financial statements and the reported amount of revenues and expenses during the reporting period. Management believes that the estimates used in the preparation of financial statement are prudent and reasonable. Future results could differ from these estimates. Difference between the actual results and estimates are recognized in the period in which the results are known / materialized.

(iii). INVENTORY:

Inventories are valued as under;

- a) Finished goods at cost including production overheads.
- b) Packing Materials and Work In Progress at cost.

All the duties and taxes have been considered while valuing the inventory, in accordance with provisions of section 145A of the Income Tax Act, 1961.

(iv). REVENUE RECOGNITION:

In appropriate circumstances, revenue is recognized on accrual basis when no significant uncertainty as to determination or realization exists.

Sales are accounted for on gross sales including excise duty & value added Tax.

Sales are accounted on dispatch of goods from the company premises.

All the items of expenses and income are accounted on accrual basis.

(v). PROPERTY, PLANT AND EQUIPMENTS AND DEPRECIATION:

All Property, Plant and Equipment are valued at cost less depreciation / amortization. Tangible property, plant and equipments are stated at cost of acquisition includes inward freight, non-refundable duties, taxes and other directly attributable incidental expenses, net of Input Tax Credit and value added tax. Depreciation is provided as per the Written Down Value Method on the basis of useful life specified in the schedule II of the Companies Act, 2013.

(vi). EMPLOYEE BENEFITS:

Short – Term Employee Benefits: Bonus:

The Company has provided for Bonus, payable to its employees, for their services rendered during the year, as per the Company's rules and policy, on an undiscounted basis.

(vii). BORROWING COST:

Borrowing Cost relating to acquisition, construction of fixed assets or production of qualifying assets which takes substantial period of time to get ready for its intended use are also included to the extent they relate to period till such assets are ready to be put to use . Other borrowing Cost are recognized as an expense in the period in which these are incurred.

(viii). SEGMENT REPORTING:

In terms of AS-17 on "Segment Reporting" the company neither has more than one business segment nor more than one geographical segment requiring separate disclosures as there are no more distinguishable component or economic environments of the enterprise engaged in providing

individual product or service or a group of related products or services and the same are not subjected to different risks and returns either of business or geographical segments.

(ix). EARNING PER SHARE:

The basic earnings per Share is calculated by dividing the Net profit or loss for the year attributable to Equity Shareholders by the weighted average number of equity shares outstanding during the year. The basic and diluted EPS are same as the company has no potential Equity shares.

(x). RELATED PARTY TRANSACTION:

Disclosure of transactions with Related Parties, as required by "Accounting Standard 18-Related Party Disclosure" has been set out in the Notes on Financial Statements. Related Parties have been identified on the basis of representations made by key managerial personnel and information available with the Company.

(xi). TAXES ON INCOME:

Current tax is determined as the amount of tax payable in respect of taxable income for the year. Deferred tax is recognized, on timing difference, being the difference between taxable incomes and accounting income that originate in one period and are capable of reversal in one or more subsequent periods. Where there is unabsorbed depreciation or carry forward losses, deferred tax assets are recognized if there is virtual certainty that sufficient future taxable income will be available against which such assets can be realized. Other deferred tax assets are recognized only to the extent there is reasonable certainty of realization in future. Such assets are reviewed at each Balance sheet date to reassess realization. Deferred tax assets and liabilities are measured using the tax rates and tax laws that have been enacted or substantively enacted by the balance sheet date.

(xii). PROVISION, CONTINGENT LIABILITIES AND CONTINGENT ASSETS:

Provisions involving substantial degree of estimation in measurement are recognized when there is a present obligation as a result of past events and it is probable that there will be an outflow of resources. Contingent Assets are neither recognized nor disclosed in the financial statements.

21. ADDITIONAL NOTES TO FINANCIAL STATEMENTS:

21.1 CONTINGENT LIABILITIES NOT PROVIDED FOR:

There are no contingent liabilities which are not provided for.

21.2 EARNINGS PER SHARE (EPS):

Weighted Average No. Of Equity shares. (Weighted Average is calculated on day basis)	8290252
Profit after tax for the year (Rs)	30621416
Earning per share (Rs.)	3.69

21.3 In the opinion of the Board, Current Assets, Loans and Advances are approximately of the value stated if realized in the ordinary course of business. The provisions for all known liabilities are adequate and not in excess of the amount reasonably necessary.

21.4 Balances of Debtors, Creditors and Loans & Advances are subject to confirmation. Adjustments, if any, will be made at the time of reconciliation of accounts. The confirmation in respect of sundry creditors has been called for during the year.

21.5 RELATED PARTY TRANSACTIONS:

List of Related Party with whom transaction were effected during the year :

Sr. No.	Name	Relation
1	Rajesh R. Mittal	Key Managerial Person
2	Preeti R. Mittal	Key Managerial Person
3	Rajat R. Mittal	Relative of Key Managerial Person

Details of Related Party Transactions:

Particulars	2019-20	2018-19
<u>Loans Accepted/(Repaid):</u>		
Rajesh R. Mittal	53563072	108937682
Rajesh R. Mittal	(36837146)	(117456998)
Preeti R. Mittal	9610308	89972627

Preeti R. Mittal	(74325890)	(111708392)
Interest :		
Rajesh R. Mittal	693715	2261540
Preeti R. Mittal	2426336	4501121
Rajat R. Mittal	Nil	Nil
Remuneration		
Rajesh R. Mittal	600000	600000
Rajat R. Mittal	Nil	Nil
Preeti R. Mittal	540000	540000
Rent Paid		
Rajesh R. Mittal	Nil	Nil

21.6 LEASE:

Operating Lease Details:

Sr. No.	Particulars	Details
1.	Land at Ahmedabad	24Th April, 2002
	Period of Lease Agreement	30 Years
	Total Lease Rent p.a.	Rs. 43000 /-

21.7 Previous year's figures have been regrouped / reclassified to make them comparable with those of the current year, wherever necessary.

21.8 Figures have been rounded off to the nearest rupees.

SIGNATURES TO NOTES 1 TO 21

As per our report of even date attached

For, Jigar Shah & Associates

Chartered Accountants

Firm Registration No : 128263W

For and on behalf of the Board

Jigar Shah
Membership No.: 075778
UDIN: 20075778AAAAFT2597
Place: Ahmedabad
Date: 31/07/2020

Rajeshkumar R Mittal
Managing Director
DIN:00878934
Place: Ahmedabad
Date: 31/07/2020

Preeti R Mittal
Director & CFO
DIN:01594555
Place: Ahmedabad
Date: 31/07/2020

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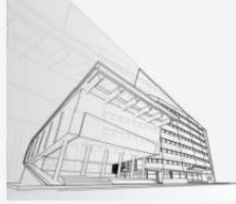
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Customized Product Range Of
RIDDHI matches their expected
Quality Deliverable.



Architects
They recommend RIDDHI for its
Versatile sizes & Perfect
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Heavy Metal Fabricators
Solid Material for Welding that
blends well in Design - RIDDHI.



Builders & Engineers
RIDDHI - Their Partner best
known for Durability & Strength.

MS Black

WHEN YOUR PROJECTS NEED DURABILITY AND SUSTAINABILITY - MS BLACK PIPES OFFER LOW MAINTENANCE AND SUPERIOR QUALITY TOO.

- Round Hollow Sections
- Square Hollow Sections
- Rectangular Hollow Sections

Pre-Galvanized

WHEN APPLICATIONS REQUIREMENTS ARE OF QUALITY, FLEXIBILITY AND STRENGTH, PRE-GALVANIZED PIPES ARE PERFECTLY SUITED FOR YOUR PROJECTS.

- Round Hollow Sections
- Square Hollow Sections
- Rectangular Hollow Sections

Galvanized

OUR GALVANIZED PIPES OFFER APPLICATIONS WITH TOUGHNESS AND STRENGTH FOR HIGH PERFORMANCE.

- Round Hollow Sections
- Square Hollow Sections
- Rectangular Hollow Sections

Other Products

- HOT ROLLED SHEETS & PLATES
- COLD ROLLED SHEET
- PRE-GALVANISED SHEET

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