RAMA
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RAMA STEEL TUBES LTD.
Manufacturers & Exporters : ERW Steel Tubes (Black & Galvanised)
CIN : L27201DL1974PLC007114 | AN ISO 9001 : 2015 CO.
Regd. Office : B-5, 3rd Floor, Main Road, Ghazipur, New Delhi (India) - 110096
+(91)-(11)-43446600 info@ramasteel.com www.ramasteel.com

Date: October 14, 2022

To

The Manager – Listing National Stock Exchange of India Ltd Exchange Plaza, Bandra Kurla Complex Bandra (East) Mumbai – 400 051 Symbol: **RAMASTEEL**	The Secretary Corporate Relationship Dept. BSE Limited P.J. Towers, Dalal Street, Mumbai – 400 001 Scrip Code: **539309**

Sub: Notice of the NCLT convened meeting of unsecured creditors of Rama Steel Tubes Limited ("the Company") for approval of the scheme

Dear Sir/Madam,

Pursuant to applicable provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and in furtherance to earlier intimation, please be informed that the New Delhi Bench of the National Company Law Tribunal ("**NCLT**") vide its order dated 26th September, 2022 & 30th May, 2022, has *inter alia* directed that a meeting of unsecured creditors of the Company to be held on **Tuesday, 15th November, 2022, at 12:00 PM** at B-5 3rd Floor, Main Road, Ghazipur, New Delhi- 110096 ("Meeting"), for the purpose of considering, and if thought fit, approving with or without modification, the compromise or arrangement proposed to be made between Lepakshi Tubes Private Limited ("Transferor Company") with Rama Steel Tubes Limited ("Transferee Company) along with their respective shareholders and creditors under Section 230-232 and other applicable provisions of Companies Act, 2013, read with Companies (Compromises, Arrangements and Amalgamations) Rules, 2016 **("Scheme").**

Please find enclosed herewith the copy of the Notice, the Scheme, explanatory statement under Section 230 and 232 read with Section 102 and other applicable provisions of the Companies Act, 2013 and Rule 6 of the Companies (Compromises, Arrangements and Amalgamations) Rules, 2016 and accompanying documents, which has also been sent to the unsecured creditors of the Company, today i.e, October 14, 2022 and is also available on the website of the Company at www.ramasteel.com.

This is for your information and record.

Thanking you,

Yours faithfully,

For **Rama Steel Tubes Limited**

ARPIT SURI Digitally signed by ARPIT SURI Date: 2022.10.14 18:17:57 +05'30'

Arpit Suri
Company Secretary & Compliance Officer

Encl.: As above.

NOTICE OF TRIBUNAL CONVENED MEETING
OF
THE UNSECURED CREDITORS
OF RAMA STEEL TUBES LIMITED

(Convened pursuant to order dated 26.09.2022 and 30.05.2022 passed by Hon'ble New Delhi Bench of the National Company Law Tribunal, at Delhi)

To,

All the Unsecured Creditors of Rama Steel Tubes Limited

MEETING

DAY	**Tuesday**
DATE	**15th November, 2022**
TIME	**12 Noon**
VENUE	**Conference Room, B -5, 3rd Floor, Main Road, Gazipur, New Delhi-110096**

Sd/-
Puneet Sachdev
Chairman appointed by Hon'ble NCLT
In the matter of Merger
Lepakshi Tubes Private Limited
With Rama Steel Tubes Limited

Date: 12.10.2022
Place: New Delhi

NOTICE OF THE NATIONAL COMPANY LAW TRIBUNAL CONVENED MEETING OF THE UNSECURED CREDITORS OF THE COMPANY

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Sd/-
Puneet Sachdev
Chairman appointed by Hon'ble NCLT
In the matter of Merger
Lepakshi Tubes Private Limited
With Rama Steel Tubes Limited

Date: 12.10.2022
Place: New Delhi

BEFORE THE NATIONAL COMPANY LAW TRIBUNAL,

BENCH AT NEW DELHI

COMPANY APPLICATION NO. C.A. (CAA)NO. 49/ND/2022

IN THE MATTER OF SECTIONS 230-232 AND OTHER APPLICABLE PROVISIONS OF THE COMPANIES ACT, 2013

AND
IN THE MATTER OF SCHEME OF AMALGAMATION OF

LEPAKSHI TUBES PRIVATE LIMITED TRANSFEROR COMPANY /APPLICANT COMPANY NO.1
WITH
RAMA STEEL TUBES LIMITED
TRANSFEREE COMPANY/APPLICANT COMPANY NO.2
AND
THEIR RESPECTIVE CREDITORS AND SHAREHOLDERS

NOTICE CONVENING THE MEETING OF UNSECURED CREDITORS OF RAMA STEEL TUBES LIMITED (TRANSFEREE COMPANY/APPLICANT COMPANY 2)

To,
All the Unsecured Creditors of Rama Steel Tubes Limited
(Transferee Company/ Applicant Company 2)

NOTICE is hereby given that by an Order dated **26th September, 2022** and **30th May, 2022** ("Order"), of the **Hon'ble New Delhi Bench of National Company Law Tribunal, at Delhi ("NCLT")** has directed a meeting of the Unsecured Creditors of Rama Steel Tubes Limited (Transferee Company/ Applicant Company 2) to be held for the purpose of considering, and if thought fit, approving, with or without modification(s), the arrangement embodied in the Scheme of Arrangement for Amalgamation of Lepakshi Tubes Private Limited (Transferor Company) with Rama Steel Tubes Limited ("the Transferee Company") and their respective shareholders and creditors under sections 230-232 of Companies Act, 2013 ("Scheme"). Further to this an order dated 26th September, 2022 was passed fixing the date of meetings as 15th November, 2022. In pursuance of the Orders and as directed therein, further notice is hereby given that a meeting of the Unsecured Creditors of the ("Transferee Company/ Applicant Company 2) will be held on **Tuesday, 15th November, 2022 at 12** Noon at B 5, 3rd Floor, Main Road, Gazipur, New Delhi 110096 ("Meeting").

Copy of the notice in relation to the Meeting, together with the documents accompanying the same, including the explanatory statement under Sections 230(3), 232(1), 232(2) and 102 of the Act read with Rule 6 of the Companies (Compromises, Arrangements and Amalgamations) Rules, 2016 ("Rules") ("Explanatory Statement") and the Scheme can be obtained free of charge on any day (except Saturday, Sunday and public holidays) from the registered office of Rama Steel Tubes Limited at C/o B 5, 3rd Floor, Main Road, Gazipur, New Delhi 110096 during business hours.

The Tribunal has appointed Mr. Puneet Sachdev as the Chairperson of the Meeting, including for any adjournment(s) thereof. The Tribunal has also appointed Mr. Mohinder Kumar Gaind, as the Scrutinizer for the Meeting, including for any adjournment(s) thereof. The Scheme, if approved at the Meeting, will be subject to the subsequent approval of the Tribunal.

Take notice that at the meeting, following resolutions will be considered and if thought fit, be passed, with or without modification(s) with the requisite majority:

"RESOLVED THAT pursuant to the provisions of Sections 230-232 and other applicable Provisions of the Companies Act, 2013, the rules, circulars and notifications made there under (including any statutory modification or re-enactment thereof) as may be applicable and subject to the provisions of the Memorandum of Association and Articles of Association of the Company and subject to the approval of Hon'ble National Company Law Tribunal, New Delhi Bench At Delhi (NCLT), or its appellate authority(ies)/ Court(s) and subject to such other approval(s), permission(s) and sanction(s) of regulatory and other authorities, as may be necessary and subject to such conditions and modifications as may be prescribed or imposed by NCLT or by any regulatory or other authorities, while granting such consents, approvals and permissions, which may be agreed to by the Board of Directors of the Company ("Board") whose term shall be deemed to mean and include one or more Committee(s) constituted/to be constituted by the Board or any person(s) which the Board may nominate to exercise its powers including the powers conferred by this resolution, the arrangement embodied in the Scheme of Arrangement and Amalgamation of Lepakshi Tubes Private Limited (Transferor Company) with Rama Steel Tubes Limited ("the Transferee Company") and their respective shareholders and creditors ("Scheme"), placed before this meeting and initialed by the Chairman of the meeting for the purpose of identification, be and is hereby approved.

RESOLVED FURTHER THAT the Board be and is hereby authorized to do all such acts, deeds, matters and things, as it may, in its absolute discretion deem requisite, desirable, appropriate or necessary to give effect to this resolution and effectively implement the arrangement embodied in the Scheme and to accept such modifications, amendments, limitations and/or conditions, if any, which may be required and/or imposed by the NCLT while sanctioning the arrangement embodied in the Scheme or by any authorities under law, or as may be required for the purpose of resolving any questions or doubts or difficulties that may arise including passing of such accounting entries and/or making such adjustments in the books of accounts as considered necessary in giving effect to the Scheme, as the Board may deem fit and proper."

TAKE FURTHER NOTICE that persons entitled to attend and vote at the said meeting, may vote in person or by proxy, provided that a proxy in the prescribed form is deposited at the registered office of the Transferee Company, at **B 5, 3rd Floor, Main Road, Gazipur, New Delhi 110096**, not later than 48 (forty-eight) hours before the time fixed for the aforesaid meeting. The form of proxy can be obtained free of charge from the registered office of the Transferee Company.

Copies of the Scheme and of the Explanatory Statement, under Sections 230(3), 232(1) and (2) and 102 of the Companies Act, 2013 read with Rule 6 of the Companies (Compromises, Arrangements and Amalgamations) Rules, 2016, along with the enclosures as indicated in the Index, can be obtained free of charge at the registered office of the Transferee Company at **B 5, 3rd Floor, Main Road, Gazipur, New Delhi 110096**.

NCLT has appointed undersigned as Chairperson and Mr. Mohinder Kumar Gaind as a scrutinizer of the said meeting of Unsecured Creditors of Transferee Company.

The Scheme, if approved in the aforesaid meeting, will be subject to the subsequent approval of National Company Law Tribunal, New Delhi Bench at Delhi. A copy of the Explanatory Statement, under Sections 230(3) and 102 of the Companies Act, 2013 read with Rule 6 of the Companies (Compromises, Arrangements and Amalgamations) Rules, 2016, the Scheme and the other enclosures as indicated in the index are enclosed.

Sd/-
Puneet Sachdev
Chairman appointed by Hon'ble NCLT
In the matter of Merger
Lepakshi Tubes Private Limited
With Rama Steel Tubes Limited

Date: 12.10.2022
Place: New Delhi

Notes:

1. THE NOTICE IN RELATION TO THE TRIBUNAL CONVENED MEETING OF THE UNSECURED CREDITORS OF RAMA STEEL TUBES LIMITED ("RSTL"), TOGETHER WITH THE DOCUMENTS ACCOMPANYING THE SAME, INCLUDING THE EXPLANATORY STATEMENT AND THE SCHEME (COLLECTIVELY, THE "NOTICE") IS BEING SENT BY E-MAILAND THROUGH POST (WHOSE EMAIL ADDRESS ARE NOT REGISTERED WITH US), AT THE LAST KNOWN ADDRESS TO ALL THE UNSECURED CREDITORS OF RSTL WHOSE NAMES APPEAR IN LIST AS ON 14.02.2022. IN CASE THE E-MAIL/POSTAL ADDRESS OF ANY UNSECURED CREDITORSIS NOT UPDATED WITH RSTL, THEN SUCH UNSECURED CREDITORS IS REQUESTEDTO CONTACT RSTL FOR UPDATION OF THE SAME BY EMAILING AT INVESTORS@RAMASTEEL.COM OR ALTERNATIVELY BY LETTER AT RSTL REGISTERED OFFICE.

2. IN TERMS OF THE ORDERS DATED SEPTEMBER 26, 2022 AND MAY 30, 2022 OF THE HON'BLE NEW DELHI BENCH OF THE NATIONAL COMPANY LAW TRIBUNAL AT DELHI ("ORDER"), RSTL IS CONVENING THE ENSUING MEETING IN PHYSICAL MODE AT THE VENUE MENTIONED IN THE NOTICE.

3. A PERSON/ ENTITY WHO IS NOT AN UNSECURED CREDITORS AS ON THE DATE REFERRED IN NOTE 1 ABOVE SHOULD TREAT THIS NOTICE FOR INFORMATION PURPOSES ONLY AND WILL NOT BE ENTITLED TO VOTE.

4. THE UNSECURED CREDITORS OF RSTL ARE ENTITLED TO VOTE THROUGH PROXY ALSO AS THE FACILITY FOR APPOINTMENT OF PROXIES BY THE UNSECURED CREDITORS WILLBE AVAILABLE FOR THE MEETING AND HENCE THE PROXY FORM AND ATTENDANCE ARE ANNEXED TO THIS NOTICE.

4. A BODY CORPORATE WHICH IS UNSECURED CREDITORS OF RSTL IS ENTITLED TO APPOINT AN AUTHORIZED REPRESENTATIVE FOR THE PURPOSE OF PARTICIPATING IN THE MEETING. FURTHER, SUCH BODY CORPORATES (I.E OTHER THAN INDIVIDUALS, HUF, NRI, ETC) ARE REQUIRED TO SEND SCANNED CERTIFIED COPY (PDF FILE) OF THE RELEVANT RESOLUTION AUTHORITY LETTER TOGETHER WITH ATTESTED SPECIMEN SIGNATURE OF THE DULYAUTHORIZED SIGNATORY (IES) WHO ARE AUTHORIZED TO VOTE, TO THE COMPANY AT INVESTORS@RAMASTEEL.COM FROM THEIR REGISTERED EMAIL ADDRESS WITH A COPY MARKED TO SCRUTINIZER AT MGAIND6@GMAIL.COM NOT LATER THAN 48 HOURS BEFORE THE SCHEDULED TIME OF THE MEETING. THE FILE/ SCANNED IMAGE OF THE RESOLUTION/ AUTHORITY LETTER/ SPECIMEN SIGNATURE SHOULD BE IN THE NAMING FORMAT 'CORPORATE NAME EVENT NAME '.

5. AUTHORIZED REPRESENTATIVE OF THE UNSECURED CREDITORS SHOULD ADDITIONALLY E-MAIL COPY OF THEIR VALID AND LEGIBLE IDENTITY PROOF (PDF FILE) ISSUED BY A STATUTORY AUTHORITY (I.E. PAN CARD/ AADHAAR CARD/ PASSPORT/DRIVING LICENSE/ VOTER ID CARD) TO THE COMPANY FROM THEIR REGISTERED EMAIL ADDRESS WITH A COPY MARKED TO SCRUTINIZER MGAIND6@GMAIL.COM NOT LATER THAN 48 HOURS BEFORE THE SCHEDULED TIME OF THE MEETING. THE FILE/ SCANNED IMAGE OF THE RESOLUTION/ AUTHORITYLETTER/ SPECIMEN SIGNATURE SHOULD BE IN THE NAMING FORMAT 'CORPORATENAME EVENT NAME.'.

6. THAT VOTING BY PROXY/AUTHORIZED REPRESENTATIVE BE PERMITTED, PROVIDED THAT A PROXY IN THE PRESCRIBED FORM DULY SIGNED BY THE PERSON ENTITLED TO ATTEND AND VOTE AT THE MEETING, ARE FILED WITH THE RSTL AT ITS REGISTERED OFFICE, NOT LATER THAN 48 HOURS BEFORE THE AFORESAID MEETING VIDE RULE 10 OF THE COMPANIES (CAA) RULES, 2016 READ WITH SECTION 105 OF THE ACT. A PERSON, INCLUDING ABODY CORPORATE, ENTITLED TO ATTEND AND VOTE AT THE VENUE OF A

MEETING, AS AFORESAID, MAY DO SO PERSONALLY OR THROUGH AUTHORISED REPRESENTATIVES, PROVIDED THE CERTIFIED COPY OF RESOLUTION OF THE BOARD OF DIRECTORS OR OTHERGOVERNING BODY OF SUCH PERSON, WHERE IT IS A BODY CORPORATE, AUTHORISING ITS REPRESENTATIVE TO ATTEND AND VOTE AT SUCH MEETING ON ITS BEHALF, AS THE CASE MAY BE, IS DEPOSITED AT THE REGISTERED OFFICE OF THE RSTL NOT LATER THAN 48 (FORTY-EIGHT) HOURS BEFORE THE TIME FOR HOLDING SUCH MEETING.

7. AS PER ORDER OF THE HON'BLE TRIBUNAL, THE QUORUM FOR THE MEETING OF THE UNSECURED CREDITORS SHALL BE 70 TO PROCEED WITH THE MEETING. IN CASE THE QUORUM OF THE MEETING IS NOT PRESENT WITHIN HALF AN HOUR FROM THE TIME APPOINTED FOR THE MEETING, THE CHAIRPERSON MAY ADJOURN SUCH MEETING TO 30 MINUTES AND CREDITORS PRESENT SHALL BE DEEMED TO CONSTITUTE QUORUM.

8. IN TERMS OF SECTIONS 230 TO 232 OF THE ACT, THE SCHEME SHALL BE CONSIDERED APPROVED BY THE UNSECURED CREDITORS OF RSTL, IF THE RESOLUTION MENTIONED ABOVE IN THE NOTICE HAS BEEN APPROVED AT THE MEETING BY A MAJORITY OF UNSECURED CREDITORS.

9. IN TERMS OF THE DIRECTIONS CONTAINED IN THE ORDER, THE NOTICE CONVENING THE MEETING WILL BE PUBLISHED BY RSTL, THROUGH ADVERTISEMENT AT LEAST 30 (THIRTY) CLEAR DAYS BEFORE THE MEETING(S) TO BE AS AFORESAID, AN ADVERTISEMENT OF THE NOTICE OF MEETING(S) BE PUBLISHED ONCE EACH IN THE BUSINESS STANDARD, ENGLISH-DELHI EDITION AND BUSINESS STANDARD HINDI DELHI EDITION AS PER RULE 7 OF THE COMPANIES (COMPROMISES, ARRANGEMENTS AND AMALGAMATIONS) RULES, 2016 INDICATING THE DAY, DATE, MODE AND TIME OF THE MEETING AND STATING THAT THE COPIES OF THE SCHEME AND THE EXPLANATORY STATEMENT AND OTHER RELEVANT DOCUMENTS CAN BE OBTAINED FREE OF CHARGE ON ANY DAY (EXCEPT SATURDAY, SUNDAY AND PUBLIC HOLIDAYS) FROM THE REGISTERED OFFICE OF RSTL DURING BUSINESS HOURS.

10. THE VOTES CAST SHALL BE SCRUTINIZED BY THE SCRUTINISER.THE SCRUTINISER SHALL PREPARE AND SUBMIT THE RESPECTIVE REPORTS ON THE MEETING ALONG WITH ALL PAPERS RELATING TO THE VOTING TO THE CHAIRPERSON OF THE MEETING WITHIN FIVE DAYS IN THE CASE OF MEETING OF THE UNSECURED CREDITORS OF THE RSTL AFTER THE CONCLUSION OF THE RESPECTIVE MEETING. THE CHAIRPERSON SHALL DECLARE THE RESULTS OF THE MEETING AFTER SUBMISSION OF THE REPORT OF THE SCRUTINISER.

11. CREDITORS OF RSTL DESIRING ANY ADDITIONAL INFORMATION OR HAVING ANY QUESTION OR QUERY ARE REQUESTED TO E-MAIL INVESTORS@RAMASTEEL.COM , AT LEAST 7 DAYS BEFORE THE DATE OF THE MEETING SO AS TO ENABLE RSTL TO KEEP THE INFORMATION READY.

12. ANY QUERIES/ GRIEVANCES IN RELATION TO THE NOTICE MAY BE ADDRESSED TO THE COMPANY THROUGH E-MAIL AT INVESTORS@RAMASTEEL.COM

Sd/-
Puneet Sachdev
Chairman appointed by Hon'ble NCLT
In the matter of Merger
Lepakshi Tubes Private Limited
With Rama Steel Tubes Limited

Date: 12.10.2022
Place: New Delhi

Encl : as above

CIN : **L27201DL1974PLC007114**
Name of the Company : **RAMA STEEL TUBES LIMITED**
Registered Office : **B-5 3rd Floor, Main Road, Ghazipur New Delhi – 110096**

BEFORE THE HON'BLE NATIONAL COMPANY LAW TRIBUNAL, AT NEW DELHI
COMPANY APPLICATION NO. C.A. (CAA) No. 4 9 / N D / 2 0 2 2

IN THE MATTER OF:

THE SCHEME OF AMALGAMATION OF:

LEPAKSHI TUBES PRIVATE LIMITED having its registered office at B-5, 3rd Floor, Main Road, Ghazipur, New Delhi - 110096. **... TRANSFEROR COMPANY/ APPLICANT COMPANY NO. 1**

WITH

RAMA STEEL TUBES LIMITED having its registered office at B-5 3rd Floor, Main Road, Ghazipur New Delhi East Delhi DL 110096. **... TRANSFEREE COMPANY/ APPLICANT COMPANY NO. 2**

PROXY FORM – UNSECURED CREDITORS

Name of the UnsecuredCreditor:	
Registered Address:	
E-Mail ID:	

I/We, being the Unsecured Creditors of Rama Steel Tubes Limited, do hereby appoint:

1. Name: _____
Address : _____
_____
E-mail ID: _____
Signature: _____
or failing him,

2. Name: _____
Address : _____
_____
E-mail ID: _____
Signature: _____
or failing him,

3. Name: _____
Address : _____
_____
E-mail ID: _____
Signature: _____

as my/our proxy to attend and vote (on a poll) for me/us on my/our behalf at the meeting of Unsecured Creditors to be held **on Tuesday, 15th November, 2022 at 12:00 PM at Conference Room, B -5, 3rd Floor, Main Road, Gazipur, New Delhi-110096** for the purpose of considering and, if thought fit, approving, with or without modification, Scheme of Amalgamation of LEPAKSHI TUBES PRIVATE LIMITED (Transferor Company) with RAMA STEEL TUBES LIMITED (Transferee Company) and at such meeting or at any adjournment thereof.

Signed this____day of_____, 2022 Signature of Unsecured Creditors:

Affix Revenue Stamp

Signature of proxy holder(s):

NOTES:

1. The Proxy need not be an Unsecured Creditor.
2. The Proxy Form duly signed across a revenue stamp of Re. 1/- should reach the Company's Registered Office at least 48 hours before the time of the meeting.
3. An Unsecured Creditor may vote either 'for' or 'against' the resolution.

RAMA
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ATTENDANCE SLIP

For NCLT Convened Meeting of Unsecured Creditors of Rama Steel Tubes Limited to be held on 15.11.2022 at B-5 3rd Floor, Main Road, Ghazipur New Delhi - 110096

Proposed Scheme of Amalgamation- Lepakshi Tubes Private Limited (Transferor Company) with Rama Steel Tubes Limited (Transferee Company)

Name of the Unsecured Creditors:	
Name of Proxy/Authorized Representative:	
Address:	

I/We hereby record my/our presence at the NCLT Convened meeting of Unsecured Creditors of the Company pursuant to the Order dated 26rd September, 2022 and 30th May, 2022 on Tuesday, 15th November, 2022.

Signatures:

Unsecured Creditor: **Authorized Representative:**

First/Sole

Proxy Holder

Second Proxy

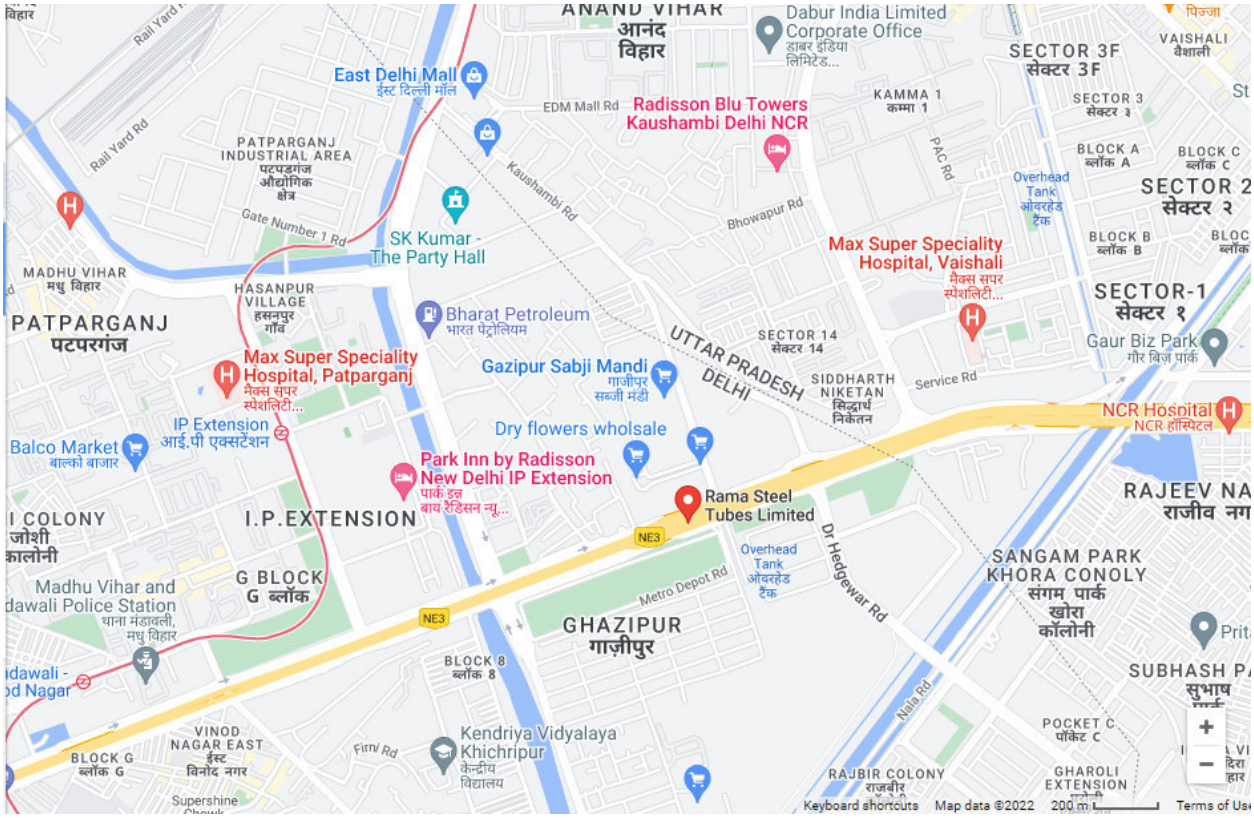
Holder Third

Proxy Holder

RAMA STEEL TUBES LIMITED

B-5, 3RD FLOOR, GHAZIPUR MAIN ROAD, NEW DELHI-110096

LOCATION MAP FOR MEETING 15.11.2022



EXPLANATORY STATEMENT UNDER SECTION 102 READ WITH SECTIONS 230(3), 231(1) AND (2) OF THE COMPANIES ACT, 2013 READ WITH RULE 6 OF THE COMPANIES (COMPROMISES, ARRANGEMENTS AND AMALGAMATIONS) RULES, 2016

1. Pursuant to the Order passed by the **Hon'ble National Company Law Tribunal, New Delhi Bench at Delhi**, (the "NCLT") in the Company Application **No. CA(CAA) No.49/ND/2022** date 12.03.2022 and orders dated 26.09.2022 and 30.05.2022 ("Orders") a meeting of the Unsecured Creditors of **Rama Steel Tubes Limited** (hereinafter referred to as the "Transferee Company/Applicant Company as the context may admit), is being convened and held on **15th November, 2022 at 12:00 Noon** at **B 5, 3rd Floor, Main Road, Ghaziapur, New Delhi 110096** for the purpose of considering and, if thought fit, approving with or without modification(s), the proposed Scheme of Arrangement among Lepakshi Tubes Private Limited (Transferor Company) with Rama Steel Tubes Limited ("the Transferee Company") and their respective shareholders and creditors ("Scheme"),under Sections 230 to 232 of the Companies Act, 2013 (the "Act") (including any statutory modification or re-enactment or amendment thereof) read with the rules issued there under.

2. In terms of the said Order, NCLT has appointed undersigned as the Chairman, and Mr. Mohinder Kumar Gaind, as a scrutinizer of the said meeting of Unsecured Creditors of Applicant Company No. 2/Transferee Company.

3. This statement is being furnished as required under Sections 230(3), 232(1) and (2) and 102 of the Companies Act, 2013 read with Rule 6 of the Companies (Compromises, Arrangements and Amalgamations) Rules, 2016 (the "Rules").

4. As stated earlier NCLT by its said Order has, inter alia, directed that a meeting of the Unsecured Creditors of the Applicant Company 2/Transferee Company shall be convened and held on 15th November, **2022 at 12:00 Noon** for the purpose of considering and, if thought fit, approving with or without modification(s), the proposed Scheme of Arrangement between Lepakshi Tubes Private Limited (Transferor Company) with Rama Steel Tubes Limited ("the Transferee Company") and their respective shareholders and Creditors ("Scheme") under Sections 230 to 232 of the Companies Act, 2013 (the "Act"). Unsecured Creditors would be entitled to vote in the said meeting either in person or through proxy.

5. A copy of the Scheme setting out in detail the terms and conditions of the arrangement, inter alia, providing for the proposed Scheme of Arrangement between Lepakshi Tubes Private Limited (Transferor Company) with Rama Steel Tubes Limited ("the Transferee Company") and their respective shareholders, which has been approved by the Board of Directors of the Applicant Company 2/Transferee Company at its meeting held on 14th February 2022 of respective company is attached to this explanatory statement and forms part of this statement.

OVERVIEW

6. The Scheme envisages the Arrangement between the Applicant Companies under Sections 230-232 of the Companies Act-2013, with effect from 1st April 2021.

7. BACKGROUND

7.1. Details of Rama Steel Tubes Limited (Transferee Company/ Applicant Company-2):

(a) Rama Steel Tubes Limited (Hereinafter referred to as "RSTL") Transferee Company/Applicant Company-2 is a Public Limited Company, incorporated on 26.02.1974 in accordance with the provisions of the Companies Act, 1956.

(b) Corporate Identification Number (CIN): L27201DL1974PLC007114

(c) Registered office of the Transferee Company/Applicant Company-2 is situated at **B 5, 3rd Floor, Main Road, Ghaziapur, New Delhi 110096**.

(d) Email address: investors@ramasteel.com

(e) The main object of the Transferee Company/Applicant Company-2 is:

i) To manufacture, process, design, buy, sell, import, export or otherwise deal in all kinds of Steel Tubes/pipes, pipe fittings, Components, accessories and all kinds of hardware items made of steel, to carry on the business of galvanisers and jappanners, re-rollers annealors, enamellers, and electroplaters and to manufacture, process, repair, convert, buy, sell, import, export or otherwise deal in such products, their raw materials, stores, packing materials, tools, plants and machineries by products and commodities.

(f) The Authorized, Issued, Subscribed and Paid-up Capital of the Applicant Company 2 as on 14.02.2022 is as follows:

As per Audited Annual Accounts as on 31st March, 2021	
Particulars	**Amount (in Rs.)**
Authorised Share Capital 1,80,00,000 Equity Shares of Rs. 5/- each 25,00,000 5% Non Cumulative Redeemable Preference shares of Rs.10/- each	 **9,00,00,000** **2,50,00,000**
Total	**11,50,00,000**
Issued, Subscribed and Paid-up Share Capital 1,67,94,000 Equity Shares of Rs. 5/- each fully paid up	 **8,39,70,000**
Total	**8,39,70,000**

8. The Scheme has been approved by the Board of Directors of the Applicant Company 2 at their Meeting held on 14.02.2022.

9. The purpose and benefits of the Scheme of Arrangement are as under:

To consolidate the operations/business of the Transferor Company into the Transferee Company by amalgamation of the Transferor Company with the Transferee Company pursuant to a Scheme of Amalgamation under Sections 230-232 and other applicable provisions, if any, of the Companies Act, 2013.

The Transferor Company is a wholly owned subsidiary of the Transferee Company within the meaning of the Companies Act, 2013. The amalgamation of the Transferor Company with the Transferee Company would result, inter-alia, in the following benefits:-

a) The merger of Transferor Company in to RSTL (Transferee Company) will result in the operational and administrative synergies resulting in to cost optimization.
b) Consolidation and simplification of the group structure, cost savings/synergies resulting from rationalization, standardization and simplification of business processes.
c) It is also the intention of the RSTL management to rationalize the Group Holding structure by way of reduction of number of entities and streamlining the corporate structure of RSTL.
d) The proposed merger will also simplify the financial reporting to all stakeholders & help evaluate financial results of RSTL in a more meaningful way and result in improved organizational capability arising from pooling of financial resources.
e) Avoiding un-necessary duplication of costs of administration, distribution, selling and marketing and reduction in legal and regulatory compliances.
f) Maximizing the overall shareholders value by strengthening its core competencies.

10. APPOINTED DATE

"Appointed Date" means 01st April, 2021 or such other date as may be fixed or approved by the Hon'ble National Company Law Tribunal ("NCLT") or any other Government Authority.

11. ACCOUNTING TREATMENT

Upon the Scheme becoming effective, the amalgamation will be accounted in accordance with applicable Indian Accounting Standard as notified under Section 133 of Companies Act, 2013, read together with Paragraph 3 of The Companies (Indian Accounting Standard) Rules, 2015 and the other accounting principles generally accepted in India.

12. REORGANIZATION OF SHARE CAPITAL

12.1. REORGANISATION OF CAPITAL IN THE TRANSFEREE COMPANY

As the Transferor Company is a WOS company of transferee company, entire issued, subscribed and paid-up equity share capital of the Transferor Company shall automatically stand cancelled.

12.2. INCREASE IN AUTHORIZED SHARE CAPITAL

As per the relevant clauses of the scheme, after Scheme becoming effective, the Capital Clause of the Memorandum of Association of the Transferee Company shall stand amended as below:

"The Authorized Share Capital of the Company is Rs. 16,40,00,000/- (Rupees Sixteen Crore Forty Lakhs only) divided into 2,78,00,000 (Two Crore Seventy Eight Lakhs only) equity shares of Rs. 5/- (Rupees five only) each and 25,00,000 (Twenty five Lakhs only) 5% Non-Cumulative Redeemable Preference Shares of Rs.10/- (Rupees Ten only) each."

12.3. DISCLOSURE ABOUT THE EFFECT OF THE SCHEME ON VARIOUS PARTIES IS GIVEN BELOW:

a	Shareholders	No impact since wholly owned subsidiary of Transferee Company
b	Key managerial personnel (KMP)	No impact since company has no KMPs
c	Directors	Shall cease to be Directors.
d	Promoters	No impact
e	Non-promoter members	Not applicable since wholly owned subsidiary of Transferee Company
f	Depositors	No impact
g	Creditors	Creditors if any shall become Creditors of Transferee Company
h	Debenture holders	No impact since company have no debenture holders
i	Deposit trustee and debenture trustee	No impact
j	Employees of the Company	No impact

13. INSPECTION DOCUMENTS

13.1. Inspection of the following documents may be done at the Registered Office of Rama Steel Tubes Limited (Transferee Company) at **B 5, 3rd Floor, Main Road, Ghazipur, New Delhi 110096** on all working days between 11.00 A.M. and 5.00 P.M.

(a) Copy of the order passed by the National Company Law Tribunal, New Delhi Bench at Delhi in Application made by Applicant Companies under Company Application CA(CAA) No.49/ND/2022 inter alia, convening the meetings.

(b) Copy of Company Application CA(CAA) No.49/ND/2022 along with Annexure filled by Applicant Companies before NCLT;

(c) Copy of Memorandum and Articles of Association of Applicant Companies;

(d) Copy of Annual Report of Applicant Companies for the financial year ended on 31st March, 2021;

(e) Copy of the Supplementary Unaudited Accounting Statement of the Applicant Companies, respectively, for the period ended 31st December 2021;

(f) Copy of the Statutory Auditors' certificate dated 14.02.2022, issued by the statutory auditor of the respective applicant companies confirming scheme is in compliance with the Accounting Standard prescribed under section 133 of the Companies Act, 2013;

(g) Copy of the Board Resolutions passed by the respective Board of Directors of the Applicant Companies dated 14.02.2022.

(h) Copy of the Scheme of Arrangement for Amalgamation; and

(i) Copy of the Reports adopted by the Board of Directors of the Applicant Companies, respectively, pursuant to the provisions of Section 232(2)(c) of the Act.

A copy of the Scheme, Explanatory Statement and Form of Proxy may be obtained from the Rama Steel Tubes Limited (Transferee Company/ Applicant Company-2) at **B 5, 3rd Floor, Main Road, Ghazipur, New Delhi 110096**.

After the Scheme is approved by the Unsecured Creditors of the Transferee Company/ Applicant Company-2, it will be subject to the approval/ sanction of the National Company Law Tribunal, New Delhi at Delhi.

Sd/-
Puneet Sachdev
Chairman appointed by Hon'ble NCLT
In the matter of Merger
Lepakshi Tubes Private Limited
With Rama Steel Tubes Private Limited

Date: 12.10.2022
Place: New Delhi

SCHEME OF AMALGAMATION

OF

LEPAKSHI TUBES PRIVATE LIMITED

(Transferor Company)

WITH

RAMA STEEL TUBES LIMITED

(Transferee Company)

AND

THEIR RESPECTIVE CREDITORS AND SHAREHOLDERS

UNDER

SECTIONS 230-232 AND ANY OTHER APPLICABLE

PROVISONS, IF ANY, OF THE COMPANIES ACT, 2013

PREAMBLE

(A) BACKGROUND AND DESCRIPTION OF COMPANY

1. **LEPAKSHI TUBES PRIVATE LIMITED** (hereinafter referred to as "**the Transferor Company**") (CIN - U28990DL2016PTC302210) is a Private Limited Company incorporated under the provisions of the Companies Act, 2013 on 28th day of June, 2016 under the name and style of "**Lepakshi Tubes Private Limited**" with Registrar of Companies, NCT of Delhi and Haryana. At present, the Transferor Company is having its Registered Office at B-5, 3rd Floor, Main Road, Ghazipur, New Delhi, East Delhi-110096 within the jurisdiction of the Hon'ble NCLT, New Delhi. As per the Memorandum of Association of Transferor Company, one of the main objects of the Transferor Company is to manufacture, process, design, buy, sell, import, export or otherwise deal in all kinds of Steel Tubes/pipes, pipe fittings, Components, accessories and all kinds of hardware items made of steel, to carry on the business of galvanisers and jappanners, re-rollers annealors, enamellers, and electroplaters and to manufacture, process, repair, convert, buy, sell, import, export or otherwise deal in such products, their raw materials, stores, packing materials, tools, plants and machineries by products and commodities.

2. **RAMA STEEL TUBES LIMITED** (hereinafter referred to as "**the Transferee Company**") (CIN - L27201DL1974PLC007114) is a Public Limited Company incorporated under the provisions of the Companies Act, 1956 on 26th day of February, 1974 under the name and style of **"Rama Steel Tubes Limited"** with Registrar of Companies, NCT of Delhi and Haryana. At present, the Transferee Company is having its registered office at B-5, 3rd Floor, Main Road, Ghazipur, New Delhi, East Delhi-110096 within the jurisdiction of the Hon'ble NCLT, New Delhi. The shares of the transferee company are listed with and BSE Limited and National Stock Exchange of India Limited. As per Memorandum of Association of the Transferee Company, one of the main objects of the Transferee Company is to manufacture, process, design, buy, sell, import, export or otherwise deal in all kinds of Steel Tubes/pipes, pipe fittings, Components, accessories and all kinds of hardware items made of steel, to carry on the business of galvanisers and jappanners, re-rollers annealors, enamellers, and electroplaters and to manufacture, process, repair, convert, buy, sell, import, export or otherwise deal in such products, their raw materials, stores, packing materials, tools, plants and machineries by products and commodities.

(B) OBJECTS/ RATIONALE FOR THE PROPOSED SCHEME:

It is proposed to consolidate the operations/business of the Transferor Company into the Transferee Company by amalgamation of the Transferor Company with the Transferee Company pursuant to a Scheme of Amalgamation under Sections 230-232 and other applicable provisions, if any, of the Companies Act, 2013. The Transferor Company is a wholly owned subsidiary of the Transferee Company within the meaning of the Companies Act, 2013. The amalgamation of the Transferor Company with the Transferee Company would result, *inter-alia*, in the following benefits:-

a. The merger of Transferor Company in to RSTL (Transferee Company) will result in the operational and administrative synergies resulting in to cost optimization.
b. Consolidation and simplification of the group structure, cost savings/synergies resulting from rationalization, standardization and simplification of business processes.
c. It is also the intention of the RSTL management to rationalize the Group Holding structure by way of reduction of number of entities and streamlining the corporate structure of RSTL.

d. The proposed merger will also simplify the financial reporting to all stakeholders & help evaluate financial results of RSTL in a more meaningful way and result in improved organizational capability arising from pooling of financial resources.

e. Avoiding un-necessary duplication of costs of administration, distribution, selling and marketing and reduction in legal and regulatory compliances.

f. Maximizing the overall shareholders value by strengthening its core competencies.

(C) PARTS OF THE SCHEME:

This Scheme is divided into the following parts:

1. **PART I** – This part deals with the Definitions and Share Capital;

2. **PART II** – This part provides for amalgamation of Lepakshi Tubes Private Limited (**"the Transferor Company"**) with Rama Steel Tubes Limited (**"the Transferee Company");**

3. **PART III** – This part deals with General Terms and Conditions applicable to this Scheme.

(D) The Amalgamation of the Transferor Company with the Transferee Company pursuant to and in accordance with the Scheme shall be

operational with effect from the Appointed Date and shall be in compliance with the relevant provisions of the Income Tax Act, 1961.

PART I

DEFINITIONS

1.1 DEFINITIONS

In this Scheme, unless repugnant to the meaning or context thereof, the following expressions shall have the meaning as under:

a) **"The Act"** means the Companies Act, 2013 or any statutory amendment and/or re-enactment thereof, from time to time and for the time being in force.

b) **"Applicable Laws"** Any statute, notification, by laws, rules, regulation, guideline, rule or common law, policy, code, directive, ordinance, schemes, notices, orders and instructions having force of law enacted or issued or sanctioned by any appropriate authority including any modification or re-enactment thereof for the time being in force.

c) **" Appropriate Authority"** means (i) the Government of any Jurisdiction (Including any central, state, municipal or local government or any political or administrative sub division thereof) any department,

ministry, agency, court, central bank, commission or any other authority thereof: (ii) any public international organization supranational body and its institutions, departments and agencies: (iii) Any governmental, quasi governmental or private body or agency lawfully exercising or entitled to exercise, any administrative, executive, judicial, legislative, regulatory, licensing competition, tax, importing or any other govt. or quasi judicial authority including the SEBI, Stock Exchanges, Registrar of Companies, Regional Director, The NCLT and Official Liquidator.

d) **"Appointed Date"** means 1st day of April 2021 or such other date as may be directed or approved by National Company Law Tribunal or any other appropriate authority.

e) **"Board of Directors" or "Board"** in relation to the Transferor Company and the Transferee Company, as the case may be, shall unless it is repugnant to the context or otherwise, include the Committee of Directors or any person authorized by the Board of Directors or such Committee of Directors.

f) **"Employees"** means staff and employees, if any of the Transferor Company who are on the pay roll of the Transferor company as on effective date.

g) **"Encumbrances"** means any mortgage, pledge, equitable interest, assignment by way of security, conditional sale contract, hypothecation, right of other person, claim, security interest, encumbrance, title defect, title retention agreement, voting trust agreement, interest, option, lien, charge, commitment, restriction or limitation of any nature whatsoever, including restriction on use, voting rights, transfer, receipt of income or exercise of any other attribute of ownership, right of setoff, any arrangement(for the purpose of or which has the effect of , granting security) , or any other security interest of any kind whatsoever, or any agreement, whether conditional or otherwise, to create of the same and the term " Encumbered" shall be construed accordingly.

h) **"Legal Proceedings"** means any proceedings taken by and/or against the Transferor Company in any Court/Tribunal/Forum/Authority, as pending on the Appointed Date.

i) **"Scheme" or "This Scheme" or "the Scheme" or "Scheme of Amalgamation"** means the present Scheme of Amalgamation framed under the provisions of Sections 230-232 and other applicable provisions, if any, of the Act as approved by the respective Board of Directors of the Transferor Company and the Transferee Company as

submitted in the present form or with any modification(s) imposed or directed by Members/ Creditors of the respective Transferor Company and Transferee Company and/or by the Hon'ble National Company Law Tribunal or by any competent authority(ies).

j) **"The Transferor Company"** means **"Lepakshi Tubes Private Limited" (LTPL),** is as defined in Preamble Clause (A) 1 above.

k) **"The Transferee Company"** means **"Rama Steel Tubes Limited", (RSTL)** is as defined in Preamble Clause (A) 2 above.

l) **"Law" or "Applicable Law"** includes all applicable statutes, enactments, acts of legislature or Parliament, laws, ordinances, rules, bye-laws, regulations, notifications, guidelines, policies, directions, directives and orders of any government, statutory authority, Tribunal, Court of India or any other country or jurisdiction as applicable.

m) **"Hon'ble National Company Law Tribunal" or "NCLT" or "Hon'ble Tribunal" or "Hon'ble NCLT"** means the Hon'ble National Company Law Tribunal at New Delhi having jurisdiction in relation to the Transferor Company and Transferee Company.

n) **"Hon'ble National Company Law Appellate Tribunal" or "NCLAT" or "Hon'ble NCLAT"** means the Hon'ble National Company Law Appellate Tribunal at New Delhi.

o) **"Record date"** means the date to be fixed by the Board of Directors or committee thereof, if any, the Transferor Company and Transferee Company for the purpose of determining the members of Transferor Company to whom equity shares will be allotted pursuant to the Scheme.

p) **"ROC" or "Registrar of Companies"** means the Registrar of Companies, NCT of Delhi and Haryana having jurisdiction over the Transferor Company and Transferee Company.

q) **"The Effective Date"** in relation to the scheme, means last of the dates on which the copy of the order of Hon'ble National Company Law Tribunal sanctioning the Scheme of Amalgamation are filed by the Transferor Company and the Transferee Company with the Registrar of Companies. Any references in this Scheme to the date of "coming into effect of this Scheme" or "effectiveness of this Scheme" or "Scheme taking effect" shall mean the Effective Date.

r) **"Undertaking"** in relation to the Transferor Company, shall mean the entire business of Transferor Company on a going concern basis as on appointed date.

s) **"IT Act"** means the Income Tax Act, 1961, as amended.

All terms and words which are used in this Scheme and not defined in this Scheme shall, unless repugnant or contrary to the context or meaning thereof, have the same meaning prescribed to them under the Act and other applicable law (as defined above), rules, regulations, bye-laws, as the case may be including any statutory modification or re-enactment thereof from time to time.

References to any law or legislation or any provision thereof shall include amendment(s), circulars, notifications, clarifications or supplement(s) to, or replacement or amendment of, that law or legislation or regulation.

In this Scheme, where the context so requires, words denoting the singular shall include the plural and words denoting any gender shall include all genders.

1.2 SHARE CAPITAL

a. LEPAKSHI TUBES PRIVATE LIMITED - THE TRANSFEROR COMPANY

As per Annual Accounts as on 31st March, 2021	
Particulars	**Amount (in Rs.)**
Authorised Share Capital 49,00,000 Equity Shares of Rs. 10/- each	**4,90,00,000**
Total	**4,90,00,000**
Issued, Subscribed and Paid-up Share Capital 49,00,000 Equity Shares of Rs. 10/- each	**4,90,00,000**
Total	**4,90,00,000**

The Equity shares of the transferor company are not listed on the Stock exchanges. The entire equity share capital of Transferor Company is held by the Transferee Company. Accordingly the Transferor Company is the wholly owned subsidiary company of the Transferee Company. The Authorised and Issued, Subscribed& Paid –up Share Capital of the Transferor Company is same as above on the date of Board Meeting i.e. 14th February, 2022 sanctioning the Scheme of Amalgamation.

b. **RAMA STEEL TUBES LIMITED -THE TRANSFEREE COMPANY**

As per Audited Annual Accounts as on 31st March, 2021	
Particulars	**Amount (in Rs.)**
Authorised Share Capital 1,80,00,000 Equity Shares of Rs. 5/- each 25,00,000 5% Non Cumulative Redeemable Preference shares of Rs.10/- each	 **9,00,00,000** **2,50,00,000**
Total	**11,50,00,000**
Issued, Subscribed and Paid-up Share Capital 1,67,94,000 Equity Shares of Rs. 5/- each fully paid up	**8,39,70,000**
Total	**8,39,70,000**

The Authorised and Issued, Subscribed& Paid –up Share Capital of the Transferee Company is same as above on the date of Board meeting i.e 14th February, 2022 sanctioning the Scheme of Amalgamation.

PART II

2. TRANSFER AND VESTING

a. Upon this Scheme becoming effective and with effect from the Appointed Date, the entire business and the undertakings of the Transferor Company including and without limited to all properties, estate, assets, liabilities, claims, reserve & surplus including Securities Premium Account and Undertaking(s) of the Transferor Company shall stand transferred to and vested in or deemed to be transferred to and vested in the Transferee Company pursuant to the sanction of this Scheme by the Hon'ble NCLT and pursuant to Section 230 -232 and other the applicable provisions of the Act and also in accordance with Section 2(1B) of the Income-Tax Act, 1961, as a going concern, without any further act, instrument, deed, matter or thing to be made, done or executed.

b. With effect from the commencement of business on the Appointed Date and subject to the provisions of the Scheme in relation to the modalities of transfer and vesting, entire undertaking, business and all properties whether moveable or immovable, tangible or intangible, in possession or reversion and also all other assets, capital, work-in-progress, current assets, all investments in India or out of India, if any, powers,

authorities, allotments, approvals, consents, licenses, insurances, registrations, contracts, engagements, arrangement, rights, intellectual property rights, titles, interests, benefits and advantages of whatsoever nature belonging to or in the ownership, power, possession, control of or vested in or granted in favour of or enjoyed by the Transferor Company, including but without being limited to, all licenses, liberties, easements, advantages, benefits, privileges, leases, tenancy rights, ownership, intellectual property rights including trademarks/ brands/ copy rights/ patents, quota rights, subsidies, capital subsidies, concessions, exemptions, sales tax exemptions, approvals, clearances, environmental clearances, occupancy certificate, authorizations, certification, quality certification, utilities, electricity connections, water connections, telephone connections, electronics and computer link ups, services of all types, reserves, provisions, funds, benefit of all agreements and all other interests arising to the Transferor Company (hereinafter collectively referred to as "the said assets") shall, without any further act, instrument or deed and without payment of any duty or other charges, be transferred to and vested in the Transferee Company as a going concern pursuant to the applicable provisions of the Act, for all the estate, right, title and interest of the Transferor Company therein so as to become the property of the Transferee Company.

c. Notwithstanding what is provided herein above, it is expressly provided that in respect to assets which are movable in nature or the assets which are otherwise capable of being transferred by physical delivery or by endorsement and delivery, the same shall be so transferred by the Transferor Company to the Transferee Company after the Scheme is duly sanctioned and given effect to without requiring any further order of the Hon'ble NCLT or any deed or instrument of conveyance for the same or without the payment of any duty or other charges and shall become the property of the Transferee Company accordingly. The vesting pursuant to this clause shall be deemed to have occurred by physical delivery or by endorsement and delivery, as appropriate to the property being vested and title to the property shall be deemed to have been transferred accordingly to the Transferee Company.

d. With effect from the appointed date and upon the scheme becoming effective, all movable assets of the Transferor Company, other than those specified in clause (c) above, including cash and cash equivalents, sundry debtors, outstanding loans and advances, if any, recoverable in cash or in kind or for value to be received, bank balances and deposits, if any with governments, semi-governments, local and other authorities and bodies, customers and other persons shall without any requirement

of any further act, instrument or deed become the property of the Transferee Company.

e. With effect from the Appointed Date, all liabilities, provisions, duties and obligations including Income Tax and other statutory liabilities, if any, of every kind, nature and description of the Transferor Company whether provided for or not in the books of accounts of the Transferor Company shall devolve and shall stand transferred or be deemed to be transferred without any further act or deed, to the Transferee Company with effect from the Appointed Date and shall be the liabilities, provisions, duties and obligations of the Transferee Company.

f. All the assets/undertaking of the Transferor Company as on the Appointed Date and all the assets/undertaking of the Transferor Company, if any, acquired by the Transferor Company after the Appointed Date but prior to the Effective Date, shall also without any further act, instrument or deed stand transferred to or be deemed to have been transferred to the Transferee Company upon the Scheme coming into effect.

g. For avoidance of doubt, upon the Scheme coming into effect, all the rights, title, interest and claims of the Transferor Company in any leasehold properties, if any, including all the leases, of the Transferor Company shall without any further act or deed, be transferred to and vested in or be deemed to have been transferred to and vested in the Transferee Company and it shall be presumed that the same were executed by the Transferee Company.

h. For avoidance of doubt and without prejudice to the generality of the foregoing, it is clarified that upon the Scheme coming into effect, all consents, permissions, licenses, quotas, liberties, special status, certificates, clearances, authorities, powers of attorney and all other benefits and privileges enjoyed or conferred upon or held or availed of by the Transferor Company or issued to or executed in favor of the Transferor Company shall stand transferred to the Transferee Company as if the same were originally given by, issued to or executed in favor of the Transferee Company and the Transferee Company shall be bound by the terms thereof, the obligations and duties thereunder and the rights and benefits under the same shall be available to the Transferee Company and shall remain valid, effective and enforceable on the same terms and conditions.

i. To the extent there are inter-corporate loans, liabilities, duties, debts and claims (including receivables), if any, due or which may hereafter become due, between the Transferor Company and the Transferee Company or vice versa, the obligations in respect thereof shall come to an end on the Scheme coming into effect and a corresponding suitable effect shall be given in the books of accounts and records of the Transferee Company and if required, the reduction/cancellation of such loans, debts and claims (including receivables) shall be reflected in the books of accounts and records of the Transferee Company. For removal of doubts, it is hereby clarified that from the Appointed Date, there would be no accrual of interest or other charges in respect of such loans, liabilities, duties, debts and claims (including receivables), due or which may hereafter become due, between the Transferee Company on the one hand and the Transferor Company on the other hand.

j. With effect from the Appointed Date and upon the scheme becoming effective, all debts, liabilities, guarantees, indemnities, contingent liabilities, disputed liabilities, duties and obligations of every kind, nature, description, whether or not secured, whether provided for or not provided for in the books of accounts and/ or whether disclosed or

undisclosed in the financial statements of the Transferor Company shall stand transferred or deemed to have been transferred without any further act, instrument or deed to the Transferee Company, pursuant to the provisions of Section 230-232 and other applicable provisions of the Act, so as to become as and from the Appointed Date, the debts, liabilities, guarantees, indemnities, contingent liabilities, disputed liabilities, duties and obligations of the Transferee Company and the Transferee Company shall, and undertakes to, meet, discharge and satisfy the same. It is hereby clarified that it shall not be necessary to obtain any consent of third party or other person who is a party to the contract or arrangements by virtue of which such debts, liabilities etc. have arisen, in order to give effect to the provisions of this Clause.

k. Where any such debts, loans raised, liabilities, duties and obligations of the Undertaking as on the Appointed Date have been discharged or satisfied by the Transferor Company after the Appointed Date and prior to the Effective Date, such discharge or satisfaction shall be deemed to be for and on account of the Transferee Company.

l. The transfer and vesting of the entire business and undertaking of the Transferor Company as aforesaid shall be subject to the existing

securities, mortgages, charges, hypothecation, encumbrances or liens, if any, subsisting over or in respect of the property and assets or any part thereof of the Transferor Company.

m. All the existing securities, mortgages, charges, encumbrances or liens (the "Encumbrances"), if any, as on the Appointed Date and created by the Transferor Company after the Appointed Date, over the assets comprised in the Undertaking or any part thereof shall be transferred to the Transferee Company by virtue of this Scheme and in so far as such Encumbrances secure or relate to liabilities of the Transferor Company, the same shall, after the Effective Date, continue to relate and attach to such assets or any part thereof to which they are related or attached prior to the Effective Date and as are transferred to the Transferee Company, and such Encumbrances shall not relate or attach to any of the other assets of the Transferee Company.

n. Any loans, advances and other facilities sanctioned to the Transferor Company by their bankers, financial institutions etc. from the Appointed Date till the Effective Date, which are partly drawn or utilized shall be deemed to be the loans and advances sanctioned to the Transferee Company and the said loans and advances shall be drawn and utilized

either partly or fully by the Transferor Company and all the loans, advances and other facilities so drawn by the Transferor Company (within the overall limits sanctioned by their bankers and financial institutions) shall on the Effective Date be treated as loans, advances and other facilities made available to the Transferee Company and all the obligations of the Transferor Company under any loan agreement shall be construed and shall become the obligation of the Transferee Company without any further act or deed on the part of the Transferee Company.

o. All pending tax assessment proceedings/ suits/ appeals and/ or other pending proceedings of whatsoever nature by or against the Transferor Company shall not abate, be discontinued or in any way prejudicially affected by reason of the merger of the Transferor Company or of anything contained in the Scheme but the proceedings shall continue and any prosecution shall be enforced by or against the Transferee Company in the same manner and to the same extent as would or might have been continued, prosecuted and/or enforced by or against the Transferor Company, as if the Scheme had not been made.

p. Any tax liabilities under the Income Tax Act, 1961 or other applicable laws or regulations dealing with taxes (whether in the form of duties,

cesses, fees, levies or by whatever name called) allocable or related to the business of the Transferor Company to the extent not provided for or covered by tax provision in the accounts made as on the date immediately preceding the Appointed Date shall be transferred to the Transferee Company. Any surplus in the provision for such taxes (including advance tax and tax deducted at source) as on the date immediately preceding the Appointed Date shall also be transferred to the account of the Transferee Company.

q. All taxes (direct or indirect) including income tax, minimum alternate tax, service tax, sales tax, Goods and Services Tax and all other statutory taxes, if any, paid or payable by the Transferor Company on or before the Appointed Date shall be on account of the Transferor Company, and in so far as it relates to the payment of taxes after the Appointed Date, such taxes shall be deemed to be the corresponding tax paid by the Transferee Company and shall, in all proceedings, be dealt with accordingly.

r. Any refunds, input credits, benefits, incentives, grants, subsidies, deductions, claims, etc. under the Income Tax Act, 1961, the Goods and Services Tax Act, 2017 or other applicable laws or regulations dealing with taxes allocable or related to the business of the Transferor

Company and due to the Transferor Company consequent to the assessment made on the Transferor Company and for which no credit is taken in the accounts as on the date immediately preceding the Appointed Date, shall also belong to and be received by the Transferee Company.

s. All taxes, benefits of any nature, duties, cesses or any other like payments or deductions available to Transferor Company under Income Tax, Sales tax, Service tax, Goods and Services tax etc. or any tax deduction/ collection at source, tax credits, benefits of CENVAT credits, benefits of input credits relating to the period after the Appointed Date up to the Effective date shall be deemed to have been on account of or paid by the Transferee Company and the relevant authorities shall be bound to transfer to the account of and give credit for the same to Transferee Company upon the passing of the orders on this Scheme by the Hon'ble NCLT. The benefit of all taxes paid including minimum alternate tax under Income Tax Act, unabsorbed depreciation, carry forward of losses as well as set-off of losses thereof shall be available to the Transferee Company as would have been available to the Transferor Company upon the sanction of the scheme by the Hon'ble NCLT.

t. Upon the Scheme becoming effective, the Transferee Company is expressly permitted to revise their respective financial statements and returns along with prescribed forms, filings and annexure under the relevant labour laws, Income tax, sales tax including value added tax, service tax, Goods and Services Tax and other applicable tax laws, and to claim refunds and/ or credits for dues and/ or taxes paid and/ or depreciation benefits, if any, as may be required consequent to implementation of this Scheme.

3. CONTRACTS, DEEDS, BONDS AND OTHER INSTRUMENTS

a. Subject to the other provisions of this Scheme, all contracts, deeds, bonds, agreements, arrangements and other instruments of whatsoever nature (including all tenancies, leases, licenses and other assurances in favour of any of the Transferor Company or powers or authorities granted by or to any of the Transferor Company), to which any of the Transferor Company is the party, subsisting or having effect immediately before or after the Effective date, shall remain in full force and effect against or in favor of the Transferee Company and may be enforced as fully and effectually, as if the Transferee Company had been a party thereto.

b. The transfer of the assets and liabilities of the Transferor Company to the Transferee Company and the continuance of all the contracts or legal proceedings by or against the Transferee Company shall not affect any contract or proceedings relating to the assets or the liabilities already concluded by any of the Transferor Company on or after the Appointed Date.

c. Without prejudice to the other provisions of this Scheme and notwithstanding the fact that vesting of the Undertaking occurs by virtue of this Scheme itself, the Transferee Company may, at any time after coming into effect of this Scheme in accordance with the provisions hereof, if so required, under any law or otherwise, execute deeds of confirmation in favor of the secured creditors of the Transferor Company or in favor of any other party to any contract or arrangement to which any of the Transferor Company is the party or any writings as may be necessary to be executed in order to give formal effect to the above provisions. The Transferee Company shall under the provisions of this Scheme be deemed to be authorised to execute any such writings on behalf of the Transferor Company and to implement and carry out all such formalities or compliance referred to above on the part/behalf of the Transferor Company to be carried out or performed.

d. Any inter-se contracts between the Transferor Company and the Transferee Company shall stand adjusted and vest in the Transferee Company upon the sanction of the Scheme and upon the Scheme becoming effective. Transaction(s), if any, between the Transferor Company and Transferee Company after the appointed date and until the effective date will be squared off in the books of accounts of the Transferee Company upon the Scheme becoming effective.

4. LEGAL PROCEEDINGS AND OTHER RESOLUTIONS

a. From the effective date, all legal proceedings of whatever nature by or against the Transferor Company pending on the appointed date or which may be instituted any time in future (irrespective of whether they relate to periods on or prior to the appointed date), shall not be abated or discontinued or be, in any way, prejudicially affected by reason of the transfer of the undertaking of the Transferor Company or of anything contained in this Scheme but the proceedings may be continued, prosecuted and enforced by or against the Transferee Company in the same manner and to the same extent as it would or might have been continued, prosecuted and enforced by or against the Transferor Company as if the Scheme had not been made.

b. The resolutions, including resolutions passed under Section 180(1)(a), 180(1)(c) and Section 186 of the Act, if any, of the Transferor Company, which are valid and subsisting on the effective date, shall, *mutatis mutandis*, continue to be valid and subsisting and be considered as the resolutions of the Transferee Company and where such resolutions have any upper monetary or other limit(s) being fixed under the provisions of the Act or any other applicable provisions, then all the said limits shall be added and shall constitute the aggregate of the said limits of the Transferee Company.

5. OPERATIVE/EFFECTIVE DATE OF THE SCHEME

This Scheme, though operative from the Appointed Date, shall be effective from the last of the dates on which certified copy of order of Hon'ble NCLT under Section 230-232 of the Act are filed with the office of the respective Registrar of Companies.

6. DISSOLUTION OF TRANSFEROR COMPANY

On this Scheme, becoming effective as provided in Clause 5 above, the Transferor Company shall stand dissolved without winding up.

7. STAFF, WORKMEN AND EMPLOYEES OF TRANSFEROR COMPANY

a. All the employees of the Transferor Company in service, if any, on the date immediately preceding the date on which the Scheme takes effect, i.e., the Effective Date, shall become the employees of the Transferee Company on such date without any break or interruption in service and upon terms and conditions not less favorable than those subsisting in the concerned Transferor Company on the said date.

b. Provident Fund, Gratuity Fund, Superannuation Fund and any other special fund or trusts created or existing for the benefit of the employees of the Transferor Company, if any, upon the Scheme becoming effective, the Transferee Company shall stand substituted for the Transferor Company for all purposes and intents, whatsoever, relating to the administration or operation of such schemes or funds or in relation to the obligation to make contributions to the said funds in accordance with the provisions of such funds. It is the intent that all the rights, duties, powers and obligations of the Transferor Company in relation to such funds shall become those of the Transferee Company. It is clarified that the services of the employees of the Transferor Company will be

treated as having been continued for the purpose of the aforesaid funds or provisions.

c. With effect from the date of filing of this Scheme with the Hon'ble NCLT and till the Effective Date, the Transferor Company shall not vary or modify the terms and conditions of employment of any of their respective employees, except with the written consent of the Transferee Company.

8. CONDUCT OF BUSINESS BY TRANSFEROR COMPANY AND TRANSFEREE COMPANY

8.1 From the Appointed Date until the Effective Date, the Transferor Company-

a. Shall possess of all its assets and properties referred to in Clause 2 above, in trust for the Transferee Company.

b. Shall be deemed to have carried on business and activities for and on behalf of and for the benefit and on account of the Transferee Company. Any income or profit accruing to the Transferor Company and all costs, charges, expenses or loss arising or incurred or suffered by the Transferor Company on and from the Appointed Date shall, for all

purposes and intents, be treated as the income, profits, costs, charges, expenses or loss, as the case may be, of the Transferee Company.

8.2 Any corporate action by Transferor Company on or after the Appointed Date until the Effective Date shall, upon the Scheme became effective, be treated as having been taken by the Transferee Company without any further application, act or deed etc. and shall be dealt with accordingly.

8.3 Till such times, the names of the Bank accounts of the Transferor Company would be replaced with that of the Transferee Company, the Transferee Company shall be entitled to operate the banks accounts of the Transferor Company in the name of the Transferor Company in so far as may be necessary.

8.4 Notwithstanding anything contained in sub-clause '8.1' and '8.2' above, the Transferor Company as well as the Transferee Company shall be free to conduct their respective businesses till the effective date of amalgamation.

9. CONSIDERATION

9.1 The entire share capital of the Transferor Company is held by the Transferee Company directly. Therefore the Transferee company shall

not be required to issue any shares or pay any consideration to the Transferor Company or to their shareholders.

9.2 Upon coming in to effect of this scheme the shares or the share certificates of the Transferor Company in relation to the share held by its member shall without any further application, act, instrument or deed be deemed to have been automatically cancelled and be of no effect on and from the effective date without any necessity of being surrendered.

10. UPON THIS SCHEME BECOMING EFFECTIVE

a. Entire issued, subscribed and paid-up equity share capital of the Transferor Company shall automatically stand cancelled.

b. The Authorized Share Capital of the Transferor Company shall get merged to form new Authorized Share Capital of the Transferee Company and thereafter, the Authorized Share Capital of the Transferee Company shall stand increased to that extent without any further act, deed and without payment of any fees or charges or stamp duty to the Registrar of Companies and/or to any other government authority and the stamp duty and fees paid by the Transferor Company on their

authorized share capital shall be set-off against any stamp duty and fees payable by the Transferee Company on any increase in the authorized share capital of the Transferee Company pursuant to the Scheme. The Fee/duty paid by the Transferor Company for its authorized share capital shall be deemed to have been paid by the Transferee Company.

c. In accordance with to sub-clause (b) above, the Memorandum of Association of the Transferee Company shall without any further act, instrument or deed be and stand altered, modified and amended pursuant to the applicable provisions of the Act. Clause V of the Memorandum of Association of the Transferee Company shall read as under:

"The Authorized Share Capital of the Company is Rs. 16,40,00,000/- (Rupees Sixteen Crore Forty Lakhs only) divided into 2,78,00,000 (Two Crore Seventy Eight Lakhs only) equity shares of Rs. 5/- (Rupees five only) each and 25,00,000 (Twenty five Lakhs only) 5% Non-Cumulative Redeemable Preference Shares of Rs.10/- (Rupees Ten only) each."

d. It is clarified that the approval of the Scheme by the members and/ or creditors of the Transferee Company shall be deemed approval of the Alteration of the Memorandum of Association and Articles of Association of the Transferee Company as required under Sections 13, 14, 61, 64 and other applicable provisions of the Act.

e. The Transferee Company shall increase/ modify/ reclassify its Authorised Share Capital for implementing the terms of this Scheme, to the extent necessary.

f. On this Scheme becoming effective, the shareholders and Creditors, if any, of the Transferee Company and the Transferor Company shall be deemed to have also accorded their approval under all relevant provisions of the Act for giving effect to the provisions contained in this Scheme and no separate resolution under the Act shall required to be passed.

11. ACCOUNTING TREATMENT FOR AMALGAMATION

Upon the Scheme becoming effective, the amalgamation will be accounted in accordance with applicable Indian Accounting Standard as notified under Section 133 of Company Act, 2013, read together with Paragraph 3 of The Company (Indian Accounting Standard) Rules, 2015 and the other accounting principles generally accepted in India.

The Accounting treatment will be as under:

a) For the purpose of Accounting for and dealing with the Book Value of Assets, Liabilities and reserves in the Books of accounts

of the Transferee Company upon the scheme become effective , the audited financial statement of Transferor Company as on the close of business on the day immediately presiding the appointed date shall be forwarded to Transferee Company by the Transferor Company.

b) The Book Value of all Assets, Liabilities and reserves of Transferor Company as recorded in the financial statement referred in 11.1 above shall be recorded in the Books of accounts of the Transferee Company as such, subject to the suitable adjustment being made, if any, to ensure uniformity of accounting policy.

c) Investment in the Share capital of Transferor Company in the books of accounts of Transferee Company, whether held directly or indirectly through nominee, shall stand cancelled.

d) Surplus or deficit, if any, arising as a result of amalgamation of Transferor company into and with the Transferee Company, in terms of this scheme, after adjustment of the amount of Investment of the Transferee Company in the Transferor

Company due to cancellation of the share capital of Transferor Company, shall be adjusted to reserves in the books of accounts of the Transferee Company.

e) Identity of the reserves of the Transferor Company, if any, shall be preserved and they shall appear in the financial statements of the Transferee Company in the same form and manner, in which they appeared in the financial statement of the Transferor Company, as on the appointed date.

f) All outstanding balances in the Books of accounts between Transferor Company and Transferee Company as on the appointed date will stand cancelled and there shall be no further obligation in this behalf.

g) In case any difference in the accounting policies followed by Transferor company from that of Transferee Company, impact of the same till the date immediately preceding the appointed date shall be qualified and shall be appropriately adjusted and reported in accordance with the accounting standards in the Books of Transferee Company, so as to ensure that the financial statement

of transferee reflect the financial position on the basis of consistent accounting policies.

12. VALIDITY OF EXISTING RESOLUTIONS, ETC.

a) Upon the coming into effect of the Scheme, the resolutions of the Transferor Company as are considered necessary by the Board of Directors of the Transferee Company which are validly subsisting be considered as resolutions of the Transferee Company.

b) If any such resolutions have any monetary or other limits approved under the provisions of the Act or of any other applicable statutory provisions, then the said limits, as are considered necessary by the Board of Directors of the Transferee Company, shall be added to the limits, if any, imposed under the like resolutions passed by the Transferee Company and shall constitute the aggregate of the said limits in the Transferee Company.

PART-III

13. COMPLIANCE OF TAX LAWS

a. This scheme has been drawn to comply with the conditions related to merger as specified under Section 2(1B) of Income tax Act, 1961 and all other relevant provisions of Income tax Act, 1961.

b. If any terms or provisions of the scheme is/ are found to be or interpreted to be inconsistent with any of the said provisions of the Income Tax Act, 1961, whether as a result of any amendment of law or any judicial interpretation of law or for any other reason whatsoever, the scheme shall stand modified to the extent necessary to comply with the provisions of the Income Tax Act, 1961. Any such modification will, however, not affect other parts of the Scheme.

14. CONDITIONALITY OF THE SCHEME

This Scheme is and shall be conditional upon and subject to:

a. The scheme being approved by the requisite majorities in number and value of such classes of members and/or creditors (wherever applicable), of the Transferor Company and the Transferee Company as may directed by Hon'ble NCLT.

b. The approval or sanction of the Hon'ble NCLT under Sections 230-232 of the Act in favor of the Transferor Company and the Transferee Company for sanctioning the Scheme being obtained.

c. The certified/ authenticated copies of the orders of the Hon'ble NCLT sanctioning the Scheme being filed by each of the Transferor Company and the Transferee Company with the respective Registrar of Company.

d. Any other approvals, sanctions or consents of any Governmental Authority or any statutory authorities as may be required by law for the implementation of Scheme being obtained.

15. APPLICATION/ PETITION TO HON'BLE NCLT

The Transferor Company and the Transferee Company shall make application under Sections 230-232 of the Company Act, 2013 and other applicable provisions, if any, of the Act to the Hon'ble NCLT where the respective registered offices of the Transferor Company and the Transferee Company are situated, for sanction of this Scheme and for the dissolution of the Transferor Company without winding-up and other concerned matters.

16. MODIFICATIONS/AMENDMENTS TO THE SCHEME

a. The Transferor Company and the Transferee Company through their respective Board of Directors may make or assent, from time to time, on behalf of all persons concerned, to any modifications or amendments to this Scheme or to any conditions or limitations which the Hon'ble NCLT and/or any authorities under the law may deem fit to approve of or impose or which may otherwise be considered necessary or desirable to resolve all doubts or difficulties that may arise for implementing and/or carrying out this Scheme and to do and execute all acts, deeds, matters and things necessary for carrying the Scheme into effect.

b. In order to give effect to this Scheme or to any modifications or amendments thereof, the Board of Directors of the Transferee Company may give and is authorized to give all such directions as may be necessary including directions for settling any question, doubt or difficulty whatsoever that may arise.

c. In the event that any conditions are imposed by any Hon'ble NCLT and/or any other competent authority which the Transferor Company and/or the Transferee Company find un-acceptable for any reason

whatsoever, then the Transferor Company and/or the Transferee Company shall be at liberty to withdraw the Scheme.

17. EFFECT OF NON – RECEIPT OF APPROVALS

In the event of this Scheme failing to take effect, this Scheme shall become null and void and in that case no rights and liabilities whatsoever shall accrue to or be incurred inter-se by the parties or their shareholders or employees or any other person. Each party shall bear and pay their respective costs, charges and expenses in connection with this Scheme.

18. COST CHARGES AND EXPENSES CONNECTED WITH THE SCHEME

All costs, charges and expenses of the Transferor Company and the Transferee Company incurred in relation to or in connection with this Scheme or incidental to the completion of the Amalgamation of the Transferor Company with the Transferee Company in pursuance of this Scheme, shall be borne and paid by the Transferee Company only. This includes, but not limited to, legal and professional fees paid to Company Secretaries, Chartered Accountants, Advocates, other professionals, fees paid on issue of shares, registration fees, stamp paper charges etc.

19. DIRECTORS OF THE TRANSFEROR COMPANY

That the Directors of Transferor Company shall cease to hold office as Directors thereof with effect from the Effective date of this scheme and consequently, the Board of Transferor Company shall stand dissolved.

20. INDEMNIFICATION

That if any liability including contingent liability not accounted for or provided in the financial statements of Transferor Company, arising upto the effective date of this Merger shall be indemnified by the Promoters of the Transferor Company to the Transferee Company.

21. SEVERABILITY

If any part of the Scheme is found to be unworkable for any reason whatsoever, the same shall not, subject to the decision of the Transferor Company and the Transferee Company, affect the validity or implementation of the other parts/provisions of the scheme.

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NATIONAL COMPANY LAW TRIBUNAL
NEW DELHI BENCH (COURT- II)

C.A.(CAA)-49/ND/2022

IN THE MATTER OF:

SCHEME OFAMALGAMATION

OF

LEPAKSHI TUBES PRIVATE LIMITED
B-5, 3rd Floor, Main Road, Ghazipur, New Delhi,
East Delhi – 110096

... Applicant No.1 /Transferor No.1 Company

WITH

RAMA STEEL TUBES LIMITED
B-5, 3rd Floor, Main Road, Ghazipur, New Delhi,
East Delhi – 110096

... Applicant No.2/Transferee Company

AND

THEIR RESPECTIVE SHAREHOLDERS AND CREDITORS

Order Delivered on: 30.05.2022

Section: 230 to 232 of the Companies Act, 2013

CORAM

SH. ABNI RAJAN KUMAR SINHA, HON'BLE MEMBER (JUDICIAL)

SH. L. N. GUPTA, HON'BLE MEMBER (TECHNICAL)

PRESENT:

For Applicants : Anang Kr. Shandilya, Adv.

ORDER

PER SHRI L. N. GUPTA, MEMBER (T)

Under consideration is the Application No. C.A.(CAA)-49/ND/2022 filed by the Applicant Companies under Section 230 to 232 of the Companies Act, 2013. The prayer made in the Application is to dispense with the holding or convening of the meetings of Equity Shareholders and Creditors in relation to the Transferor Companies and Transferee Company and for approval of the 'Scheme of Amalgamation, which shall come into effect from the Appointed Date of 01.04.2021.

2. That Lepakshi Tubes Private Limited (hereinafter referred to as the **("Transferor Company No.1"),** having CIN U28990DL2016PTC302210 is a Private Limited Company incorporated on 28.06.2016 under the Companies Act, 2013. The registered office of the Transferor No.1 Company is situated at B-5, 3rd Floor, Main Road, Ghazipur, New Delhi, East Delhi – 110096.

3. That Rama Steel Tubes Limited (hereinafter referred to as the **("Transferee Company"),** having CIN L27201DL1974PLC007114 is a Private Limited Company incorporated on 26.02.1974 under the erstwhile Companies Act, 1956. The registered office of the Transferee Company is situated at B-5, 3rd Floor, Main Road, Ghazipur, New Delhi, East Delhi – 110096.

4. That the present Application has been jointly filed by the Transferor Company and the Transferee Company (collectively hereinafter referred to as the **'Applicant Companies'**). The Registered offices of the Applicant Companies are situated in Delhi and therefore, the jurisdiction lies with this Tribunal.

5. It is seen from the records that the Board of Directors of the respective Applicant Companies vide separate Board meetings held on 14.02.2022 have unanimously approved the proposed 'Scheme of Amalgamation'.

6. It is stated by the Applicant Companies that the aforesaid Scheme of Amalgamation will result in the following advantages:

> *"(a) The merger of the Transferor Company into Transferee Company will result in the operational and administrative synergies resulting in to cost optimization.*
>
> *(b) Consolidation and simplification of the group structure cost savings/synergies resulting from rationalization standardization and simplification of business process.*
>
> *(c) It is also the intention of the transferee Company's management or rationalize the Group Holding structure by way of reduction of number of entities and streamlining the corporate Structure of Transferee Company.*
>
> *(d) The proposed merger will also simplify the financial reporting to all stakeholders & help evaluate financial*

results of Transferee Company in a more meaningful way and result in improved organizational capability arising from pooling of financial resources.

(e) Avoiding un-necessary duplication of costs of administration, distribution, selling and marketing and reduction in legal and regulatory compliances.

(f) Maximizing the overall shareholders value by strengthening its core competencies."

7. That the Applicant Companies have filed their separate Affidavits in compliance of Section 230(2)(a) of Companies Act 2013, submitting therein that no prosecution, investigation and inquiry is pending against either of the Applicant companies.

8. That the Applicant Companies have also placed on record the Certificate from the Statutory Auditors confirming that their Accounting Standards are in conformity with the provision of Section 133 of the Companies Act 2013.

9. That the Applicant Companies have filed their respective Memorandum of Association (MoAs) and Articles of Association (AoAs). The Applicant Companies have filed their latest Audited Balance Sheets as on 31.03.2020. The Applicant Companies have also filed their latest Un-Audited Balance Sheets as on 31.03.2021.

10. That the position regarding no. of Shareholders and Creditors and their consent through Affidavits is summarised below :

Company Name		Total In Number	Consent Given (in percentage and in value)
Transferor Company	Equity Shareholders	7	100%
	Preference Shareholders	Nil	Nil
	Unsecured creditors	8	99.41%
	Secured Creditor	2	100%
Transferee Company	Equity Shareholders	30,102	-
	Preference Shareholders	Nil	Nil
	Unsecured creditors	96	-
	Secured Creditor	8	75.98

11. Since all the Equity shareholders of all the Transferor Company have given consent to the Scheme, therefore, the requirement of holding / convening the meeting of Equity shareholders of the Transferor Company is dispensed with.

12. Since there are 'no' preference shareholders of the Transferor Company, therefore the requirement of holding or convening the meeting does not arise.

13. Since 99.41% of the Unsecured Creditors of the Transferor Company have given consent to the Scheme, therefore, the requirement of holding / convening the meeting of Unsecured Creditors of the Transferor Company is dispensed with.

14. Since both the Secured Creditors of the Transferor Company has given their consents to the Scheme, therefore, the requirement of holding / convening the meetings of Secured Creditors of the Transferor Company is dispensed with.

15. Since there are 'no' preference shareholders in the Transferee Company, therefore the requirement of holding or convening the meeting does not arise.

16. Since all the Equity Shareholders and Unsecured Creditors of Transferee Company have not given their consent to the Scheme and only 75.98% of the Secured Creditors of Transferee Company have given their consent to the Scheme, therefore, the separate meetings of the Equity shareholders, Unsecured creditors and Secured creditors of the Transferee Company are ordered to be convened in the following manner:

(i) Meeting of the Equity shareholders, unsecured creditors and Secured creditors of Transferee Company be conducted through Physical mode or Video Conferencing.

(ii) That the details of the quorum, time and date of the meeting of Equity shareholders, Unsecured creditors and Secured creditors of the Transferee Company shall be as follows :

Meeting	Time	Date of Meeting	Total no. of creditors	Quorum of the meeting
Equity Shareholders	10:00 AM	04.07.2022	30,102	3000
Unsecured Creditors	12:00	04.07.2022	96	70
Secured Creditors	03:00 PM	04.07.2022	8	6

(iii) If the quorum is not complete at the time of the meetings, the Chairman shall adjourn the meeting by 30 minutes, and the shareholders/members present after 30 minutes shall be deemed to constitute the quorum for the said meetings.

(iv) Mr. Puneet Sachdev, having IBBI Registration Number IBBI/IPA-001/IP-P01124/2018-19/11821 (Email ID: psachdev78@gmail.com) from the panel of names received from IBBI is appointed as Chairman of the meeting against fee of Rs.1,00,000/- (One lakh) only.

(v) That Mr. Mohinder Kumar Gaind, having IBBI Registration Number IBBI/IPA-003/IP-N000158/2018-19/11842 (Email ID: mgaind6@gmail.com) from the panel of names received from IBBI is appointed as scrutinizer against fee of Rs.1,00,000/- (One lakh) only.

(vi) The notice of the abovesaid meetings shall be sent by the Transferee Company through registered post or courier or by email, 30 days in advance before the scheduled date of the

meeting, indicating the day, date, the place and the time as aforesaid, together with the proposed scheme of amalgamation, copy of explanatory statement as required to be sent under the companies Act, 2013, the prescribed from of proxy and any other document as may be prescribed under the Act or rules. The guidelines for conducting meeting by video conferencing shall be clearly mentioned in the notice.

(vii) The Transferee Company shall publish advertisement in the newspapers namely, "Business Standard" (English, Delhi edition) and "Business Standard" (Hindi, Delhi edition) not less than 30 days before the aforesaid meetings.

(viii) The Voting shall be allowed on the proposed Scheme through voting in virtual mode. The chairperson shall submit his report regarding the result/outcome of the meetings within a period of 05 days of the date of the meeting with details of voting on the proposed Scheme.

17. That in accordance with Section 230(5) of the Companies Act, 2013, the Applicant Companies shall also serve the notices of these meetings to the following Authorities, namely:

(a) Central Government through Regional Director (Northern Region), Ministry of Corporate Affairs,

(b) Registrar of Companies (NCT of Delhi & Haryana), Ministry of Corporate Affairs,

(c) Official Liquidator, attached to the Delhi High Court;

(d) Jurisdictional Income Tax Authorities,

(e) SEBI

(f) Stock Exchange Concerned

(e) Such other Sectoral Regulatory Authorities, which govern working of the Companies involved in the Scheme;

at least 30 days before the date fixed for the meetings.

18. The Authorities are directed to raise objection/representations, if any, within 30 days from the date of receipt of the notice. In the event that no objection or representation is made within the stipulated timeframe, it shall be presumed that they do not have any objection.

19. The Chairman's Report shall be filed before this Tribunal within 7 days from the conclusion of this meeting.

20. **The Application is allowed in aforesaid terms.**

Sd/-
30.05.2022

(L. N. Gupta)
Member (T)

Sd/-

(Abni Rajan Kumar Sinha)
Member (J)

IN THE NATIONAL COMPANY LAW TRIBUNAL
NEW DELHI BENCH (COURT – II)

Item No. 204
(CA)-(CAA)-49/ND/2022
IA-133/2022

IN THE MATTER OF:
Lepakshi Tubes Pvt. Ltd. with Rama Steel Tubes Ltd. ... **Applicant**

Under Section: 230-232

Order delivered on 26.09.2022

CORAM:
SHRI. BACHU VENKAT BALARAM DAS, HON'BLE MEMBER (J)

SHRI. L.N. GUPTA, HON'RLE MEMBER (T)

PRESENT:
For the Applicant : Adv Anang Shandilya

ORDER

IA-133/2022: This is an application filed by the Applicants for fixing a revised date for convening and holding the meetings of the equity shareholders, secured and unsecured creditors of the Transferee Company and also to direct the publication of notices for the same. While going through the records, we find that the first motion order was passed by this Tribunal on 30.05.2022 and the meetings of the shareholders, secured and unsecured creditors were fixed on 04.07.2022.

Ld. Counsel appearing for the Applicant now proposes to hold the aforesaid meetings on 15.11.2022. Accordingly, the meetings of the equity shareholders, unsecured creditors and secured creditors of the Transferee Company are permitted to be held on 15.11.2022 at the same time notified earlier. Accordingly, the para 16(ii) of the order dated 30.05.2022 would stand modified.

With this, the present IA stands disposed of.

Sd/-
(L.N. GUPTA)
MEMBER (T)

Sd/-
(BACHU VENKAT BALARAM DAS)
MEMBER (J)

UPASANA

RAMA
BUILD WITH TRUST

RAMA STEEL TUBES LTD.
Manufacturers & Exporters : ERW Steel Tubes (Black & Galvanised)
CIN : L27201DL1974PLC007114 | AN ISO 9001 : 2015 CO.
Regd. Office : B-5, 3rd Floor, Main Road, Ghazipur, New Delhi (India) - 110096
+(91)-(11)-43446600 info@ramasteel.com www.ramasteel.com

Report adopted by the Board of Directors of Rama Steel Tubes Limited ("the Company") on the Draft Scheme of Amalgamation (Merger by Absorption) ("Scheme") of Lepakshi Tubes Private Limited("Transferor Company") with Rama Steel Tubes Limited ("Transferee Company") and their respective shareholders pursuant to the provisions of Section 232(2)(c) of the Companies Act, 2013.

1. Background:

i. A Meeting of the Board of Directors ('Board') of **Rama Steel Tubes Limited** ("the Transferee Company" or "RSTL") is proposed to be was held on February 14, 2022 to approved the Scheme of Amalgamation (Merger by absorption) of the **Lepakshi Tubes Private Limited** with Company to be implemented as per the terms specified in the scheme.

ii. The provisions of Section 232(2)(c) of Companies Act, 2013 requires the Board of Directors to adopt a report explaining the effect of the Scheme of Merger (By Absorption) on each class of Shareholders, Key Managerial Personnel, Promoters and non-promoter Shareholders and the same is required to be appended with the Notice of the Meeting of Shareholders. This report of the Board is made in order to comply with the requirements of Section 232(2)(c) of Companies Act, 2013.

iii. This report is made by the Board after perusing inter alia the following necessary documents ('Documents'):

a) Draft Scheme of Merger (By Absorption) initialled by the Director for the purposes of identification.

b) Memorandum of Association and Articles of Association of the Transferor and Transferee Company.

c) Audited accounts of the Transferor and Transferee Company as on 31st March, 2021

2. BOARD REPORT

Based on review of the Draft Scheme of Merger (By Absorption) and the above-mentioned documents, the Board has formed the opinion that:

i. Since the Company is a Holding Company of LTPL and the entire paid up share capital of the LTPL is held by the Company and its nominee, as a result of the proposed Merger (By Absorption), the shares of the LTPL held by Company will stand cancelled and there shall be no issuance of shares or payment of any consideration by Company to the shareholders of the LTPL.

ii. As the entire undertaking of the LTPL shall stand transferred to Company, the rights and interests of the shareholders and / or the creditors of the Company shall not be affected and the Scheme shall also not be prejudicial to the interest of the shareholders and / or creditors of the Company.

iii. The proposed Merger (By Absorption) would inter alia have the following benefits:

LEPAKSHI TUBES PRIVATE LIMITED DELHI

RAMA STEEL TUBES LTD. NEW DELHI

(i) It will enable more economic and efficient management, control and running of the businesses of the companies concerned.
(ii) In general, the business of both, the Company and LTPL, will be carried on more profitably under the Scheme and the Scheme will contribute in furthering and fulfilling the objects of both the Company and LTPL.
(iii) The proposed amalgamation and vesting of the LTPL into Company, with effect from the Appointed Date, is in the interest of the shareholders, creditors, stakeholders and employees, of both the companies, as it would enable a focused business approach for the maximization of benefits to all stakeholders.
iv. Since there shall be no payment of consideration or issuance of shares by RSTL, the proposed Scheme of Merger (By Absorption) does not entitle the Promoter/Promoter Group, related parties of the Promoter/Promoter Group, associates of the Promoter/Promoter Group, subsidiaries of the Promoter/Promoter Group to any additional shares or any special benefits.
v. The effect of the proposed Scheme of Amalgamation on the stakeholders of the Company would be as follows:

Effect of the Scheme on:

a	Shareholders	No impact since wholly owned subsidiary of Transferee Company
b	key managerial personnel (KMP)	No impact
c	Directors	No impact
d	Promoters	No impact
e	non-promoter members	Not applicable since wholly owned subsidiary of Transferee Company
f	Depositors	No impact
g	Creditors	Creditors if any shall become Creditors of Transferee Company
h	debenture holders	No impact since company have no debenture holders
i	deposit trustee and debenture trustee	No impact
j	employees of the Company	No impact

vi. In the opinion of the Board, the said scheme will be of advantage and beneficial to the Company, its Shareholders, Creditors and other Stakeholders and the terms thereof are fair and reasonable. It is for these reasons that the Board of Directors of the Company approved the Scheme at their meeting held on February 14, 2022

For and on behalf of the Board of Directors of Rama Steel Tubes Limited

Naresh Kumar Bansal
Managing Director

Place: New Delhi
Date: February 14, 2022

STANDALONE FINANCIAL STATEMENTS

INDEPENDENT AUDITOR'S REPORT

To the Members of
RAMA STEEL TUBES LIMITED
Report on the Standalone Financial Statements

Opinion

We have audited the standalone financial statements of RAMA STEEL TUBES LIMITED ("the Company"), which comprise the balance sheet as at March 31, 2021, and the statement of Profit and Loss, statement of changes in equity and statement of cash flows for the year then ended, and notes to the standalone financial statements, including a summary of significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone 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, of the state of affairs of the Company as at March 31, 2021, and profits, changes in equity and its cash flows 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 Standalone 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 standalone 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 on the standalone financial statements.

Emphasis of Matter

We draw your attention to Note 52 to the standalone financial statements which explains the uncertainties and the management's assessment of the financial impact due to the lock-downs and other restrictions and conditions related to the COVID -19 pandemic situation. As per the management's current assessment, there is no significant impact on carrying amounts of inventories, tangible assets, trade receivables, investments and other financial assets is expected, and management continue to monitor changes in future economic conditions. Our opinion is not modified in respect of this matter.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the standalone financial statements of the current period. These matters were addressed in the context of our audit of the standalone financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. We have determined the matters described below to be the key audit matters to be communicated in our report.

Key Audit Matter	Auditor's Response
1. Related Party Transactions' The Company has entered into several transactions with related parties during the year 2020-21.We identified related party transactions as a key audit matter because of risks with respect to completeness of disclosures made in the standalone financial statements including recoverability thereof; compliance with statutory regulations governing relate party relationships such as the Companies Act,2013 and SEBI Regulations and the judgement involved in assessing whether transactions with related parties are undertaken at arms' length. Refer Note 48 to the standalone financial statements.	Our audit procedures on related party transactions included: · Assessed the key controls to identify and disclose related party relationships and transactions in accordance with the relevant accounting standard. · Assessed compliances with the listing regulations and the regulations under Companies Act,2013 including checking of approvals/scrutiny as specified in Sections 177 and 188 of the Companies Act,2013 with respect to the related party transactions. · Considered the adequacy and appropriateness of the disclosures in the standalone financial statements, including recoverability thereof, relating to the related party transactions.

	• Inspected relevant ledgers, agreements and other information that may indicate the existence of related party relationships or transactions. Further, we also tested completeness of related parties with reference to the various registers maintained by the company statutorily. • On a sample basis, tested Company's assessment of related party transactions for arms' length pricing.
2. Provisions and contingent liabilities in relation to tax positions Company has received outstanding demands and show cause notices from various tax authorities. The Management have made judgements relating to the likelihood of an obligation arising and whether there is a need to recognize a provision or disclose a contingent liability. We therefore focused on this area as a result of uncertainty and potential material impact. Refer Note 41 to the standalone financial statements.	We have involved our tax experts to gain an understanding of the current status of the tax cases and monitored changes in the disputes by reading external opinions received by the company if any, where relevant to establish that the tax provisions had been appropriately adjusted to reflect the latest external developments. For Legal, regulatory and tax matters our procedures included the following: ▸ Testing key controls surrounding litigation, regulatory and tax procedures. ▸ Performing substantive procedures on the underlying calculations supporting the provisions recorded. ▸ Where relevant, reading external legal opinions obtained by the management ▸ Discussing open matters with the litigation, regulator, general counsel and tax teams ▸ Assessing management's conclusions through understanding precedents set in similar cases. Based on the evidence obtained, while noting the inherent uncertainty with such legal, regulatory and tax matters, we determined the level of provisioning and disclosure of contingent liabilities as at March 31,2021 to be appropriate.

Information other than the Financial Statements and Auditor's Report thereon

The Company's Board of Directors is responsible for the preparation of the other information. The other information comprises the information included in the Management Discussion and Analysis, Board's Report including Annexures to Board's Report, Business Responsibility Report, Corporate Governance and Shareholder's Information, but does not include the standalone financial statements and our auditor's report thereon.

Our opinion on the standalone financial statements does not cover the other information and we will 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 identified above when it becomes available and, in doing so, consider whether the other information is materially inconsistent with the standalone financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

When we read the other information and if we conclude that there is a material misstatement therein, we will communicate the matter to those charged with governance and take necessary action as per applicable laws and regulations.

Management's Responsibility for the Standalone 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

standalone financial statements that give a true and fair view of the financial position, financial performance, changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the accounting Standards specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate implementation and maintenance of 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 standalone financial statement that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the standalone 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.

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

Auditor's Responsibilities for the Audit of the Standalone Financial Statements

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

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

- Identify and assess the risks of material misstatement of the standalone financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal financial controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate financial controls system in place and the operating effectiveness of such controls.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the standalone financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the company to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the standalone financial statements, including the disclosures, and whether the standalone financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

(c) Materiality is the magnitude of misstatements in the standalone financial statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonable knowledgeable under of the standalone financial statements may be influences. 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 standalone financial statements.

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

(e) 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.

(f) From the matters communicated with 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 are 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 would be 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 of India in terms of sub-section (11) of section 143 of the Companies Act, 2013, we give in "Annexure A" a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.

2. As required by Section 143(3) of the Act, we report that:

   a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.

   b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.

   c) The Balance Sheet, the Statement of Profit and Loss including other comprehensive income, Statement of Changes in Equity and the statement of Cash Flow dealt with by this Report are in agreement with the books of account.

   d) In our opinion, the aforesaid standalone financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.

   e) On the basis of the written representations received from the directors as on 31st March, 2021 taken on record by the Board of Directors, none of the directors is disqualified as on 31st March, 2021 from being appointed as a director in terms of Section 164 (2) of the Act.

f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B".

g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended:

In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Company to its directors during the year is in accordance with the provisions of section 197 of the Act.

h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:

i. The Company has disclosed the impact of pending litigations on its financial position in its standalone financial statements.

ii. The Company is not required to make any provision, as required under the applicable law or accounting standards, for material foreseeable losses on long-term contracts including derivative contracts.

iii. The Company is not required to transfer any amount to the Investor Education and Protection Fund.

For **Alok Mittal & Associates**
Chartered Accountants
ICAI Firm Registration Number: 005717N

Alok Kumar Mittal
Partner
Membership Number: 071205

Place: New Delhi
Date: June 18, 2021
UDIN: 21071205AAAARC2557

ANNEXURE 'A' TO THE INDEPENDENT AUDITOR'S REPORT

(Referred to in paragraph 1 under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of RAMA STEEL TUBES LIMITED of even date)

i. (a) The company is maintaining proper records showing full particulars including quantitative details and situation of fixed assets.

(b) The company has a program of verification to cover all the items of fixed assets in a phased manner which, in our opinion, is reasonable having regard to the size of the Company and the nature of its assets. Pursuant to the programme, certain fixed assets have been physically verified by the management during the year and no material discrepancies were noticed on such physical verification.

(c) The title deeds of immovable properties, as disclosed in Note 3 & Note 4 on fixed assets to the standalone financial statements, are held in the name of the Company.

ii. According to the information available to us that physical verification of inventory has been conducted at reasonable intervals by the management and no material discrepancies is noticed on physical verification between the physical stocks and the book records.

iii. The Company has not granted any loans, secured or unsecured, to companies, firms, Limited Liability Partnerships or other parties covered in the register maintained under Section 189 of the Act. Therefore, the provisions of Clause 3(iii), (iii)(a), (iii)(b) and (iii)(c) of the said Order are not applicable to the Company.

iv. In our opinion, and according to the information and explanations given to us, the Company has complied with the provisions of Section 185 and 186 of the Companies Act, 2013 in respect of the loans and investments made, and guarantees and security provided by it.

v. The Company has not accepted any deposits from the public within the meaning of Sections 73, 74, 75 and 76 of the Act and the Rules framed there under to the extent notified.

vi. Pursuant to the rules made by the Central Government of India, the company is required to maintain cost records as specified under Section 148(1) of the Act in respect of its products. We have broadly reviewed the same, and are of the opinion that, prima facie, the prescribed accounts and records have been made and maintained. We have not made a detailed examination of the records with a view to determine whether they are accurate or complete.

vii. (a) The Company has generally been regular in depositing undisputed statutory dues, including Provident Fund, Employees' State Insurance, Income-tax, Sales Tax, Service Tax, Goods and Service Tax, Customs Duty, Excise Duty, Value Added Tax, cess and other material statutory dues applicable to it to the appropriate authorities.

(b) There were no undisputed amounts payable in respect of Provident Fund, Employees' State Insurance, Income-tax, Sales Tax, Service Tax, Customs Duty, Excise Duty, Value Added Tax, Goods and Service Tax, cess and other material statutory dues in arrears as at March 31, 2021 for a period of more than six months from the date they became payable.

(c) The particulars of dues of Entry Tax as at March 31, 2021 which have not been deposited on account of dispute, are as follows:

Name of the Statute	Nature of Dues	Amount in Lacs (₹)	Period to which dues Related	Authority where the Dispute is Pending for Decision
UP Tax on Entry of Goods into Local Areas Ordinance,2007	Constitutional Validity of the ordinance has been challenged	69.90	Nov 2008 to March 2011	Allahabad High Court

viii. According to the records of the Company examined by us and the information and explanation given to us, the company has not defaulted in repayment of loans or borrowings to any bank. Further, the company has not obtained any loan or borrowing from government or financial institution.

ix. In our opinion and according to the information and explanations given to us, the Company has not raised any moneys by way of initial public offer or further public offer (including debt instruments).In our opinion and according to the information and explanations given to us, money raised by way of term loans have been applied by the company during the year for the purposes for which they were raised.

x. During the course of our examination of the books and records of the Company, carried out in accordance with the generally accepted auditing practices in India, and according to the information and explanations given to us, we have neither come across any instance of material fraud by the Company or on the Company by its officers or employees, noticed or reported during the year, nor have we been informed of any such case by the Management. The Company has not given any guarantee for loans taken by others from bank or financial institutions.

xi. The Company has paid/ provided for managerial remuneration during the year in accordance with the provisions of Section 197 read with Schedule V to the Act.

xii. As the Company is not a Nidhi Company and the Nidhi Rules,2014 are not applicable to it, the provisions of Clause 3(xii) of the Order are not applicable to the Company.

xiii. The Company has entered into transactions with related parties in compliance with the provisions of Section 177 and 1988 of the Act. The details of such related party transactions have been disclosed in the Standalone Financial Statements as required under Indian Accounting Standard (Ind AS) 24, Related Party Disclosures specified under Section 133 of the Act, read with Rule 4 of the Companies (Indian Accounting Standards) Rules, 2015 (as amended).

xiv. During the year, the Company has not made any preferential allotment or private placement of shares or fully or partly paid convertible debentures and hence reporting under clause 3 (xvi) of the order is not applicable to the company.

xv. The Company has not entered into any non-cash transactions with its Directors or persons connected with him. Accordingly, the provisions of Clause 3(xv) of the Order are not applicable to the Company

xvi. The Company is not required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934. Accordingly, the provisions of Clause 3(xvi) of the Order are not applicable to the Company.

For **Alok Mittal & Associates**
Chartered Accountants
ICAI Firm Registration Number: 005717N

Alok Kumar Mittal
Partner
Membership Number: 071205

Place: New Delhi
Date: June 18, 2021
UDIN: 21071205AAAARC2557

ANNEXURE "B" TO THE INDEPENDENT AUDITOR'S REPORT

(Referred to in paragraph 2(f) under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of Rama Steel Tubes Limited of even date)

Report on the Internal Financial Controls Over Financial Reporting 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 RAMA STEEL TUBES LIMITED ("the Company") as of March 31, 2021 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

Opinion

In our opinion, to the best of our information and according to the explanations given to us, 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 March 31, 2021, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

Management's Responsibility for Internal Financial Controls

The Board of Directors of the Company is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India. 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, 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.

Auditor's Responsibility

Our responsibility is to express an opinion on the internal financial controls over financial reporting of the Company 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") issued by the Institute of Chartered Accountants of India and the Standards on Auditing prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls. 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 judgement, 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 obtained by us are 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.

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 be come in adequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

For **Alok Mittal & Associates**
Chartered Accountants
ICAI Firm Registration Number: 005717N

Alok Kumar Mittal
Partner
Membership Number: 071205

Place: New Delhi
Date: June 18, 2021
UDIN: 21071205AAAARC2557

STANDALONE BALANCE SHEET AS AT MARCH 31, 2021

(₹ in Lakhs)

Particulars	Note	As at March 31, 2021	As at March 31, 2020
ASSETS			
Non-current assets			
Property, Plant and Equipment	3	3,244.82	2,172.70
Capital Work in Progress	3	183.83	678.97
Investment Properties	4	384.13	363.51
Intangible Assets	5	2.01	0.67
Right of Use Assets	6	126.66	141.56
Investment in Subsidiaries, Associates & Joint Ventures	7	1,405.76	1,265.33
Financial assets			
(i) Investments	8	0.61	0.61
(ii) Other financial assets	9	2,349.68	2,261.10
Deferred tax assets(net)	19	-	-
Other non current assets	10	7.46	66.28
Total non current assets		**7704.96**	**6,950.74**
Current Assets			
Inventories	11	5,718.29	2,745.01
Financial Assets			
(i) Trade Receivables	12(a)	3,485.52	5,505.21
(ii) Cash and Cash Equivalents	12(b)	483.55	652.09
(iii) Bank balances other than (ii) above		-	-
(iv) Other Financial Assets	12(c)	22.34	24.23
Other current assets	13	1901.52	2,938.85
Total current assets		**11,611.22**	**11,865.39**
Total Assets		**19,316.18**	**18,816.12**
Equity and Liabilities			
Equity			
Equity Share Capital	14	839.70	839.70
Other Equity	15	8,007.13	7,462.74
Total equity		**8,846.83**	**8,302.44**
Liabilities			
Non-current liabilities			
Financial Liabilities			
(i) Borrowings	16	2,425.80	1,130.28
(ii) Other financial liabilities	17	25.13	94.00
Provisions	18	52.42	51.61
Deferred Tax Liabilities (Net)	19	195.82	198.46
Total non-current liabilities		**2,699.17**	**1,474.35**
Current Liabilities			
Financial Liabilities			
(i) Borrowings	20(a)	4,998.90	5,613.09
(ii) Trade Payables	20(b)	2,199.62	3,035.26
(iii) Other Financial Liabilities	20(c)	194.25	177.68
Provisions	21	33.22	29.54
Other Current Liabilities	22	264.88	174.77
Current Tax Liability(net)	23	79.30	8.99
Total current liabilities		**7,770.18**	**9,039.33**
Total equity and liabilities		**19,316.18**	**18,816.12**

As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

Place : Delhi
Date : June 18, 2021

STANDALONE STATEMENT OF PROFIT OR LOSS

FOR THE YEAR ENDED MARCH 31, 2021

(₹ in Lakhs)

Particulars	Notes	Year ended March 31, 2021	Year ended March 31, 2020
Income			
Revenue from operations	24	32,571.00	29,176.13
Other income	25	312.47	472.34
Total Income		**32,883.47**	**29,648.47**
Expenses:			
Cost of Materials consumed	26	27,603.48	23,357.11
Purchase of stock-in-trade (traded goods)	27	3,666.48	3,861.38
Changes in inventories of finished goods, work-in-progress and stock-in-Trade	27	(1,325.37)	(189.64)
Employee Benefit Expense	28	498.72	530.55
Financial Costs	29	610.22	807.06
Depreciation and Amortization	30	265.74	221.78
Other Expenses	31	1,026.35	1,024.12
Total expenses		**32,345.62**	**29,612.36**
Profit before share of net profits of investments in Associates and Joint Ventures		537.86	36.11
Share of net profits of associates and joint ventures accounted for using the equity method		140.44	232.39
Profit before tax		**678.29**	**268.50**
Tax expense:	32		
(a) Current tax		145.31	18.99
(b) Deferred tax Charge		(4.84)	111.76
(c) Income Tax of earlier year		-	0.48
Total Tax Expense		**140.47**	**131.23**
Profit/(Loss) for the Year		**537.82**	**137.28**
Other Comprehensive Income(OCI)			
Items that will not be reclassified to Profit & Loss subsequently			
-Remeasurement of the Defined Benefit Plans to Employees		8.76	(1.11)
-Income Tax relating to Items that will not be reclassified to Profit & Loss		(2.20)	0.27
Items that will be reclassified to Profit & Loss subsequently			
-Exchange Difference on translation of Foreign operations		-	-
-Income Tax relating to Items that will be reclassified to Profit & Loss		-	-
Total Other comprehensive Income for the Year		**6.56**	**(0.84)**
Total Comprehensive Income for the year		**544.38**	**136.44**
Earnings per share			
Basic Earnings per share		**3.24**	**0.81**
Diluted earnings per share		**3.24**	**0.81**

As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

STANDALONE STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED MARCH 31, 2021

(₹ in Lakhs)

S No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
A.	**Cash Flow from operating activities**		
	Net Profit before Tax	678.29	268.50
	Adjustments For		
	Depreciation and amortisation expense	265.74	221.78
	Finance Cost	610.22	807.06
	Remeasurement of the Defined Benefit Plans to Employees routed through OCI	8.76	(1.11)
	Share of Profit in Joint Venture	(140.44)	(232.39)
	Interest Income on FD with banks	(214.03)	(250.84)
	Operating Profit before working capital changes	**1,208.54**	**813.01**
	Adjustment for Working Capital Changes		
	Decrease/(Increase) in Inventories	(2,973.28)	2,038.44
	Decrease/(Increase) in Trade receivables	2,019.69	(622.62)
	Decrease/(Increase) in other financial and non-financial assets	1,009.46	(1,886.11)
	(Decrease)Increase in Trade Payables	(835.63)	1,159.69
	(Decrease)/Increase in other financial, non financial liabilities and provisions	42.31	(15.31)
	Cash generated from Operations	471.08	1,487.10
	Net Direct Taxes paid	(75.00)	(62.23)
	Net Cash flow from operating activitites	**396.08**	**1,424.87**
B.	**CASH FLOW FROM INVESTING ACTIVITIES**		
	Sale / (Purchase) of Property,Plant and equipment (Including Capital Work in Progress)	(817.55)	(598.14)
	Addition / Deletion to right of Use Assets	-	(141.56)
	Addition to Investment Properties	(36.00)	-
	Addition to Intangible Assets	(1.50)	-
	Increase in Investment in Subsidiaries, Associates & Joint Ventures	(140.44)	(232.39)
	Proceeds from sale of Property, Plant and Equipments	5.27	-
	Share of Profit in Joint Venture	140.44	232.39
	Interest received	214.03	250.84
	Net cash flow from investing Activities	**(635.75)**	**(488.86)**

(₹ in Lakhs)

S No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
C.	**CASH FLOW FROM FINANCING ACTIVITIES**		
	Proceeds from Borrowings (Secured)	681.33	(113.73)
	Interest paid	(610.22)	(807.06)
	Net Cash from financing Activities	**71.12**	**(920.78)**
	NET INCREASE /(DECREASE) IN CASH AND CASH EQUIVALENT	(168.54)	15.22
	Opening balance of Cash & Cash equivalents(April 1, 2020/April 1, 2019)	652.09	636.87
	Closing balance of Cash & cash equivalent	**483.54**	**652.09**
	Cash and cash Equivalents comprises		
	Cash in Hand	3.45	5.46
	Balance with Scheduled Banks		
	-In current Accounts	268.62	60.68
	-In Fixed Deposit Accounts with original maturity of less than 3 months	211.48	585.95
	Total Cash and Cash Equivalents	**483.54**	**652.09**
	Total		

Notes:

1 The above Cash Flow Statement has been prepared under the indirect method as set out in IND AS 7-Statement of Cash flows notified under Section 133 of the Companies Act,2013(The Act)[Companies(Indian Accounting Standrads) Rules,2015, as amended.

2 Figures in Bracket indicate cash outflow

See accompanying notes to the Standalone financial statements

As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

STANDALONE STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED MARCH 31, 2021

a. Equity share capital

(₹ in Lakhs)

Particulars	Amount
As at March 31, 2019	**839.70**
Equity shares issued during the Year	-
As at March 31, 2020	**839.70**
Equity shares issued during the year	-
As at March 31, 2021	**839.70**

b. Other equity

(₹ in Lakhs)

Particulars	Reserves and Surplus				Money recd. against Share Warrants	Total
	General Reserve#	Retained Earnings	Securities Premium Reserve^	Capital Reserve		
Balance as at March 31, 2019	**1,277.28**	**3,872.82**	**2,176.20**	**-**	**-**	**7,326.29**
Profit for the year	-	137.28	-	-	-	137.28
Other comprehensive income for the year						
- Remeasurement of the Defined Benefit Plans to Employees	-	(0.84)	-	-	-	(0.84)
- Transfer from Retained Earnings to capital reserve on account of foreiture of Money Recd. Against share Warrants	-	(225.70)	-	225.70	-	-
- Exchange Difference on Foreign Currency Translation	-	-	-	-	-	-
- Transfer from Retained Earnings to General Reserves	-	-	-		-	-
Balance as at March 31, 2020	**1,277.28**	**3,783.56**	**2,176.20**	**225.70**	**-**	**7,462.74**
Profit for the year	-	537.82	-	-	-	537.82
Other comprehensive income for the year						
-Remeasurement of the Defined Benefit Plans to Employees	-	6.56	-	-	-	6.56
- Transfer from Retained Earnings to capital reserve on account of foreiture of Money Recd. Against share Warrants	-	-	-	-	-	-
- Exchange Difference on Foreign Currency Translation	-	-	-	-	-	-
- Transfer from Retained Earnings to General Reserves	-	-	-		-	-
Balance as at March 31, 2021	**1,277.28**	**4,327.95**	**2,176.20**	**225.70**	**-**	**8,007.12**

#General Reserve is used from time to time to transfer profits from retained earnings for appropriation purposes. As the General Reserve is created by the transfer from one component of equity to another and is not a item of other comprehensive income, items included in the General Reserve will not be reclassified subsequently to Profit or Loss.

^Securties Premium Reserve is used to record the premium on issue of shares. This is utilised in accordance with the provisions of the Companies Act, 2013.

The above statement of changes in equity should be read in conjunction with the accompanying notes

This is the statement of changes in equity referred to in our report of even date.

As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

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

1. Corporate Information

Rama Steel Tubes Limited (" the Company') is limited Company domiciled in India and incorporated on Febuary 26, 1974 under the provisions of the CompanyAct, 1956 having its registered office at B-5, 3rd Floor, Main Road,Ghazipur, New Delhi-110096. The Company is a public company listed on the Bombay Stock Exchange (BSE) and National Stock Exchange (NSE). The Company is engaged in the business of manufacturing of Steel Pipes and related products. The Company's manufacturing facilities are located at Sahibabad, District Ghaziabad in Uttar Pradesh and Khopoli, District Raigarh in Maharasthra.

2. Basis of preparation of financial statements & Use of estimates

2.1 Basis of Preparation of financial Statements

These financial statements are prepared in accordance with Indian Accounting Standards (Ind AS) under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair values, the provisions of the Companies Act, 2013 ('the Act') (to the extent notified) and guidelines issued by the Securities and Exchange Board of India (SEBI). The Ind AS are prescribed under Section 133 of the Act read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 and Companies (Indian Accounting Standards) Amendment Rules, 2016. Accounting policies have been consistently applied except where a newly-issued accounting standard is initially adopted or a revision to an existing accounting standard requires a change in the accounting policy hitherto in use.

2.2 Statement of compliance

The financial statements have been prepared in accordance with Indian Accounting Standard (Ind AS) notified under the Companies (Indian Accounting Standards) Rules, 2015 read with Section 133 of the Companies Act, 2013.

2.3 Use of estimates

The preparation of the financial statements in conformity with Ind AS requires the Management to make estimates, judgements and assumptions. These estimate, judgements and assumptions affect the application of accounting sheet date is classified as capital advances under other noncurrent assets and the cost of Property, Plant and Equipment not available for use before such date are disclosed under 'Capital work-in-progress'policies and the reported amounts of assets and liabilities,the disclosures of contingent assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the period. The application of accounting policies that require critical accounting estimates involving complex and subjective judgements and the use of assumptions in these financial statements have been disclosed in Note 4. Accounting estimates could change from period to period. Actual results could differ from those estimates. Appropriate changes in estimates are made as the Management becomes aware of the changes in circumstances surrounding the estimates. Changes in estimates are reflected in the financial statements in the period in which changes are made and if material, their effects are disclosed in the notes to the financial statements,

3. Significant Accounting Policies

3.1 Basis of Measurement

These standalone financial statements have been prepared under the historical cost except for the following assets and liabilities which have been measured at fair value: . The standalone financial statements are presented in Indian Rupees (₹), which is the Company's functional and presentation currency and all amounts are rounded to the nearest Lakh and two decimals thereof, except as stated otherwise.

3.2 Investment in Joint Venture

Interests in joint venture are accounted for using the equity method, after initially being recognised at cost in the standalone balance sheet. When the Group transacts with a joint venture , profits and losses from transactions with the joint venture are recognised in the balance sheet of Group only to the extent of interests in the joint venture that are not related to the Group.

The carrying amount of the investment is adjusted to recognise changes in the Group's share of net assets of the joint venture since the acquision date. Goodwill relating to the joint venture is included in the carrying amount of the investment.

The Standalone Statement of Profit and Loss reflects the Group's share of the results of operations of the joint venture. Any change in OCI of those investees is presented as part of the Group's OCI. In addition, when there has been a change recognised directly in the equity of the joint venture, the Group recognises its share of any changes, when applicable, in the statement of changes in equity. Unrealised gains and losses resulting from transactions between the Group and the joint venture are eliminated to the extent of the interest in the associate/joint venture. The aggregate of the Group's share of profit or loss of joint venture is shown on the face of the Standalone Statement of Profit and Loss.

After application of the equity method, the Group determines whether it is necessary to recognise an impairment loss on its investment in its joint venture. At each reporting date, the Group determines whether there is objective evidence that the investment in the joint venture is impaired. If there is such evidence, the Group calculates the amount of impairment as the difference between the recoverable amount of the joint venture and its carrying value, and then recognises the loss as 'Share of Profit of joint venture' in the Consolidated Statement of Profit & Loss.

Upon loss of significant influence over the joint venture, the Group measures and recognises any retained investment at its fair value. Any difference between the carrying amount of the joint venture upon loss of significant and the fair value of the retained investment and proceeds from disposal is recognised in the Standalone Statement of Profit & Loss.

3.3 Property, Plant and Equipment (PPE)

Property, plant and equipment are stated at cost, net of accumulated depreciation and accumulated impairment losses, if any. Cost comprises of the purchase price (net of GST credits / duty credits wherever applicable) and all direct costs attributable to bringing the asset to its working condition for intended use and includes the borrowing costs for qualifying assets and the initial estimate of restoration cost if the recognition criteria is met. All other repair and maintenance costs are recognised in the statement of profit and loss as incurred. Software and licences which are integral part of the PPE are capitalised along with respective PPE. An item of property, plant & equipment is de-recognised upon disposal or when no future economic benefits are expected from its use or disposal. The gain or loss arising on the disposal or etirement of an item of property, plant and equipment is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognised in the Statement of Profit and Loss on the date of disposal or retirement. Capital work-in-progress includes cost of property, plant and equipment under installation / under development as at the balance sheet date. Advances paid towards the acquisition of property, plant and equipment outstanding at each balance of profit and loss if there has been a change in the estimates used to determine the recoverable amount. The carrying amount of the asset is increased to its revised recoverable amount, provided that this amount does not exceed the carrying amount that would have been determined (net of any accumulated amortization or depreciation) had no impairment loss been recognised for the asset in prior years. A reversal of impairment loss is recognised immediately in Statement of Profit and Loss.

3.4 Depreciation and Amortisation

i Depreciation on the property, plant and equipment is provided over the useful life of assets which is coincide with the life specified in Schedule II to the Companies Act, 2013. The range of useful lives of the Property,Plant and Equipment are as follows:

Property, Plant & Equipment	Useful lives in Years
Plant & equipment	8- 15
Building	5- 60
Office equipment	5
Vehicles	8-10
Furniture & fixtures	10
Computers	3- 6

The depreciation has been provided based on the useful life of assets specified in ScheduleII to the Companies Act, 2013 on straight line method. The useful lives of assets as mentioned above is on their single shift basis, if an asset is used for any time during the year for double shift, the depreciation will increase by 50% for that period and in case of triple shift the depreciation shall be calculated on the basis of 100%for that period.

ii Property, plant and equipment (PPE) which are added/ disposed- of during the year, depreciation is provided on pro-rata basis from (up- to) the date on which the PPE is available for use (disposed-of).

iii Assets residual values and useful lives are reviewed at each financial year end considering the physical condition of the assets and benchmarking analysis or whenever there are indicators for review of residual value and useful life adjusted prospectively, if appropriate. Freehold land is not depreciated. Lease hold land is amortised over the period of lease.

iv Free-hold land are not subject to amortisation.

3.5 Impairment of non-financial assets

Property, plant and equipment and other non-financial assets are evaluated for recoverability whenever events or changes in circumstances indicate that their carrying amounts may not be recoverable. For the purpose of impairment testing, the recoverable amount (i.e. the higher of the fair value less cost to sell and the value-in-use) is determined on an individual asset basis unless the asset does not generate cash flows that are largely independent of those from other assets. In such cases, the recoverable amount is determined for the Cash Generating Unit (CGU) to which the asset belongs. If such assets are considered to be impaired, the impairment to be recognised in the Statement of Profit and Loss is measured by the amount by which the carrying value of the assets exceeds the estimated recoverable amount of the asset. An impairment loss is reversed in the statement of profit and loss if there has been a change in the estimates used to determine the recoverable amount. The carrying amount of the asset is increased to its revised recoverableamount, provided that this amount does not exceed the carrying amount that would have been determined (net of any accumulated amortization or depreciation) had no impairment loss been recognised for the asset in prior years. A reversal of impairment loss is recognised immediately in Statement of Profit and Loss.

3.6 Cash and cash equivalents

Cash and cash equivalents includes cash on hand and at bank, deposits held at call with banks, other short-term highly liquid investments with original maturities of three months or less that are readily convertible to a known amount of cash and are subject to an insignificant risk of changes in value and are held for the purpose of meeting short-term cash commitments. The cash flow statement has been prepared under the indirect method as set out in Indian Accounting Standard (IND AS) 7 statement of cash flows.

3.7 Inventories

Inventories are carried in the balance sheet as follows:

Raw material, Stores & Spares At lower of cost or net realisable value, cost includes cost of purchases and other cost incurred in bringing the inventories to their present location and condition.

Work-in Progress At lower of cost of material plus appropriate production overheads or net realisable value.

Finished Goods At lower of cost of materials plus production overheads and excise duty (wherever applicable) or net realisable value.

Purchased Goods in transit Valued at cost.

The cost of inventories comprises of cost of purchase, cost of conversion and other related costs incurred in bringing the inventories to their respective present location and condition. Net realisable value is the estimated selling price in the ordinary course of business, less estimated costs of completion and the estimated costs necessary to make the sale.

3.8 Employee benefits

Expenses and liabilities in respect of employee benefits are recorded in accordance with Ind-AS 19 – Employee Benefits.

a) Defined contribution plan

(I) Provident Fund: Contribution to the provident fund with the government at pre-determined rates is a defined contribution scheme and is charged to the statement of Profit and Loss. There are no other obligations other than contribution to PF Schemes

(II) National pension scheme : Contribution to national pension scheme with the at predetermined rates is a defined contribution scheme and is charged to the statement of Profit and Loss when employees have rendered services entitling them to such benefit

b) Defined benefit plan Gratuity : The Company provides for gratuity, a defined benefit retirement plan ('the Gratuity Plan') covering eligible employees. The Gratuity Plan provides a lumpsum payment to vested employees at retirement, death, or termination of employment, of an amount based on the respective employee's salary and the tenure of employment with the Company. Liabilities with regard to the Gratuity Plan are determined by actuarial valuation, performed by an independent actuary, at each balance sheet date using the projected unit credit method. The company recognizes the net obligation of a defined benefit plan in its balance sheet as an asset or liability. Gains and losses through re-measurements of the net defined benefit liability/ (asset) are recognised in other comprehensive income. The actual return of the portfolio of plan assets, in excess of the yields computed by applying the discount rate used to measure the defined benefit obligations is recognised in Other Comprehensive Income. The effect of any plan amendments are recognised in net profits in the Statement of Profit and Loss.

c) Long term employee benefits: Provisions for other long term employee benefits-compensated absences, a defined benefit scheme, is made on the basis of actuarial valuation at the end of each financial year and are charged to the statement of profit and loss. All actuarial gains or losses are recognised immediately in the statement of profit and loss.

d) Other Short-term employee benefits: All employee benefits payable wholly within twelve months rendering services are classified as short term employee benefits. Benefits such as salaries, wages, short-term compensated absences, performance incentives etc.and the expected cost of bonus, ex-gratia are recognised during the period in which the employee renders related service.

3.9 Foreign currency reinstatement and translation

Initial Recognition:

On initial recognition, transactions in foreign currencies entered into by the Group are recorded in the Functional currency (i.e. Indian Rupees), by applying to the Foreign currency amount, the spot exchange rate between the Functional currency and the Foreign currency at the date of transation. Exchange differences arising on foreign exchange transations settled during the year are recognised in the Standalone Statement of Profit and Loss.

Measurement of Foreign currency Items at reporting date:

Foreign currency monetary items of the Group are translated at the closing exchange rates. Non-monetary items that are measured at historical cost in a Foreign currecy, are translated using the exchange rate at the date of the translation. Non-monetary items that are measured at fair value in a foreign currency, are translated using the exchange rates at the date when the fair value is measured.

Exchange differences arising out of these translations are recognised in the Standalone Statement of Profit and Loss.

3.10 Leases

As a lessee The Company's lease asset classes primarily consist of leases for land. The Company assesses whether a contract contains a lease, at inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company assesses whether: (i) the contract involves the use of an identified asset (ii) the Company has substantially all of the economic benefits from use of the asset through the period of the lease and (iii) the Company has the right to direct the use of the asset. At the date of commencement of the lease, the Company recognizes a right-of-use asset ("ROU") and a corresponding lease liability for all lease arrangements in which it is a lessee, except for leases with a term of twelve months or less (short-term leases) and low value leases. For these short-term and low value leases, the Company recognizes the lease payments as an operating expense on a straight-line basis over the term of the lease.

Certain lease arrangements includes the options to extend or terminate the lease before the end of the lease term. ROU assets and lease liabilities includes these options when it is reasonably certain that they will be exercised. The right-of-use assets are initially recognized at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or prior to the commencement date of the lease plus any initial direct costs less any lease incentives. They are subsequently measured at cost less accumulated depreciation and impairment losses.

The lease liability is initially measured at amortized cost at the present value of the future lease payments. The lease payments are discounted using the interest rate implicit in the lease or, if not readily determinable, using the incremental borrowing rates in the country of domicile of these leases. Lease liabilities are remeasured with a corresponding adjustment to the related right of use asset if the Company changes its assessment if whether it will exercise an extension or a termination option.

Lease liability and ROU asset have been separately presented in the Balance Sheet and lease payments have been classified as financing cash flows.

3.11 Financial instruments

Initial recognition: The Company recognises financial assets and financial liabilities when it becomes a party to the contractual provisions of the instrument. All financial assets and liabilities are recognised at fair value on initial recognition. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities thar are not at fair value through profit or loss, are added to or deducted from the fair value on initial recognition

Subsequent measurement:

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

ii **Financial assets carried at fair value through other comprehensive income:** A financial asset is subsequently measured at fair value through other comprehensive income if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

iii **Financial assets at fair value through profit or loss:** A financial asset which is not classified in any of (i) & (ii) above categories are subsequently fair valued through profit or loss.

v **Financial Liabilities:** Financial liabilities are subsequently carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

De-recognition

The company de-recognises of financial assets when the contractual rights to receive cash flows from the financial asset expire or transfer the financial asset and transfer qualifies for de-recognition under IND AS 109. A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires. The difference between the carrying amount of a financial liability that has been extinguished is recognised in profit or loss as other income.

Offsetting of financial instruments

Financial assets and financial liabilities are offset and the net amount is reported in the balance sheet if there is a currently enforceable legal right to offset the recognised amounts and there is an intention to settle on a net basis, to realise the assets and settle the liabilities simultaneously.

3.12 Derivative financial instruments

The Company uses derivative financial instruments, such as forward contracts to hedge its foreign currency exposure. The recognizing of the resulting gain or loss depends on whether the derivative is designated as a hedging instrument, and if so, on the nature of the item being hedged. Any gains or losses arising from changes in the fair value of derivatives are taken directly to profit or loss.

3.13 Borrowing costs

a) Borrowing costs that are attributable to the acquisition, construction, or production of a qualifying asset are capitalised as a part of the cost of such asset till such time the asset is ready for its intended use or sale. A qualifying asset is an asset that necessarily requires a substantial period of time to get ready for its intended use or sale.

b) All other borrowing costs are recognised as expense in the period in which they are incurred.

3.14 Taxation

i Income tax expense represents the sum of current tax and deferred tax. Tax is recognised in the Statement of Profit and Loss, except to the extent that it relates to items recognised directly in equity or other comprehensive income.

ii Current tax provision is computed on Income

calculated after considering allowances and exemptions under the provisions of the applicable Income Tax Laws.

iii Provision for current income taxes and advance taxes paid are presented in the balance sheet after offsetting them on an assessment year basis.

iv Deferred tax is recognised on differences between the carrying amounts of assets and liabilities in the Balance sheet and the corresponding tax bases used in the computation of taxable profit and are accounted for using the Balance Sheet approach for all taxable temporary differences to the extent that it is probable that future taxable profits will be available. Deferred tax assets and liabilities are measured at the applicable tax rates and tax laws those are enacted or substantively enacted. Deferred tax assets and deferred tax liabilities are off set, and presented on net basis. The carrying amount of deferred tax is reviewed at each balance sheet date.The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Company expects, at the end of the reporting period, to recover or settle the carrying amount of its assets and liabilities.

3.15 Revenue recognition and other income

a) Revenue from the sale of goods and services are measured at the fair value of the consideration received or receivable, net of returns and allowances, trade discounts, rebates and incentives etc. Sales exclude Goods and Service Tax.

b) Revenue from the sale of goods is recognised, when all the significant risks and rewards of ownership of the goods have passed to the buyer, the amount of revenue can be measured reliably and no significant uncertainty exists regarding the amount of Consideration that will be derived from the sales of goods.

c) Revenue from Services is recognised as per terms of the contract with customers based on stage of completion when the outcome of the transaction involving rendering of services can be estimated reliably.

d) Export benefits are accounted for in the year of exports based on eligibility and when there is no uncertainty in receiving the same and there is reasonable assurance that the Company will comply with the conditions attached to them.

e) Other Income Interest income is recognised on a time proportion basis taking into account the amount outstanding and the rate applicable.

3.16 Government grants / Assistance

Government grants/Assistance recognised where there is reasonable assurance that the same will be received and all elegibility criterias are met out If the grants/assistance are related to subvention of a particular expense, it is deducted form that expense in the year of recognition of government grant / Assistance.

3.17 Dividend Distribution

Annual dividend distribution to the shareholders is recognised as a liability in the period in which the dividends are approved by the shareholders. Any interim dividend paid is recognised on approval by Board of Directors. Dividend payable and corresponding tax on dividend distribution is recognised directly in equity.

3.18 Fair Value measurement

The Company measures financial instruments at fair value at each balance sheet date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the

asset or transfer the liability takes place either: In the principal market for the asset or liability, or In the absence of a principal market, in the most advantageous market for the asset or liability The principal or the most advantageous market must be accessible by the Company. The fair value of an asset ora liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest. A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use. The Company uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs. All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole: Level 1: Quoted (unadjusted) prices in active markets for identical assets and liabilities Level 2: Other techniques for which all inputs which have a significant effect on the recorded fair value are observable either directly or indirectly Level 3: Techniques which use inputs that have a significant effect on the recorded fair value that are not based on observable market data. For assets and liabilities that are recognised in the financial statements on a recurring basis, the Company determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period. For the purpose of fair value disclosures, the Company has determined classes of assets & liabilities on the basis of the nature, characteristics and the risks of the asset or liability and the level of the fair value hierarchy as explained above.

3.19 Earnings per share

Basic earnings per equity share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares outstanding during the year. Diluted earnings per equity share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares considered for deriving basic earnings per equity share and also the weighted average number of equity shares that could have been issued upon conversion of all dilutive potential equity shares.

3.20 Provisions

a) **Provision**s Provisions (excluding employee benefits) are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. If the effect of the time value of money is material, provisions are discounted using equivalent period government securities interest rate. Unwinding of the discount is recognised in the Statement of Profit and Loss as a finance cost. Provisions are reviewed at each balance sheet date and are adjusted to reflect the current best estimate.

b) **Contingencies** Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain

future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made. Information on contingent liability is disclosed in the Notes to the Financial Statements. Contingent assets are not recognised. However, when the realisation of income is virtually certain, then the related asset is no longer a contingent asset, but it is recognised as an asset.

3.21 Research and development costs

Research costs are expensed as incurred. Development expenditures on an individual project are recognised as an intangible asset when the Company can demonstrate:

a) The technical feasibility of completing the intangible asset so that the asset will be available for use or sale.

b) Its intention to complete and its ability and intention to use or sell the asset

c) How the asset will generate future economic benefits

d) The availability of resources to complete the asset

e) The ability to measure reliably the expenditure during development

Following initial recognition of the development expenditure as an asset, the asset is carried at cost less any accumulated amortisation and accumulated impairment losses. Amortisation of the asset begins when development is complete and the asset is available for use. It is amortised over the period of expected future benefit. Amortisation expense is recognised in the statement of profit and loss unless such expenditure forms part of carrying value of another asset.

4. Critical accounting estimates, assumptions and judgements

In the process of applying the Company's accounting policies, management has made the following estimates, assumptions and judgements, which have significant effect on the amounts recognised in the financial statement:

a) Property, plant and equipment - Useful lives of assets The Company reviews the useful life of assets at the end of each reporting period. This reassessment may result in change in depreciation expenses in future periods.

b) Warranties The Company generally offers Warranties for its consumer products and the liability towards warranty related costs are recognized in the year of sales or service provided to the customers. Management ascertain and measure the liability for warranty claims based on historical experience and trend. The assumptions made in relation to current year are consistent of those are in prior years.

c) Provision and Contingencies A provision is recognised when the Company has a present obligation as a result of past events and it is probable that an outflow of resources will be required to settle the obligation in respect of which a reliable estimate can be made. Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made. Contingent liabilities are disclosed in the notes. Contingent assets are not recognised in the financial statements.

NOTE 3 : PROPERTY,PLANT AND EQUIPMENT

(₹ in Lakhs)

Particulars	Freehold Land	Build-ings	Furni-ture and Fixtures	Plant & Equip-ment	Office Equip-ment	Elect. Fitting & Installa-tion	Com-puters -Hard-ware	Vehicle	Capital Work -in Progress	Total
Year ended 31 March, 2021										
Gross Carrying Amount										
Gross Carrying Cost as of April 1, 2020	108.72	426.36	32.32	2,213.29	36.40	33.48	7.60	66.31	678.97	3,603.44
Additions during the year	-	639.47	-	658.88	2.06	-	5.00	7.69	777.24	2,090.34
Diposals during the year	-	-	-	15.55	-	-	-	0.83	1,272.38	1,288.76
Closing Gross carrying amount	**108.72**	**1,065.83**	**32.32**	**2,856.61**	**38.46**	**33.48**	**12.59**	**73.17**	**183.83**	**4,405.02**
Accumulated Depreciation										
As at April 1, 2020	-	69.41	3.30	614.76	15.00	15.70	5.66	27.94	-	751.78
Depreciation charged during the year	-	20.53	3.33	190.57	5.78	3.13	1.04	10.91	-	235.29
Disposals during the year	-	-	-	10.28	-	-	-	0.41	-	10.70
Closing accumulated depreciation	**-**	**89.93**	**6.62**	**795.06**	**20.79**	**18.83**	**6.70**	**38.44**	**-**	**976.37**
Net carrying value as on March 31, 2021	**108.72**	**975.90**	**25.70**	**2,061.55**	**17.67**	**14.66**	**5.89**	**34.74**	**183.83**	**3,428.65**

NOTE 4 : INVESTMENT PROPERTIES

(₹ in Lakhs)

Particulars	Freehold Land	Buildings	Plant and Equip-ments	Furniture and Fix-tures	Office Equip-ments	Elect. Fit-ting & In-stallation	Total
Year ended 31 March, 2021							
Gross Carrying Amount							
Gross Carrying Cost as of April 1, 2020	95.06	295.59	16.79	6.05	6.96	15.05	435.49
Additions during the year	-	36.00	-	-	-	-	36.00
Diposals during the year	-	-	-	-	-	-	-
Closing Gross carrying amount	95.06	331.59	16.79	6.05	6.96	15.05	471.49
Accumulated Depreciation							
As at April 1, 2020	-	49.39	4.56	3.64	5.11	9.29	71.98
Depreciation charged during the year	-	10.96	1.27	0.91	-	2.24	15.38
Disposals during the year	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Closing accumulated depreciation	**-**	**60.35**	**5.84**	**4.56**	**5.11**	**11.53**	**87.36**
Net carrying value as on March 31, 2021	**95.06**	**271.24**	**10.95**	**1.49**	**1.85**	**3.52**	**384.13**

NOTE 5 : INTANGIBLE ASSETS

(₹ in Lakhs)

Particulars	Computer Software	Total
Year ended March 31, 2021		
Gross Carrying Amount		
Deemed Cost as of April 1, 2020	13.84	13.84
Additions during the year	1.50	1.50
Diposals during the year	-	-
Closing Gross carrying amount	**15.34**	**15.34**
Accumulated Depreciation		
Opening	13.16	13.16
Depreciation charge during the year	0.17	0.17
Disposals during the year	-	-
Closing accumulated depreciation	13.33	13.33
Net carrying value as on March 31, 2021	**2.01**	**2.01**

NOTE 6 : RIGHT OF USE ASSETS

(₹ in Lakhs)

Particulars	Land	Commercial Vehicles	Total
Balance as at April 1, 2020	65.24	76.32	141.56
Depreciation/Amortisation	1.59	13.31	14.90
Net carrying value as on March 31, 2021	**63.64**	**63.01**	**126.66**

NOTE 7 : INVESTMENT IN SUBSIDIARIES, ASSOCIATES AND JOINT VENTURES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
a) Investment in Subsidiaries (Unquoted and valued at cost)		
M/s Lepakshi Tubes Pvt. Ltd.	490.00	490.00
49,00,000 (as at 31st March 2020 : 49,00,000) Equity Shares of ₹ 10/- each full paid up		
M/s RST International Trading FZE, Duabi	90.20	90.20
500 (as at 31 March 220 : 500) Equity Shares of AED 1000/- each fully paid up		
b) Investment in Joint Venture		
M/s Pir Panchal Construction Pvt. Ltd. Joint Venture	825.56	685.13
	1,405.76	**1,265.33**

Details of Joint Ventures

Name of the Joint Venture	Principal Place of Business/ Principal Activity	Ownership Interest % as of	
		As at March 31, 2021	As at March 31, 2020
M/s Pir Panchal Construction Pvt. Ltd.-JV	India / Erection of Poles	25.00	25.00

The amounts recognised in the balance sheet are as follows:

Particulars	As at March 31, 2021	Asat March 31, 2020
Joint Ventures	825.56	685.13

NOTE 8 : INVESTMENTS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Investment in Equity Instruments		
-Others		
Quoted		
60,500 (as at 31st March 2020: 60,500) Face value of Equity shares of ₹10/- each fully paid up of Uttam Value Steels Limited	0.60	0.60
25 (as at 31st March 2020: 25) Equity shares of ₹25/- each fully paid up of SVC-Cooperative Bank Limited	0.01	0.01
Unquoted		
2 (as at 31st March 2020: 2) Equity shares of ₹10 each fully paid up of CIDCO Mumbai	0.00	0.00
Total	**0.61**	**0.61**

NOTE 9 : OTHER FINANCIAL ASSETS (NON-CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Security Deposits	83.37	82.11
Loans to Subsidiaries	1,158.27	1,456.37
Loans to Others	655.24	593.80
Bank Deposits with maturity period more than 12 months*	452.80	128.83
Total	**2,349.68**	**2,261.10**

*Held as margin money or security against the borrowings, guarantees and other commitments.

NOTE 10 : OTHER NON-CURRENT ASSETS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Unsecured,considered good:		
Capital Advances	-	66.28
Total	**-**	**66.28**

NOTE 11 : INVENTORIES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Raw Materials	2,989.53	1,334.55
(Including material in-transit ₹520.36 Lakhs/- (As at 31st March, 2020 : ₹ NIL/-)		
Finished Goods	1,288.58	767.88
Work-in-progress	1,392.97	572.53
Scrap Material	21.45	37.22
Stores, spares and consumable	25.76	32.84
Total	**5,718.29**	**2,745.01**

NOTE 12(a) : TRADE RECEIVABLES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Unsecured:		
Considered Good	3,485.52	5,505.21
Total	**3,485.52**	**5,505.21**

NOTE 12(b) : CASH AND CASH EQUIVALENTS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Balances with banks		
-Current Accounts	268.62	60.68
-In Fixed deposit accounts with original maturity of less than 3 months*	211.48	585.95
Cash in Hand	3.45	5.46
Total	**483.55**	**652.09**

*Held as margin money or security against the borrowings, guarantees and other commitments.

NOTE 12(c) : OTHER FINANCIAL ASSETS (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Interest accrued on loans,investments and deposits	22.34	24.23
Total	**22.34**	**24.23**

NOTE 13 : OTHER CURRENT ASSETS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Advances other than capital advances		
Advance to suppliers and others	165.80	1,860.54
Balance with Government Authorities	1,340.96	839.26
Prepaid Expenses	33.68	19.44
Other Receivables	368.54	219.61
Total	**1,908.98**	**2,938.85**

NOTE 14 : SHARE CAPITAL:

(₹ in Lakhs)

Particulars		As at March 31, 2021	As at March 31, 2020
A.	**Share Capital**		
	Authorized:		
	1,80,00,000 (as at 31st March 2020: 1,80,00,000) Equity Shares of ₹5/- each	900.00	900.00
	25,00,000 (as at 31st March 2020: 25,00,000) 5% Non Cumulative Redeemable Preference shares of ₹ 10/- each	250.00	250.00
		1,150.00	**1,150.00**
	Issued, Subscribed & Paid up:		
	1,67,94,000 (as at 31st March 2020: 1,67,94,000) Equity Shares of ₹5/- each fully paid up	839.70	839.70
	Total	**839.70**	**839.70**

B. RECONCILIATION OF NUMBER OF SHARES

Equity Shares of ₹5/- Each fully paid up	As at March 31, 2021		As at March 31, 2020	
	Number of Shares	(₹ in Lakhs)	Number of Shares	(₹ in Lakhs)
Balance as at the beginning of the year	16,794,000	839.70	16,794,000	839.70
Additions during the year:	-	-	-	-
Deletion during the year :	-	-	-	-
Balance as at the end of the year	**16,794,000**	**839.70**	**16,794,000**	**839.70**

C. DETAIL OF SHAREHOLDER HOLDING MORE THAN 5% SHARES OF THE COMPANY :

Name of Shareholder	As at March 31, 2021		As at March 31, 2020	
	Numbers of Shares held	% of holding	Numbers of Shares held	% of holding
Naresh Kumar Bansal	6,389,848	38.05	6,185,073	36.83
Richi Bansal	1,469,287	8.75	1,469,289	8.75
Nikhil Naresh Bansal	1,355,998	8.07	1,356,000	8.07
Tarun Dhir-Arun Enterprises (a Partnership Firm)	1,209,821	7.20	1,209,821	7.20

D. RIGHT, PREFERENCE AND RESTRICTIONS ATTACHED TO SHARES EQUITY SHARES

The Company has only one class of equity shares having a par value of ₹ 5/- per share. Each Shareholder is eligible for one vote per share. In the event of liquidation, the equity shareholders are eligible to receive the remaining assets of the Company, after distribution of all preferential amount, in proportion of their shareholding.

NOTE 15 : OTHER EQUITY

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Securities Premium Account	2,176.20	2,176.20
General Reserve	1,277.28	1,277.28
Retained Earnings	4,327.95	3,783.56
Capital Reserve	225.70	225.70
Total	**8,007.13**	**7,462.74**

For movement during the year in Other Equity, refer "Statement of Changes in Equity

NOTE 16 : BORROWINGS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Secured		
Term Loans from banks#	2,418.74	1,248.02
Less: Current Maturities transferred to Other financial liabilities	(194.25)	(177.68)
	2,224.49	**1,070.34**
Unsecured Loans		
Loan from Directors	139.81	-
Loans and Advances from Related Parties	61.51	59.94
	201.32	59.94
Total	**2,425.80**	**1,130.28**

(1) Loan against property (LAP) is secured by way of mortgage of plot No 131, Sector-44, Gurgaon, Haryana & hypothecation of fixed assets of the Company and extension of charge by way of hypothecation of current assets of the company. (2) Term loan for plant expansion is secured by way of hypothecation of plant and machinery purchased from proposed term loan and factory land and Building at Survey No.155,H.No. 4A, Village Umbare, Taluka Khalapur, District Raigad-410203, Maharasthra. (3) Vehicle loan is secured by way of hypothecation of vehicle.

- First Term loan against property (LAP) from bank outstanding amounting ₹402.97 Lakhs as at 31.03.2021 are payable in 110 monthly installments commencing from August 2014 to September 2023, carrying a floating interest rate linked with MCLR of bank (1 year MCLR : 8.35% plus 0.95 % p.a.) with periodical interest reset.

- Second topup term loan against property (LAP) from bank outstanding amounting ₹ 119.62 Lakhs as at 31.03.2021 are payable in 121 monthly installments commencing from May 2017 to May 2027, carrying a floating interest rate linked with MCLR of bank (1 year MCLR: 8.35% plus 1.40 % p.a.) with periodical interest reset.

- Third topup term loan against property (LAP) from bank outstanding amounting ₹214.95 Lakhs as at 31.03.2021 are payable in 120 monthly installments commencing from Nov 2018 to Oct 2028, carrying a floating interest rate linked with MCLR of bank (1 year MCLR: 7.40% plus 0.95 % p.a.) with periodical interest reset.

- Term loan for plant expansion from bank outstanding amounting ₹ 531.96 Lakhs as at 31.03.2021 are payable in 26 equal monthly installments of ₹ 20 Lakhs each commencing from July 2021 to September 2023 and last 1 installment of ₹ 13 Lakhs with rate of interest 10% p.a. at year end.

- First Vehicle term loan from bank outstanding amounting ₹ 15.80 Lakhs as at 31.03.2021 are payable in 60 monthly installments commencing from March 2017 to Feb 2022 with rate of interest 9.75% p.a. at year end.

- Second Vehicle term loan from bank outstanding amounting ₹9.64 Lakhs as at 31.03.2021 are payable in 60 monthly installments commencing from October 2019 to Sept 2024 with rate of interest 9.05% p.a

Note: Installments falling due in respect of all the above loans upto 31st March, 2021 have been grouped under "" Current Maturities of long term debt"". (Refer Note 20 (c).

NOTE 17 : OTHER FINANCIAL LIABILITIES (NON CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Security Deposits	25.13	94.00
Total	**25.13**	**94.00**

NOTE 18 : PROVISIONS (NON CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Gratuity	45.67	46.43
Compensated Absences	6.76	5.19
Total	**52.42**	**51.61**

NOTE 19 : DEFERRED TAX ASSETS/LIABILITIES(NET)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Deferred Tax Assets		
Provision for Gratuity and Compensated Absences	21.56	20.43
	21.56	**20.43**
Deferred Tax Liabilities		
Depreciation	217.38	218.88
	217.38	**218.88**
Deferred Tax Assets(Net)	**-**	**-**
Deferred Tax Liabilities(Net)	**195.82**	**198.46**

NOTE 20(a) : BORROWINGS (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Secured		
Loans Repayable on demand from Banks*	4,998.90	5,613.09
Total	**4,998.90**	**5,613.09**

* Working Capital Facilities from Banks are secured by way of hypothecation of Company's current assets (present and future) including interalia stock of raw materials, stores, spares, stock in process, finished goods etc. lying in the factory, shop, godowns, elsewhere and including goods in transit , book debts, bills receivable and first charge by way of collateral in respect of fixed assets of the company and further guaranteed by Sh. Naresh Kumar Bansal, Director and Sh. Richi Bansal, Director of the Company.

NOTE 20(b) : TRADE PAYABLES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Total outstanding dues to Micro,Small and medium Enerprises (Refer Note No-45)	49.60	-
Total outstanding dues to other than Micro,Small and medium Enerprises	2,150.03	3,035.26
Total	**2,199.62**	**3,035.26**

NOTE 20(c) : OTHER FINANCIAL LIABILITIES (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Current Maturities of term loans transferred from long term borrowings	194.25	177.68
Total	**194.25**	**177.68**

NOTE 21 : PROVISIONS (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Gratuity	29.09	26.58
Compensated Absences	4.13	2.96
Total	**33.22**	**29.54**

NOTE 22 : OTHER CURRENT LIABILITIES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Advance from Customers and Others	152.47	82.30
Statutory Levies	15.79	11.52
Employee Benefits Payable	30.57	40.26
Expenses Payable	66.05	40.70
Total	**264.88**	**174.77**

NOTE 23 : CURRENT TAX LIABILITIES (NET)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Provision for Taxation	164.30	18.99
Less: Advance Tax	(85.00)	(10.00)
Total	**79.30**	**8.99**

NOTE 24 : REVENUE FROM OPERATIONS

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Sale of Products		
Finished Goods		
Within India	22,932.60	20,248.71
Outside India	5,645.78	4,700.41
Traded Goods	3,715.64	3,917.37
Total Gross Sales	**32,294.02**	**28,866.51**
Other Operating Revenue		
Scrap Sale	200.19	281.25
Job Work Income	8.64	0.60
Export Incentives	68.15	27.77
Total	**276.98**	**309.63**
Total Revenue from Operations	**32,571.00**	**29,176.13**

NOTE 25 : OTHER INCOME

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Interest Income from financial assets measured at amortised cost		
- on fixed deposits with bank	214.03	250.84
Liabilities no longer required written back	1.73	0.60
Net Gain on disposal of property,plant and equipment and investment property	(0.17)	-
Foreign Exchange Gain(net)	7.03	38.30
Rental Income	89.85	180.50
Miscellaneous Income	-	2.10
Total	**312.47**	**472.34**

NOTE 26 : COST OF MATERIALS CONSUMED

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Raw Materials		
Opening Stock	1,334.55	3,009.59
Add: Purchase	32,404.59	25,543.45
Less: Closing Stock	(2,469.18)	(1,334.55)
Less: Cost of Raw Material cleared as such	(3,666.48)	(3,861.38)
Total	**27,603.48**	**23,357.11**

NOTE 27: CHANGES IN INVENTORIES OF FINISHED GOODS, WORK-IN-PROGRESS AND STOCK-IN-TRADE

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Opening Stock		
Finished Goods	767.88	626.88
WIP	529.60	548.69
Scrap Material	80.15	12.40
Total (A)	**1,377.63**	**1,187.97**
Closing Stock		
Finished Goods	1,288.58	767.88
WIP	1,392.97	572.53
Scrap Material	21.45	37.22
Total (B)	**2,703.00**	**1,377.62**
Total (A-B)	**(1,325.37)**	**(189.64)**

NOTE 28 : EMPLOYEE BENEFIT EXPENSES

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Salaries, Wages, Bonus etc.	470.04	495.70
Contribution to Provident and Other Funds	10.12	15.09
Staff Welfare Expenses	14.03	4.52
Gratuity	1.76	13.09
Compensated Absences	2.77	2.16
Total	**498.72**	**530.55**

NOTE 29 : FINANCE COST

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Interest Expense	610.22	807.06
Total	**610.22**	**807.06**

NOTE 30 : DEPRECIATION AND AMORTISATION

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Depreciation on property,plant and equipment	235.29	192.20
Depreciation on investment property	15.38	14.53
Amortisation of intangible assets	0.17	1.12
Right of Use Assets Amortisation	14.90	13.94
Total	**265.74**	**221.78**

NOTE 31 : OTHER EXPENSES

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Job Work Charges	14.68	7.89
Power & Fuel Expenses	230.67	245.09
Repair & Maintenance :-		
Building	11.67	23.47
Plant & Machinery	31.53	21.11
Rent (Including Lease Rent)	34.66	24.04
Printing & Stationery	2.10	5.81
Postage & Telephone	5.43	18.25
Vehicle Running Expenses	8.37	8.85
Fees & Taxes	25.49	20.42
Travelling Expenses:		
Directors	2.13	5.20
Others	41.47	25.45
Legal & Professional Charges	33.69	27.44
Donation	-	0.11
Corporate social responsibility expenses (Refer Note 40)	19.95	25.50
Miscellaneous Expenses	20.33	15.61
Auditor's Remuneration	2.00	2.00
Insurance	6.73	6.31
Key-man Insurance	19.39	15.69
Office Expenses	12.53	4.30
Commission	18.29	43.12
Freight Outward	215.11	164.17
Business Promotion	18.92	27.49
Bad Debt	9.03	-
Other Selling Expenes	2.56	76.32
Stores and Spares	239.62	210.48
Total	**1,026.35**	**1,024.12**

NOTE 32 : TAX EXPENSE

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Current Tax		
Current Tax on profits for the year	145.31	18.99
Adjustment for current tax of prior periods	-	0.48
Total current tax expense	**145.31**	**19.47**
Deferred Tax		
Decrease/(increase) in deferred tax assets	-	-
(Decrease)/increase in deferred tax liabilities	(4.84)	111.76
Total deferred tax expense/(benefit)	**(4.84)**	**111.76**
Total Tax Expense	**140.47**	**131.24**

33. FINANCIAL RISK MANAGEMENT

Financial Risk Factors

The Company's principal financial liabilities comprise borrowings, trade and other payables. The main purpose of these financial liabilities is to manage finances for the Company 's operations. The Company has loan and other receivables, trade and other receivables, and cash and short terms deposits that arise directly from its operations. The Company's activities expose it to a variety of financial risks.

i) Market Risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market prices comprise three types of risks: currency rate risk, interest rate risk and other price risks such as equity price risk and commodity risk. Financials instruments affected by market risk includes loans and borrowings, deposits, investments. Foreign currency risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign exchanges rates. Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. This is based on the financial assets and financial liabilities held as of March 31, 2021 and March 31, 2020.

ii) Credit Risk

Credit risk is the risk that a counter party will not meet its obligations under a financial instrument or customer contract, leading to a financial loss.

iii) Liquidity Risk

Liquidity risk is the risk that the Company may not be able to meet its present and future cash and collateral obligations without incurring unacceptable losses.

The Company 's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise potential adverse effects on the Company's financial performance.

Market Risk

The sensitivity analysis excludes the impact of movementsin market variables on the carrying value of post employeement benefit obligations provisions and on the non-financial assets and liabilities. The sensitivity of the relevant statement of Profit and Loss item is the effect of the assumed changes in the respective market risks. The Company's acitivies expose it to a variety of financial risks, including the effects of changes in foreign currency exchange rates and interest rates. However, such effect is not material.

(a) Foreign exchange risk and sensitivity

The company transacts business primarly in Indian Rupee.The company is exposed to foreign exchange risk through its sales in international markets. The company has given unsecured loan to its wholly owned subsidiary company and has foreign currency receivables and is therefore, exposed to foreign exchange risk. The company evaluates foreign currency exposure time to time and follow established risk management policies by taking foreign exchange forward contracts to hedge exposure of foreign currency risk and also some of the foreign currency exposure remains natually hedged. The Following table analyses foreign currency risk from financial instruments as of March 31, 2021 and March 31, 2020 :-

(₹ in Lakhs)

Particulars	Currency	As at March 31, 2021	As at March 31, 2020
Financial Assets:-			
Trade Receivables*	USD	1,554.21	2,661.64
Unsecured Loan / Advance Receivables	USD	6.51	128.43
Financial Liabilities:-			
Trade Payables*	USD	831.62	2,188.65
Net (Assets) / Liabilities		**729.10**	**601.42**

* Trade Receivables and Trade Payables are related to Merchant Trade which is naturally hedged, as inward and outward remittances are conrolled by EEFC Account.

Particulars of forward contracts taken during the year are given below

Particulars	Type	No. of Contract	US$ Equivalent (Lakhs)	(₹ in Lakhs)
As at 31st March, 2021	Sell	15.00	21.09	1,550.47
	Buy	-	-	-
As at 31st March, 2020	Sell	23.00	24.78	1,869.34
	Buy	-	-	-

Summary of exchange difference accounted in Statement of Profit & Loss

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Net foreign exchange (gain)/ losses shown under Other Income	7.03	38.30
Total	**7.03**	**38.30**

(b) Interest rate risk and sensitivity

The Company does not have any borrowings on which the interest risk and Sensitivity arises.

Interest rate

The below table demonstrates the borrowings of fixed and floating rate of interest:-

(₹ in Lakhs)

Particulars	Total Borrowings	Floating rate borrowings	Fixed rate borrowings	Weighted average interest rate
INR	7,618.95	7,392.20	75.61	9.00%
Total as at 31 March, 2021	**7,618.95**	**7,392.20**	**75.61**	**9.00%**
INR	6,921.05	6,817.55	92.15	9.60%
Total as at 31 March, 2020	**6,921.05**	**6,817.55**	**92.15**	**9.60%**

(c) Commodity price risk and sensitivity

The company is exposed to the movement in price of key raw materials in domestic markets. The Company enters into contracts for procurement of material most of the transactions are short term fixed price conract.

Credit Risk

The Company is exposed to credit risk from its operating activities (primarily trade receivables). Credit risk arises from the possibility that counter party may not be able to settle their obligations as agreed. To manage this, the

Company periodically assesses the financial reliability of customers, taking into account the financial condition, current economic trends, and analysis of historical bad debts and ageing of accounts receivable. Individual risk limits are set accordingly. The Company considers the probability of default upon initial recognition of assets and whether there has been a significant increase in credit risk on an ongoing basis through each reporting period. To assess whether there is a significant increase in credit risk, the company compares the risk of a default occurring on the asset as at the reporting date with the risk of default as at the date of initial recognition. It considers reasonable and supportive forward-looking information.

Cash and Cash Equivalents, Deposit in Banks and other Financial instruments

The Company considers factors such as track record, size of the institution, market reputation and service standards to select the banks with which balances and deposits are maintained. Generally, the balances are maintained with the institutions with which the Company has also availed borrowings. The Company does not maintain significant cash and deposit balances other than those required for its day to day operations. For other financial assets the company monitors ratings, credit spreads and financial strengths of its counterparties. Based on its ongoing assessment of the counter party's risk, the company adjust its exposures to various counter parties. Based on the assessment there is no impairment in other financial assets.

Liquidity Risk

Liquidity risk is defined as the risk that the Company will not be able to settle or meet its obligations on time or at a reasonable price.The Company's finance department is responsible for liquidity, funding as well as settlement management. In addition, processes and policies related to such risks are overseen by senior management. Management monitors the Company's net liquidity position through rolling forecasts on the basis of expected cash flows.

Maturity profile of financial liabilities

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

(₹ in Lakhs)

As at March 31, 2021	Less than 1 year	Above 1 year	Total
Non Current borrowings	-	2,425.80	2,425.80
Current borrowings	4,998.90	-	4,998.90
Trade payables	2,199.62	-	2,199.62
Other financial liabilities	194.25	25.13	219.38
Total	**7,392.78**	**2,450.94**	**9,843.71**

(₹ in Lakhs)

As at March 31, 2020	Less than 1 year	Above 1 year	Total
Non Current borrowings	-	1,130.28	1,130.28
Current borrowings	5,613.09	-	5,613.09
Trade payables	3,035.26	-	3,035.26
Other financial liabilities	177.68	94.00	271.68
Total	**8,826.03**	**1,224.28**	**10,050.31**

Capital Risk Management

For the purposes of the Company's capital management, capital includes issued capital and all other equity reserves. The primary objective of the Company's Capital Management is to maximize shareholder value. The company manages its capital structure and makes adjustments in the light of changes in economic environment and the requirements of the financial covenants. In order to achieve this overall objective, the Company's capital management, amongst

other things, aims to ensure that it meets financial covenants attached to the interest-bearing loans and borrowings that define capital structure requirements. Breaches in meeting the financial covenants would permit the bank to immediately call loans and borrowings. There have been no breaches of the financial covenants of any interest bearing loans and borrowing for reported periods.

Further the company monitors capital using gearing ratio, which is total debt divided by total capital plus debt. as under :-

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Interest-bearing loans and borrowings	7,467.80	6,909.70
Equity & Other Equity	8,846.83	8,302.44
Capital and net debt	16,314.63	15,212.14
Gearing ratio in %	**45.77%**	**45.42%**

34. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES

Set out below is a comparison by class of the carrying amounts and fair value of the company's financial instuments that are recognised in the financial statements.

(₹ in Lakhs)

Particulars	March 31,2021		March 31,2020	
	Carrying Amount	Fair Value	Carrying Amount	Fair Value
Financial assets designated at amortised cost				
Trade Receivables	3,485.52	3,485.52	5,505.21	5,505.21
Cash & cash Equivalents	483.55	483.55	652.09	652.09
Bank balances other than above	-	-	-	-
Other Financial assets	2,372.02	2,372.02	2,285.33	2,285.33
Total	**6,341.09**	**6,341.09**	**8,442.63**	**8,442.63**
Financial liabilities designated at amortised cost				
Non Current Borrowings	2,425.80	2,425.80	1,130.28	1,130.28
Current Borrowings	4,998.90	4,998.90	5,613.09	5,613.09
Trade payables	2,199.62	2,199.62	3,035.26	3,035.26
Other financial liabilities	219.38	219.38	271.68	271.68
Total	**9,843.71**	**9,843.71**	**10,050.31**	**10,050.31**

Fair Value Hierarchy

The company measures financial instuments at fair value in accordance with the accounting policies mentioned above. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the assets or transfer the liability takes place either:

Fair values are categorised into different levels in a fair value hierarchy based on the inputs used in the valution techniques as follows:-

1. Level 1: Quoted prices/ NAV for Identical instuments in an active market.

2. Level 2: Directly or indirectly observable market inputs, other than level 1 inputs; and

3. Level 3: Inputs which are not based on observable market data.

When measuring the fair value of an asset or a liability, the Company uses observable market data as far as possible. If the inputs used to measure the fair value of an asset or a liability fall into different levels of the fair value hierarchy, then the fair value measurement is categorised in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement. The company recognises transfers between levels of the fair value hierarchy at the end of the reporting period during which the change has occurred.

Fair Value Technique

1) The carrying amounts of trade receivables, trade payables and cash and cash equivalents are considered to be the same as their fair values due to their short term nature.

2) The fair value of security deposit given was calculated based on cash flows discounted using the current lending rate. They are classified as a level 2 fair values in the fair value hierarchy due to the inclusion of unobservable inputs inlcuding counterparty credit risk.

3) For financial assets and liabilities that are measured at fair value, the carrying amounts are equal to the fair values.

The following table provides the fair value measurement hierarchy of Company's asset and liabilities, grouped into level 1 to Level 2 as described below:-

Assets/ Liabilities measured at fair value (Accounted)

(₹ in Lakhs)

Particulars	As at March 31, 2021		
	Level 1	Level 2	Level 3
Financial Assets			
Security deposits'	-	83.37	-

(₹ in Lakhs)

Particulars	As at March 31, 2020		
	Level 1	Level 2	Level 3
Financial Assets			
Security deposits'	-	82.11	-

(₹ in Lakhs)

Particulars	As at March 31, 2021		
	Level 1	Level 2	Level 3
Financial Liabilities			
Borrowings-fixed rate	-	75.61	-
Other financial liabilities	-	219.38	-

(₹ in Lakhs)

Particulars	As at March 31, 2020		
	Level 1	Level 2	Level 3
Financial Liabilities			
Borrowings-fixed rate	-	92.15	-
Other financial liabilities	-	271.68	-

During the year ended 31st March 2021 and 31st March 2020, there were no transfers between level 1 and Level 2 fair value measurements and no transfer into and out of Level 3 vair value measurements. There is no transaction/ balance under Level 3.

Following table describes the valuation techniques used and key inputs for valaution under fair value hierarchy as of March 31, 2021 and March 31, 2020 respectively:-

(a) Assets/ Liabilities measured at Fair value

Particulars	Fair Value hierarchy	Valution technique	Inputs used
Security deposits	Level 2	Discounted Cash Flow	Prevailing interest rates in market, Future payouts.

Particulars	Fair Value hierarchy	Valution technique	Inputs used
Borrowings fixed	Level 2	Discounted Cash Flow	Prevailing interest rates in market, Future payouts.
Other Financial liabilities	Level 2	Discounted Cash Flow	Prevailing interest rates in market, Future payouts.

35. SEGMENT REPORTING

The Company is in the business of manufacturing in a single segment of manufacturing of Steel and related products. Therefore, segment reported as per IND AS 108 is our operating segment.

36. INCOME TAX EXPENSES

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
1	Current Tax	145.31	18.99
2	Deferred Tax	(4.84)	111.76
3	Previous year taxation adjustments	-	0.48
4	MAT credit entilement	-	-
	Total	**140.47**	**131.23**

Effective Tax Reconciliation

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
	Net Loss/ Income before Taxes	678.29	342.13
	Enacted tax rates Computed Tax	25.168%	25.168%
	Income (Expense)	170.71	86.11
	Increase /(Reduction) in taxes on account of :-		
1	Amount Not taxable/ exempt	(25.40)	(67.12)
2	Previous year taxation adjustments	-	0.48
3	Deferred tax	(4.84)	111.76
	Total	**140.47**	**131.23**
	Effective Tax Rate	**21%**	**38%**

37. DEFERRED TAX

The analysis of deferred tax accounted for in the statementof Profit and Loss is as follows:-

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Book base and tax base of Fixed Assets	(1.50)	110.71
(Disallowance)/ Allowance (net) Under Income Tax	(1.13)	0.78
Ind-As adjustments	(2.20)	0.27
Total	**(4.84)**	**111.76**

Component of tax accounted in OCI

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Deferred Tax Gain/ (Loss) on defined benefit	(2.20)	0.27
Total	**(2.20)**	**0.27**

38. RETIREMENT BENEFIT OBLIGATION

I. Expenses recognised for Defined Contribution plan

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Company's Contribution to provident fund	7.35	10.57
Company's Contribution to ESI	2.77	4.52
Company's Contribution to superannuation fund	-	-
Total	**10.12**	**15.09**

Below tables sets forth the changes in the projected benefit obligation and plan assets and amounts recognised in Balance sheet as of March 31, 2021 and March 31, 2020, being the respective measurement dates:-

II. Movement in Defined benefit obligation

(₹ in Lakhs)

Particulars	Gratuity (unfunded)	Leave encashment (unfunded)
Present value of obligation-April 1, 2019'	65.01	7.38
Current Service Cost	6.99	1.12
Interest Cost	4.98	0.57
Benefits paid	(5.09)	(1.39)
Remeasurements-actuarial loss/ (gain)	1.11	0.47
Present value of obligation-March 31, 2020'	**73.00**	**8.15**
Present value of obligation-April 1, 2020	73.00	8.15
Current Service Cost	5.58	1.18
Interest Cost	4.94	0.55
Benefits paid	-	(0.04)
Remeasurements-actuarial loss/ (gain)	(8.76)	1.04
Present value of obligation-March 31, 2021'	**74.76**	**10.88**

III. Movement in Plan Assets-Gratuity

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Fair Value of plan assets at beginning of year'	-	-
Expected return on plan assets	-	-
Employer contributions	-	-
Benefits paid	-	-
Amount received on redemtion of plan assets	-	-
Acquisitions/ Transfer in / Transfer out	-	-
Acturial gain / (loss)	-	-
Fair Value of plan assets at end of year	-	-
Present value of obligation Net Funded status of plan	-	-
Actual return on plan assets	-	-

IV. Recognised in Profit & Loss

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
Current Service Cost	6.99	1.12
Interest Cost	4.98	0.57
Expected return on plan assets	-	-
Remeasurements-actuarial loss/ (gain)	1.11	0.47
Past Service cost	-	-
For the year ended March 31, 2020	**13.08**	**2.16**
Current Service Cost	5.58	1.18
Interest Cost	4.94	0.55
Expected return on plan assets	-	-
Remeasurements-actuarial loss/ (gain)	(8.76)	1.04
Past Service cost	-	-
For the year ended March 31, 2021	**1.76**	**2.77**
Actual return on plan assets	-	-

V. Recognised in other comprehensive income

(₹ in Lakhs)

Particulars	Employee Benefit Eexpenses
Remeasurement-Actuarial (loss)/gain	1.11
For the year ended March 31, 2020	**1.11**
Remeasurement-Actuarial (loss)/ gain	(8.76)
For the year ended March 31, 2021	**(8.76)**

VI. The principal actuarial assumptions used for estimating the Company's defined benefit obligation are set out below :-

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Attrition rate	3%	3%
Discount rate	6.76	6.76
Expected rate of increase in Compensation levels	6.00	6.00
Expected rate of Return on plan Assets	NA	NA
Mortality rate	"100% of IALM (2012-14)"	"100% of IALM (2012-14)"
Expected Average remaining working lives of employees (years)	16.85	19.12

The assumptions of future salary increase takes into account the inflation, seniority, promotion and other relevant factors such as supply and demand in employment market.

VII. SensitivityAnalysis:-

For the year ended March 31, 2021

(₹ in Lakhs)

Particulars	Change in Assumption	Effect on Gratuity obligation	Effect on compensated absence obligation
Discount rate	0.50%	-2.89	-0.35
	-0.50%	3.15	0.38
Salary Growth rate	0.50%	3.16	0.38
	-0.50%	-2.93	-0.35
Withdrawal rate*	-	-	-

* Sensitivities due to mortality & withdrawals are not material & hence impact of change due to these not calculated.

For the year ended March 31, 2020

(₹ in Lakhs)

Particulars	Change in Assumption	Effect on Gratuity obligation	Effect on compensated absence obligation
Discount rate	0.50%	-2.89	-0.35
	-0.50%	3.15	0.38
Salary Growth rate	0.50%	3.16	0.38
	-0.50%	-2.93	-0.35
Withdrawal rate	-	-	-

The above sensitivity analysis is based on a change in an assumption while holding all other assumptions constant. In practice , this is unlikely to occur, and changes in some of the assumptions may be correlated. When calculating the sensitivity of the defined benefit obligation to significant acturial assumptions the same method (projected unit credit method) has been applied as when calculating the defined benefit obligation recognised within the Balance Sheet.

VIII. History of experience adjustments is as follows:

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
For the year ended March 31, 2021		
Plan Liabilities-loss / (gain)	-	-
Plan Assets-loss / (gain)	-	-
For the year ended March 31, 2020		
Plan Liabilities-loss / (gain)	-	-
Plan Assets-loss / (gain)	-	-

Estimate of expected benefits payments (In absolute terms i.e. undiscounted)

(₹ in Lakhs)

Particulars	Gratuity
01 Apr 2021 to 31 Mar 2022	29.09
01 Apr 2022 to 31 Mar 2023	1.48
01 Apr 2023 to 31 Mar 2024	0.86
01 Apr 2024 to 31 Mar 2025	0.75
01 Apr 2025 to 31 Mar 2026	1.86
01 Apr 2026 to 31 Mar 2027	2.19
01 Apr 2027 Onwards	38.54

IX. Statement of Employee benefit provision

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Gratuity	74.76	73.01
Compensated absences	10.89	8.15
Other employee benefits	-	-
Total	**85.65**	**81.16**

X. Current and non-current provision for Gratuity and Leave Encashment

For the year ended March 31, 2021

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
Current Provision	29.09	4.13
Non Current Provision	45.67	6.76
Total Provision	**74.76**	**10.89**

For the year ended March 31, 2020

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
Current Provision	26.58	2.96
Non Current Provision	46.43	5.19
Total Provision	**73.01**	**8.15**

XI. Employee benefits expenses

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Salary and Wages	470.04	495.70
Costs-defined contribution plan	14.64	30.33
Welfare expenses	14.03	4.52
Total	**498.71**	**530.54**

(Figures in no.)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Average no of people employed	85	97

OCI presentation of defined benefit plan

a) Gratuity is in the nature of defined benefit plan, re-measurement gains / (losses) on defined benefit plans is shown under OCI as Items that will not be reclassified to profit or loss and also the income tax effect on the same.

b) Leave encashment cost is in the nature of short term employee benefits.

Presentation in Statement of Profit and Loss and Balance Sheet

Expenses for Service cost , net interest on net defined benefit liability (asset) is charged to Statement of Profit & Loss.

IND AS 19 do not require seggregation of provision in current and non-current, however net defined liability (Assets) is shown as current and non-current provision in balance sheet as per IND AS 1.

Actuarial liability for short terms benefits (leave encashment cost) is shown as current and non-current provision in balance sheet.

When there is surplus in defined plan, the company is required to measure the net defined benefit at the lower of the surplus in the defined benefit plan and the assets ceiling, determined using the discount rate specified i.e. market yield at the end of the reporting period on government bonds, this is applicable for domestic companies, foreign company can use corporate bonds rate.

39. OTHER DISCLOSURES

a) Statutory Auditors Remuneration, Tax Auditors Remuneration, GST Auditors Remuneration, Cost Auditors Remuneration and Secretarial Auditors Remuneration :-

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
I	**Statutory Auditors Fees**		
	a) Audit Fees	2.00	2.00
	b) Certification /Others	-	-
	c) Out of Pocket Expenses	0.21	0.21
	Total	**2.21**	**2.21**
II	**Tax Auditors Fees**		
	a) Audit Fees	2.00	2.00
	Total	**2.00**	**2.00**

III	**GST Auditors Fees**		
	a) Audit Fees	-	0.50
	Total	**-**	**0.50**
IV	**Cost Auditors Fees**		
	a) Audit Fees	0.35	0.35
	Total	**0.35**	**0.35**
V	**Secretarial Auditors Fees**		
	a) Audit Fees	0.40	0.40
	Total	**0.40**	**0.40**

b) The company has not proposed any dividend to its shareholders during the year.

c) The Company has not given any loan or given any guarantee with respect to the parties covered under section 186 (4) of the Companies Act, 2013.

d) Certain balances of trade receivables, loan and advances, trade payable and other liabilities are subject to confirmation and / or reconciliation.

40. EXPENDITURE INCURRED ON CORPORATE SOCIAL RESPONSIBILITY:

Details of expenditure on Corporate Social Responsibility Activities as per section 135 of the Companies Act, 2013 and with schedule III are as below:

(₹ in Lakhs)

S.No.	Particulars	For the year ended March 31, 2021	For the year ended March 31, 2020
A	Gross amount required to be spent by the Company during the year	19.95	25.50
B	Amount spent during the year	19.95	25.00
(I)	Construction / Acquisition of Asset	NIL	NIL
(II)	On purpose other than (i) above-		
	a) Rural Development	-	-
	b) Women Education	-	-
	c) Women Empowerment and Skill Development	19.95	25.00

41. CONTINGENT LIABILITES NOT PROVIDED FOR IN RESPECT OF:

(₹ in Lakhs)

S.No.	Particulars	For the year ended March 31, 2021	For the year ended March 31, 2020
1)	Disputed liability of Entry tax	69.90	69.90
3)	Guarantees issued by Company's Bankers on behalf of the Company	2,537.29	2,089.42
4)	Letter of Credit Outstanding	2,323.42	2,364.48

42. There are no amounts due and outstanding to be credited to Investor Education and Protection Fund as at March, 2021.

43. Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances) is ₹ NIL (Previous Year ₹ NIL).

44. Exceptional item consists of Loss (Net) of ₹ NIL (Previous year Loss (Net) of ₹ NIL on the provision of employees benefits pertaining to previous years.

45. Based on the intimation received from supplier regarding their status under the Micro, Small and Medium Enterprises Development Act, 2006, the required disclosure is given below:-

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
1	Principal Amount due outstanding	49.53	-
2	Interest due on (1) above and unpaid	0.07	-
3	Interest paid to the supplier	-	-
4	Payments made to the supplier beyond the appointed day during the year	-	-
5	Interest due and payable for the period of delay	-	-
6	Interest accrued and remaining unpaid'	-	-
7	Amount of further interest remaining due and payable in succeeding year	-	-

46. Pursuant to Ind AS-116-'Leases', the following information is disclosed:

Following are the changes in the carrying value of right of use assets for the year ended March 31, 2021:

(₹ in Lakhs)

Particulars	Category of ROU Asset "Land"	Category of ROU Asset "Commercial Vehicles"	Total
Balance as at April 1, 2020	**65.24**	**76.32**	**141.56**
Reclassified on adoption of Ind AS 116	-	-	-
Additions	-	-	-
Deletions	-	-	-
Depreciation / Amortisation	1.59	13.31	14.90
Balance as at March 31, 2021	**63.65**	**63.01**	**126.66**

"The aggregate depreciation expense on ROU assets is included under depreciation and amortization expense in the statement of Profit and Loss.

The following is the break-up of current and non-current lease liabilities as at March 31, 2021:

Included in the Financial Statements as

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Current lease liability	18.24	18.12
Non-current lease liability	7.20	25.44
Total	**25.44**	**43.56**

The following is the movement in lease liabilities during the year ended March 31, 2021:

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Balance at the beginning	**43.56**	**46.55**
Finance Cost accrued during the period	3.09	3.91
Deletions	**-**	**-**
Additions		**13.00**
Payment of lease liabilities	**21.21**	**19.90**
Total	**25.44**	**43.56**

The table below provides details regarding the contractual maturities of lease liabilities as at March 31, 2021 on an undiscounted basis:

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Less than one year	34.66	34.66
One to Five Years	69.31	69.31
More than Five Years	-	-
Total	**103.97**	**103.97**

The Company does not face a significant liquidity risk with regard to its lease liabilities as the current assets are sufficient to meet the obligations related to lease liabilities as and when they fall Rental expenses recorded for short-term leases was ₹34.66 Lakhs for the year ended March 31,2021 and ₹ 24.04 Lakhs for the year ended March 31,2020 respectively

47. Disclosure pursuant to Ind AS 20 "Accounting for Government Grants and Disclosure of Government Assistance.

The Company's exports qualify for various export benefits offered in the form of duty credit scrips under foreign trade policy framed by Department General of Foreign Trade India (DGFT). Income accounted towards such export incentives and duty drawback amounts to ₹ 67.82 Lakh (previous year: ₹ 43.12 Lakh)

48. RELATED PARTY TRANSACTIONS

In accordance with the requirements of IND AS 24, on related party disclosures, name of the related party, related

party relationship, transactions and outstanding balances including commitments where control exits and with whom transactions have taken place during reported periods, are:

List of related parties

1. A. Key Management Personnel

S.No.	Name	Designation
1	Mr. Naresh Kumar Bansal	Managing Director
2	Mr. Richi Bansal	Director & CEO
3	Mr. Surender Kumar Sharma	Director
4	Mr. Rajeev Kumar Agarwal	Chief Financial Officer
5	Mr. Kapil Datta	Company Secretary

B. Non-executive and Independent Directors

S.No.	Name	Designation
1	Mr.Bharat Bhushan Sahny	Independent Director
2	Mr.Charat Sharma(Till Sept 4,2020)	Independent Director
3	Mr.Jai Prakash Gupta (W.e.f. Sept 4,2020)	Independent Director
4	Ms.Anju Gupta	Independent Director

2. Entities where key management personnel and their relatives exercise significant influence

S.No.	Entities	Principal activities
1	M/s Advance Hightech Agro Products Pvt. Ltd.	Chemicals Manufacturer
2	M/s Ravi Developers Pvt. Ltd.	Agriculture goods Producer
3	M/s Pir Panchal Construction Pvt. Ltd., Joint Venture	Erection of Electric Poles
4	M/s RST International Trading FZE	Trading of Steel Products
5	M/s RST Industries Limited	Trading of Steel Products
6	M/s Lepakshi Tubes Pvt. Ltd.	Manufacturer of Steel Pipes
7	M/s Virinder Engineering and Chemical Pvt. Ltd.	Warehouse Renting
8	M/s Naresh Kumar & Sons HUF	HUF

3. Relatives of key management personnel where transactions have taken place

S.No.	Name of Relatives	Relationship
1	Mrs. Kumud Bansal	Spouse of Mr. Naresh Kumar Bansal
2	Mr.Nikhil Bansal	Son of Mr. Naresh Kumar Bansal

4. The following transactions were carried out with the related parties in the ordinary course of business

(₹ in Lakhs)

S.No.	Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
I	**Payment of Rent**		
	Mrs. Kumud Bansal	12.00	12.00
	Mr. Richi Bansal	-	1.30
	Mr. Nikhil Naresh Bansal	-	1.30
II	**Payment of Interest**		
	M/s Advance Hightech Agro Products Pvt. Ltd.	2.90	2.89
III	**Receipt of Interest**		
	M/s Lepakshi Tubes Pvt. Ltd	82.15	112.87
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	60.18	58.55
IV	**Sales of finished goods/ Traded goods**		
	M/s RST International Trading FZE, Dubai	1,412.77	4.59
	M/S RST Industries Limited	1,677.17	3,488.96
	Pir Panchal Constuction Pvt. Ltd Joint Venture	-	116.06
	M/s Virinder Engineering and Chemicals Pvt. Ltd.	0.19	2.81
V	**Advance given against supply of material**		
	M/s RST International Trading FZE, Dubai	-	286.88
VI	**Advance received back given against supply of material**		
	M/s RST International Trading FZE, Dubai	-	207.96
VII	**Unsecured Loans given**		
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	10.00	395.00
	M/s Advance Hightech Agro Products Pvt. Ltd.	1.10	-
	M/s Lepakshi Tubes Pvt. Ltd	1,265.87	2,196.00
	M/s RST International Trading FZE, Dubai	6.55	-
VIII	**Unsecured Loans received back**		
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	10.00	85.00
	M/s Ravi Developers Pvt. Ltd.	0.50	-
	M/s Lepakshi Tubes Pvt. Ltd	1,442.05	1,515.00
	M/s RST International Trading FZE, Dubai	-	97.89
IX	**Unsecured Loans taken**		
	Mr. Naresh Kumar Bansal	463.28	39.74
	Mr. Richi Bansal	16.25	7.44

(₹ in Lakhs)

S.No.	Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
	Mr. Nikhil Naresh Bansal	10.67	2.95
X	**Unsecured Loans repaid**		
	Mr. Naresh Kumar Bansal	323.48	91.08
	M/s Advance Hightech Agro Products Pvt. Ltd.	-	9.00
	Mr. Richi Bansal	16.25	7.44
	Mr. Nikhil Naresh Bansal	10.67	2.95
XI	**Payment of Compensation***		
	Mr. Nikhil Bansal	9.29	9.60
XII	Director sitting Fees		
	Mr. Bharat Bhushan Sahny	0.40	0.30
	Ms. Anju Gupta	0.35	0.35
	Mr. Charat Sharma	0.20	0.10
	Mr. Jai Prakash Gupta	0.20	-

Compensation of Key Management Personnel of the Company

(₹ in Lakhs)

S.No.	Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
	Payment of Compensation*		
I	Mr. Naresh Kumar Bansal	46.01	48.00
II	Mr. Richi Bansal	40.31	42.00
III	Mr. Surender Kumar Sharma	3.37	3.20
IV	Mr. Rajeev Kumar Agarwal	18.22	19.00
V	Mr. Kapil Datta	5.06	5.16

*A. Short-term benefits comprises the expenses recorded under the head employee benefit expenses (eg. Salary and wages, contribution to provident and other funds and staff welfare expenses).

B. The liability for gratuity and compensated absences are provided on actuarial basis for the Company as a whole, amounts accrued pertaining to key managerial personnel are not included above.

C. The remuneration of directors and key executives is determined by the remuneration committee having regard to the performance of individuals and market trends.

5. Balance at the end of the year

(₹ in Lakhs)

Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
Receivable amount of unsecured loan/ Advance		
M/s Pir Panchal Construction Pvt. Ltd., JV	612.87	558.55
M/s Lepakshi Tubes Pvt. Ltd.	1,151.75	1,327.93
M/s RST International Trading FZE, Dubai	6.51	128.43
M/s Ravi Developers Pvt. Ltd.	-	0.50
Receivable amount of goods		
M/s RST International Trading FZE, Dubai	317.39	-
M/S RST Industries Limited	497.81	2,646.00
Payable amount of Loans & Interest		
M/s Advance Hightech Agro Products Pvt. Ltd.	50.17	48.59
Mr. Naresh Kumar Bansal	139.81	-

The transactions with the related parties are made on terms equivalent to those that prevail in arm's length transactions. This assessment is undertaken each financial year through examining the financial position of the related party and the market in which the related party operates. Outstanding balances at the year-end are unsecured and settlement occurs in cash.

49. EARNING PER SHARE (EPS)

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
a.	Net Profit / Loss after tax as per Profit and Loss for basic EPS	544.38	136.44
b.	Add: Interest Expenses on potential equtiy shares (net of tax)	-	-
c.	Net Profit / Loss after tax as per Profit and Loss for diluted EPS	544.38	136.44
d.	No of Equity Share Outstanding at the end of the year	16,794,000	16,794,000
e.	Weighted Average No. of Equity Shares for basic EPS	16,794,000	16,794,000
f.	Weighted Average No. of Potential Equity Shares	-	-
g.	Weighted Average No. of Equity Shares for diluted EPS	16,794,000	16,794,000
h.	Basic EPS per Share (in ₹)	3.24	0.81
i.	Diluted EPS per Share (in ₹)	3.24	0.81
j.	Face Value Per share (in ₹)	5.00	5.00

The Company does not have any potential equity shares and thus, weighted average number of equity shares for the computation of Basis EPS and Diluted EPS remains same.

50. Prior period income booked amounting to ₹ 73.63 Lakhs has been reversed and the same has been treated retrospectively by restating the financial statement of FY 2019-2020 for the comparision purpose according to Ind AS 8' Accounting Policies, Changes in Accounting Estimates and Errors'.

51. The company has practice of getting balance confirmations from its Debtor, Creditor and other parties on annual basis. However, the confirmations of balances as on 31.03.2021 with respect to certain parties could not be received

due to current situation of pandemic COVID-19 thereby the Government of various states have imposed lockdown along with several restrictions, which is still going on, hence to that extent the balances have been taken as per book balances in the absence of balance confirmations. As and when the confirmations with respect to the balances are received, the reconciliation would be made and the adjustments, if any, on this account would be recorded in the books of account.

52. The Company has evaluated the impact of COVID pandemic on the operations of the Company, revenue, inventories, investments, property, plant & equipment, current borrowings and trade payables. The management has considered the possible effects, if any, on the carrying amounts of these assets and liabilties up to the date of approval of these results. As per the management's current assessment, no significant impact on carrying amounts of inventories, tangible assets, trade receivables, investments and other financial assets is expected, and management continue to monitor changes in future economic conditions. The company values its inventory of finished goods at lower of cost and Net realisable value. The Net realisable value of all the inventories of the company is higher than their cost based on subsequent sales taken place till date and their present market prices. Hence there is no impairment risk in the inventory.

53. Previous year figures have been regrouped/ rearranged, wherever considered necessary to conform to current year's classification.

54. Notes 1 to 52 are annexed to and form an integral part of financial statements.

As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

CONSOLIDATED FINANCIAL STATEMENTS

INDEPENDENT AUDITOR'S REPORT

To the Members of
RAMA STEEL TUBES LIMITED
Report on the Consolidated Financial Statements

Opinion

We have audited the consolidated financial statements of RAMA STEEL TUBES LIMITED ("hereinafter referred to as "the Holding Company"), its subsidiaries and associates (the Holding Company ,its subsidiaries and associates together referred to as "the Group") which comprise the balance sheet as at March 31, 2021, and the statement of Profit and Loss, statement of changes in equity and statement of cash flows for the year then ended, and notes to the consolidated financial statements, including a summary of significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid consolidated 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, of the state of affairs of the Group as at March 31, 2021, and profits, changes in equity and its cash flows 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 consolidated Financial Statements section of our report. We are independent of the Group 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 consolidated 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 on the consolidated financial statements.

Emphasis of Matter

We draw your attention to Note 52 to the consolidated financial statements which explains the uncertainties and the management's assessment of the financial impact due to the lock-downs and other restrictions and conditions related to the COVID -19 pandemic situation. As per the management's current assessment, there is no significant impact on carrying amounts of inventories, tangible assets, trade receivables, investments and other financial assets is expected, and management continue to monitor changes in future economic conditions. Our opinion is not modified in respect of this matter.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. We have determined the matters described below to be the key audit matters to be communicated in our report.

Key Audit Matter	Auditor's Response
1. Related Party Transactions The Company has entered into several transactions with related parties during the year 2020-21.We identified related party transactions as a key audit matter because of risks with respect to completeness of disclosures made in the consolidated financial statements including recoverability thereof; compliance with statutory regulations governing relate party relationships such as the Companies Act,2013 and SEBI Regulations and the judgement involved in assessing whether transactions with related parties are undertaken at arms' length. Refer Note 48 to the consolidated financial statements.	Our audit procedures on related party transactions included: · Assessed the key controls to identify and disclose related party relationships and transactions in accordance with the relevant accounting standard. · Assessed compliances with the listing regulations and the regulations under Companies Act,2013 including checking of approvals/scrutiny as specified in Sections 177 and 188 of the Companies Act,2013 with respect to the related party transactions. · Considered the adequacy and appropriateness of the disclosures in the consolidated financial statements, including recoverability thereof, relating to the related party transactions.

	• Inspected relevant ledgers, agreements and other information that may indicate the existence of related party relationships or transactions. Further, we also tested completeness of related parties with reference to the various registers maintained by the company statutorily. • On a sample basis, tested Company's assessment of related party transactions for arms' length pricing.
2. Provisions and contingent liabilities in relation to tax positions Company has received outstanding demands and show cause notices from various tax authorities. The Management have made judgements relating to the likelihood of an obligation arising and whether there is a need to recognize a provision or disclose a contingent liability. We therefore focused on this area as a result of uncertainty and potential material impact. Refer Note 41 to the consolidated financial statements.	We have involved our tax experts to gain an understanding of the current status of the tax cases and monitored changes in the disputes by reading external opinions received by the company if any, where relevant to establish that the tax provisions had been appropriately adjusted to reflect the latest external developments. For Legal, regulatory and tax matters our procedures included the following: ▸ Testing key controls surrounding litigation, regulatory and tax procedures. ▸ Performing substantive procedures on the underlying calculations supporting the provisions recorded. ▸ Where relevant, reading external legal opinions obtained by the management ▸ Discussing open matters with the litigation, regulator, general counsel and tax teams ▸ Assessing management's conclusions through understanding precedents set in similar cases. Based on the evidence obtained, while noting the inherent uncertainty with such legal, regulatory and tax matters, we determined the level of provisioning and disclosure of contingent liabilities as at March 31,2021 to be appropriate.

Information other than the Financial Statements and Auditor's Report thereon

The Holding Company's Board of Directors is responsible for the preparation of the other information. The other information comprises the information included in the Management Discussion and Analysis, Board's Report including Annexures to Board's Report, Business Responsibility Report, Corporate Governance and Shareholder's Information, but does not include the consolidated financial statements and our auditor's report thereon.

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

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information identified above when it becomes available and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information. We are required to report the fact. We have nothing to report in this regard.

Management's Responsibility for the Consolidated Financial Statements

The Holding Company's management and Board of

Directors are responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these consolidated financial statements that give a true and fair view of the consolidated financial position, consolidated financial performance, consolidated changes in equity and consolidated cash flows of the Group in accordance with the accounting principles generally accepted in India, including the accounting Standards specified under section 133 of the Act.

The respective management and Board of Directors of the companies included in the group are responsible for maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of each company and for preventing and detecting frauds and other irregularities; selection and application of appropriate implementation and maintenance of 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 consolidated financial statement that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, the respective Board of Directors of the companies included in the Group are responsible for assessing the Group'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 or to cease operations, or has no realistic alternative but to do so. The respective Board of Directors of the companies included in the Group are also responsible for overseeing the Group's financial reporting process.

Auditor's Responsibilities for the Audit of the Consolidated Financial Statements

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

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

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal financial controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Holding Company has adequate financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- 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 Group to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw

attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the group to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

  Obtain sufficient appropriate audit evidence regarding the financial information of such entities or business activities within the Group to express an opinion on the consolidated financial statements, of which we are the independent auditors. We are responsible for the direction, supervision and performance of the audit of financial information of such entities included in the consolidated financial statements of which we are the independent auditors. For the other entity included in the consolidated financial statements, which has been audited by other auditor, such other auditor remains responsible for the direction, supervision and performance of the audit carried out by them. We remain solely responsible for our audit opinion. Our responsibilities in this regard are further described in para of the section titled 'Other Matters' in this audit report.

We believe that the audit evidence obtained by us along with the consideration of audit report of the other auditor referred to in "Other Matters" paragraph below, is sufficient and appropriate to provide a basis for our audit opinion on the consolidated financial statements.

We communicate with those charged with governance of the Holding Company and such other entities included in the consolidated financial statements of which we are the independent auditors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are 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 would be reasonably be expected to outweigh the public interest benefits of such communication.

Other Matters

We did not audit the financial results of M/s Pir Panchal Construction Private Limited, Joint Venture, Jammu whose total revenue of ₹1326.56 Lakhs and ₹4276.59 Lakhs for the quarter and year ended March 31, 2021 respectively and total profit after tax including OCI of ₹14.45 Lakhs and ₹561.74 Lakhs for the quarter and year ended March 31, 2021 respectively. Our share in net profits of ₹3.62 Lakhs and ₹140.44 Lakhs for the quarter and year ended March 31, 2021 respectively is included in the standalone audited financial results. These financial results are unaudited and have been furnished to us by the management and our opinion and conclusion on the statement, in so far as it relates to the amounts included in respect to these joint venture is based solely on such unaudited financial statements. In our opinion and according to the information and explanations given to us by the Board of Directors, these financial statements are not material to the company.

Report on Other Legal and Regulatory Requirements

As required by Section 143(3) of the Act, based on

our audit and on the consideration of report of the other auditor on separate financial statements of such subsidiary as was audited by other auditor, as noted in the 'Other Matters' paragraph, we report, to the extent applicable, that:

a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit of the aforesaid Consolidated Financial Statements.

b) In our opinion, proper books of account as required by law relating to preparation of the aforesaid consolidated financial statements have been kept so far as it appears from our examination of those books, returns and the reports of the other auditor.

c) The Consolidated Balance Sheet, the Consolidated Statement of Profit and Loss (including other consolidated comprehensive income), Consolidated Statement of Changes in Equity and the consolidated statement of Cash Flow dealt with by this Report are in agreement with the relevant books of account maintained for the purpose of preparation of the consolidated financial statements.

d) In our opinion, the aforesaid consolidated financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.

e) On the basis of the written representations received from the directors of the Holding Company as on 31 March 2021 taken on record by the Board of Directors of the Holding Company and the reports of the statutory auditors of its subsidiary companies, none of the directors of the Group companies are disqualified as on 31 March 2021 from being appointed as a director in terms of section 164(2) of the Act.

f) With respect to the adequacy of the internal financial controls over financial reporting of the Group and the operating effectiveness of such controls, refer to our separate Report in "Annexure A".

g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended:

In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Holding Company to its directors during the year is in accordance with the provisions of section 197 of the Act.

h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:

i. The Group has disclosed the impact of pending litigations on its financial position in its consolidated financial statements.

ii. The Group is not required to make any provision, as required under the applicable law or accounting standards, for material foreseeable losses on long-term contracts including derivative contracts.

iii. The Group is not required to transfer any amount to the Investor Education and Protection Fund.

For **Alok Mittal & Associates**
Chartered Accountants
ICAI Firm Registration Number: 005717N

Alok Kumar Mittal
Partner
Membership Number: 071205

Place: New Delhi
Date: June 18, 2021
UDIN: 21071205AAAAUJ9802

ANNEXURE "A" TO THE INDEPENDENT AUDITOR'S REPORT

(Referred to in paragraph (f) under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of Rama Steel Tubes Limited of even date)

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

Opinion

In conjunction with our audit of the consolidated financial statements of Rama Steel Tubes Limited (hereinafter referred to as "the Holding Company") as of and for the year ended 31 March 2021, we have audited the internal financial controls with reference to consolidated financial statements of the Holding Company and such other companies which are its subsidiary companies, as of that date.

In our opinion, to the best of our information and according to the explanations given to us, the Holding Company and such other companies which are its subsidiary companies, have, in all material respects, adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2021, based on the internal control over financial reporting criteria established by the respective companies considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

Management's Responsibility for Internal Financial Controls

The respective company's management and board of directors are responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the respective company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India. 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, 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.

Auditor's Responsibility

Our responsibility is to express an opinion on the internal financial controls over financial reporting of the Company 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") issued by the Institute of Chartered Accountants of India and the Standards on Auditing prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls. 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 judgement, 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 and the audit evidence obtained by the auditor of the subsidiaries (which are incorporated in India) and associates, , in terms of their report referred to in other matters paragraph

below, is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting of the Holding company and its subsidiaries (which are incorporated in India) and associates .

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.

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 be come in adequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

For **Alok Mittal & Associates**
Chartered Accountants
ICAI Firm Registration Number: 005717N

Alok Kumar Mittal
Partner
Membership Number: 071205

Place: New Delhi
Date: June 18, 2021
UDIN: 21071205AAAAUJ9802

CONSOLIDATED BALANCE SHEET AS AT MARCH 31, 2021

(₹ in Lakhs)

Particulars	Note	As at March 31, 2021	As at March 31, 2020
ASSETS			
Non-current assets			
Property, Plant and Equipment	3	4,598.46	3,551.51
Capital Work in Progress	3	432.87	678.97
Investment Properties	4	384.13	363.51
Intangible Assets	5	3.14	0.67
Right of Use Assets	6	144.39	162.00
Investment in Subsidiaries, Associates & Joint Ventures	7	825.56	685.13
Financial assets			
(i) Investments	8	0.61	0.61
(ii) Other financial assets	9	1,212.68	823.07
Deferred tax assets(net)	19	-	-
Other non current assets	10	41.52	111.03
Total non current assets		**7,643.36**	**6,376.49**
Current Assets			
Inventories	11	7,286.07	5,393.90
Financial Assets			
(i) Trade Receivables	12(a)	5,225.58	7,214.99
(ii) Cash and Bank Balances	12(b)	2,207.68	1,311.65
(iii) Bank balances other than (ii) above		-	-
(iv) Other Financial Assets	12(c)	22.34	24.23
Other current assets	13	2,370.81	3,431.67
Total current assets		**17,112.48**	**17,376.45**
Total Assets		**24,755.84**	**23,752.94**
Equity and Liabilities			
Equity			
Equity Share Capital	14	839.70	839.70
Other Equity	15	9,154.75	7,943.12
Total equity		**9,994.45**	**8,782.82**
Liabilities			
Non-current liabilities			
Financial Liabilities			
Borrowings	16	2,997.71	1,815.37
Other financial liabilities	17	25.13	94.00
Provisions	18	55.76	53.92
Deferred Tax Liabilities (Net)	19	38.53	87.00
Total non-current liabilities		**3,117.13**	**2,050.29**
Current Liabilities			
Financial Liabilities			
Borrowings	20(a)	5,187.36	6,159.31
Trade Payables	20(b)	5,029.72	5,926.29
Other Financial Liabilities	20(c)	359.20	342.02
Provisions	21	33.64	29.95
Other Current Liabilities	22	812.13	453.27
Current Tax Liability(net)	23	222.22	8.99
Total current liabilities		**11,644.26**	**12,919.82**
Total equity and liabilities			
Total		**24,755.84**	**23,752.94**

See accompanying notes to the Consolidated financial statements
As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

CONSOLIDATED STATEMENT OF PROFIT OR LOSS

FOR THE YEAR ENDED MARCH 31, 2021

(₹ in Lakhs)

Particulars	Notes	Year ended March 31, 2021	Year ended March 31, 2020
Income			
Revenue from operations	24	47,043.45	35,280.90
Other income	25	613.89	365.06
Total Income		**47,657.35**	**35,645.96**
Expenses:			
Cost of Materials consumed	26	28,736.52	26,002.06
Purchase of stock-in-trade (traded goods)	27	14,692.78	7,128.74
Changes in inventories of finished goods, work-in-progress and stock-in-Trade	27	(309.97)	(730.93)
Employee Benefit Expense	28	722.02	696.61
Financial Costs	29	769.78	963.14
Depreciation and Amortization	30	346.17	290.09
Other Expenses	31	1,369.84	1,317.32
Total expenses		**46,327.14**	**35,667.04**
Profit before share of net profits of investments in Associates and Joint Ventures		1,330.21	(21.08)
Share of net profits of associates and joint ventures accounted for using the equity method		140.44	232.39
Profit before tax		**1,470.65**	**211.31**
Tax expense:	32		
(a) Current tax		287.93	18.99
(b) Deferred tax Charge		(55.09)	149.20
(c) Income Tax of earlier year		-	0.48
Total Tax Expense		**232.83**	**168.67**
Profit/(Loss) for the period		**1,237.81**	**42.64**
Other Comprehensive Income(OCI)			
Items that will not be reclassified to Profit & Loss subsequently			
- Remeasurement of the Defined Benefit Plans to Employees		8.86	(1.32)
- Income Tax relating to Items that will not be reclassified to Profit & Loss"		(2.23)	0.32
Items that will be reclassified to Profit & Loss subsequently			
- Exchange Difference on translation of Foreign Currency		(32.80)	40.24
- Income Tax relating to Items that will not be reclassified to Profit & Loss"		-	-
Total Other comprehensive Income for the Year		**(26.17)**	**39.24**
Total Comprehensive Income for the year		**1,211.64**	**81.88**
Earnings per share			
Basic Earnings per share		7.21	0.49
Diluted earnings per share		7.21	0.49

See accompanying notes to the Consolidated financial statements

As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

Place : Delhi
Date : June 18, 2021

CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR
FOR THE YEAR ENDED MARCH 31, 2021

(₹ in Lakhs)

S No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
A.	**Cash Flow from operating activities**		
	Net Profit before Tax	1,470.65	211.31
	Adjustments For		
	Depreciation and amortisation expense	346.17	290.09
	Finance Cost	769.78	963.14
	Remeasurement of the Defined Benefit Plans to Employees routed through OCI	8.86	(1.32)
	Foreign Exchange Fluctuation directly debited to Exchange Reserve	(32.80)	40.24
	Share of Profit in Joint Venture	(140.44)	(232.39)
	Interest Income on FD with banks	(135.97)	(139.58)
	Operating Profit before working capital changes	2,286.25	1,131.49
	Adjustment for Working Capital Changes		
	Decrease/(Increase) in Inventories	(1,892.17)	(258.72)
	Decrease/(Increase) in Trade receivables	1,989.41	(769.04)
	Decrease/(Increase) in other financial and non-financial assets	747.03	(1,339.24)
	(Decrease)Increase in Trade Payables	(896.58)	4,044.35
	(Decrease)/Increase in other financial, non financial liabilities and provisions	312.69	233.65
	Cash generated from Operations	2,546.63	3,042.50
	Net Direct Taxes paid	(74.70)	(62.23)
	Net Cash flow from operating activitites	**2,471.93**	**2,980.27**
B.	**CASH FLOW FROM INVESTING ACTIVITIES**		
	Sale / (Purchase) of Property,Plant and equipment (Including Capital Work in Progress)	(1,120.26)	(660.99)
	Addition / Deletion to right of Use Assets	-	(162.00)
	Addition to Investment Properties	(36.00)	-
	Addition to Intangible Assets	(1.50)	-
	Increase in Investment in Subsidiaries, Associates & Joint Ventures	(140.44)	(232.39)
	Proceeds from sale of Property, Plant and Equipments	5.27	-
	Share of Profit in Joint Venture	140.44	232.39
	Interest received	135.97	139.58
	Net cash flow from investing Activities	**(1,016.52)**	**(683.40)**

(₹ in Lakhs)

S No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
C.	**CASH FLOW FROM FINANCING ACTIVITIES**		
	Proceeds from Borrowings (Secured)	210.39	(698.19)
	Interest paid	(769.78)	(963.14)
	Net Cash from financing Activities	**(559.38)**	**(1,661.32)**
	NET INCREASE /(DECREASE) IN CASH AND CASH EQUIVALENT	896.03	635.54
	Opening balance of Cash & Cash equivalents(April 1, 2020/April 1, 2019)	**1,311.65**	**676.11**
	Closing balance of Cash & cash equivalent	**2,207.68**	**1,311.65**
	Cash and cash Equivalents comprises		
	Cash in Hand	8.97	14.63
	Balance with Scheduled Banks		
	-In current Accounts	1,987.23	711.07
	-In Fixed Deposit Accounts with original maturity of less than 3 months	211.48	585.95
	Total Cash and Cash Equivalents	**2,207.68**	**1,311.65**
	Total		

Notes:

1 The above Cash Flow Statement has been prepared under the indirect method as set out in IND AS 7-Statement of Cash flows notified under Section 133 of the Companies Act,2013(The Act)[Companies(Indian Accounting Standrads) Rules,2015, as amended.

2 Figures in Bracket indicate cash outflow

See accompanying notes to the Standalone financial statements

As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED MARCH 31, 2021

a. Equity share capital

(₹ in Lakhs)

Particulars	Amount
As at March 31, 2019	**839.70**
Equity shares issued during the Year	-
As at March 31, 2020	**839.70**
Equity shares issued during the year	-
As at March 31, 2021	**839.70**

b. Other equity

(₹ in Lakhs)

Particulars	Reserves and Surplus					Foreign Currency Trans Reserve	Total
	General Reserve#	Retained Earnings	Securities Premium Reserve^	Capital Reserve	Foreign Currency Trans Reserve		
Balance as at March 31, 2019	1,277.28	4,392.09	2,176.20	-	15.67	-	7,861.24
Profit for the year	-	42.64	-		-	-	42.64
Other comprehensive income for the year							
- Remeasurement of the Defined Benefit Plans to Employees	-	(1.00)	-	-	-	-	(1.00)
- Transfer from Retained Earnings to capital reserve on account of foreiture of Money Recd. Against share Warrants	-	(225.70)	-	225.70	-	-	-
- Exchange Difference on Foreign Currency Translation	-	-	-	-	40.24	-	40.24
- Transfer from Retained Earnings to General Reserves	-	-	-	-	-	-	-
Balance as at March 31, 2020	**1,277.28**	**4,208.04**	**2,176.20**	**225.70**	**55.90**	**-**	**7,943.12**
Profit for the year	-	1,237.81	-		-	-	1,237.81
Other comprehensive income for the year							
- Remeasurement of the Defined Benefit Plans to Employees	-	6.63	-	-	-	-	6.63
- Transfer from Retained Earnings to capital reserve on account of foreiture of Money Recd. Against share Warrants	-	-	-	-	-	-	-
- Exchange Difference on Foreign Currency Translation	-	-	-	-	(32.80)	-	(32.80)
- Transfer from Retained Earnings to General Reserves	-	-	-	-	-	-	-
Balance as at March 31, 2021	**1,277.28**	**5,452.47**	**2,176.20**	**225.70**	**23.10**	**-**	**9,154.76**

#General Reserve is used from time to time to transfer profits from retained earnings for appropriation purposes. As the General Reserve is created by the transfer from one component of equity to another and is not a item of other comprehensive income, items included in the General Reserve will not be reclassified subsequently to Profit or Loss.

^Securties Premium Reserve is used to record the premium on issue of shares. This is utilised in accordance with the provisions of the Companies Act, 2013.

The above statement of changes in equity should be read in conjunction with the accompanying notes.

This is the statement of changes in equity referred to in our report of even date.

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

Place : Delhi
Date : June 18, 2021

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

1. Corporate Information

Rama Steel Tubes Limited (" the Company') is limited Company domiciled in India and incorporated on Febuary 26, 1974 under the provisions of the CompanyAct, 1956 having its registered office at B-5, 3rd Floor, Main Road, Ghazipur, New Delhi-110096. The Company is a public company listed on the Bombay Stock Exchange (BSE) and National Stock Exchange (NSE). The Company is engaged in the business of manufacturing of Steel Pipes and related allied products.The Company's manufacturing facilities are located at Sahibabad, District Ghaziabad in Uttar Pradesh , Khopoli, District Raigarh in Maharasthra and District Hindupur in Andhra Pradesh-through wholly owned Subsidiary-Lepakshi Tubes Pvt.Ltd. Company have a wholly owned foreign subsidiary in Dubai, UAE in the name of RST International Trading FZE which is engaged in trading of Building & Construction material Item and also one step down subsidiary in the name of RST Industries Limited in Lagos, Nigeria which is engaged in trading business of Steel related Products.

2. Basis of preparation of financial statements & Use of estimates

2.1 Basis of Preparation of financial Statements

These financial statements are prepared in accordance with Indian Accounting Standards (Ind AS) under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair values, the provisions of the Companies Act, 2013 ('the Act') (to the extent notified) and guidelines issued by the Securities and Exchange Board of India (SEBI). The Ind AS are prescribed under Section 133 of the Act read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 and Companies (Indian Accounting Standards) Amendment Rules, 2016. Accounting policies have been consistently applied except where a newly-issued accounting standard is initially adopted or a revision to an existing accounting standard requires a change in the accounting policy hitherto in use.

2.2 Statement of compliance

The financial statements have been prepared in accordance with Indian Accounting Standard (Ind AS) notified under the Companies (Indian Accounting Standards) Rules, 2015 read with Section 133 of the Companies Act, 2013.

2.3 Use of estimates

The preparation of the financial statements in conformity with Ind AS requires the Management to make estimates, judgements and assumptions. These estimate, judgements and assumptions affect the application of accounting sheet date is classified as capital advances under other noncurrent assets and the cost of Property, Plant and Equipment not available for use before such date are disclosed under 'Capital work-in-progress'policies and the reported amounts of assets and liabilities,the disclosures of contingent assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the period. The application of accounting policies that require critical accounting estimates involving complex and subjective judgements and the use of assumptions in these financial statements have been disclosed in Note 4. Accounting estimates could change from period to period. Actual results could differ from those estimates. Appropriate changes in estimates are made as the Management becomes aware of the changes in circumstances surrounding the estimates. Changes in estimates are reflected in the financial statements in the period in which changes are made and if material, their effects are disclosed in the notes to the financial statements.

3. Significant Accounting Policies

3.1 Basis of Measurement

These consolidated financial statements have been prepared under the historical cost except for the following assets and liabilities which have been measured at fair value: The consolidated financial statements are presented in Indian Rupees (₹), which is the Company's functional and presentation currency and all amounts are rounded to the nearest Lakh and two decimals thereof, except as stated otherwise.

3.2 Basis of Consolidation

The consolidated financial statements comprise the financial statements of the Company, its subsidiaries and associate. Control is achieved when the Group is exposed , or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee. Specifically, the Group Controls on investee if and only if the Group has :

- Power over the investee (i.e. existing rights that gave it the current ability to direct the relevant activities of the investee);
- Exposure, or rights, to variable returns from its involvement with the investee, and
- The ability to use its power over the investee to affect its returns.

Generally, there is a presumption that a majority of voting rights result in control. To support this presumption and when the Group has less than a majority of the voting or similar rights of an investee, the Group considers all relevant facts and circumstances in assessing whether it has power over an investee, including:-

a) The Contractural arrangement with the other vote holders of the investee;

b) The rights arising from other contractual arrangements;

d) The size of the Group's holding of voting rights relative to the size and dispersion of the holdings of the other voting rights holders.

The Group re-assesses whether or not it controls an investee if facts and circumstances indicate that there are changes to one or more of the three elements of control. Consolidation of a subsidiary begins when the Group obtains control over the subsidiary and ceases when the Group loses control of the subsidiary. Assets, liabilities, income and expenses of a subsidiary acquired or disposed off during the year are included in the consolidated financial statements from the date the Group gains control until the date the Group ceases to control the subsidiary.

Consolidated financial statements are prepared using uniform accounting policies for like transactions and other events in similar circumstances. If a member of the Group uses accounting policies other than those adopted in the consolidated financial statements for like transactions and events in similar circumstances, appropriate adjustments are made to that member's financial statements in preparing the consolidated financial statements to ensure conformity with the Group's accounting policies.

An associate is an entity over which the Group has significant influence i.e. power to participate in the financial and operating policy decisions of the investee but no control or joint control over those policies.

The financial statements of all entities used for the purpose of consolidation are drawn up to same reporting date as that of the parent company i.e. year ended 31 March.When the end of the reporting period of the parent is different from that of a subsidiary / associate, the subsidiary/ associate prepares for consolidation purposes, additional financial information as of the same date as the financial statements of the parent to enable the parent to consolidate the financial information of the subsidiary, unless it is impracticable to do so.

Subsidiary:

a) Combine like items of assets, liabilities, equity, income ,expenses and cash flows of the parent with those of its subsidiaries. For this purpose, income and expenses of the subsidiary are based on the amounts of the assets and liabilities recognixed in the consolidated financial statements at the acquisition date;

b) Offset (elimainate) the carrying amount of the parent's investment in each subsidiary and the parent's portion of equity ot each subsidiary. Business combinations policy explains how to account for any related goodwill and

c) Eliminate in full intragroup assets and liability, equity, income, expenses and cash flows relating to transactions between entities of the group (profits or losses resulting from intragroup transactions that are recognised in assets, such as inventory and fixed assets, are eliminated in full). Ind AS 12 " Income Taxes' applies to temporary differences that arise from the elimination of profits and losses resulting from intragroup transactions.

Profit or loss and each component of Other Comprehensive Income ("OCI") are attributed to the equity holders of the parent of the Group and to the non-controlling interests, even if this results in the non-controlling interests having a deficit balance.

A change in the ownership interest of a subsidiary, without a loss of control, is accounted for as an equity transaction. If the Group loses control over a subsidiary, it:

- Derecognises the assets (including goodwill) and liabilities of the subsidiary;
- Derecognises the carrying amount of any non-controlling interests;
- Derecognises the cumulative translation differences recorded in equity;
- Recognises the fair value of the consideration received;
- Recognises the fair value of any investment retained;
- Recognises any surplus or deficit in Consolidated Statement of Profit and Loss;
- Reclassifies the parent's share of components previously recognised in OCI to profit or loss or retained earnings, as appropriate, as would be required if the Group had directly disposd of the related assets or liabilities.

Associates / Joint Venture:

Interests in associates/joint venture are accounted for using the equity method, after initially being recognised at cost in the consolidated balance sheet. When a member of the Group transacts with an associate of the Group, profits and losses from transactions with the associate/ joint venture are recognised in the CFS only to the extent of interests in the associate/ joint venture that are not related to the Group.

The carrying amount of the investment is adjusted to recognise changes in the Group's share of net assets of the associate since the acquision date. Goodwill relating to the associate is included in the carrying amount of the investment.

The Consolidated Statement of Profit and Loss reflects the Group's share of the results of operations of the associate/ joint venture. Any change in OCI of those investees is presented as part of the Group's OCI. In addition, when there has been a change recognised directly in the equity of the associate/joint venture, the Group recognises its share of any changes, when applicable, in the statement of changes in equity. Unrealised gains and losses resulting from transactions between the Group and the associate/ joint venture are eliminated to the extent of the interest in the associate/joint venture. The aggregate of the Group's share of profit or loss of an associate/joint venture is shown on the face of the Consolidated Statement of Profit and Loss.

After application of the equity method, the Group determines whether it is necessary to recognise an impairment loss on its investment in its associate / joint venture. At each

reporting date, the Group determines whether there is objective evidence that the investment in the associate is impaired. If there is such evidence, the Group calculates the amount of impairment as the difference between the recoverable amount of the associate / joint venture and its carrying value, and then recognises the loss as 'Share of Profit of an associate /joint venture' in the Consolidated Statement of Profit & Loss.

Upon loss of significant influence over the associate /joint venture, the Group measures and recognises any retained investment at its fair value. Any difference between the carrying amount of the associate /joint venture upon loss of significant and the fair value of the retained investment and proceeds from disposal is recognised in the Consolidated Statement of Profit & Loss.

3.3 Property, Plant and Equipment (PPE)

Property, plant and equipment are stated at cost, net of accumulated depreciation and accumulated impairment losses, if any. Cost comprises of the purchase price (net of GST credits / duty credits wherever applicable) and all direct costs attributable to bringing the asset to its working condition for intended use and includes the borrowing costs for qualifying assets and the initial estimate of restoration cost if the recognition criteria is met. All other repair and maintenance costs are recognised in the statement of profit and loss as incurred. Software and licences which are integral part of the PPE are capitalised along with respective PPE. An item of property, plant & equipment is de-recognised upon disposal or when no future economic benefits are expected from its use or disposal. The gain or loss arising on the disposal or etirement of an item of property, plant and equipment is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognised in the Statement of Profit and Loss on the date of disposal or retirement. Capital work-in-progress includes cost of property, plant and equipment under installation / under development as at the balance sheet date. Advances paid towards the acquisition of property, plant and equipment outstanding at each balance of profit and loss if there has been a change in the estimates used to determine the recoverable amount. The carrying amount of the asset is increased to its revised recoverable amount, provided that this amount does not exceed the carrying amount that would have been determined (net of any accumulated amortization or depreciation) had no impairment loss been recognised for the asset in prior years. A reversal of impairment loss is recognised immediately in Statement of Profit and Loss.

3.4 Depreciation and Amortisation

i Depreciation on the property, plant and equipment is provided over the useful life of assets which is coincide with the life specified in Schedule II to the Companies Act, 2013. The range of useful lives of the Property,Plant and Equipment are as follows:

Property, Plant & Equipment	Useful lives in Years
Plant & equipment	8- 15
Building	5- 60
Office equipment	5
Vehicles	8-10
Furniture & fixtures	10
Computers	3- 6

The depreciation has been provided based on the useful life of assets specified in Schedule II to the Companies Act, 2013 on straight line method. The useful lives of assets as mentioned above is on their single shift basis, if an asset is used for any time during the year for double shift, the depreciation will increase by 50% for that period and in case of triple shift the depreciation shall be calculated on the basis of 100%for that period.

ii Property, plant and equipment (PPE) which are added/ disposed- of during the year, depreciation is provided on pro-rata basis from (up- to) the date on which the PPE is available for use (disposed-of).

iii Assets residual values and useful lives are reviewed at each financial year end considering

the physical condition of the assets and benchmarking analysis or whenever there are indicators for review of residual value and useful life adjusted prospectively, if appropriate. Freehold land is not depreciated. Lease hold land is amortised over the period of lease.

iv Free-hold land are not subject to amortisation.

3.5 Impairment of non-financial assets

Property, plant and equipment and other non-financial assets are evaluated for recoverability whenever events or changes in circumstances indicate that their carrying amounts may not be recoverable. For the purpose of impairment testing, the recoverable amount (i.e. the higher of the fair value less cost to sell and the value-in-use) is determined on an individual asset basis unless the asset does not generate cash flows that are largely independent of those from other assets. In such cases, the recoverable amount is determined for the Cash Generating Unit (CGU) to which the asset belongs. If such assets are considered to be impaired, the impairment to be recognised in the Statement of Profit and Loss is measured by the amount by which the carrying value of the assets exceeds the estimated recoverable amount of the asset. An impairment loss is reversed in the statement of profit and loss if there has been a change in the estimates used to determine the recoverable amount. The carrying amount of the asset is increased to its revised recoverableamount, provided that this amount does not exceed the carrying amount that would have been determined (net of any accumulated amortization or depreciation) had no impairment loss been recognised for the asset in prior years. A reversal of impairment loss is recognised immediately in Statement of Profit and Loss.

3.6 Cash and cash equivalents

Cash and cash equivalents includes cash on hand and at bank, deposits held at call with banks, other short-term highly liquid investments with original maturities of three months or less that are readily convertible to a known amount of cash and are subject to an insignificant risk of changes in value and are held for the purpose of meeting short-term cash commitments. The cash flow statement has been prepared under the indirect method as set out in Indian Accounting Standard (IND AS) 7 statement of cash flows.

3.7 Inventories

Inventories are carried in the balance sheet as follows:

Raw material, Stores & Spares At lower of cost or net realisable value, cost includes cost of purchases and other cost incurred in bringing the inventories to their present location and condition.

Work-in Progress At lower of cost of material plus appropriate production overheads or net realisable value.

Finished Goods At lower of cost of materials plus production overheads and excise duty (wherever applicable) or net realisable value

Purchased Goods in transit Valued at cost.

The cost of inventories comprises of cost of purchase, cost of conversion and other related costs incurred in bringing the inventories to their respective present location and condition. Net realisable value is the estimated selling price in the ordinary course of business, less estimated costs of completion and the estimated costs necessary to make the sale.

3.8 Employee benefits

Expenses and liabilities in respect of employee benefits are recorded in accordance with Ind-AS 19 – Employee Benefits.

a) Defined contribution plan (I) Provident Fund: Contribution to the provident fund with the government at pre-determined rates is a defined contribution scheme and is charged to the statement of Profit and Loss. There are no other obligations other than contribution to PF Schemes. (II) National pension scheme : Contribution to national pension scheme with the

at predetermined rates is a defined contribution scheme and is charged to the statement of Profit and Loss when employees have rendered services entitling them to such benefit

b) **Defined benefit plan Gratuity :** The Company provides for gratuity, a defined benefit retirement plan ('the Gratuity Plan') covering eligible employees. The Gratuity Plan provides a lumpsum payment to vested employees at retirement, death, or termination of employment, of an amount based on the respective employee's salary and the tenure of employment with the Company. Liabilities with regard to the Gratuity Plan are determined by actuarial valuation, performed by an independent actuary, at each balance sheet date using the projected unit credit method. The company recognizes the net obligation of a defined benefit plan in its balance sheet as an asset or liability. Gains and losses through re-measurements of the net defined benefit liability/ (asset) are recognised in other comprehensive income. The actual return of the portfolio of plan assets, in excess of the yields computed by applying the discount rate used to measure the defined benefit obligations is recognised in Other Comprehensive Income. The effect of any plan amendments are recognised in net profits in the Statement of Profit and Loss.

c) **Long term employee benefits:** Provisions for other long term employee benefits-compensated absences, a defined benefit scheme, is made on the basis of actuarial valuation at the end of each financial year and are charged to the statement of profit and loss. All actuarial gains or losses are recognised immediately in the statement of profit and loss. d) Other Short-term employee benefits: All employee benefits payable wholly within twelve months rendering services are classified as short term employee benefits. Benefits such as salaries, wages, short-term compensated absences, performance incentives etc.and the expected cost of bonus, ex-gratia are recognised during the period in which the employee renders related service.

3.9 Foreign currency reinstatement and translation

Initial Recognition:

On initial recognition, transactions in foreign currencies entered into by the Group are recorded in the Functional currency (i.e. Indian Rupees), by applying to the Foreign currency amount, the spot exchange rate between the Functional currency and the Foreign currency at the date of transation. Exchange differences arising on foreign exchange transations settled during the year are recognised in the Consolidated Statement of Profit and Loss.

Measurement of Foreign currency Items at reporting date:

Foreign currency monetary items of the Group are translated at the closing exchange rates. Non-monetary items that are measured at historical cost in a Foreign currecy, are translated using the exchange rate at the date of the translation. Non-monetary items that are measured at fair value in a foreign currency, are translated using the exchange rates at the date when the fair value is measured.

Exchange differences arising out of these translations are recognised in the Standalone Statement of Profit and Loss.

Translation of Financial Statements of Foreign entities:

On consolidation, the assets and liabilities of Foreign operations are translated into (Indian Rupees) at the exchange rate prevailing at the reporting date and their statement of profit and loss are translated at exchange rates prevailing at the dates of the transactions. The exchange differences arising on translation for consolidation are recognised in the Consolidated Statement of OCI. On disposal of a foreign operation, the component of OCI relating to that particular foreign operation is reclassified to

Consolidated Statement of Profit and Loss.

Any goodwill arising in the acquisition / business combinatiton of a foreign operation on or after adoption of Ind AS 103-Business Combination, and any fair value adjustments to the carrying amounts of assets and liabilities arising on the acquisition are treated as assets and liabilities of the foreign operation and translated at the spot rate of exchange at the reporting date.

Any goodwill or fair value adjustments arising in business combinations/ acquisitions, which occurred before the date of adoption of Ind AS 103-Business Combination, are treated as assets and liabilities of the entity rather than as assets and liabilities of the foreign operations. Therefore, those assets and liabilities are non-monetory items already expressed in the functional currency of the parent and no further translation differences occur.

3.10 Leases

As a lessee The Company's lease asset classes primarily consist of leases for land. The Company assesses whether a contract contains a lease, at inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company assesses whether: (i) the contract involves the use of an identified asset (ii) the Company has substantially all of the economic benefits from use of the asset through the period of the lease and (iii) the Company has the right to direct the use of the asset. At the date of commencement of the lease, the Company recognizes a right-of-use asset ("ROU") and a corresponding lease liability for all lease arrangements in which it is a lessee, except for leases with a term of twelve months or less (short-term leases) and low value leases. For these short-term and low value leases, the Company recognizes the lease payments as an operating expense on a straight-line basis over the term of the lease.

Certain lease arrangements includes the options to extend or terminate the lease before the end of the lease term. ROU assets and lease liabilities includes these options when it is reasonably certain that they will be exercised. The right-of-use assets are initially recognized at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or prior to the commencement date of the lease plus any initial direct costs less any lease incentives. They are subsequently measured at cost less accumulated depreciation and impairment losses.

The lease liability is initially measured at amortized cost at the present value of the future lease payments. The lease payments are discounted using the interest rate implicit in the lease or, if not readily determinable, using the incremental borrowing rates in the country of domicile of these leases. Lease liabilities are remeasured with a corresponding adjustment to the related right of use asset if the Company changes its assessment if whether it will exercise an extension or a termination option.

Lease liability and ROU asset have been separately presented in the Balance Sheet and lease payments have been classified as financing cash flows.

3.11 Financial instruments

Initial recognition: The Company recognises financial assets and financial liabilities when it becomes a party to the contractual provisions of the instrument. All financial assets and liabilities are recognised at fair value on initial recognition. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities thar are not at fair value through profit or loss, are added to or deducted from the fair value on initial recognition.

Subsequent measurement:

i **Financial assets carried at amortised cost:** A financial asset is subsequently measured at amortised cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give

rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

ii **Financial assets carried at fair value through other comprehensive income:** A financial asset is subsequently measured at fair value through other comprehensive income if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

iii **Financial assets at fair value through profit or loss:** A financial asset which is not classified in any of (i) & (ii) above categories are subsequently fair valued through profit or loss.

iv **Financial Liabilities:** Financial liabilities are subsequently carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

De-recognition

The company de-recognises of financial assets when the contractual rights to receive cash flows from the financial asset expire or transfer the financial asset and transfer qualifies for de-recognition under IND AS 109.A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires. The difference between the carrying amount of a financial liability that has been extinguished is recognised in profit or loss as other income.

Offsetting of financial instruments

Financial assets and financial liabilities are offset and the net amount is reported in the balance sheet if there is a currently enforceable legal right to offset the recognised amounts and there is an intention to settle on a net basis, to realise the assets and settle the liabilities simultaneously.

3.12 Derivative financial instruments

The Company uses derivative financial instruments, such as forward contracts to hedge its foreign currency exposure. The recognizing of the resulting gain or loss depends on whether the derivative is designated as a hedging instrument, and if so, on the nature of the item being hedged. Any gains or losses arising from changes in the fair value of derivatives are taken directly to profit or loss.

3.13 Borrowing costs

a) Borrowing costs that are attributable to the acquisition, construction, or production of a qualifying asset are capitalised as a part of the cost of such asset till such time the asset is ready for its intended use or sale. A qualifying asset is an asset that necessarily requires a substantial period of time to get ready for its intended use or sale.

b) All other borrowing costs are recognised as expense in the period in which they are incurred.

3.14 Taxation

i Income tax expense represents the sum of current tax and deferred tax. Tax is recognised in the Statement of Profit and Loss, except to the extent that it relates to items recognised directly in equity or other comprehensive income.

ii Current tax provision is computed on Income calculated after considering allowances and exemptions under the provisions of the applicable Income Tax Laws.

iii Provision for current income taxes and advance taxes paid are presented in the balance sheet after offsetting them on an assessment year basis.

iv Deferred tax is recognised on differences between the carrying amounts of assets and liabilities in the Balance sheet and the corresponding tax bases used in the computation of taxable profit and are accounted for using the Balance Sheet approach for all taxable temporary differences to the extent that it is probable that future taxable profits will be available. Deferred tax assets and liabilities are measured at the applicable tax rates and tax laws those are enacted or substantively enacted. Deferred tax assets and deferred tax liabilities are off set, and presented on net basis. The carrying amount of deferred tax is reviewed at each balance sheet date.The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Company expects, at the end of the reporting period, to recover or settle the carrying amount of its assets and liabilities.

3.15 Revenue recognition and other income

a) Revenue from the sale of goods and services are measured at the fair value of the consideration received or receivable, net of returns and allowances, trade discounts, rebates and incentives etc. Sales exclude Goods and Service Tax.

b) Revenue from the sale of goods is recognised, when all the significant risks and rewards of ownership of the goods have passed to the buyer, the amount of revenue can be measured reliably and no significant uncertainty exists regarding the amount of Consideration that will be derived from the sales of goods.

c) Revenue from Services is recognised as per terms of the contract with customers based on stage of completion when the outcome of the transaction involving rendering of services can be estimated reliably.

d) Export benefits are accounted for in the year of exports based on eligibility and when there is no uncertainty in receiving the same and there is reasonable assurance that the Company will comply with the conditions attached to them. e) Other Income Interest income is recognised on a time proportion basis taking into account the amount outstanding and the rate applicable.

3.16 Government grants / Assistance

Government grants/Assistance recognised where there is reasonable assurance that the same will be received and all elegibility criterias are met out If the grants/assistance are related to subvention of a particular expense, it is deducted form that expense in the year of recognition of government grant / Assistance.

3.17 Dividend Distribution

Annual dividend distribution to the shareholders is recognised as a liability in the period in which the dividends are approved by the shareholders. Any interim dividend paid is recognised on approval by Board of Directors. Dividend payable and corresponding tax on dividend distribution is recognised directly in equity.

3.18 Fair Value measurement

The Company measures financial instruments at fair value at each balance sheet date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either: In the principal market for the asset or liability, or In the absence of a principal market, in the most advantageous market for the asset or liability The principal or the most advantageous market must be accessible by the Company.The fair value of an asset ora liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest. A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits

by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use. The Company uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs. All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

Level 1: Quoted (unadjusted) prices in active markets for identical assets and liabilities

Level 2: Other techniques for which all inputs which have a significant effect on the recorded fair value are observable either directly or indirectly

Level 3: Techniques which use inputs that have a significant effect on the recorded fair value that are not based on observable market data. For assets and liabilities that are recognised in the financial statements on a recurring basis, the Company determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period. For the purpose of fair value disclosures, the Company has determined classes of assets & liabilities on the basis of the nature, characteristics and the risks of the asset or liability and the level of the fair value hierarchy as explained above.

3.19 Earnings per share

Basic earnings per equity share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares outstanding during the year. Diluted earnings per equity share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares considered for deriving basic earnings per equity share and also the weighted average number of equity shares that could have been issued upon conversion of all dilutive potential equity shares.

3.20 Provisions

a) **Provisions** Provisions (excluding employee benefits) are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. If the effect of the time value of money is material, provisions are discounted using equivalent period government securities interest rate. Unwinding of the discount is recognised in the Statement of Profit and Loss as a finance cost. Provisions are reviewed at each balance sheet date and are adjusted to reflect the current best estimate.

b) **Contingencies** Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made. Information on contingent liability is disclosed in the Notes to the Financial Statements. Contingent assets are not recognised. However, when the realisation of income is virtually certain, then the related asset is no longer a contingent asset, but it is recognised as an asset.

3.21 Research and development costs

Research costs are expensed as incurred. Development expenditures on an individual project are recognised as an intangible asset when the

Company can demonstrate:

a) The technical feasibility of completing the intangible asset so that the asset will be available for use or sale.

b) Its intention to complete and its ability and intention to use or sell the asset

c) How the asset will generate future economic benefits

d) The availability of resources to complete the asset

e) The ability to measure reliably the expenditure during development

Following initial recognition of the development expenditure as an asset, the asset is carried at cost less any accumulated amortisation and accumulated impairment losses. Amortisation of the asset begins when development is complete and the asset is available for use. It is amortised over the period of expected future benefit. Amortisation expense is recognised in the statement of profit and loss unless such expenditure forms part of carrying value of another asset.

4. Critical accounting estimates, assumptions and judgements

In the process of applying the Company's accounting policies, management has made the following estimates, assumptions and judgements, which have significant effect on the amounts recognised in the financial statement:

a) Property, plant and equipment - Useful lives of assets The Company reviews the useful life of assets at the end of each reporting period. This reassessment may result in change in depreciation expenses in future periods.

b) Warranties The Company generally offers Warranties for its consumer products and the liability towards warranty related costs are recognized in the year of sales or service provided to the customers. Management ascertain and measure the liability for warranty claims based on historical experience and trend. The assumptions made in relation to current year are consistent of those are in prior years.

c) Provision and Contingencies A provision is recognised when the Company has a present obligation as a result of past events and it is probable that an outflow of resources will be required to settle the obligation in respect of which a reliable estimate can be made. Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made. Contingent liabilities are disclosed in the notes. Contingent assets are not recognised in the financial statements.

NOTE 3 : PROPERTY,PLANT AND EQUIPMENT

(₹ in Lakhs)

Particulars	Freehold Land	Build-ings	Furni-ture and Fixtures	Plant & Equip-ment	Office Equip-ment	Elect. Fitting & Installa-tion	Com-puters -Hard-ware	Vehicle	Capital Work -in Progress	Total
Year ended 31 March, 2021										
Gross Carrying Amount										
Gross Carrying Cost as of April 1, 2020	478.47	820.24	59.20	2,918.22	36.80	35.72	11.55	89.35	678.97	5,128.52
Additions during the year	-	641.61	0.62	663.31	2.06	0.06	5.00	52.70	1,026.28	2,391.65
Diposals during the year	-	-	-	15.55	-	-	-	0.83	1,272.38	1,288.76
Closing Gross carrying amount	**478.47**	**1,461.86**	**59.82**	**3,565.98**	**38.86**	**35.78**	**16.55**	**141.22**	**432.87**	**6,231.41**
Accumulated Depreciation										
As at April 1, 2020	-	97.03	12.83	717.82	15.13	15.90	7.02	32.75	-	898.47
Depreciation charged during the year	-	33.60	9.57	236.27	5.86	3.34	1.07	22.59	-	312.30
Disposals during the year	-	-	-	10.28	-	-	-	0.41	-	10.70
Closing accumulated depreciation	**-**	**130.64**	**22.40**	**943.80**	**20.98**	**19.25**	**8.09**	**54.93**	**-**	**1,200.08**
Net carrying value as on March 31, 2021	**478.47**	**1,331.22**	**37.42**	**2,622.17**	**17.88**	**16.54**	**8.47**	**86.29**	**432.87**	**5,031.33**

NOTE 4 : INVESTMENT PROPERTIES

(₹ in Lakhs)

Particulars	Freehold Land	Buildings	Plant and Equip-ments	Furniture and Fix-tures	Office Equip-ments	Elect. Fit-ting & In-stallation	Total
Year ended 31 March, 2021							
Gross Carrying Amount							
Gross Carrying Cost as of April 1, 2020	95.06	295.59	16.79	6.05	6.96	15.05	435.49
Additions during the year	-	36.00	-	-	-	-	36.00
Diposals during the year	-	-	-	-	-	-	-
Closing Gross carrying amount	95.06	331.59	16.79	6.05	6.96	15.05	471.49
Accumulated Depreciation							
As at April 1, 2020	-	49.39	4.56	3.64	5.11	9.29	71.98
Depreciation charged during the year	-	10.96	1.27	0.91	-	2.24	15.38
Disposals during the year	**-**	**-**	**-**	**-**	**-**		**-**
Closing accumulated depreciation	**-**	**60.35**	**5.82**	**4.55**	**5.11**	**11.53**	**87.36**
Net carrying value as on March 31, 2021	**95.06**	**271.24**	**10.97**	**1.50**	**1.85**	**3.52**	**384.13**

NOTE 5 : INTANGIBLE ASSETS

(₹ in Lakhs)

Particulars	Computer Software	Total
Year ended March 31, 2021		
Gross Carrying Amount		
Deemed Cost as of April 1, 2020	**15.55**	**15.55**
Additions during the year	1.50	1.50
Diposals during the year	-	-
Closing Gross carrying amount	**17.05**	**17.05**
Accumulated Depreciation		
Opening	13.33	13.33
Depreciation charge during the year	0.59	0.59
Disposals during the year	-	-
Closing accumulated depreciation	13.92	13.92
Net carrying value as on March 31, 2021	**3.14**	**3.14**

NOTE 6 : RIGHT OF USE ASSETS

(₹ in Lakhs)

Particulars	Land	Commercial Vehicles	Total
Balance as at April 1, 2020	65.24	96.75	162.00
Depreciation/Amortisation	1.59	16.02	17.61
Net carrying value as on March 31, 2021	**63.65**	**80.74**	**144.39**

NOTE 7 : INVESTMENT IN SUBSIDIARIES, ASSOCIATES AND JOINT VENTURES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Investment in Joint Venture		
M/s Pir Panchal Construction Pvt. Ltd. Joint Venture	825.56	685.13
	825.56	**685.13**

Details of Joint Ventures

Name of the Joint Venture	Principal Place of Business/ Principal Activity	Ownership Interest % as of	
		As at March 31, 2021	As at March 31, 2020
M/s Pir Panchal Construction Pvt. Ltd.-JV	India / Erection of Poles	25.00	25.00

The amounts recognised in the balance sheet are as follows:

Particulars	As at March 31, 2021	Asat March 31, 2020
Joint Ventures	825.56	685.13

NOTE 8 : INVESTMENTS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Investment in Equity Instruments		
-Others		
Quoted		
60,500 (as at 31st March 2020: 60,500) Face value of Equity shares of ₹10/- each fully paid up of Uttam Value Steels Limited	0.60	0.60
25 (as at 31st March 2020: 25) Equity shares of ₹25/- each fully paid up of SVC-Cooperative Bank Limited	0.01	0.01
Unquoted		
2 (as at 31st March 2020: 2) Equity shares of ₹ 10 each fully paid up of CIDCO Mumbai	0.00	0.00
Total	**0.61**	**0.61**

NOTE 9 : OTHER FINANCIAL ASSETS (NON-CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Security Deposits	104.57	100.36
Loans to Others	655.24	593.80
Bank Deposits with maturity period more than 12 months*	452.87	128.90
Total	**1,212.68**	**823.07**

*Held as margin money or security against the borrowings, guarantees and other commitments.

NOTE 10 : OTHER NON-CURRENT ASSETS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Unsecured,considered good:		
Capital Advances	-	66.28
Unamortized Expenses	41.52	44.75
Total	**41.52**	**111.03**

NOTE 11 : INVENTORIES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Raw Materials	3,121.76	1,469.63
(Including material in-transit ₹544.52 Lakhs/- (As at 31st March, 2020 : ₹ NIL/-)		
Finished Goods	2,704.91	3,191.94
Work-in-progress	1,405.64	656.06
Scrap Material	21.45	37.22
Stores, spares and consumable	32.31	39.06
Total	**7,286.07**	**5,393.90**

NOTE 12(a) : TRADE RECEIVABLES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Unsecured:		
Considered Good	5,225.58	7,214.99
Total	**5,225.58**	**7,214.99**

NOTE 12(b) : CASH AND CASH EQUIVALENTS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Balances with banks		
-Current Accounts	1,987.23	711.07
-In Fixed deposit accounts with original maturity of less than 3 months*	211.48	585.95
Cash in Hand	8.97	14.63
Total	**2,207.68**	**1,311.65**

*Held as margin money or security against the borrowings, guarantees and other commitments.

NOTE 12(c) : OTHER FINANCIAL ASSETS (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Interest accrued on loans,investments and deposits	22.34	24.23
Total	**22.34**	**24.23**

NOTE 13 : OTHER CURRENT ASSETS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Advances other than capital advances		
Advance to suppliers and others	282.60	2,021.10
Balance with Government Authorities	1,411.54	867.35
Prepaid Expenses	64.56	23.41
Other Receivables	612.11	519.81
Total	**2,370.81**	**3,431.67**

NOTE 14 : SHARE CAPITAL:

(₹ in Lakhs)

Particulars		As at March 31, 2021	As at March 31, 2020
A.	**Share Capital**		
	Authorized:		
	1,80,00,000 (as at 31st March 2020: 1,80,00,000) Equity Shares of ₹5/- each	900.00	900.00
	25,00,000 (as at 31st March 2020: 25,00,000) 5% Non Cumulative Redeemable Preference shares of ₹ 10/- each	250.00	250.00
		1,150.00	**1,150.00**
	Issued, Subscribed & Paid up:		
	1,67,94,000 (as at 31st March 2020: 1,67,94,000) Equity Shares of ₹5/- each fully paid up	839.70	839.70
	Total	**839.70**	**839.70**

B. RECONCILIATION OF NUMBER OF SHARES

Equity Shares of ₹5/- Each fully paid up	As at March 31, 2021		As at March 31, 2020	
	Number of Shares	(₹ in Lakhs)	Number of Shares	(₹ in Lakhs)
Balance as at the beginning of the year	16,794,000	839.70	16,794,000	839.70
Additions during the year:	-	-	-	-
Deletion during the year :	-	-	-	-
Balance as at the end of the year	**16,794,000**	**839.70**	**16,794,000**	**839.70**

C. DETAIL OF SHAREHOLDER HOLDING MORE THAN 5% SHARES OF THE COMPANY : :

Name of Shareholder	As at March 31, 2021		As at March 31, 2020	
	Numbers of Shares held	% of holding	Numbers of Shares held	% of holding
Naresh Kumar Bansal	6,389,848	38.05	6,212,578	36.99
Richi Bansal	1,469,287	8.75	1,469,287	8.75
Nikhil Naresh Bansal	1,355,998	8.07	1,355,998	8.07
Tarun Dhir-Arun Enterprises (a Partnership Firm)	1,209,821	7.20	1,209,821	7.20

D. RIGHT, PREFERENCE AND RESTRICTIONS ATTACHED TO SHARES EQUITY SHARES

The Company has only one class of equity shares having a par value of ₹5/- per share. Each Shareholder is eligible for one vote per share. In the event of liquidation, the equity shareholders are eligible to receive the remaining assets of the Company, after distribution of all preferential amount, in proportion of their shareholding.

NOTE 15 : OTHER EQUITY

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Securities Premium Account	2,176.20	2,176.20
General Reserve	1,277.28	1,277.28
Retained Earnings	5,452.47	4,208.04
Foreign Currency Translation Reserve	23.10	55.90
Capital Reserve	225.70	225.70
Total	**9,154.75**	**7,943.12**

For movement during the year in Other Equity, refer "Statement of Changes in Equity

NOTE 16 : BORROWINGS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Secured		
Term Loans from banks#	2,951.82	1,910.39
Less: Current Maturities transferred to Other financial liabilities	(359.20)	(342.02)
	2,592.62	**1,568.37**
Unsecured Loans		
Loan from Directors	343.58	187.06
Loans and Advances from Related Parties	61.51	59.94
	405.09	**247.00**
Total	**2,997.71**	**1,815.37**

Term loan against property (LAP) from banks is secured by way of mortgage of plot No 131, sector-44, Gurgaon & hypothecation of fixed assets of the Company and extension of charge by way of hypothecation of current assets of the Company. Another term loan from bank is secured by way of morgage of land & building & hypothecation of fixed assets of the Company (movable & immovable) belonging to the unit set up at Anantpur District, Andhra Pradesh, present and future belonging to the company and extension of first charge by way of hypothecation of entire current assets of the company,present and future and guaranted by personal guarantee by Mr. Naresh Kumar Bansal and Mr. Richi Bansal, Directors of the Company. Further secured by way of corporate guarantee by holding company-Rama Steel Tubes Limited. Another Term loan for plant expansion is secured by way of hypothecation of plant and machinery purchased from proposed term loan and factory land and Building at Survey No.155,H.No. 4A, Village Umbare, Taluka Khalapur, District Raigad-410203, Maharasthra. Vehicles loan is secured by way of hypothecation of said vehicle.

Term loan from banks outstanding amounting ₹ 517.88 Lakhs as at 31.03.2021 carrying interest @ Repo Rate + 4.80% p.a i.e.9.20 p.a.This balance loan is repayable in 60 monthly installments of ₹ 13.21 Lakhs till March 31, 2024 and last installment of ₹2.69 Lakhs to be paid in April 2024.

- First Term loan against property (LAP) from bank outstanding amounting ₹402.97 Lakhs as at 31.03.2021 are payable in 110 monthly installments commencing from August 2014 to September 2023, carrying a floating interest rate linked with MCLR of bank (1 year MCLR : 8.35% plus 0.95 % p.a.) with periodical interest reset.
- Second topup term loan against property (LAP) from bank outstanding amounting ₹ 119.62 Lakhs as at 31.03.2021 are payable in 121 monthly installments commencing from May 2017 to May 2027, carrying a floating interest rate linked with MCLR of bank (1 year MCLR: 8.35% plus 1.40 % p.a.) with periodical interest reset.
- Third topup term loan against property (LAP) from bank outstanding amounting ₹214.95 Lakhs as at 31.03.2021 are payable in 120 monthly installments commencing from Nov 2018 to Oct 2028, carrying a floating interest rate linked with MCLR of bank (1 year MCLR: 7.40% plus 0.95 % p.a.) with periodical interest reset.
- Term loan for plant expansion from bank outstanding amounting ₹531.96 Lakhs as at 31.03.2021 are payable in 26 equal monthly installments of ₹ 20 Lakhs each commencing from July 2021 to September 2023 and last 1 installment of ₹ 13 Lakhs with rate of interest 10% p.a. at year end.
- First Vehicle term loan from bank outstanding amounting ₹ 15.80 Lakhs as at 31.03.2021 are payable in 60 monthly installments commencing from March 2017 to Feb 2022 with rate of interest 9.75% p.a. at year end.
- Second Vehicle term loan from bank outstanding amounting ₹ 9.64 Lakhs as at 31.03.2021 are payable in 60 monthly installments commencing from October 2019 to Sept 2024 with rate of interest 9.05% p.a

  Truck Loan outstanding amounting ₹ 15.20 Lakhs as on 31.03.2021 from Bank carrying a interest rate i.e. 9.50% p.a. repayable in 47 monthly installment of ₹ 0.65 Lakhs till March 01,2023 is secured by hypothecation of vehicle.

Note: Installments falling due in respect of all the above loans upto 31st March, 2021 have been grouped under "" Current Maturities of long term debt"". (Refer Note 20 (c).

NOTE 17 : OTHER FINANCIAL LIABILITIES (NON CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Security Deposits	25.13	94.00
Total	**25.13**	**94.00**

NOTE 18 : PROVISIONS (NON CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Gratuity	48.40	48.36
Compensated Absences	7.36	5.56
Total	**55.76**	**53.92**

NOTE 19 : DEFERRED TAX ASSETS/LIABILITIES(NET)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Deferred Tax Assets		
Provision for Gratuity and Compensated Absences	22.50	21.05
Unabsorbed Depreciation/ carried forward losses	212.34	167.45
	234.84	**188.50**
Deferred Tax Liabilities		
Depreciation	273.37	275.49
	273.37	**275.49**
Deferred Tax Assets(Net)	**-**	**-**
Deferred Tax Liabilities(Net)	**38.53**	**87.00**

NOTE 20(a) : BORROWINGS (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Secured		
Loans Repayable on demand from Banks*	5,187.36	6,159.31
Unsecured		
Other Loans from Banks	-	-
Total	**5,187.36**	**6,159.31**

* Working Capital Facilities from Banks are secured by way of hypothecation of Company's current assets (present and future) including interalia stock of raw materials, stores, spares, stock in process, finished goods etc. lying in the factory, shop, godowns, elsewhere and including goods in transit , book debts, bills receivable and first charge by way of collateral in respect of fixed assets of the company and further guaranteed by Sh. Naresh Kumar Bansal, Director and Sh. Richi Bansal, Director of the Company.

NOTE 20(b) : TRADE PAYABLES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Total outstanding dues to Micro,Small and medium Enerprises (Refer Note No-45)	49.60	-
Total outstanding dues to other than Micro,Small and medium Enerprises	4,980.12	5,926.28
Total	**5,029.72**	**5,926.29**

NOTE 20(c) : OTHER FINANCIAL LIABILITIES (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Current Maturities of term loans transferred from long term borrowings	359.20	342.02
Total	**359.20**	**342.02**

NOTE 21 : PROVISIONS (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Gratuity	29.10	26.58
Compensated Absences	4.54	3.37
Total	**33.64**	**29.95**

NOTE 22 : OTHER CURRENT LIABILITIES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Advance from Customers and Others	619.48	310.43
Statutory Levies	33.12	23.78
Employee Benefits Payable	51.21	51.41
Expenses Payable	108.32	67.65
Total	**812.13**	**453.27**

NOTE 23 : CURRENT TAX LIABILITIES (NET)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Provision for Taxation	307.22	18.99
Less: Advance Tax	(85.00)	(10.00)
Total	**222.22**	**8.99**

NOTE 24 : REVENUE FROM OPERATIONS

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Sale of Products		
Finished Goods		
Within India	27,717.82	26,457.52
Outside India	2,555.83	1,206.80
Traded Goods	16,479.90	7,227.73
Total Gross Sales	**46,753.55**	**34,892.05**
Other Operating Revenue		
Scrap Sale	213.11	352.27
Job Work Income	8.64	8.81
Export Incentives	68.15	27.77
Total	**289.90**	**388.85**
Total Revenue from Operations	**47,043.45**	**35,280.90**

NOTE 25 : OTHER INCOME

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Interest Income from financial assets measured at amortised cost		
- on fixed deposits with bank	135.97	139.58
Liabilities no longer required written back	1.73	0.60
Net Gain on disposal of property,plant and equipment and investment property	(0.17)	-
Foreign Exchange Gain(net)	354.36	42.27
Rental Income	89.85	180.50
Miscellaneous Income	32.15	2.10
Total	**613.89**	**365.06**

NOTE 26 : COST OF MATERIALS CONSUMED

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Raw Materials		
Opening Stock	1,469.63	3,064.48
Add: Purchase	44,536.91	31,535.95
Less: Closing Stock	(2,577.24)	(1,469.63)
Less: Cost of Raw Material cleared as such	(14,692.78)	(7,128.74)
Total	**28,736.52**	**26,002.06**

NOTE 27: CHANGES IN INVENTORIES OF FINISHED GOODS, WORK-IN-PROGRESS AND STOCK-IN-TRADE

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Opening Stock		
Finished Goods	1,127.34	658.37
WIP	613.13	551.00
Scrap Material	80.15	12.40
Traded Goods	1,999.54	-
Total (A)	**3,820.16**	**1,221.77**
Closing Stock		
Finished Goods	1,392.56	1,127.34
WIP	1,405.64	656.06
Scrap Material	21.45	37.22
Traded Goods	1,310.48	132.07
Total (B)	**4,130.13**	**1,952.69**
Total (A-B)	**(309.97)**	**(730.93)**

NOTE 28 : EMPLOYEE BENEFIT EXPENSES

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Salaries, Wages, Bonus etc.	685.15	654.21
Contribution to Provident and Other Funds	12.44	18.45
Staff Welfare Expenses	18.77	7.30
Gratuity	2.66	13.94
Compensated Absences	3.00	2.71
Total	**722.02**	**696.61**

NOTE 29 : FINANCE COST

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Interest Expense on :	709.33	953.07
Other Expenses	60.45	10.07
Total	**769.78**	**963.14**

NOTE 30 : DEPRECIATION AND AMORTISATION

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Depreciation	312.59	258.16
Depreciation on investment property	15.38	14.53
Amortisation of intangible assets	0.59	1.12
Right of Use Assets Amortisation	17.61	16.29
Total	**346.17**	**290.09**

NOTE 31 : OTHER EXPENSES

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Job Work Charges	14.68	7.89
Power & Fuel Expenses	288.60	311.05
Repair & Maintenance :-		
Building	11.67	23.47
Plant & Machinery	33.39	22.98
Rent (Including Lease Rent)	70.91	43.33
Printing & Stationery	4.13	5.99
Postage & Telephone	11.03	24.17

Vehicle Running Expenses	9.30	9.96
Fees & Taxes	30.40	22.86
Travelling Expenses:		
Directors	2.59	6.02
Others	46.52	31.91
Legal & Professional Charges	169.38	35.28
Donation	-	0.11
Corporate social responsibility expenses (Refer Note 40)	19.95	25.50
Miscellaneous Expenses	31.76	18.70
Auditor's Remuneration	4.27	2.50
Insurance	7.89	13.92
Key-man Insurance	19.39	15.69
Office Expenses	32.82	20.83
Commission	18.29	43.12
Freight Outward	226.57	277.74
Business Promotion	22.23	29.38
Bad Debt	9.03	1.75
Other Selling Expenes	24.70	86.52
Stores and Spares	260.34	236.64
Total	**1,369.84**	**1,317.32**

NOTE 32 : TAX EXPENSE

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Current Tax		
Current Tax on profits for the year	287.93	18.99
Adjustment for current tax of prior periods	-	0.48
Total current tax expense	**287.93**	**19.47**
Deferred Tax		
Decrease/(increase) in deferred tax assets	-	-
(Decrease)/increase in deferred tax liabilities	(55.09)	149.20
Total deferred tax expense/(benefit)	**(55.09)**	**149.20**
Total Tax Expense	**232.83**	**168.67**

33. FINANCIAL RISK MANAGEMENT

Financial Risk Factors

The Company's principal financial liabilities comprise borrowings, trade and other payables. The main purpose of these financial liabilities is to manage finances for the Company 's operations. The Company has loan and other receivables, trade and other receivables, and cash and short terms deposits that arise directly from its operations. The Company's activities expose it to a variety of financial risks.

i) Market Risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market prices comprise three types of risks: currency rate risk, interest rate risk and other price risks such as equity price risk and commodity risk. Financials instruments affected by market risk includes loans and borrowings, deposits, investments. Foreign currency risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign exchanges rates. Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. This is based on the financial assets and financial liabilities held as of March 31, 2021 and March 31, 2020.

ii) Credit Risk

Credit risk is the risk that a counter party will not meet its obligations under a financial instrument or customer contract, leading to a financial loss.

iii) Liquidity Risk

Liquidity risk is the risk that the Company may not be able to meet its present and future cash and collateral obligations without incurring unacceptable losses.

The Company 's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise potential adverse effects on the Company's financial performance.

Market Risk

The sensitivity analysis excludes the impact of movementsin market variables on the carrying value of post employeement benefit obligations provisions and on the non-financial assets and liabilities. The sensitivity of the relevant statement of Profit and Loss item is the effect of the assumed changes in the respective market risks. The Company's acitivies expose it to a variety of financial risks, including the effects of changes in foreign currency exchange rates and interest rates. However, such effect is not material.

(a) Foreign exchange risk and sensitivity

The company transacts business primarly in Indian Rupee.The company is exposed to foreign exchange risk through its sales in international markets. The company has given unsecured loan to its wholly owned subsidiary company and has foreign currency receivables and is therefore, exposed to foreign exchange risk. The company evaluates foreign currency exposure time to time and follow established risk management policies by taking foreign exchange forward contracts to hedge exposure of foreign currency risk and also some of the foreign currency exposure remains natually hedged The Following table analyses foreign currency risk from financial instruments as of March 31, 2021 and March 31, 2020 :-

(₹ in Lakhs)

Particulars	Currency	As at March 31, 2021	As at March 31, 2020
Financial Assets:-			
Trade Receivables	**USD**	1,554.21	2,661.64
Unsecured Loan / Advance Receivables	**USD**	6.51	128.43
Financial Liabilities:-			
Trade Payables	**USD**	831.62	2,188.65
Net (Assets) / Liabilities		**729.10**	**601.42**

* Trade Receivables and Trade Payables are related to Merchant Trade which is naturally hedged, inward and outward conrolled by EEFC Account.

Particulars of forward contracts taken during the year are given below .

Particulars	Type	No. of Contract	US$ Equivalent (Lakhs)	(₹ in Lakhs)
As at 31st March, 2021	Sell	15.00	21.09	1,550.47
	Buy	-	-	-
As at 31st March, 2020	Sell	23.00	24.78	1,869.34
	Buy	-	-	-

Summary of exchange difference accounted in Statement of Profit & Loss

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Net foreign exchange (gain)/ losses shown under Other Income	354.36	42.27
Net foreign exchange (gain)/ losses shown under OCI	(32.80)	40.24
Total	**321.56**	**82.51**

(b) Interest rate risk and sensitivity

The Company does not have any borrowings on which the interest risk and Sensitivity arises.

Interest rate

The below table demonstrates the borrowings of fixed and floating rate of interest:-

(₹ in Lakhs)

Particulars	Total Borrowings	Floating rate borrowings	Fixed rate borrowings	Weighted average interest rate
INR	8,544.27	8,113.74	75.61	9.25%
Total as at 31 March, 2021	**8,544.27**	**8,113.74**	**75.61**	**9.25%**
INR	8,316.70	8,026.14	92.15	9.75%
Total as at 31 March, 2020	**8,316.70**	**8,026.14**	**92.15**	**9.75%**

(c) Commodity price risk and sensitivity

The company is exposed to the movement in price of key raw materials in domestic markets. The Company enters into contracts for procurement of material most of the transactions are short term fixed price conract.

Credit Risk

The Company is exposed to credit risk from its operating activities (primarily trade receivables). Credit risk arises from the possibility that counter party may not be able to settle their obligations as agreed. To manage this, the Company periodically assesses the financial reliability of customers, taking into account the financial condition, current economic trends, and analysis of historical bad debts and ageing of accounts receivable. Individual risk limits are set accordingly. The Company considers the probability of default upon initial recognition of assets and whether there has been a significant increase in credit risk on an ongoing basis through each reporting period. To assess whether there is a significant increase in credit risk, the company compares the risk of a default occurring on the asset as at the reporting date with the risk of default as at the date of initial recognition. It considers reasonable and supportive forward-looking information.

Cash and Cash Equivalents, Deposit in Banks and other Financial instruments

The Company considers factors such as track record, size of the institution, market reputation and service standards to select the banks with which balances and deposits are maintained. Generally, the balances are maintained with the institutions with which the Company has also availed borrowings. The Company does not maintain significant cash and deposit balances other than those required for its day to day operations. For other financial assets the company monitors ratings, credit spreads and financial strengths of its counterparties.

Based on its ongoing assessment of the counter party's risk, the company adjust its exposures to various counter parties. Based on the assessment there is no impairment in other financial assets.

Liquidity Risk

Liquidity risk is defined as the risk that the Company will not be able to settle or meet its obligations on time or at a reasonable price.The Company's finance department is responsible for liquidity, funding as well as settlement management. In addition, processes and policies related to such risks are overseen by senior management. Management monitors the Company's net liquidity position through rolling forecasts on the basis of expected cash flows.

Maturity profile of financial liabilities

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

(₹ in Lakhs)

As at March 31, 2021	Less than 1 year	Above 1 year	Total
Non Current borrowings	-	2,997.71	2,997.71
Current borrowings	5,187.36	-	5,187.36
Trade payables	5,029.72	-	5,029.72
Other financial liabilities	359.20	25.13	384.33
Total	**10,576.27**	**3,022.85**	**13,599.12**

(₹ in Lakhs)

As at March 31, 2020	Less than 1 year	Above 1 year	Total
Non Current borrowings	-	1,815.37	1,815.37
Current borrowings	6,159.31	-	6,159.31
Trade payables	5,926.28	-	5,926.28
Other financial liabilities	342.02	94.00	436.02
Total	**12,427.61**	**1,909.37**	**14,336.98**

Capital Risk Management

For the purposes of the Company's capital management, capital includes issued capital and all other equity reserves. The primary objective of the Company's Capital Management is to maximize shareholder value. The company manages its capital structure and makes adjustments in the light of changes in economic environment and the requirements of the financial covenants. In order to achieve this overall objective, the Company's capital management, amongst other things, aims to ensure that it meets financial covenants attached to the interest-bearing loans and borrowings that define capital structure requirements. Breaches in meeting the financial covenants would permit the bank to immediately call loans and borrowings. There have been no breaches of the financial covenants of any interest bearing loans and borrowing for reported periods.

Further the company monitors capital using gearing ratio, which is total debt divided by total capital plus debt. as under :-

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Interest-bearing loans and borrowings	8,189.35	8,118.29
Equity & Other Equity	9,994.45	8,782.82
Capital and net debt	18,183.80	16,901.11
Gearing ratio in %	**45.04%**	**48.03%**

34. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES

Set out below is a comparison by class of the carrying amounts and fair value of the company's financial instuments that are recognised in the financial statements.

(₹ in Lakhs)

Particulars	March 31,2021		March 31,2020	
	Carrying Amount	Fair Value	Carrying Amount	Fair Value
Financial assets designated at amortised cost				
Trade Receivables	5,225.58	5,225.58	7,214.99	7,214.99
Cash & cash Equivalents	2,207.68	2,207.68	1,311.65	1,311.65
Bank balances other than above	-	-	-	-
Other Financial assets	1,235.02	1,235.02	847.29	847.29
Total	**8,668.27**	**8,668.27**	**9,373.93**	**9,373.93**
Financial liabilities designated at amortised cost				
Non Current Borrowings	2,997.71	2,997.71	1,815.37	1,815.37
Current Borrowings	5,187.36	5,187.36	6,159.31	6,159.31
Trade payables	5,029.72	5,029.72	5,926.28	5,926.28
Other financial liabilities	384.33	384.33	436.02	436.02
Total	**13,599.12**	**13,599.12**	**14,336.98**	**14,336.98**

Fair Value Hierarchy

The company measures financial instuments at fair value in accordance with the accounting policies mentioned above. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the assets or transfer the liability takes place either:

Fair values are categorised into different levels in a fair value hierarchy based on the inputs used in the valution techniques as follows:-

1. **Level 1:** Quoted prices/ NAV for Identical instuments in an active market.
2. **Level 2:** Directly or indirectly observable market inputs, other than level 1 inputs; and
3. **Level 3:** Inputs which are not based on observable market data.

When measuring the fair value of an asset or a liability, the Company uses observable market data as far as possible. If the inputs used to measure the fair value of an asset or a liability fall into different levels of the fair value hierarchy, then the fair value measurement is categorised in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement. The company recognises transfers between levels of the fair value hierarchy at the end of the reporting period during which the change has occurred.

Fair Value Technique

1) The carrying amounts of trade receivables, trade payables and cash and cash equivalents are considered to be the same as their fair values due to their short term nature.
2) The fair value of security deposit given was calculated based on cash flows discounted using the current lending rate. They are classified as a level 2 fair values in the fair value hierarchy due to the inclusion of unobservable inputs inlcuding counterparty credit risk.

3) For financial assets and liabilities that are measured at fair value, the carrying amounts are equal to the fair values.

The following table provides the fair value measurement hierarchy of Company's asset and liabilities, grouped into level 1 to Level 2 as described below:-

Assets/ Liabilities measured at fair value (Accounted)

(₹ in Lakhs)

Particulars	As at March 31, 2021		
	Level 1	Level 2	Level 3
Financial Assets			
Security deposits'	-	104.57	-

(₹ in Lakhs)

Particulars	As at March 31, 2020		
	Level 1	Level 2	Level 3
Financial Assets			
Security deposits'	-	100.36	-

(₹ in Lakhs)

Particulars	As at March 31, 2021		
	Level 1	Level 2	Level 3
Financial Liabilities			
Borrowings-fixed rate	-	75.61	-
Other financial liabilities	-	384.33	-

(₹ in Lakhs)

Particulars	As at March 31, 2020		
	Level 1	Level 2	Level 3
Financial Liabilities			
Borrowings-fixed rate	-	92.15	-
Other financial liabilities	-	436.02	-

During the year ended 31st March 2021 and 31st March 2020, there were no transfers between level 1 and Level 2 fair value measurements and no transfer into and out of Level 3 vair value measurements. There is no transaction/ balance under Level 3.

Following table describes the valuation techniques used and key inputs for valaution under fair value hierarchy as of March 31, 2021 and March 31, 2020 respectively:-

(a) Assets/ Liabilities measured at Fair value

Particulars	Fair Value hierarchy	Valution technique	Inputs used
Security deposits	Level 2	Discounted Cash Flow	Prevailing interest rates in market, Future payouts.

Particulars	Fair Value hierarchy	Valution technique	Inputs used
Borrowings fixed	Level 2	Discounted Cash Flow	Prevailing interest rates in market, Future payouts.
Other Financial liabilities	Level 2	Discounted Cash Flow	Prevailing interest rates in market, Future payouts.

35. SEGMENT REPORTING

The Company is carrying out the activity of Manufacturing of Pipes and Trading of steel related products. However as its wholly owned subisidiary company in Dubai viz. RST International Trading FZE is pursuing the business of Trading of Steel Products and Non Ferrous Metal Products. Company has eastablished a new foreign company namely RST Industries Limited in Lagos, Nigeria through the investment by its wholly owned subsidiary RST International Trading FZE, Dubai in the same line of business. The Segment wise Results of Manufacturing and Trading are given below :

Statement of Segment wise Revenue, Results, Assets & Liabilities:-

(₹ in Lakhs)

Particulars	Quarter ended March 31,2021	Quarter ended Dec 31,2020	Quarter ended March 31,2020	Year ended March 31,2021	Year ended March 31,2020"
Segment Total Revenue					
Manufacturing - Steel Pipe	9,713.49	10,448.37	4,048.23	31,177.44	28,418.23
Trading- Steel Products	4,654.21	5,013.07	4,492.99	16,479.90	7,227.73
Total	**14,367.70**	**15,461.44**	**8,541.22**	**47,657.35**	**35,645.96**
Segment Results					
Manufacturing - Steel Pipe	480.86	447.37	431.34	1,264.48	1,075.44
Trading- Steel Products	679.58	100.71	50.20	975.94	98.99
Total	**1,160.45**	**548.08**	**481.54**	**2,240.42**	**1,174.44**
Less : Finance Cost	177.07	182.23	225.63	769.78	963.14
Add : Exceptional Items	-	-	-	-	-
Profit before Tax	**983.38**	**365.85**	**255.91**	**1,470.65**	**211.30**
Segment Assets					
Manufacturing - Steel Pipe	19,342.23	17,101.84	20,201.43	19,342.23	20,127.80
Trading- Steel Products	5,413.60	5,038.45	3,625.12	5,413.60	3,625.13
	24,755.84	**22,140.29**	**23,826.55**	**24,755.84**	**23,752.93**
Segment Liabilities					
Manufacturing - Steel Pipe	10,862.89	12,902.50	14,970.12	10,862.89	14,970.12
Trading- Steel Products	3,898.50	4,133.97	2,902.40	3,898.50	2,902.40
	14,761.39	**17,036.47**	**17,872.52**	**14,761.39**	**17,872.52**

36. INCOME TAX EXPENSES

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
1	Current Tax	287.93	18.99
2	Deferred Tax	(55.09)	149.20
3	Previous year taxation adjustments	-	0.48
4	MAT credit entilement	-	-
	Total	**232.83**	**168.67**

Effective Tax Reconciliation

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
	Net Loss/ Income before Taxes	1,470.65	284.94
	Enacted tax rates Computed Tax	25.168%	25.168%
	Income (Expense)	370.13	71.71
	Increase /(Reduction) in taxes on account of :-		
1	Amount Not taxable/ exempt	(155.62)	(52.73)
2	Previous year taxation adjustments	-	0.48
3	Deferred tax	(55.09)	149.20
	Total	**159.43**	**168.67**
	Effective Tax Rate	**11%**	**59%**

37. DEFERRED TAX

The analysis of deferred tax accounted for in the statementof Profit and Loss is as follows:-

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Book base and tax base of Fixed Assets	44.96	167.32
(Disallowance)/ Allowance (net) Under Income Tax	(102.95)	(18.44)
Ind-As adjustments	(2.23)	0.32
Total	**(60.21)**	**149.20**

Component of tax accounted in OCI

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Deferred Tax Gain/ (Loss) on defined benefit	(2.23)	0.32
Total	**(2.23)**	**0.32**

38. RETIREMENT BENEFIT OBLIGATION

I. Expenses recognised for Defined Contribution plan

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Company's Contribution to provident fund	9.05	13.00
Company's Contribution to ESI	3.38	5.45
Company's Contribution to superannuation fund	-	-
Total	**12.44**	**18.45**

Below tables sets forth the changes in the projected benefit obligation and plan assets and amounts recognised in Balance sheet as of March 31, 2021 and March 31, 2020, being the respective measurement dates:-

II. Movement in Defined benefit obligation

(₹ in Lakhs)

Particulars	Gratuity (unfunded)	Leave encashment (unfunded)
Present value of obligation-April 1, 2019'	65.87	7.61
Current Service Cost	7.79	1.49
Interest Cost	5.05	0.58
Benefits paid	(5.09)	(1.39)
Remeasurements-actuarial loss/ (gain)	1.32	0.64
Present value of obligation-March 31, 2020'	**74.94**	**8.93**
Present value of obligation-April 1, 2020	74.93	8.93
Current Service Cost	6.35	1.53
Interest Cost	5.07	0.60
Benefits paid	-	(0.04)
Remeasurements-actuarial loss/ (gain)	(8.86)	0.86
Present value of obligation-March 31, 2021'	**77.49**	**11.89**

III. Movement in Plan Assets-Gratuity

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Fair Value of plan assets at beginning of year'	-	-
Expected return on plan assets	-	-
Employer contributions	-	-
Benefits paid	-	-
Amount received on redemtion of plan assets	-	-
Acquisitions/ Transfer in / Transfer out	-	-
Acturial gain / (loss)	-	-
Fair Value of plan assets at end of year	-	-
Present value of obligation Net Funded status of plan	-	-
Actual return on plan assets	-	-

IV. Recognised in Profit & Loss

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
Current Service Cost	7.79	1.49
Interest Cost	5.05	0.58
Expected return on plan assets	-	-
Remeasurements-actuarial loss/ (gain)	1.32	0.64
Past Service cost	-	-
For the year ended March 31, 2020	**14.16**	**2.71**
Current Service Cost	6.35	1.95
Interest Cost	5.07	0.60
Expected return on plan assets	-	-
Remeasurements-actuarial loss/ (gain)	(8.86)	0.86
Past Service cost	-	-
For the year ended March 31, 2021	**2.56**	**3.42**
Actual return on plan assets	-	-

V. Recognised in other comprehensive income

(₹ in Lakhs)

Particulars	Employee Benefit Eexpenses
Remeasurement-Actuarial loss/ (gain)	1.32
For the year ended March 31, 2020	**1.32**
Remeasurement-Actuarial (loss)/ gain	(8.86)
For the year ended March 31, 2021	**(8.86)**

VI. The principal actuarial assumptions used for estimating the Company's defined benefit obligation are set out below:

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Attrition rate	3%	3%
Discount rate	6.76	6.76
Expected rate of increase in Compensation levels	6.00	6.00
Expected rate of Return on plan Assets	NA	NA
Mortality rate	100% of IALM (2012-14)	100% of IALM (2012-14)
Expected Average remaining working lives of employees (years)	16.85	19.12

The assumptions of future salary increase takes into account the inflation, seniority, promotion and other relevant factors such as supply and demand in employment market.

VII. SensitivityAnalysis:-

For the year ended March 31, 2021

(₹ in Lakhs)

Particulars	Change in Assumption	Effect on Gratuity obligation	Effect on compensated absence obligation
Discount rate	0.50%	-2.74	-0.47
	-0.50%	2.98	0.52
Salary Growth rate	0.50%	2.48	0.52
	-0.50%	-2.29	-0.48
Withdrawal rate*	-	-	-

* Sensitivities due to mortality & withdrawals are not material & hence impact of change due to these not calculated.

For the year ended March 31, 2020

(₹ in Lakhs)

Particulars	Change in Assumption	Effect on Gratuity obligation	Effect on compensated absence obligation
Discount rate	0.50%	-2.98	-0.38
	-0.50%	3.25	0.42
Salary Growth rate	0.50%	3.26	0.42
	-0.50%	-3.01	-0.39
Withdrawal rate	-	-	-

The above sensitivity analysis is based on a change in an assumption while holding all other assumptions constant. In practice , this is unlikely to occur, and changes in some of the assumptions may be correlated. When calculating the sensitivity of the defined benefit obligation to significant acturial assumptions the same method (projected unit credit method) has been applied as when calculating the defined benefit obligation recognised within the Balance Sheet.

VIII. History of experience adjustments is as follows:

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
For the year ended March 31, 2021		
Plan Liabilities-loss / (gain)	-	-
Plan Assets-loss / (gain)	-	-
For the year ended March 31, 2020		
Plan Liabilities-loss / (gain)	-	-
Plan Assets-loss / (gain)	-	-

Estimate of expected benefits payments (In absolute terms i.e. undiscounted)

(₹ in Lakhs)

Particulars	Gratuity
01 Apr 2020 to 31 Mar 2021	29.10
01 Apr 2021 to 31 Mar 2022	2.51
01 Apr 2022 to 31 Mar 2023	0.87
01 Apr 2023 to 31 Mar 2024	0.76
01 Apr 2024 to 31 Mar 2025	1.88
01 Apr 2025 to 31 Mar 2026	2.20
01 Apr 2026 Onwards	39.37

IX. Statement of Employee benefit provision

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Gratuity	77.50	74.94
Compensated absences	11.89	8.93
Other employee benefits	-	-
Total	**89.39**	**83.87**

X. Current and non-current provision for Gratuity and Leave Encashment

For the year ended March 31, 2021

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
Current Provision	29.10	4.54
Non Current Provision	48.40	7.36
Total Provision	**77.50**	**11.89**

For the year ended March 31, 2020

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
Current Provision	26.58	3.37
Non Current Provision	48.36	5.56
Total Provision	**74.94**	**8.93**

XI. Employee benefits expenses

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Salary and Wages	685.15	654.21
Costs-defined contribution plan	18.09	35.11
Welfare expenses	18.77	7.30
Total	**722.00**	**696.62**

(Figures in no.)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Average no of people employed	95	112

OCI presentation of defined benefit plan

a) Gratuity is in the nature of defined benefit plan, re-measurement gains / (losses) on defined benefit plans is shown under OCI as Items that will not be reclassified to profit or loss and also the income tax effect on the same.

b) Leave encashment cost is in the nature of short term employee benefits.

Presentation in Statement of Profit and Loss and Balance Sheet

Expenses for Service cost , net interest on net defined benefit liability (asset) is charged to Statement of Profit & Loss.

IND AS 19 do not require seggregation of provision in current and non-current, however net defined liability (Assets) is shown as current and non-current provision in balance sheet as per IND AS 1.

Actuarial liability for short terms benefits (leave encashment cost) is shown as current and non-current provision in balance sheet.

When there is surplus in defined plan, the company is required to measure the net defined benefit at the lower of the surplus in the defined benefit plan and the assets ceiling, determined using the discount rate specified i.e. market yield at the end of the reporting period on government bonds, this is applicable for domestic companies, foreign company can use corporate bonds rate.

39. OTHER DISCLOSURES

a) Statutory Auditors Remuneration, Tax Auditors Remuneration, GST Auditors Remuneration, Cost Auditors Remuneration and Secretarial Auditors Remuneration :-

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
I	**Statutory Auditors Fees**		
	a) Audit Fees	4.02	2.50
	b) Certification /Others	-	-
	c) Out of Pocket Expenses	0.21	0.21
	Total	**4.22**	**2.71**
II	**Tax Auditors Fees**		
	a) Audit Fees	2.25	2.25
	Total	**2.25**	**2.25**
III	**GST Auditors Fees**		
	a) Audit Fees	-	0.75
	Total	**-**	**0.75**
IV	**Cost Auditors Fees**		
	a) Audit Fees	0.35	0.35
	Total	**0.35**	**0.35**
V	**Secretarial Auditors Fees**		
	a) Audit Fees	0.40	0.40
	Total	**0.40**	**0.40**

b) The company has not proposed any dividend to its shareholders during the year.

c) The Company has not given any loan or given any guarantee with respect to the parties covered under section 186 (4) of the Companies Act, 2013.

c) Certain balances of trade receivables, loan and advances, trade payable and other liabilities are subject to confirmation and / or reconciliation.

40. EXPENDITURE INCURRED ON CORPORATE SOCIAL RESPONSIBILITY:

Details of expenditure on Corporate Social Responsibility Activities as per section 135 of the Companies Act, 2013 and with schedule III are as below:

(₹ in Lakhs)

S.No.	Particulars	For the year ended March 31, 2021	For the year ended March 31, 2020
A	Gross amount required to be spent by the Company during the year	19.95	25.50
B	Amount spent during the year	19.95	25.00
(I)	Construction / Acquisition of Asset	NIL	NIL
(II)	On purpose other than (i) above-		
	a) Rural Development	-	-
	b) Women Education	-	-
	c) Women Empowerment and Skill Development	19.95	25.00

41. CONTINGENT LIABILITES NOT PROVIDED FOR IN RESPECT OF:

(₹ in Lakhs)

S.No.	Particulars	For the year ended March 31, 2021	For the year ended March 31, 2020
1)	Disputed liability of Entry tax	69.90	69.90
3)	Guarantees issued by Company's Bankers on behalf of the Company	2,537.29	2,089.42
4)	Letter of Credit Outstanding	2,323.42	2,364.48

42. There are no amounts due and outstanding to be credited to Investor Education and Protection Fund as at March, 2021.

43. Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances) is ₹ NIL (Previous Year ₹ NIL).

44. Exceptional item consists of Loss (Net) of ₹ NIL (Previous year Loss (Net) of ₹ NIL on the provision of employees benefits pertaining to previous years.

45. Based on the intimation received from supplier regarding their status under the Micro, Small and Medium Enterprises Development Act, 2006, the required disclosure is given below:-

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
1	Principal Amount due outstanding	49.53	-
2	Interest due on (1) above and unpaid	0.07	-
3	Interest paid to the supplier	-	-
4	Payments made to the supplier beyond the appointed day during the year	-	-
5	Interest due and payable for the period of delay	-	-
6	Interest accrued and remaining unpaid'	-	-
7	Amount of further interest remaining due and payable in succeeding year	-	-

46. PURSUANT TO IND AS-116-'LEASES', THE FOLLOWING INFORMATION IS DISCLOSED:

Following are the changes in the carrying value of right of use assets for the year ended March 31, 2021:

(₹ in Lakhs)

Particulars	Category of ROU Asset "Land"	Category of ROU Asset "Commercial Vehicles"	Total
Balance as at April 1, 2020	**65.24**	**96.75**	**161.99**
Reclassified on adoption of Ind AS 116			
Additions	-	-	-
Deletions	-	-	-
Depreciation	1.59	16.02	17.61
Balance as at March 31, 2021	**63.65**	**80.73**	**144.39**

The aggregate depreciation expense on ROU assets is included under depreciation and amortization expense in the statement of Profit and Loss.

The following is the break-up of current and non-current lease liabilities as at March 31, 2021:

Included in the Financial Statements as

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Current lease liability	24.98	24.25
Non-current lease liability	15.67	39.58
Total	**40.64**	**63.83**

The following is the movement in lease liabilities during the year ended March 31, 2021:

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Balance at the beginning	63.83	46.55
Finance Cost accrued during the period	4.52	5.92
Deletions	-	-
Additions	-	38.40
Payment of lease liabilities	27.34	27.04
Total	**41.01**	**63.83**

The table below provides details regarding the contractual maturities of lease liabilities as at March 31, 2021 on an undiscounted basis:

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Less than one year	70.91	53.95
One to Five Years	69.31	69.31
More than Five Years	-	-
Total	**140.22**	**123.26**

The Company does not face a significant liquidity risk with regard to its lease liabilities as the current assets are sufficient to meet the obligations related to lease liabilities as and when they fall Rental expenses recorded for short-term leases was ₹ 70.91 Lakhs for the year ended March 31,2021 and ₹ 43.33 Lakhs for the year ended March 31,2020 respectively

47. Disclosure pursuant to Ind AS 20 "Accounting for Government Grants and Disclosure of Government Assistance.

The Company's exports qualify for various export benefits offered in the form of duty credit scrips under foreign trade policy framed by Department General of Foreign Trade India (DGFT). Income accounted towards such export incentives and duty drawback amounts to ₹ 67.82 Lakh (previous year: ₹ 43.12 Lakh)

48. RELATED PARTY TRANSACTIONS

In accordance with the requirements of IND AS 24, on related party disclosures, name of the related party, related party relationship, transactions and outstanding balances including commitments where control exits and with whom transactions have taken place during reported periods, are:

List of related parties

1. A. Key Management Personnel

S.No.	Name	Designation
1	Mr. Naresh Kumar Bansal	Managing Director
2	Mr. Richi Bansal	Director & CEO
3	Mr. Surender Kumar Sharma	Director
4	Mr. Rajeev Kumar Agarwal	Chief Financial Officer
5	Mr. Kapil Datta	Company Secretary

B. Non-executive and Independent Directors

S.No.	Name	Designation
1	Mr.Bharat Bhushan Sahny	Independent Director
2	Mr.Charat Sharma(Till Sept 4,2020)	Independent Director
3	Mr.Jai Prakash Gupta (W.e.f. Sept 4,2020)	Independent Director
4	Ms.Anju Gupta	Independent Director

2. Entities where key management personnel and their relatives exercise significant influence

S.No.	Entities	Principal activities
1	M/s Advance Hightech Agro Products Pvt. Ltd.	Chemicals Manufacturer
2	M/s Ravi Developers Pvt. Ltd.	Agriculture Goods Producer
3	M/s Pir Panchal Construction Pvt. Ltd., Joint Venture	Erection of Electric Poles
4	M/s Virinder Engineering and Chemical Pvt. Ltd.	Warehouse Renting
5	M/s Naresh Kumar & Sons HUF	HUF

3. Relatives of key management personnel where transactions have taken place

S.No.	Name of Relatives	Relationship
1	Mrs.Kumud Bansal	Spouse of Mr. Naresh Kumar Bansal
2	Mr.Nikhil Bansal	Son of Mr. Naresh Kumar Bansal

4.The following transactions were carried out with the related parties in the ordinary course of business

(₹ in Lakhs)

S.No.	Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
I	**Payment of Rent**		
	Mrs. Kumud Bansal	12.00	12.00
	Mr. Richi Bansal	-	1.30
	Mr. Nikhil Naresh Bansal	-	1.30
II	**Payment of Interest**		
	M/s Advance Hightech Agro Products Pvt. Ltd.	2.90	2.89
III	**Receipt of Interest**		
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	60.18	58.55
IV	**Sales of finished goods**		
	M/s Virinder Engineering and Chemicals Pvt. Ltd.	0.19	2.81
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	-	116.06

(₹ in Lakhs)

S.No.	Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
V	**Unsecured Loan given**		
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	10.00	395.00
	M/s Ravi Developers Pvt. Ltd.	1.10	-
VI	**Unsecured Loans received back**		
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	10.00	85.00
VII	**Unsecured Loan taken**		
	Mr. Naresh Kumar Bansal	698.28	273.74
	Mr. Richi Bansal	16.25	7.44
	Mr. Nikhil Naresh Bansal	10.67	2.95
VIII	**Unsecured Loans repaid**		
	Mr. Naresh Kumar Bansal	518.48	505.08
	M/s Advance Hightech Agro Products Pvt. Ltd.	-	9.00
	Mr. Richi Bansal	34.23	72.44
	Mr. Nikhil Naresh Bansal	10.67	2.95
IX	**Payment of Compensation***		
	Mr. Nikhil Bansal	9.29	9.60
X	**Director sitting Fee's**		
	Mr. Bharat Bhushan Sahny	0.40	0.30
	Ms. Anju Gupta	0.35	0.35
	Mr. Jai Prakash Gupta	0.20	0.10

Compensation of Key Management Personnel of the Company

(₹ in Lakhs)

S.No.	Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
	Payment of Compensation*		
I	Mr. Naresh Kumar Bansal	46.01	48.00
II	Mr. Richi Bansal	40.31	42.00
III	Mr. Surender Kumar Sharma	3.37	3.20
IV	Mr. Rajeev Kumar Agarwal	18.22	19.00
V	Mr. Kapil Datta	5.06	5.16

A. Short-term benefits comprises the expenses recorded under the head employee benefit expenses (eg. Salary and wages, contribution to provident and other funds and staff welfare expenses).

B. The liability for gratuity and compensated absences are provided on actuarial basis for the Company as a whole, amounts accrued pertaining to key managerial personnel are not included above.

C. The remuneration of directors and key executives is determined by the remuneration committee having regard to the performance of individuals and market trends.

5. Balance at the end of the year

(₹ in Lakhs)

Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
Receivable amount of unsecured loan		
M/s Pir Panchal Construction Pvt. Ltd., Joint Venture	612.87	558.55
M/s Ravi Developers Pvt. Ltd.	-	0.50
Payable amount of unsecured Loans & Interest		
M/s Advance Hightech Agro Products Pvt. Ltd.	50.17	48.59
Mr. Naresh Kumar Bansal	339.81	160.00
Mr. Richi Bansal	-	17.98

The transactions with the related parties are made on terms equivalent to those that prevail in arm's length transactions. This assessment is undertaken each financial year through examining the financial position of the related party and the market in which the related party operates. Outstanding balances at the year-end are unsecured and settlement occurs in cash.

49. Earning Per Share (EPS)

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
a.	Net Profit / Loss after tax as per Profit and Loss for basic EPS	1,211.64	81.88
b.	Add: Interest Expenses on potential equtiy shares (net of tax)	-	-
c.	Net Profit / Loss after tax as per Profit and Loss for diluted EPS	1,211.64	81.88
d.	No of Equity Share Outstanding at the end of the year	16,794,000	16,794,000
e.	Weighted Average No. of Equity Shares for basic EPS	16,794,000	16,794,000
f.	Weighted Average No. of Potential Equity Shares	-	-
g.	Weighted Average No. of Equity Shares for diluted EPS	16,794,000	16,794,000
h.	Basic EPS per Share (in ₹)	7.21	0.49
i.	Diluted EPS per Share (in ₹)	7.21	0.49
j.	Face Value Per share (in ₹)	5.00	5.00

The Company does not have any potential equity shares and thus, weighted average number of equity shares for the computation of Basis EPS and Diluted EPS remains same.

50. Prior period income booked amounting to ₹ 73.63 Lakhs has been reversed and the same has been treated retrospectively by restating the financial statement of FY 2019-2020 for the comparision purpose according to Ind AS 8' Accounting Policies, Changes in Accounting Estimates and Errors'.

51. The Group has practice of getting balance confirmations from its Debtor, Creditor and other parties on annual basis. However, the confirmations of balances as on 31.03.2021 with respect to certain parties could not be received due to current situation of pandemic COVID-19 thereby the Government of various states have imposed lockdown along with several restrictions, which is still going on, hence to that extent the balances have been taken as per book balances in the absence of balance confirmations.

As and when the confirmations with respect to the balances are received, the reconciliation would be made and the adjustments, if any, on this account would be recorded in the books of account.

52. The Group has evaluated the impact of COVID pandemic on the operations of the Company, revenue, inventories, investments, property, plant & equipment, current borrowings and trade payables. The management has considered the possible effects, if any, on the carrying amounts of these assets and liabilties up to the date of approval of these results. As per the management's current assessment, no significant impact on carrying amounts of inventories, tangible assets, trade receivables, investments and other financial assets is expected, and management continue to monitor changes in future economic conditions. The Group values its inventory of finished goods at lower of cost and Net realisable value. The Net realisable value of all the inventories of the Group is higher than their cost based on subsequent sales taken place till date and their present market prices. Hence there is no impairment risk in the inventory.

53. Previous year figures have been regrouped/ rearranged, wherever considered necessary to conform to current year's classification.

54. Notes 1 to 52 are annexed to and form an integral part of financial statements.

As per our attached report of even date

For Alok Mittal & Associates
Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

Sd/-
Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Kapil Datta
(Company Secretary)

RAMA STEEL TUBES LTD
CIN No L27201DL1974PLC007114
B-5, THIRD FLOOR, MAIN ROAD, GHAZIPUR , NEW DELHI-110066

UNAUDITED STANDALONE BALANCE SHEET AS AT DECEMBER 31, 2021

(₹ in Lakhs)

Particulars	Note	As at Dec 31, 2021	As at March 31, 2021
ASSETS			
Non-current assets			
Property, Plant and Equipment	3	3,090.46	3,244.82
Capital Work in Progress	3	388.29	183.83
Investment Properties	4	416.55	384.13
Intangible Assets	5	1.85	2.01
Right of Use Assets	6	197.47	126.66
Investment in Subsidiaries, Associates & Joint Ventures	7	1,416.95	1,405.76
Financial assets			
(i) Investments	8	0.61	0.61
(ii) Other financial assets	9	1,395.89	2,307.31
Deferred tax assets(net)	19	-	-
Other non current assets	10	-	-
Total non current assets		**6,908.08**	**7,655.13**
Current Assets			
Inventories	11	4,722.12	5,718.29
Financial Assets			
(i) Trade Receivables	12(a)	4,654.56	3,485.52
(ii) Cash and Cash Equivalents	12(b)	334.63	483.55
(iii) Bank balances other than (ii) above		-	-
(iv) Other Financial Assets	12(c)	19.42	22.34
Other current assets	13	3,407.45	1,951.34
Total current assets		**13,138.19**	**11,661.04**
Total Assets		**20,046.26**	**19,316.18**
Equity and Liabilities			
Equity			
Equity Share Capital	14	839.70	839.70
Other Equity	15	8,726.49	8,007.13
Total equity		**9,566.19**	**8,846.83**
		-	
Liabilities			
Non-current liabilities			
Financial Liabilities			
(i) Borrowings	16	2,347.87	2,425.80
(ii) Other financial liabilities	17	55.37	25.13
Provisions	18	43.03	52.42
Deferred Tax Liabilities (Net)	19	175.10	195.82
Total non-current liabilities		**2,621.37**	**2,699.17**
Current Liabilities			
Financial Liabilities			
(i) Borrowings	20(a)	5,436.43	4,998.90
(ii) Trade Payables	20(b)	1,721.93	2,199.62
(iii) Other Financial Liabilities	20(c)	210.99	194.25
Provisions	21	33.22	33.22
Other Current Liabilities	22	234.16	264.88
Current Tax Liability(net)	23	221.97	79.30
Total current liabilities		**7,858.69**	**7,770.18**
Total equity and liabilities		**20,046.26**	**19,316.18**

See accompanying notes to the Standalone financial statements

For and On Behalf of the Board

Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Richi Bansal
(Director)
DIN: 00119206

Rajeev Kumar Agarwal
(Chief Financial Officer)

Kapil Datta
(Company Secretary)

Place : Delhi
Date : Feb 14, 2022

RAMA STEEL TUBES LTD
B-5, THIRD FLOOR, MAIN ROAD, GHAZIPUR , NEW DELHI-110066
CIN No L27201DL1974PLC007114

UNAUDITED STANDALONE STATEMENT OF PROFIT OR LOSS FOR THE PERIOD ENDED DECEMBER 31, 2021

(₹ in Lakhs)

Particulars	Notes	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Income			
Revenue from operations	24	32,177.49	32,571.00
Other income	25	276.13	312.47
Total Income		**32,453.62**	**32,883.47**
Expenses:			
Cost of Materials consumed	26	26,871.98	27,603.48
Purchase of stock-in-trade (traded goods)	27	3,627.34	3,666.48
Changes in inventories of finished goods, work-in-progress and stock-in-Trade	27	(1,406.34)	(1,325.37)
Employee Benefit Expense	28	574.42	498.72
Financial Costs	29	588.27	610.22
Depreciation and Amortization	30	237.38	265.74
Other Expenses	31	1,104.71	1,026.35
Total expenses		**31,597.75**	**32,345.62**
Profit before share of net profits of investments in Associates and Joint Ventures		855.88	537.86
Share of net profits of associates and joint ventures accounted for using the equity method		61.18	140.44
Profit before tax		**917.05**	**678.29**
Tax expense:	32		
(a) Current tax		225.36	145.31
(b) Deferred tax Charge		(22.48)	(4.84)
(c) Income Tax of earlier year		-	-
Total Tax Expense		**202.88**	**140.47**
Profit/(Loss) for the Year		**714.18**	**537.82**
Other Comprehensive Income(OCI)			
Items that will not be reclassified to Profit & Loss subsequently			
-Remeasurement of the Defined Benefit Plans to Employees		6.94	8.76
-Income Tax relating to Items that will not be reclassified to Profit & Loss		(1.75)	(2.20)
Items that will be reclassified to Profit & Loss subsequently			
-Exchange Difference on translation of Foreign operations		-	-
-Income Tax relating to Items that will be reclassified to Profit & Loss		-	-
Total Other comprehensive Income for the Year		**5.19**	**6.56**
Total Comprehensive Income for the year		**719.37**	**544.38**
Earnings per share			
Basic Earnings per share		**4.28**	**3.24**
Diluted earnings per share		**4.28**	**3.24**

See accompanying notes to the Standalone financial statements

For and On Behalf of the Board

Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Richi Bansal
(Director)
DIN: 00119206

Rajeev Kumar Agarwal
(Chief Financial Officer)

Kapil Datta
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Place : Delhi
Date : Feb 14, 2022

RAMA STEEL TUBES LTD
B-5, THIRD FLOOR, MAIN ROAD, GHAZIPUR , NEW DELHI-110066
CIN No L27201DL1974PLC007114
UNAUDITED STANDALONE STATEMENT OF CHANGES IN EQUITY FOR THE PERIOD ENDED DECEMBER 31, 2021

a. Equity share capital (₹ in Lakhs)

Particulars	Amount
As at March 31, 2020	**839.70**
Equity shares issued during the Year	-
As at March 31, 2021	**839.70**
Equity shares issued during the 9 Months	-
As at December 31, 2021	**839.70**

b. Other equity (₹ in Lakhs)

Particulars	Reserves and Surplus				Money recd. against Share Warrants	Total
	General Reserve#	Retained Earnings	Securities Premium Reserve^	Capital Reserve		
Balance as at March 31, 2020	**1,277.28**	**3,783.56**	**2,176.20**	**225.70**	-	**7,462.74**
Profit for the year	-	537.82	-	-	-	537.82
Other comprehensive income for the year						
-Remeasurement of the Defined Benefit Plans to Employees	-	6.56	-	-	-	6.56
-Transfer from Retained Earnings to capital reserve on account of foreiture of Money Recd. Against share Warrants	-	-	-	-	-	-
-Exchange Difference on Foreign Currency Translation	-	-	-	-	-	-
-Transfer from Retained Earnings to General Reserves	-	-	-		-	-
Balance as at March 31, 2021	**1,277.28**	**4,327.94**	**2,176.20**	**225.70**	-	**8,007.13**
Profit for the 9 Months	-	714.18	-	-	-	714.18
Other comprehensive income for the 9 Months						
-Remeasurement of the Defined Benefit Plans to Employees	-	5.19	-	-	-	5.19
-Exchange Difference on Foreign Currency Translation	-	-	-	-	-	-
-Transfer from Retained Earnings to General Reserves	-	-	-		-	-
Balance as at December 31, 2021	**1,277.28**	**5,047.31**	**2,176.20**	**225.70**	-	**8,726.49**

#General Reserve is used from time to time to transfer profits from retained earnings for appropriation purposes. As the General Reserve is created by the transfer from one component of equity to another and is not a item of other comprehensive income, items included in the General Reserve will not be reclassified subsequently to Profit or Loss.

^Securties Premium Reserve is used to record the premium on issue of shares. This is utilised in accordance with the provisions of the Companies Act, 2013.

The above statement of changes in equity should be read in conjunction with the accompanying notes

For and on behalf of the Board

Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Rajeev Kumar Agarwal
(Chief Financial Officer)

Richi Bansal
(Director)
DIN: 00119206

Kapil Datta
(Company Secretary)

Place : Delhi
Date : Feb 14, 2022

RAMA STEEL TUBES LTD
B-5, THIRD FLOOR, MAIN ROAD, GHAZIPUR , NEW DELHI-110066
CIN No L27201DL1974PLC007114

UNAUDITED STANDALONE STATEMENT OF CASH FLOWS FOR THE PERIOD ENDED DECEMBER 31, 2021

(₹ in Lakhs)

S No.	Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
A.	**Cash Flow from operating activities**		
	Net Profit before Tax	917.05	678.29
	Adjustments For		
	Depreciation and amortisation expense	237.38	265.74
	Finance Cost	588.27	610.22
	Remeasurement of the Defined Benefit Plans to Employees routed through OCI	6.94	8.76
	Foreign Exchange Fluctuation directly debited to Exchange Reserve	-	-
	Share of Profit in Joint Venture	(61.18)	(140.44)
	Interest Income on FD with banks	(162.88)	(214.03)
	Loss/(Gain) on sale of property,plant and equipment	0.33	-
	Operating Profit before working capital changes	**1,525.93**	**1,208.54**
	Adjustment for Working Capital Changes		
	Decrease/(Increase) in Inventories	996.18	(2,973.28)
	Decrease/(Increase) in Trade receivables	(1,169.04)	2,019.69
	Decrease/(Increase) in other financial and non-financial assets	(541.77)	1,009.46
	(Decrease)Increase in Trade Payables	(477.70)	(835.63)
	(Decrease)/Increase in other financial, non financial liabilities and provisions	6.87	42.31
	Cash generated from Operations	340.47	471.08
	Net Direct Taxes paid	(82.70)	(75.00)
	Net Cash flow from operating activitites	**257.77**	**396.08**
B.	**CASH FLOW FROM INVESTING ACTIVITIES**		
	Sale / (Purchase) of Property,Plant and equipment (Including Capital Work in Progress)	(346.50)	(817.55)
	Addition / Deletion to right of Use Assets	-	-
	Addition to Investment Properties	(45.26)	(36.00)
	Addition to Intangible Assets	(0.23)	(1.50)
	Increase in Investment in Subsidiaries, Associates & Joint Ventures	(11.18)	(140.44)
	Proceeds from sale of Property, Plant and Equipments	1.09	5.27
	Proceeds from sale of Investment Properties	-	-
	Share of Profit in Joint Venture	61.18	140.44
	Interest received	162.88	214.03
	Net cash flow from investing Activities	**(178.01)**	**(635.75)**
C.	**CASH FLOW FROM FINANCING ACTIVITIES**		
	Issue of Equity Shares including Share Premium & Share Warrants	-	-
	Redemption of Preference Shares	-	-
	Proceeds from Borrowings (Secured)	359.59	681.33
	Interest paid	(588.27)	(610.22)
	Net Cash from financing Activities	**(228.67)**	**71.12**
	NET INCREASE /(DECREASE) IN CASH AND CASH EQUIVALENT	(148.91)	(168.54)
	Opening balance of Cash & Cash equivalents(April 1, 2020/April 1, 2019)	483.54	652.09
	Closing balance of Cash & cash equivalent	**334.63**	**483.54**
	Cash and cash Equivalents comprises		
	Cash in Hand	1.71	3.45
	Balance with Scheduled Banks		
	-In current Accounts	40.05	268.62
	-In Fixed Deposit Accounts with original maturity of less than 3 months	292.87	211.48
	Total Cash and Cash Equivalents	**334.63**	**483.54**
	Total		

Notes:

1 The above Cash Flow Statement has been prepared under the indirect method as set out in IND AS 7-Statement of Cash flows notified under Section 133 of the Companies Act,2013(The Act)[Companies(Indian Accounting Standrads) Rules,2015, as amended.

2 Figures in Bracket indicate cash outflow

See accompanying notes to the Standalone financial statements

For and On Behalf of the Board

Naresh Kumar Bansal
(Managing Director)
DIN: 00119213

Rajeev Kumar Agarwal
(Chief Financial Officer)

Richa Bansal
(Director)
DIN: 00119206

Kapil Datta
(Company Secretary)

Place : Delhi
Date : Feb 14, 2022

Rama Steel Tubes Limited
Notes to the Standalone Financial Statements for the period ended December 31, 2021

(₹ in Lakhs)

Note 3 : Property,Plant and Equipment

Particulars	Freehold Land	Buildings	Furniture and Fixtures	Plant & Equipment	Office Equipment	Elect. Fitting & Installation	Computers - Hardware	Vehicle	Capital Work in Progress	Total
9 Months ended 31 December, 2021										
Gross Carrying Amount										
Gross Carrying Cost as of April 1, 2021	108.72	1,065.83	32.32	2,856.61	38.46	33.48	12.59	73.17	183.83	4,405.02
Additions during the 9 months	-	-	-	17.80	4.97	-	3.52	30.41	204.46	261.17
Diposals during the 9 months	-	-	-	-	-	-	-	39.98	-	39.98
Closing Gross carrying amount	**108.72**	**1,065.83**	**32.32**	**2,874.41**	**43.43**	**33.48**	**16.11**	**63.61**	**388.29**	**4,626.21**
Accumulated Depreciation										
As at April 1, 2021	-	89.93	6.62	795.06	20.79	18.83	6.70	38.44	-	976.37
Depreciation charged during the 9 months	-	25.90	2.45	165.19	4.71	2.39	1.94	7.07	-	209.65
Disposals during the 9 months	-	-	-	-	-	-	-	38.55	-	38.55
Closing accumulated depreciation	-	**115.83**	**9.08**	**960.25**	**25.50**	**21.22**	**8.64**	**6.96**	-	**1,147.47**
Net carrying value as on Dec 31, 2021	**108.72**	**950.00**	**23.25**	**1,914.16**	**17.92**	**12.27**	**7.47**	**56.65**	**388.29**	**3,478.75**

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Capital-Work-in Progress(CWIP)

Particulars	Less than 1 yr	1-2 years	2-3 years	More than 3 years	Total
Projects in progress	388.29	-	-	-	**388.29**
Projects temporarily suspended	-	-	-	-	-

RAMA STEEL TUBES LTD. NEW DELHI

LAKSHMI TUBES PRIVATE LIMITED DELHI

RAMA STEEL TUBES LTD. NEW DELHI

K Jatia

Rama Steel Tubes Limited
Notes to the Standalone Financial Statements for the period ended December 31, 2021

(₹ in Lakhs)

Note 4 : Investment Properties

Particulars	Freehold Land	Buildings	Plant and Equipments	Furniture and Fixtures	Office Equipments	Car	Elect. Fitting & Installation	Total
9 Months ended 31 December, 2021								
Gross Carrying Amount								
Gross Carrying Cost as of April 1, 2021	95.06	331.59	16.79	6.05	6.96	-	15.05	471.49
Additions during the 9 Months	-	35.33	-	-	-	9.93	-	45.26
Diposals during the 9 Months	-	-	-	-	-	-	-	-
Closing Gross carrying amount	95.06	366.92	16.79	6.05	6.96	9.93	15.05	516.75
Accumulated Depreciation								
As at April 1, 2021	-	60.35	5.83	4.55	5.11	-	11.53	87.36
Depreciation charged during the 9 Months	-	8.76	0.96	0.69	-	0.75	1.68	12.84
Disposals during the 9 Months	-	-	-	-	-	-	-	-
Closing accumulated depreciation	-	69.11	6.79	5.24	5.11	0.75	13.21	100.20
Net carrying value as on Dec 31, 2021	**95.06**	**297.81**	**10.00**	**0.81**	**1.85**	**9.18**	**1.84**	**416.55**

Note 5 : Intangible Assets

(₹ in Lakhs)

Particulars	Computer Software	Total
9 Months ended Dec 31, 2021		
Gross Carrying Amount		
Deemed Cost as of April 1, 2021	15.34	15.34
Additions during the 9 Months	0.23	0.23
Disposals during the 9 Months	-	-
Closing Gross carrying amount	15.57	15.57
Accumulated Depreciation		
Opening	13.33	13.33
Depreciation charge during the 9 Months	0.39	0.39
Disposals during the 9 Months	-	-
Closing accumulated depreciation	13.72	13.72
Net carrying value as on Dec 31, 2021	**1.85**	**1.85**

Note 6 : Right of Use Assets

(₹ in Lakhs)

Particulars	Land	Commercial Vehicles	Total
Balance as at April 1, 2021	63.64	63.01	126.65
Reclassified on adoption of IND-AS 116	-	-	-
Additions	-	85.76	85.76
Deductions	-	-	-
Depreciation/Amortisation	1.20	13.74	14.94
Net carrying value as on December 31, 2021	**62.43**	**135.03**	**197.47**

Note 7 : Investment in Subsidiaries, Associates and Joint Ventures

Particulars	As at Dec 31, 2021	As at March 31, 2021
a) Investment in Subsidiaries (Unquoted and valued at cost)		
M/s Lepakshi Tubes Pvt. Ltd. 49,00,000 (as at 31st March 2021 : 49,00,000) Equity Shares of ₹10/- each fully paid up	490.00	490.00
M/s RST International Trading FZE,Dubai 500 (as at 31st March 2021 : 500) Equity Shares of AED 1000/- each fully paid up	90.20	90.20
b) Investment in Joint Venture		
M/s Pir Panchal Construction Pvt. Ltd. Joint Venture	836.75	825.56
	1,416.95	**1,405.76**

Details of Joint Ventures

Name of the Joint Venture	Principal Place of Business/ Principal Activity	Ownership Interest % as of	
		As at Dec 31, 2021	As at March 31, 2021
M/s Pir Panchal Construction Pvt. Ltd.-JV	India / Erection of Poles	25.00	25.00

The amounts recognised in the balance sheet are as follows:

Particulars	As at Dec 31, 2021	As at March 31, 2021
Joint Ventures	836.75	825.56

Note 8 : Investments

(₹ in Lakhs)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Investment in Equity Instruments		
-Others		
Quoted		
63,500 (as at 31st March 2021: 63,500) Face value of Equity shares of ₹10/- each fully paid up of Uttam Value Steels Limited	0.60	0.60
25 (as at 31st March 2021: 25) Equity shares of ₹25/- each fully paid up of SVC Cooperative Bank Limited	0.01	0.01
Unquoted		
2 (as at 31st March 2021: 2) Equity shares of ₹ 10 each fully paid up of CIDCO Mumbai	0.00	0.00
Total	0.61	0.61

Note 9 : Other Financial Assets (Non-Current)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Security Deposits	90.20	83.37
Loans to Subsidiaries and JV	847.01	1,771.14
Loans to Others	5.89	-
Bank Deposits with maturity period more than 12 months*	452.80	452.80
Total	1,395.89	2,307.31

*Held as margin money or security against the borrowings, guarantees and other commitments.

Note 10 : Other Non-Current Assets

Particulars	As at Dec 31, 2021	As at March 31, 2021
Unsecured,considered good:		
Capital Advances	-	-
Operating Lease Prepayments	-	-
Unamortized Expenses	-	-
Total	-	-

Note 11 : Inventories

Particulars	As at Dec 31, 2021	As at March 31, 2021
Raw Materials (Including material in-transit ₹ 39.88 Lakhs/- (As at 31st March, 2021 : ₹ 544.52 Lakhs/-)	579.12	2,989.53
Finished Goods	1,759.17	1,288.58
Work-in-progress	2,332.87	1,392.97
Scrap Material	17.30	21.45
Stores, spares and consumable	33.66	25.76
Total	4,722.12	5,718.29

Note 12(a) : Trade Receivables

Particulars	Outstanding for following Periods from due date of Payment						As at Dec 31, 2021	As at March 31, 2021
	Less than 6 months	6 months-1 yrs.	1-2 yrs.	2-3 yrs.	More than 3 yrs.	Total		
(i) Undisputed Trade receivables-considered good	4,460.39	14.69	31.40	6.62	28.28	4,541.37		
(ii) Undisputed Trade receivables-considered Doubtful	-	-	-	-	-	-		
(iii) Disputed Trade receivables-considered good	-	-	-	78.44	34.75	113.19		
(ii) Disputed Trade receivables-considered Doubtful	-	-	-	-	-	-		
Outstanding							4,654.56	3,485.52
Total	4,460.39	14.69	31.40	85.06	63.03	4,654.56	4,654.56	3,485.52

Note 12(b) : Cash and Cash Equivalents

Particulars	As at Dec 31, 2021	As at March 31, 2021
Balances with banks		
-Current Accounts	40.05	268.62
-In Fixed deposit accounts with original maturity of less tha	292.87	211.48
Cash in Hand	1.71	3.45
Total	334.63	483.55

*Held as margin money or security against the borrowings, guarantees and other commitments.

Rama Steel Tubes Limited

Notes to the Standalone Financial Statements for the period ended Dec 31, 2021

Note 12(c) : Other financial assets (Current)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Interest accrued on loans,investments and deposits	19.42	22.34
Total	**19.42**	**22.34**

Note 13 : Other current assets

Particulars	As at Dec 31, 2021	As at March 31, 2021
Advances other than capital advances		
Advance to suppliers and others	1,922.48	208.17
Balance with Government Authorities	1,114.75	1,340.96
Prepaid Expenses	38.42	33.68
Other Receivables	331.79	368.54
Total	**3,407.45**	**1,951.34**

Note 14 - Share Capital:

(₹ in Lakhs)

Particulars	As at Dec 31, 2021	As at March 31, 2021
A. **Share Capital**		
Authorized:		
1,80,00,000 (as at 31st March 2021: 1,80,00,000) Equity Shares of ₹5/- each	900.00	900.00
25,00,000 (as at 31st March 2021: 25,00,000) 5% Non Cumulative Redeemable Preference shares of ₹ 10/- each	250.00	250.00
	1,150.00	1,150.00
Issued, Subscribed & Paid up:		
1,67,94,000 (as at 31st March 2021: 1,67,94,000) Equity Shares of ₹5/- each fully paid up	839.70	839.70
Total	839.70	839.70

B. **Reconciliation of Number of Shares**

Equity Shares of ₹5/- Each fully paid up	As at Dec 31, 2021		As at March 31, 2021	
	Number of Shares	(₹ in Lakhs)	Number of Shares	(₹ in Lakhs)
Balance as at the beginning of the year	16,794,000	839.70	16,794,000	839.70
Additions during the year:	-	-	-	-
Deletion during the year :	-	-	-	-
Balance as at the end of the year	**16,794,000**	**839.70**	**16,794,000**	**839.70**

C. **Detail of shareholder holding more than 5% shares of the Company :**

Name of Shareholder	As at Dec 31, 2021		As at March 31, 2021	
	Numbers of Shares held	% of holding	Numbers of Shares held	% of holding
Naresh Kumar Bansal	6,389,848	38.05	6,389,848	38.05
Richi Bansal	1,469,287	8.75	1,469,287	8.75
Nikhil Naresh Bansal	1,355,998	8.07	1,355,998	8.07
Tarun Dhir-Arun Enterprises (a Partnership Firm)	1,209,821	7.20	1,209,821	7.20

D. **Shareholding of Promotors :**

Shares held by promoters as on Dec 31,2021				% Change during the Quarter
S.No.	Promoter's Name	No. of Shares	% of Total Shares	
1	Naresh Kumar Bansal	6,389,848	38.05	-
2	Richi Bansal	1,469,287	8.75	-
3	Nikhil Naresh Bansal	1,355,998	8.07	-
4	Kumud Bansal	692,000	4.12	-
5	Krati Bansal	450,000	2.68	-
6	Kanika Bansal	111,000	0.66	-
	Total	**10,468,133**	**62.33**	-

E. **Right, preference and restrictions attached to shares Equity Shares**

The Company has only one class of equity shares having a par value of ₹ 5/- per share. Each Shareholder is eligible for one vote per share. In the event of liquidation, the equity shareholders are eligible to receive the remaining assets of the Company, after distribution of all preferential amount , in proportion of their shareholding.

Note 15 : Other Equity

(₹ in Lakhs)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Securities Premium Account	2,176.20	2,176.20
General Reserve	1,277.28	1,277.28
Retained Earnings	5,047.31	4,327.95
Capital Reserve	225.70	225.70
Total	**8,726.49**	**8,007.13**

For movement during the year in Other Equity, refer "Statement of Changes in Equity"

Note 16 : Borrowings

Particulars	As at Dec 31, 2021	As at March 31, 2021
Secured		
Term Loans from banks#	2,394.41	2,418.74
Less: Current Maturities transferred to Other finan	(210.99)	(194.25)
	2,183.42	2,224.49
Unsecured Loans		
Loan from Directors	153.11	139.81
Loans and Advances from Related Parties	11.34	61.51
	164.45	201.32
Total	**2,347.87**	**2,425.80**

#Others includes Financial Institutions

Note 17 : Other Financial Liabilities (Non Current)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Security Deposits	55.37	25.13
Total	**55.37**	**25.13**

Note 18 : Provisions (Non Current)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Gratuity	34.87	45.67
Compensated Absences	8.16	6.76
Total	**43.03**	**52.42**

Note 19 : Deferred Tax Assets/Liabilities(Net)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Deferred Tax Assets		
Provision for Gratuity and Compensated Absences	19.19	21.56
	19.19	21.56
Deferred Tax Liabilities		
Depreciation	194.30	217.38
OCI Adjustments	-	-
	194.30	217.38
Deferred Tax Assets(Net)	-	-
Deferred Tax Liabilities(Net)	**175.10**	**195.82**

Note 20(a) : Borrowings (Current)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Secured		
Loans Repayable on demand from Banks*	5,436.43	4,998.90
Unsecured		
Other Loans from Banks	-	-
Total	**5,436.43**	**4,998.90**

Note 20(b) : Trade payables

Particulars	Outstanding for following periods from due date of payment					As at Dec 31, 2021	As at March 31, 2021
	Less than 1 yr.	1-2 yrs.	2-3 yrs.	More than 3 yrs.	Total	-	
(i) MSME	9.25	-	-	-	9.25	9.25	49.60
(ii) Others	1,684.18	10.48	1.38	-	1,696.04		
(iii) Disputed dues-MSME	-	-	-	-	-		
(iv) Disputed dues-Others	-	-	-	16.64	16.64		
Total outstanding						1,712.68	2,150.03
Total	**1,693.43**	**10.48**	**1.38**	**16.64**	**1,721.93**	**1,721.93**	**2,199.62**

Note 20(c) : Other financial liabilities (Current)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Current Maturities of term loans transferred from long term borrowings	210.99	194.25
Interest accrued but not due on Loans	-	-
Total	**210.99**	**194.25**

Note 21 : Provisions (Current)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Gratuity	29.09	29.09
Compensated Absences	4.13	4.13
Total	**33.22**	**33.22**

Note 22 : Other Current Liabilities

Particulars	As at Dec 31, 2021	As at March 31, 2021
Advance from Customers and Others	75.43	152.47
Statutory Levies	17.72	15.79
Employee Benefits Payable	38.95	30.57
Expenses Payable	102.06	66.05
Total	**234.16**	**264.88**

Note 23 : Current Tax Liabilities (Net)

Particulars	As at Dec 31, 2021	As at March 31, 2021
Provision for Taxation	389.66	164.30
Less: Advance Tax	(167.69)	(85.00)
Total	**221.97**	**79.30**

Note 24 : Revenue from Operations

(₹ in Lakhs)

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Sale of Products		
Finished Goods		
Within India	25,555.88	22,932.60
Outside India	2,537.89	5,645.78
Traded Goods	3,666.90	3,715.64
Total Gross Sales(including excise duty)	**31,760.67**	**32,294.02**
Other Operating Revenue		
Scrap Sale (Including Excise Duty)	414.49	200.19
Job Work Income	0.08	8.64
Export Incentives	2.25	68.15
Total	**416.82**	**276.98**
Total Revenue from Operations	**32,177.49**	**32,571.00**

Note 25 : Other Income

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Interest Income from financial assets measured at amortised cost		
- on fixed deposits with bank	162.88	214.03
Liabilities no longer required written back	0.92	1.73
Net Gain on disposal of property,plant and equipment and investment property	4.44	(0.17)
Foreign Exchange Gain(net)	18.22	7.03
Rental Income	89.68	89.85
Miscellaneous Income	-	-
Total	**276.13**	**312.47**

Note 26 : Cost of Materials Consumed

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Raw Materials		
Opening Stock	2,469.18	1,334.55
Add: Purchase	28,609.26	32,404.59
Less: Closing Stock	(579.12)	(2,469.18)
Less: Cost of Raw Material cleared as such	(3,627.34)	(3,666.48)
Total	**26,871.98**	**27,603.48**

Note 27 : Changes in inventories of finished goods, work-in-progress and Stock-in-Trade

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Opening Stock		
Finished Goods	1,288.58	767.88
WIP	1,392.97	529.60
Scrap Material	21.45	80.15
Traded Goods	-	-
Total (A)	**2,703.00**	**1,377.63**
Closing Stock		
Finished Goods	1,759.17	1,288.58
WIP	2,332.87	1,392.97
Scrap Material	17.30	21.45
Traded Goods	-	-
Total (B)	**4,109.34**	**2,703.00**
Total (A-B)	**(1,406.34)**	**(1,325.37)**

Note 28 : Employee Benefit Expenses

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Salaries, Wages, Bonus etc.	545.83	470.04
Contribution to Provident and Other Funds	11.05	10.12
Staff Welfare Expenses	7.57	14.03
Gratuity	7.89	1.76
Compensated Absences	2.08	2.77
Total	**574.42**	**498.72**

Note 29 : Finance Cost

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Interest Expense	588.27	610.22
Other Expenses	-	-
Total	**588.27**	**610.22**

Note 30 : Depreciation and amortisation

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Depreciation on property,plant and equipment	209.22	235.29
Depreciation on investment property	12.84	15.38
Amortisation of intangible assets	0.39	0.17
Right of Use Assets Amortisation	14.94	14.90
Total	**237.38**	**265.74**

Note 31 : Other Expenses

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Job Work Charges	-	14.68
Power & Fuel Expenses	239.78	230.67
Repair & Maintenance :-		
Building	20.00	11.67
Plant & Machinery	13.14	31.53
Rent (Including Lease Rent)	51.07	34.66
Printing & Stationery	5.17	2.10
Postage & Telephone	4.05	5.43
Vehicle Running Expenses	3.33	8.37
Fees & Taxes	22.00	25.49
Travelling Expenses:		
Directors	3.41	2.13
Others	50.33	41.47
Legal & Professional Charges	33.42	35.69
Loss on sale of PPE / Investments	0.33	-
Donation	-	-
Corporate social responsibility expenses (Refer Note 40)	9.80	19.95
Miscellaneous Expenses	24.39	20.33
Auditor's Remuneration	3.00	2.00
Insurance	6.85	6.73
Key-man Insurance	7.88	19.39
Office Expenses	11.16	12.53
Advertisement Expenses	13.79	-
Commission	4.35	18.29
Freight Outward	283.20	215.11
Business Promotion	35.20	18.92
Bad Debt	-	9.03
Other Selling Expenes	1.49	2.56
Stores and Spares	257.58	239.62
Total	**1,104.71**	**1,026.35**

Note 32 : Tax Expense

Particulars	9 Months ended Dec 31, 2021	Year ended March 31, 2021
Current Tax		
Current Tax on profits for the year	225.36	145.31
Adjustment for current tax of prior periods	-	-
Total current tax expense	**225.36**	**145.31**
Deferred Tax		
Decrease/(increase) in deferred tax assets	-	-
(Decrease)/increase in deferred tax liabilities	(22.48)	(4.84)
Total deferred tax expense/(benefit)	**(22.48)**	**(4.84)**
Total Tax Expense	**202.88**	**140.47**