



SHREE METALLOYS LIMITED

**Dealers of Non Ferrous, Precious Metals
Manufacturers of Non Ferrous Metals**

(Formerly known as VALLEY INDIANA LEISURE LIMITED)

CIN No. : L67120GJ1994PLC023471

Regd. Office:

103, Sunsquare, Nr. Klasic Gold Hotel, Off C. G. Road,
Ahmedabad- 380 009. Gujarat (India)

Phone: +91 79 26442254, 26442231

Fax: +91 79 26442297, Mo.: +91 93270 35601

Email: shreemetalloys.ahd@gmail.com

Date: 06/09/2021

To,

BSE Limited
Floor 25 P.J.Towers,
Dalal Street,
Mumbai-400 001

SUB : Notice of the 27th Annual General Meeting and Annual Report of the Company for the financial year 2020-21.

Script Code : 531962

Dear Sir,

We would like to inform you that the 27th Annual General Meeting ("AGM") of the Company will be held on Wednesday, 29th September, 2021 at 4:00 p.m. through Video Conferencing ("VC") / Other Audio Visual Means ("OAVM"), in accordance with the applicable circulars issued by the Ministry of Corporate Affairs and the Securities and Exchange Board of India.


Pursuant to Regulation 34(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Annual Report of the Company along with the Notice of Annual General Meeting ("AGM") for the financial year 2020-21 which is being sent through electronic mode to the Members.

Kindly take the above information on your record.

Thanking You,

Yours Faithfully,

Shree Metalloys Limited

Pratik R. Kabra
Managing Director
DIN : 00006358

27th Annual Report 2020-21

KEY MANAGERIAL PERSONNEL & BOARD OF DIRECTORS

Pratik R. Kabra (DIN: 00006358)
Chairman & Managing Director

Govindlal M. Dudani (DIN : 07775287)
Non- Executive Director

Tagaram L. Chowdhary (DIN: 00483173)
Independent Director

Leena Vijayan (DIN:08551144)
Independent Director

Nimish H. Bavishi
Chief Financial Officer

Sonali Panchal
Company Secretary & Compliance Officer

AUDITORS:

M/S. Talati & Talati,
Chartered Accountant,
Ahmedabad

BANKERS:

ICICI Bank Ltd.
Punjab National Bank

REGISTRAR & SHARE TRANSFER

AGENT:

ACCURATE SECURITIES & REGISTRY P.
LTD
12/1/5 MANOHARPUKUR ROAD,
KOLKATA-700026
Email: www accuratesecurities.com

REGISTERED OFFICE:

103, SUN SQUARE,
NR. KLASSIC GOLD HOTEL,
OFF. C.G. ROAD,
AHMEDABAD-380009
Tel No.: 079-26442254
Email: shreemetalloys.ahd@gmail.com

Content	Page No.
1) Notice	1
2) Directors Report	13
3) Management Discussion and analysis Report	24
4) Secretarial Audit Report	33
5) Auditors' report	39
6) Balance Sheet	51
7) Statement of Profit & Loss	52
8) Cash Flow Statement	53
9) Notes to the Financial Statements	55

SHREE METALLOYS LIMITED**CIN: L67120GJ1994PLC023471****NOTICE**

NOTICE is hereby given that the Twenty Seven Annual General Meeting of Shree Metalloys Limited will be held on Wednesday, September 29, 2021 at 4:00 p.m. IST through Video Conferencing ("VC") / Other Audio Visual Means ("OAVM") to transact the following businesses:

ORDINARY BUSINESS:

1. To receive, consider and adopt the Audited Balance Sheet as at 31st March, 2021, Statement of Profits & Loss and together with Cash Flow Statement and Notes forming part thereto ("Financial Statement") for the year ended on 31st March, 2021 and Report of the Board of Directors and Auditors thereon.
2. To appoint a Director in place of Mr. Pratik R. Kabra (DIN: 00006358), Director who retires by rotation at this meeting and being eligible, offers himself for re-appointment.

SPECIAL BUSINESS:

3. **To approve related party transactions to be entered by the Company with related parties:**

To consider and if thought fit, to give your assent/dissent to the following resolution as an Ordinary Resolution:

"RESOLVED THAT pursuant to the provisions of Section 188 and other applicable provisions of the Companies Act, 2013 read with the rules made there under (including any statutory modification(s) or re-enactment thereof for the time being in force) and pursuant to provisions of regulation 23 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (including any statutory modification(s) or re-enactment thereof and subject to such other approvals, consents, permissions and sanctions of other authorities as may be necessary, and also pursuant to the approval of the Audit Committee and the Board of Directors vide resolutions passed/to be passed at their respective meetings, consent of the Members of the Company be and is hereby accorded to the Board of Directors of the Company (hereinafter referred to as "the Board" which term shall be deemed to include any Committee of the Board), to approve all the material related party transactions (including any modifications, alterations or amendments thereto) to be entered into by the Company in the ordinary course of business and on arm's length basis with related party/ies and for the maximum amounts per annum, for 5 (five) consecutive years as mentioned herein below

Sr. No.	Name of Transaction	Name of KMP/ Director who is related and nature of their relationship	Name of Related Parties	Receipts (In Rs.)	Payment (In Rs.)
1.	Sale of Goods	Mr. Pratik Kabra is also a Director in Shree Extrusion Ltd.	Shree Extrusion Ltd.	30,00,00,000/-	-
2.	Sale of Goods	Firm in which Managing Director is a Partner	Metal Alloys Corporation	10,00,00,000/-	-
3.	Purchase	Mr. Pratik Kabra is also a Director	Shree Extrusion Ltd.	50,00,000/-	

		in Shree Extrusion Ltd.			
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RESOLVED FURTHER THAT the transaction may be entered into subject to the compliance of criteria mentioned under Rule 15 of the Companies (Meetings of Board and its Power) Rules, 2014 of the Companies Act, 2013.

RESOLVED FURTHER THAT the Board of Directors of the Company/ or Committee thereof be and is hereby authorized to do or cause to be done all such acts, matters, deeds and things and to settle any queries, difficulties that may arise with regard to any transaction with the related party and execute such agreements, documents and writings and to make such filings as may be necessary or desirable for the purpose of giving effect to this resolution, in the best interest of the Company”.

4. **To re-appoint Mr. Pratik Radheshyam Kabra (DIN: 00006358) as a Managing Director of the Company for the term of 3 (Three) years who shall be liable to retire by rotation.**

To consider and, if thought fit, to give your assent/dissent to pass the following resolution as an Ordinary Resolution:-

“RESOLVED THAT pursuant to recommendation of the Nomination and Remuneration Committee and in accordance with the provision of Section 196, 197 and 203 and other applicable provisions of the Companies Act, 2013 and the rules made thereunder (including any statutory modification or re-enactment thereof) read with Schedule- V of the Companies Act, 2013 and the Articles of Association of the Company, the approval of the members of the Company be and is hereby accorded to re-appoint Mr. Pratik R. Kabra, (Din:00006358) as Managing Director of the Company with effect from 28th May, 2021 for the term of 3 (Three) year and who shall be liable to retire by rotation, *as well as the payment of salary and perquisites (hereinafter referred to as “remuneration”), upon the terms and conditions as detailed in the explanatory statement attached herewith, which is hereby approved and sanctioned with authority to the Board of Directors to alter and vary the terms and conditions of the said re- appointment and / or agreement in such manner as may be agreed to between the Board of Directors and Mr. Pratik R. Kabra.*

RESOLVED FURTHER THAT the remuneration payable to Mr. Pratik R. Kabra, shall not exceed the overall ceiling of the total managerial remuneration as provided under Schedule V and Section 197 of the Companies Act, 2013 or such other limits as may be prescribed from time to time.

RESOLVED FURTHER THAT the Board of directors be and is hereby authorized to do all such acts, deeds and things and execute all such documents, instruments and writings as may be required and to delegate all or any of its powers herein conferred to any Committee of Directors or Director(s) to give effect to the aforesaid resolution.”

**By Order of the Board of Directors
For, Shree Metalloys Limited**

**Date: 28th August, 2021
Place: Ahmedabad**

**Registered Office: -
103, Sun Square,
Nr. Klassic gold hotel,
off. C.G.Road,Navrangpura,
Ahmedabad - 380009.**

**Sd/-
Pratik R. Kabra
Chairman & Managing Director
DIN: (00006358)**

NOTES

1. In view of the massive outbreak of the COVID-19 pandemic, social distancing is a norm to be followed and pursuant to the Circular No. 14/2020 dated April 08, 2020, Circular No.17/2020 dated April 13, 2020 issued by the Ministry of Corporate Affairs followed by Circular No. 20/2020 dated May 05, 2020, physical attendance of the Members to the EGM/AGM venue is not required and annual general meeting (AGM) be held through video conferencing (VC) or other audio visual means (OAVM). Hence, Members can attend and participate in the ensuing EGM/AGM through VC/OAVM.
2. Pursuant to the Circular No. 14/2020 dated April 08, 2020, issued by the Ministry of Corporate Affairs, the facility to appoint proxy to attend and cast vote for the members is not available for this EGM/AGM. However, the Body Corporates are entitled to appoint authorised representatives to attend the EGM/AGM through VC/OAVM and participate thereat and cast their votes through e-voting.
3. The Members can join the EGM/AGM in the VC/OAVM mode 15 minutes before and after the scheduled time of the commencement of the Meeting by following the procedure mentioned in the Notice. The facility of participation at the EGM/AGM through VC/OAVM will be made available for 1000 members on first come first served basis. This will not include large Shareholders (Shareholders holding 2% or more shareholding), Promoters, Institutional Investors, Directors, Key Managerial Personnel, the Chairpersons of the Audit Committee, Nomination and Remuneration Committee and Stakeholders Relationship Committee, Auditors etc. who are allowed to attend the EGM/AGM without restriction on account of first come first served basis.
4. The attendance of the Members attending the AGM through VC/OAVM will be counted for the purpose of reckoning the quorum under Section 103 of the Companies Act, 2013.
5. Pursuant to the provisions of Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (as amended) and Regulation 44 of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 (as amended), and the Circulars issued by the Ministry of Corporate Affairs dated April 08, 2020, April 13, 2020 and May 05, 2020 the Company is providing facility of remote e-voting to its Members in respect of the business to be transacted at the AGM. For this purpose, the Company has entered into an agreement with National Securities Depository Limited (NSDL) for facilitating voting through electronic means, as the authorized agency. The facility of casting votes by a member using remote e-voting system as well as venue voting on the date of the AGM will be provided by NSDL.
6. In line with the Ministry of Corporate Affairs (MCA) Circular No. 17/2020 dated April 13, 2020, the Notice calling the AGM has been uploaded on the website of the Company at www.shreemetalloys.com. The Notice can also be accessed from the websites of the Stock Exchanges i.e. BSE Limited and National Stock Exchange of India Limited at www.bseindia.com and www.nseindia.com respectively and the AGM Notice is also available on the website of NSDL (agency for providing the Remote e-Voting facility) i.e. www.evoting.nsdl.com.
7. AGM has been convened through VC/OAVM in compliance with applicable provisions of the Companies Act, 2013 read with MCA Circular No. 14/2020 dated April 08, 2020 and MCA Circular No. 17/2020 dated April 13, 2020 and MCA Circular No. 20/2020 dated May 05, 2020.
8. Since the AGM will be held through VC / OAVM, the Route Map is not annexed in this Notice.
9. Members are requested to quote Folio number in all their correspondences

10. Information pursuant to Regulation 36(3) of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 with regard to Directors seeking appointment / re-appointment is annexed hereto.

11. SEBI As per Regulation 40 of SEBI Listing Regulations, as amended, securities of listed companies can be transferred only in dematerialized form with effect from, April 1, 2019, except in case of request received for transmission or transposition of securities. In view of this and to eliminate all risks associated with physical shares and for ease of portfolio management, members holding shares in physical form are requested to consider converting their holdings to dematerialized form. Members can contact the Company or Company's Registrars and Transfer Agent i.e. www accuratesecurities.com for assistance in this regard.

THE INSTRUCTIONS FOR MEMBERS FOR REMOTE E-VOTING ARE AS UNDER:-

The remote e-voting period begins on 26th September, 2021 at 10:00 A.M. and ends on 28th September, 2021 at 05:00_P.M. The remote e-voting module shall be disabled by NSDL for voting thereafter.

The Members whose names appear in the Register of Members / List of Beneficial Owners maintained by the Depositories as on 22nd September, 2021 (cut-off date) shall be entitled to avail the facility of remote e-voting as well as e-voting system on the date of the AGM. Any recipient of the Notice, who has no voting rights as on the Cut-off date, shall treat this Notice as intimation only.

How do I vote electronically using NSDL e-Voting system?

The way to vote electronically on NSDL e-Voting system consists of "Two Steps" which are mentioned below:

Step 1: Log-in to NSDL e-Voting system at <https://www.evoting.nsdl.com/>

Step 2: Cast your vote electronically on NSDL e-Voting system.

Details on Step 1 is mentioned below:

How to Log-in to NSDL e-Voting website?

1. **Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <https://www.evoting.nsdl.com/> either on a Personal Computer or on a mobile.**
2. **Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholders' section.**
3. **A new screen will open. You will have to enter your User ID, your Password and a Verification Code as shown on the screen.**

Alternatively, if you are registered for NSDL eservices i.e. IDEAS, you can log-in at <https://eservices.nsdl.com/> with your existing IDEAS login. Once you log-in to NSDL eservices after using your log-in credentials, click on e-Voting and you can proceed to Step 2 i.e. Cast your vote electronically.

4. **Your User ID details are given below :**

Manner of holding shares i.e. Demat (NSDL or CDSL) or Physical	Your User ID is:
a) For Members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID For example if your DP ID is IN300*** and Client ID is 12***** then your user

	ID is IN300***12*****.
b) For Members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID For example if your Beneficiary ID is 12***** then your user ID is 12*****
c) For Members holding shares in Physical Form.	EVEN Number followed by Folio Number registered with the company For example if folio number is 001*** and EVEN is 101456 then user ID is 101456001***

5. Your password details are given below:

- a) If you are already registered for e-Voting, then you can use your existing password to login and cast your vote.
- b) If you are using NSDL e-Voting system for the first time, you will need to retrieve the 'initial password' which was communicated to you. Once you retrieve your 'initial password', you need to enter the 'initial password' and the system will force you to change your password.
- c) How to retrieve your 'initial password'?
 - (i) If your email ID is registered in your demat account or with the company, your 'initial password' is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a pdf file. Open the pdf file. The password to open the pdf file is your 8 digit client ID for NSDL account, last 8 digits of client ID for CDSL account or folio number for shares held in physical form. The .pdf file contains your 'User ID' and your 'initial password'.
 - (ii) If your email ID is not registered, please follow steps mentioned below in process for those shareholders whose email ids are not registered

6. If you are unable to retrieve or have not received the "Initial password" or have forgotten your password:

- a) Click on "[Forgot User Details/Password?](#)"(If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com.
- b) [Physical User Reset Password?](#)" (If you are holding shares in physical mode) option available on www.evoting.nsdl.com.
- c) If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.co.in mentioning your demat account number/folio number, your PAN, your name and your registered address.

Members can also use the OTP (One Time Password) based login for casting the votes on the e-Voting system of NSDL.

7. After entering your password, tick on Agree to "Terms and Conditions" by selecting on the check box.
8. Now, you will have to click on "Login" button.
9. After you click on the "Login" button, Home page of e-Voting will open.

Details on Step 2 is given below:

How to cast your vote electronically on NSDL e-Voting system?

1. After successful login at Step 1, you will be able to see the Home page of e-Voting. Click on e-Voting. Then, click on Active Voting Cycles.
2. After click on Active Voting Cycles, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle is in active status.
3. Select "EVEN" of company for which you wish to cast your vote.

4. Now you are ready for e-Voting as the Voting page opens.
5. Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on "Submit" and also "Confirm" when prompted.
6. Upon confirmation, the message "Vote cast successfully" will be displayed.
7. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.
8. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

General Guidelines for shareholders

1. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail to cssuchaknikhil@gmail.com with a copy marked to evoting@nsdl.co.in.
2. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the "Forgot User Details/Password?" or "Physical User Reset Password?" option available on www.evoting.nsdl.com to reset the password.
3. In case of any queries, you may refer the Frequently Asked Questions (FAQs) for Shareholders and e-voting user manual for Shareholders available at the download section of www.evoting.nsdl.com or call on toll free no.: 1800-222-990 or send a request to (Pratik Bhatt) at evoting@nsdl.co.in or pratikb@nsdl.co.in Contact No. 02224994738
4. In case of joint holders attending the Meeting, only such joint holder who is higher in the order of names will be entitled to vote at the Meeting.
5. The Company has notified closure of Register of Members and Share Transfer Books from 22nd September, 2021 to 29th September, 2021 (both days inclusive).
6. Members holding shares in electronic form are requested to intimate immediately any change in their address or to their Depository Participants with whom they are maintaining their DEMAT Accounts. Members holding shares in physical form are requested to advise any change in their address or bank mandates immediately to the Company / ACCURATE SECURITIES & REGISTRY P. LTD.
7. The Securities and Exchange Board of India (SEBI) has mandated the submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in electronic form are, therefore, requested to submit their PAN to their Depository Participants with whom they are maintaining their DEMAT Accounts. Members holding shares in physical form can submit their PAN to the Company / ACCURATE SECURITIES & REGISTRY P. LTD.
8. Members who hold shares in physical form in multiple folios in identical names or joint holding in the same order of names are requested to send the share certificates to ACCURATE SECURITIES & REGISTRY P. LTD for consolidation into a single folio.
9. Members who have not registered their e-mail addresses so far are requested to register their e-mail address on the website of the Registrar and Share Transfer Agent of the Company i.e. ACCURATE SECURITIES & REGISTRY P. LTD for receiving all communications including Annual Report, Notices, Circulars, etc. from the Company electronically .
10. SEBI As per Regulation 40 of SEBI Listing Regulations, as amended, securities of listed companies can be transferred only in dematerialized form with effect from, April 1, 2019, except in case of request received for transmission or transposition of securities. In view of this and to eliminate all risks associated with physical shares and for ease of portfolio management, members holding shares in physical form are requested to consider converting their holdings to dematerialized form. Members can contact the Company or Company's Registrars and Transfer Agent i.e. ACCURATE SECURITIES & REGISTRY P. LTD for assistance in this regard.
11. M/S NIKHIL SUCHAK AND ASSOCIATES, Practicing Company Secretary (Membership No.: ACS 40614; CP No: 18938) (Address: 607, HAVELI ARCADE, SECTOR-11, GANDHINAGAR-382011, Gujarat, India) has been appointed as the Scrutinizer for overseeing the voting through Remote-E-voting in a fair and transparent manner.

12. Subject to receipt of requisite number of votes, the Resolutions shall be deemed to be passed on the date of Annual General Meeting i.e. Wednesday, 29th September, 2021.

13. Members of the Company had approved the Appointment of M/s. Talati & Talati, Chartered Accountants as the Statutory Auditor of the Company which is valid till 28th AGM of the Company. In accordance with the Companies Amendment Act, 2017, enforced on 7th May, 2018 by Ministry of Corporate Affairs, the Appointment of Statutory Auditors is not required to be ratified at every AGM.

Process for those shareholders whose email ids are not registered with the depositories for procuring user id and password and registration of e mail ids for e-voting for the resolutions set out in this notice:

In case shares are held in physical mode please provide Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) by email to shreemetalloys.ahd@gmail.com.

In case shares are held in demat mode, please provide DPID-CLID (16 digit DPID + CLID or 16 digit beneficiary ID), Name, client master or copy of Consolidated Account statement, PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) to shreemetalloys.ahd@gmail.com.

THE INSTRUCTIONS FOR MEMBERS FOR e-VOTING ON THE DAY OF THE EGM/AGM ARE AS UNDER:-

1. The procedure for e-Voting on the day of the EGM/AGM is same as the instructions mentioned above for remote e-voting.
2. Only those Members/ shareholders, who will be present in the EGM/AGM through VC/OAVM facility and have not casted their vote on the Resolutions through remote e-Voting and are otherwise not barred from doing so, shall be eligible to vote through e-Voting system in the EGM/AGM.
3. Members who have voted through Remote e-Voting will be eligible to attend the EGM/AGM. However, they will not be eligible to vote at the EGM/AGM.
4. The details of the person who may be contacted for any grievances connected with the facility for e-Voting on the day of the EGM/AGM shall be the same person mentioned for Remote e-voting.

INSTRUCTIONS FOR MEMBERS FOR ATTENDING THE EGM/AGM THROUGH VC/OAVM ARE AS UNDER:

1. Member will be provided with a facility to attend the EGM/AGM through VC/OAVM through the NSDL e-Voting system. Members may access the same at <https://www.evoting.nsdl.com> under shareholders/members login by using the remote e-voting credentials. The link for VC/OAVM will be available in shareholder/members login where the EVEN of Company will be displayed. Please note that the members who do not have the User ID and Password for e-Voting or have forgotten the User ID and Password may retrieve the same by following the remote e-Voting instructions mentioned in the notice to avoid last minute rush. Further members can also use the OTP based login for logging into the e-Voting system of NSDL.
2. Members are encouraged to join the Meeting through Laptops for better experience.
3. Further Members will be required to allow Camera and use Internet with a good speed to avoid any disturbance during the meeting.
4. Please note that Participants Connecting from Mobile Devices or Tablets or through Laptop connecting via Mobile Hotspot may experience Audio/Video loss due to Fluctuation in their respective network. It is therefore recommended to use Stable Wi-Fi or LAN Connection to mitigate any kind of aforesaid glitches.

5. Shareholders who would like to express their views/have questions may send their questions in advance mentioning their name demat account number/folio number, email id, mobile number at (company email id). The same will be replied by the company suitably.

By Order of the Board of Directors
For, **Shree Metalloys Limited**

Date: 28th August, 2021
Place: Ahmedabad

Sd/-
Pratik R. Kabra
Chairman & Managing Director
DIN: (00006358)

Registered Office:-
103, Sun Square,
Nr. Klassic gold hotel,
off. C.G.Road, Navrangpura,
Ahmedabad - 380 009

**BRIEF PROFILE OF DIRECTORS SEEKING APPOINTMENT/ RE-APPOINTMENT AT THE
27th ANNUAL GENERAL MEETING****{Pursuant to Regulation 36 of the SEBI (Listing Obligation and Disclosure Requirement)
Regulations, 2015}**

NAME	Mr. Pratik R. Kabra
DIN	00006358
Designation	Managing Director
Date of Birth	30/03/1986
Date of Appointment	13/11/2007
Qualification and experience in specific functional area	BE Electrical and has experience in trading and manufacturing of metals and alloys of more than 16 years.
Directorship held in other companies*	1
Membership/ Chairmanships of Committee in other Public Companies	NIL
Shareholding of Non-executive Director	N.A
Relationships between Directors inter-se	N.A

***Pvt. Companies excluded**

Date: 28th August, 2021
Place: Ahmedabad

Registered Office:-
103, Sun Square,
Nr. Klassic gold hotel,
off. C.G.Road, Navrangpura,
Ahmedabad – 380 009

By Order of the Board of Directors
For, **Shree Metalloys Limited**
Sd/-
Pratik R. Kabra
Chairman & Managing Director
DIN:(00006358)

ANNEXURE TO THE NOTICE**EXPLANATORY STATEMENT AS REQUIRED UNDER SECTION 102 OF THE COMPANIES ACT, 2013.**

The following statement sets out all material facts relating to Special Business mentioned in the accompanying Notice:

ITEM NO. 3

The Companies Act, 2013 aims to ensure transparency in the transactions and dealings between the related parties of the Company. The provisions of section 188(1) of the Companies Act, 2013 that govern the Related Party Transactions, requires that for entering into any contract or arrangement as mentioned herein below with the related party, the Company must obtain the prior approval of Board of Directors and in case of;

1. Sale, purchase or supply of any goods or materials directly or through appointment of agents exceeding ten percent of the turnover of the Company or rupees one hundred crore, whichever is lower as mentioned in Clause (a) and Clause (e) respectively of sub-section (1) of Section 188.
2. Leasing of property of any kind exceeding ten percent of the net worth or exceeding ten percent of turnover of the Company or rupees one hundred crore, whichever is lower as mentioned in clause (c) of sub-section (1) of Section 188.
3. availing or rendering of any services directly or through appointment of agents exceeding ten percent of the turnover of the Company or rupees fifty Crore, whichever is lower, as mentioned in clause (d) and clause (e) of sub-section (1) of Section 188.

Prior approval of the shareholders by way of an Ordinary Resolution must be obtained:

1. Sale, purchase or supply of any goods or materials;
2. Leasing of property of any kind;
3. Availing or rendering of any services;

In the light of the provisions of the Companies Act, 2013 and ("the Act") and/or the Securities and Exchange Board of India(Listing Obligations and Disclosure Requirements)Regulations, 2015 ("Listing Regulations"), the Board of Directors of your Company has approved the proposed transactions along with annual limit for 5 (Five) consecutive years including financial year 2020-21 that your Company may enter into with the related parties (as defined under section 2(76) of the Companies Act, 2013) the name of the related parties, name of the Director or Key Managerial Personnel who is related, if any and nature of relationship is mentioned in the resolution. The respective transactions may carry out on arm's Length basis and all factors relevant to the respective transactions may consider by the Board. The Company will seek fresh approval of shareholders under applicable provisions on completion of 5 (five) consecutive years.

None of the Directors except Mr. Pratik R Kabra along with their relatives are interested in the said resolution except to the extent of their Shareholding. The Board recommends the Ordinary Resolution set out at Item No. 3 of the Notice for approval by the Shareholders.

ITEM No. 4:

The Board of Directors of the Company (the 'Board') at its meeting held on 28th August, 2021 and also on the basis of recommendation of Nomination and Remuneration Committee of the Company has re-appointed Mr. Pratik R. Kabra, (DIN: 00006358) as Managing Director for a period of Three (3) years w.e.f. 28th May, 2021, who shall be liable to retire by rotation and his re-appointment was subject to the approval of shareholders at ensuing General Meeting of the Company.

Keeping in view that Mr Pratik R. Kabra has been involved in the operations of the Company over past period of more than 16 years hence it shall be in the interest of the Company to continue the employment of Mr. Pratik R. Kabra as Managing Director of the Company.

Mr. Pratik R. Kabra, aged 35 years, is B.Tech in Electronics having more than 16 years of experience of production and management.

This explanatory statement may also be read and treated as disclosure in compliance with the requirements of Section 190 of the Companies Act, 2013.

The details of remuneration payable to Mr. Pratik R. Kabra and the terms and conditions of the re-appointment are given below:

I.Period:

For a period of 3 years from 28th May, 2021

II.Salary:

Up to Rs.1, 00,000/- per month which is eligible for revision on a date to be determined by the Nomination and Remuneration Committee.

III.Perquisites:

The Managing Director shall be entitled to all the perquisites listed herein below in addition to the salary mentioned above;

i.Medical Re-imburement:

Reimbursement of medical expenses incurred, including premium paid on health insurance policies, whether in India or abroad, for self and family including hospitalisation, surgical charges, nursing charges and domiciliary charges for self and for family.

ii.Leave Travel Concession:

For self and family every year incurred in accordance with the rules of the Company.

iii.Club Fees:

Fees of clubs, subject to a maximum of three clubs.

iv.Personal Accident Insurance/Group Life Insurance:

Premium not to exceed Rs.6500/- per annum.

v.Provident Fund/Pension:

Contribution to Provident Fund and Pension Fund to the extent such contributions, either singly or put together are exempt under the Income Tax Act, 1961. Contribution to Pension Fund will be paid on basic salary and commission.

vi.Gratuity:

Gratuity payable shall be in accordance with the provisions of the Payment of Gratuity Act and to the extent not taxable under the Income Tax law.

vii.Use of Car with Driver:

The Company shall provide a car with driver for business and personal use. In addition, the Company shall also reimburse running and maintenance expenses of another car owned by, or leased/ rented to, the Managing Director for business and personal use.

viii. Telephone facility at residence: Telephone facility shall be provided at the residence. All personal long distance calls shall be billed by the Company to the Managing Director.

IV. Duties:

Subject to the superintendence, direction, and control of the Board of Directors of the Company, the Managing Director shall be entrusted with substantial power of management and also such other duties and responsibilities as may be entrusted to him by the Board of Directors from time to time. The headquarter of the Managing Director shall be at Ahmadabad or at such place as the Board of Directors may decided from time to time.

V.TERMINATION:

Managing Director may be removed from his office for gross negligence, breach of duty or trust if a special Resolution to that effect is passed by the Company in its General Meeting. The Managing Director may resign from his office by giving 90 days' Notice to the Company.

VI.COMPENSATION:

In the event of termination of office of Managing Director takes place before the expiration of tenure thereof, he shall be entitled to receive compensation from the Company for loss of office to extent and subject to limitation as provided under Section 202 of the Companies Act, 2013.

VII.OTHER TERMS AND CONDITIONS:

i.In the event of absence or inadequacy of profits in any financial year during the tenure of the Managing Director, salary and perquisites subject to the limits stipulated under Schedule V read with Section 196 and 197 of the Companies Act, 2013, are payable.

ii.“Family” means the spouse and dependent children of Mr. Pratik R. Kabra.

iii.Leave with full pay and allowances shall be allowed as per the Company's rules.

iv.Reimbursement of entertainment expenses actually and properly incurred in the course of business of the Company shall be allowed.

v.No sitting fees shall be paid to the Managing Director for attending the meetings of the Board of Directors or Committees thereof.

vi.The perquisites as listed in para (III) above shall be valued as per the Income Tax Rules, 1962, as may be applicable.

No Director, Key Managerial Personnel or their relatives, except Mr. Pratik R. Kabra whom the resolution relates, are interested or concerned in the resolution.

The Board recommends the resolution set forth in Item no. 4 for the approval of the members.

By Order of the Board of Directors
For, **Shree Metalloys Limited**

Date: 28th August, 2021
Place: Ahmedabad

Registered Office:-

103, Sun Square,
Nr. Klassic gold hotel,
off. C.G.Road,Navrangpura,
Ahmedabad – 380 009

Sd/-
Pratik R. Kabra
Chairman & Managing Director
DIN:-00006358

Director's Report

Dear Members,

Your Directors have pleasure in presenting the 27th Annual Report on business and operations of the Company together with the Audited Financial Statements of the Company for the year ended on 31st March, 2021.

I. FINANCIAL RESULTS:

The financial performance of the Company for the year ended 31st March, 2021 is summarized below:

(Amount in Rupees)		
FINANCIAL RESULTS	F.Y 2020-21	F.Y 2019-20
Total Revenue from Operations (Net)	48,49,32,763	43,56,18,643
Total Expenditure (Excluding Depreciation)	47,88,09,181	43,13,79,793
Gross Profit/(Loss)	61,23,582	42,38,850
Less:		
Depreciation	22,49,086	22,74,076
Provision for Taxation		-
Earlier year's Tax		
Deferred Tax liabilities	(1,68,171)	(1,03,838)
Current Tax	2,00,000	6,18,080
Short/(Excess) Provision written back	81,394	94,695
MAT Credit	(1,22,343)	-
Profit/ (Loss) after Tax (PAT)	38,83,616	13,55,837
Other Comprehensive Income	28,712	(77,552)
Total Comprehensive Income	39,12,328	12,78,285

II. OVERVIEW OF COMPANY'S FINANCIAL PERFORMANCE:

The overall Revenue of the Company for the Current Financial year 2020-21 has increased to Rs. **48,49,32,763/-** as compared to Rs. **43,56,18,643/-** in the Previous Financial year 2019-20. The Company's PAT as on 31st March 2021 is recorded at Rupees **38,83,616/-** as against **13,55,837/-**. Your directors are confident and optimistic of achieving upward growth and achieving much better results in the coming years.

III. AMOUNT TRANSFERRED TO RESERVE:

During the year under review, the Company has not transferred any amount to reserves.

IV. DIVIDEND:

To conserve the resources for the future requirement of the company, your directors have not recommended any dividend for the year.

V. TRANSFER OF UNCLAIMED DIVIDEND TO INVESTOR EDUCATION AND PROTECTION FUND:

Since there was no unpaid/unclaimed Dividend declared and paid last year, the provisions of Section 125 of the Companies Act, 2013 do not apply.

VI. CHANGES IN SHARE CAPITAL:

At present, the paid up Equity Share Capital of the Company is **Rs. 5,25,63,000/-** (Five Crore Twenty Five Lakh and Sixty Three Thousand rupees only).

The company has neither issued shares with differential rights as to dividend, voting or otherwise nor issued shares (including sweat equity shares) to the employees or directors of the company; under any scheme. Your Company does not have any ESOP scheme for its employees/Directors.

VII. PUBLIC DEPOSITS:

The Company has not accepted or renewed any amount falling within the purview of provisions of Section 73 and 76 of the Companies Act, 2013 ("the Act") read with the Companies (Acceptance of Deposit) Rules, 2014 during the period under review. Hence, the requirement for furnishing the details of deposits which are not in compliance with Chapter V of the Act is not applicable. The question of non-compliance of the relevant provisions of the law relating to acceptance of deposit does not arise.

VIII. CHANGE IN THE NATURE OF THE BUSINESS:

During the year, there is no change in the nature of the business of the Company.

IX. PARTICULARS OF CONTRACTS OR ARRANGEMENTS WITH RELATED PARTIES:

During the year under review, the Company has entered into any contracts or arrangements with related parties in terms of Section 188(1) of the Companies Act, 2013. The particulars of Contracts or Arrangements made with related parties required to be furnished under section 134(3) (h) are disclosed in the prescribed form **(Form AOC-2)** which is attached to this Report as **Annexure- "A"**.

X. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS MADE UNDER SECTION 186 OF THE COMPANIES ACT, 2013:

The company has not given any loans or guarantees covered under the provisions of section 186 of the Companies Act, 2013 during the financial period under review. The details of the investments made by company are given in the notes to the financial statements.

XI. MATERIAL CHANGES AND COMMITMENT AFFECTING THE FINANCIAL POSITION OF THE COMPANY WHICH HAVE OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR OF THE COMPANY TO WHICH THE FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT:

No material changes and commitments affecting the financial position of the Company occurred between the end of the financial year to which this financial statements relate and the date of this report.

XII. DISCLOSURE OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY REGULATORS OR COURTS OR TRIBUNALS IMPACTING THE GOING CONCERN STATUS AND COMPANY'S OPERATIONS IN FUTURE:

No orders have been passed by any Regulator or Court or Tribunal, impacting on the going concern status and the Company's operations in future.

XIII. SUBSIDIARIES, JOINT VENTURES AND ASSOCIATE COMPANIES:

The Company does not have any Subsidiary, Joint venture or Associate Company.

XIV. ADEQUACY OF INTERNAL FINANCIAL CONTROLS:

In Pursuant to Section 134(5)(e) of the Companies Act, 2013 the Internal Financial Controls with reference to financial statements as designed and implemented by the Company are adequate. The nature of the Company's business and size and complexity of its operations are in place and have been operating satisfactorily. Internal control systems consisting of policies and procedures are designed to ensure reliability of financial reporting, timely feedback on achievement of operational and strategic goals, compliance with policies, procedure, applicable laws and regulations and that all assets and resources are acquired economically, used efficiently and adequately protected.

During the period under review, no material or serious observation has been received from the Internal Auditors of the Company for inefficiency or inadequacy of such controls.

XV. PARTICULARS OF EMPLOYEES (DISCLOSURE UNDER ULE 5 OF COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014):

The information required under Section 197 of the Companies Act, 2013 read with rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 is provided in the Report and marked as **Annexure-“B”**. No employee of the Company was in receipt of the remuneration exceeding the limits prescribed in the rule 5(2) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.

XVI. ANNUAL RETURN:

The Annual Return of the Company as on 31st March, 2021 is available on the website of the Company at <http://shreemetalloys.com/annual-reports/>

XVII. PARTICULARS OF CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO:**i) CONSERVATION OF ENERGY :**

- The steps taken or impact on conservation of energy: As the Company does not have heavy plant and machineries, which could have consume more electricity, therefore, the Company has not taken any steps towards conservation of energy.
- The steps taken by the Company for utilizing alternate sources of energy: The Company has not taken any steps to use alternate sources of energy.
- The Capital investment on energy conservation equipment's: Nil

ii) TECHNOLOGY ABSORPTION :

- The efforts made towards technology absorption: No
- The benefits derived like product improvement, cost reduction, product development or import substitution: Nil
- In case of imported technology (imported during the last three years reckoned from the beginning of the financial year)- Not Applicable
 - the details of technology imported
 - the year of import;
 - whether the technology been fully absorbed;
 - if not fully absorbed, areas where absorption has not taken place, and the reasons thereof; and
- The expenditure incurred on Research and development (R& D) : NIL

iii) FOREIGN EXCHANGE EARNINGS & OUT GO :

- **Foreign Exchange Earning :** NIL
- **Foreign Exchange Outgo :**
 - CIF Value of Import : NIL

– Expenditure in Foreign Currency : NIL

XVIII. AUDITORS :

The matters related to Auditors and their Reports are as under:

A. Statutory Auditors

M/s Talati & Talati, Chartered Accountants, was appointed as Statutory Auditors for a period of 5 year(s) in the Annual General Meeting held on 25th September, 2017 to hold the office till the conclusion of 28th Annual General Meeting of the Company to be held in the year 2022. (Subject to ratification of their appointment at every AGM).

In accordance with the Companies Amendment Act, 2017, enforced on 7th May, 2018 by the Ministry of Corporate Affairs, the appointment of Statutory Auditor is not required to be ratified at every Annual General Meeting.

There are no qualifications, reservations or adverse remarks made by M/s Talati & Talati, Chartered Accountants, the Statutory Auditors of the Company, in their report.

B. Secretarial Auditors

Section 204 read with Section 134(3) of the Companies Act, 2013, mandates to obtain Secretarial Audit Report from Practising Company Secretary. M/s Nikhil Suchak & Associates, Practising Company Secretaries had been appointed as Secretarial Auditor of the Company for the financial year 2020-21.

Secretarial Audit Report issued by M/s Nikhil Suchak & Associates, Practising Company Secretaries in Form MR-3 attached and marked as **Annexure-“C”**, for the period under review forms part of this report.

C. Cost Auditors

The Company has not appointed the Cost Auditor as pursuant to Section 148(1) of the Companies Act, 2013 read with the Companies (Cost Records and Audit) Amendment Rules, 2014, as the cost audit is not applicable to the Company.

XIX. MATTERS RELATED TO DIRECTORS AND KEY MANAGERIAL PERSONNEL:

a) *Composition of Board:*

Name of Director	Designation	Category
Mr. Pratik R. Kabra (DIN:00006358)	Chairman & Managing Director	Promoter Executive Director
TagaramLchowdhary (DIN:00483173)	Director	Independent Director
Mr.Govindlal M. Dudani(DIN:07775287)	Director	Non-executive Director
Mrs. Leena Vijayan	Director	Woman Independent Director

b) *Retire by Rotation and subsequent re-appointment :*

Mr. Pratik R. Kabra (DIN: 00006358), is liable to retire by rotation at the ensuing AGM in accordance with the provisions of Section 152(6) of the Companies Act, 2013 read with the Companies (Appointment and Qualification of Directors) Rules, 2014 and the Articles of Association of Company and being eligible have offered himself for reappointment.

Appropriate resolutions for the re-appointment are being placed for your approval at the ensuing AGM. The Board recommends his re-appointment.

c) Key Managerial Personnel:

The following persons have been designated as Key Managerial Personnel of the Company pursuant to Section 2(51) and Section 203 of the Companies Act, 2013 read with the Rules framed there under:

1. Mr. Pratik R. Kabra - Managing Director (DIN: 00006358)
2. Mr. Nimish H. Bavishi - Chief Financial Officer
3. Ms. Sonali Panchal - Company Secretary & Compliance Officer

d) Board Evaluation:

Pursuant to the provisions of the Companies Act, 2013 as provided under Schedule IV (Code of independent director) of the Act and the Regulation 17(10) of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015, made there under, the Independent Directors held their meeting to evaluate the performance of the Non Independent Directors and the Board as a whole. Each Board member's contribution, their participation was evaluated and the domain knowledge they brought. They also evaluated the manner in which the information flows between the Board and the Management and the manner in which various documents are prepared and furnished by the Board.

Subsequently the Board adopted a formal mechanism for evaluating its performance and as well as that of its Committees and individual Directors, including the Chairman of the Board. The exercise was carried out through a structured evaluation process covering various aspects of the Board functioning such as composition of the Board & committees, experience & competencies, performance of specific duties & obligations, contribution at the meetings and otherwise, independent judgment, governance issues etc.

XX. DIRECTORS' RESPONSIBILITY STATEMENT:

Pursuant to Section 134(5) of the Companies Act, 2013 (including any statutory modification(s) or re-enactment(s) for the time being in force) the Board of Directors of your company states its responsibility Statement:

- i. In the preparation of the annual accounts for the financial year ended 31st March, 2021, the applicable accounting standards and Schedule III of the Companies Act, 2013 (including any statutory modification(s) or re-enactment(s) for the time being in force), have been followed along with proper explanation relating to material departures;
- ii. The directors had selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year as at 31st March, 2021 and of the profit or loss of the Company for the year ended 31st March, 2021.
- iii. The directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of Companies Act, 2013 (including any statutory modification(s) or re-enactment(s) for the time being in force) for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities.
- iv. The directors had prepared the annual accounts on a going concern basis.
- v. The directors had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively.
- vi. The directors had devised proper system to ensure compliance with the provisions of all applicable laws and that such system was adequate and operating effectively.

XXI. NUMBER OF BOARD MEETINGS CONDUCTED DURING THE YEAR UNDER REVIEW AND DATES:

The Company had conduct 8 (Eight) Board meetings during the financial year 2020-21 under review on: 10/04/2020, 24/06/2020, 11/07/2020, 26/08/2020, 19/09/2020, 29/10/2020, 11/11/2020, 13/02/2021.

The details of attendance of Directors at the Board Meetings and at the last Annual General Meeting are as under:

Name of Director(s)	Number of Board Meetings held and attended during the year		Attended Last AGM
	Held during the tenure	Attended	
Mr. Pratik R. Kabra	8	8	Yes
Mr. Govindlal M. Dudani	8	8	Yes
Mr. TAGARAM L. CHOWDHARY	8	8	Yes
Mrs. Leena Vijayan	8	8	Yes

XXII. COMMITTEES OF THE BOARD:

The Board Committees are set up under the formal approval of the Board to carry out clearly defined roles under which are considered to be performed by members of the Board. The Board supervises the execution of its responsibilities by the Committees and is responsible for their action.

A) AUDIT COMMITTEE:

Pursuant to the provisions of section 177(8) of the Companies Act, 2013, the Board hereby discloses the composition of the Audit Committee and other relevant matters as under:

▪ **Composition of the Committee:**

Name of Directors	Category	Designation	Number of Meeting entitled to attend	Number of Meeting Attended
Mr. Govindlal M. Dudani	Non-executive	Member	4	4
Mr. Tagaram L Chowdhary*	Non-executive & Independent	Member	4	4
Mrs. Leena Vijayan*	Women Independent Director	Chairman	4	4

The Audit Committee acts in accordance with the terms of reference specified by the Board of Directors of the Company. Further during the period under review, the Board of Directors of the Company had accepted all the recommendations of the Committee.

During the Year, 4(Four) meetings of the Committee were held on 24/06/2020, 26/08/2020, 11/11/2020 and 13/02/2021.

▪ **Vigil Mechanism/Whistle Blower Policy:**

Your Company is committed to highest standards of ethical, moral and legal business conduct of business operations. Accordingly the Board of Directors of the Company has, pursuant to the provisions of Section 177(9) of the Companies Act, 2013 read with Rule 7

of the Companies (Meetings of Board and its Powers) Rules, 2014, framed the Whistle Blower Policy for Directors and employees of the Company to provide a mechanism which ensures adequate safeguards to employees and Directors from any victimization on raising of concerns of any violations of legal or regulatory requirements, incorrect or misrepresentation of any, financial statements and reports etc.

The employees of the Company have the right/option to report their concern/grievance to the Chairman of the Audit Committee. No person has been denied access to the chairman of the Audit Committee.

During the financial year 2020-21, all the directors and employees had full access to approach the Vigil Mechanism Officer. No complaint was received during the year 2019-20 of any sort from any directors and employee of your company. Whistle Blower Policy is disclosed on the website of the Company www.shreemetalloys.com.

B) NOMINATION AND REMUNERATION COMMITTEE:

- **Composition of the Committee:**

Name of Directors	Category	Designation	Number of Meeting entitle to attend	Number of Meeting Attended
Mrs. Leena Vijayan	Non-executive &Independent	Member	1	1
Mr. Govindlal M. Dudani	Non-executive	Member	1	1
Mr. Tagaram L Chowdhary	Non-executive & Independent	Chairman	1	1

The Board has in accordance with the provisions of sub-section (3) of Section 178 of the Companies Act, 2013, formulated the policy setting out the criteria for determining qualifications, positive attributes, independence of a Director and policy relating to remuneration for Directors, Key Managerial Personnel and other employees. The said policy is furnished in **Annexure- "D"** and is attached to this report.

- Meeting:

During the Year, 1 (One) meeting of the committee was held on 05/03/2021

C) STAKEHOLDERS RELATIONSHIP COMMITTEE:

During the period under review, pursuant to Section 178(5) of the Companies Act, 2013 Regulation 20 of the Listing (Obligations and Disclosure Requirements) Regulations, 2015 with Stock Exchanges. The Board of Directors of the Company constituted the Stakeholder's Relationship Committee.

- **Composition of the Committee:**

Name of Directors	Category	Designation	Number of Meeting entitled to attend	Number of Meeting Attended
Mrs. Leena Vijayan*	Non-executive & Independent	Chairman	1	1
Mr. Govindlal M. Dudani	Non-executive	Chairman	1	1
Mr. TAGARAM LUMBHARAM	Non-executive & Independent	Member	1	1

CHOWDHARY				
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▪ **Details of Investor's grievances/ Complaints**

No. of investors' complaints received by the RTA/ Company during the year: Nil
 No. of complaints not solved to the satisfaction of shareholders/Investors during the year: Nil

No. of complaints pending as at the end of the current financial year 31st March, 2021:
 Nil

▪ **Compliance Officer**

The Compliance officer of the Company is Ms. Sonali Panchal .

Meetings of the Committee

The Committee duly met on 25/03/2021.

I. MANAGEMENT'S DISCUSSION AND ANALYSIS REPORT

The Management's Discussion and Analysis Report for the year under review, as stipulated under Regulation 34(2)(e) of the Listing Regulations is given as an **Annexure-E** to this report.

XXIII. *CORPORATE SOCIAL RESPONSIBILITY INITIATIVES:*

The provision of section 135(1) of Companies Act 2013 i.e. Corporate Social Responsibility is not applicable on the company. Therefore, the company has not constituted and developed CSR committee neither taken any steps towards Corporate Social Responsibility.

XXIV. *STATEMENT REGARDING DEVELOPMENT AND IMPLEMENTATION OF RISK MANAGEMENT POLICY:*

The Company does not have any Risk Management Policy or any statement concerning development and implementation of risk management policy of the company as the elements of risk threatening the Company's existence are very minimal.

XXV. *CORPORATE GOVERNANCE:*

As per the provisions of SEBI (Listing Obligations and Disclosures requirement) Regulation, 2015, the annual report of the listed entity shall contain Corporate Governance Report and it is also further provided that if the Company is not having the paid up share capital exceeding Rs. 10 crores and Net worth exceeding Rs. 25 crores, the said provisions are not applicable. As our Company does not have the paid up share capital exceeding Rs. 10 crores and Net worth exceeding Rs. 25 crores, the Corporate Governance Report is not applicable and therefore not provided by the Board.

XXVI. *GENERAL SHAREHOLDERS INFORMATION:*

▪ **Annual general meeting :**

Day and Date	Time	Venue
Wednesday, 29 th September, 2021	04.00 p.m.	Video Conferencing or other Audio Visual means

▪ **Financial Calendar for 2020-2021 (tentative schedule, subject to change)**

The Company expects to announce the unaudited/audited quarterly results for the year 2021-22 as per the following schedule:

Period

Quarter ending 30th June, 2020
 Quarter and half year ending 30th
 September, 2020
 Quarter ending 31st December, 2020
 The year ending 31st March, 2021

Approval of Quarterly results

By 2nd Week of August 2021
 By 2nd Week of November, 2021
 By 2nd Week of February, 2022
 By end of May, 2022

- **Listing:**

The Equity Shares of the Company are listed on Bombay Stock Exchange (BSE). The company has paid its Annual Listing fees to the Stock Exchange for the year 2020-21; further the Company is regular in compliances of various clauses and regulations of the Listing Agreement and/or LODR.

- **THE DETAILS OF APPLICATION MADE OR ANY PROCEEDING PENDING UNDER THE INSOLVENCY AND BANKRUPTCY CODE, 2016**

During the financial year ended on March 31, 2021, There is no application made or any proceeding pending under the INSOLVENCY AND BANKRUPTCY CODE, 2016 (31 of 2016) against the company.

- **THE DETAILS OF DIFFERENCE BETWEEN AMOUNT OF THE VALUATION DONE AT THE TIME OF ONE TIME OF ONE TIME SETTLEMENT AND THE VALUATION DONE WHILE TAKING LOAN FROM THE BANKS OR FINANCIAL INSTITUTIONS ALONG WITH THE REASONS THEREOF:**

Not applicable during the year under review.

ACKNOWLEDGEMENT:

Your Directors wish to acknowledge and place on record their appreciation for the support extended by Bankers and Office bearers of Government Department and Financial Institutions. Your Directors thank all, esteemed customers, suppliers and business associates for their faith, trust and confidence reposed in the Company. Your Directors also acknowledge the continued invaluable support extended by you our shareholders and the confidence that you have placed in the company.

Regd. Office:

103, SUN Square,
 Nr. Klassic Gold Hotel,
 Off. C.G.Road,
 Navrangpura,
 Ahmedabad -380009

Date: 28th August, 2021

Place: Ahmedabad

By Order of the Board
 For, **Shree Metalloys Limited**

Sd/-
Pratik R. Kabra
 Chairman & Managing Director
 DIN: (00006358)

CERTIFICATE BY CHIEF FINANCIAL OFFICER OF THE COMPANY**TO****Board of Directors,
SHREE METALLOYS LIMITED
AHMEDABAD****CERTIFICATE**

Mr. NIMISH HASMUKHLAL BAVISHI CFO of the Company hereby certifies that:

- (a) I have reviewed financial statements and the cash flow statement for
The year ended 31st March, 2021 and that to the best of my
Knowledge and belief:
- (i) These statements do not contain any materially untrue statement or omit
any material fact or contain statements that might be misleading.
- (ii) These statements together present a true and fair view of the Company's
affairs and are in compliance with existing accounting standards,
applicable laws and regulations.

(b) There are, to the best of my knowledge and belief, no transactions entered into
by the company during the year which are fraudulent, illegal or volatile of the
Company's code of conduct.

(c) I accept responsibility for establishing and maintaining internal controls and
that have evaluated the effectiveness of the internal control systems of the
Company and he has disclosed this to the auditors and the Audit Committee.

(d) I have indicated to the auditors and the Audit committee:

- (i) Significant changes in internal control during the year.
- (ii) Significant changes in accounting policies during the year and that the
same have been disclosed in the notes to the financial statements;
- (iii) Instances of significant fraud of which they have become aware and the
Involvement therein, if any, of the management or an employee having a Significant
role in the company's internal control system.

For and on behalf of the Board of Directors**Date: 28.08.2021****Place: AHMEDABAD****Sd/-**
NIMISH HASMUKHLAL BAVISHI**Chief Financial Officer**
(PAN: ADIPB2847H)

To
The Shareholders,
SHREE METALLOYS LIMITED
AHMEDABAD

Sub: Declaration for Compliance of Code of Conduct

I hereby declare that all the Board Members and senior Managerial Personnel have for the year ended 31st March, 2021, affirmed compliance on an annual basis with the Code of Conduct as laid down by the Company pursuant to the requirements of Para D of Schedule V of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

For and on behalf of the Board of Directors

Regd. Office:
103, SUN Square,
Nr. Klassic Gold Hotel,
Off. C.G.Road,
Navrangpura,
Ahmedabad -380009

Date: 28th August, 2021
Place: Ahmedabad

By Order of the Board
For, **Shree Metalloys Limited**

Sd/-
Pratik R. Kabra
Chairman & Managing Director
DIN: (00006358)

Annexure-E
MANAGEMENT DISCUSSION & ANALYSIS REPORT

Management Discussion & Analysis Report Pursuant to Regulation 34(2)(e) of Securities And Exchange Board Of India (Listing Obligations And Disclosure Requirements) Regulations, 2015.

I. Industry Structure and Development

The Company is engaged in the business of trading of ferrous and non ferrous. The Company also extended its area of operations to manufacturing sector of non-ferrous metals by carrying out job works at its manufacturing facility. The metal industry in which the Company is dealing is recently having trends of volatility and there are very good chances for the Company to develop its area of operation in the metal industry.

Metals sector have always been in the forefront of a nation's economy and India is no exception. Both ferrous and non ferrous metals are equally important towards building up the country's future. Ferrous metals are definitely more in use in India, but at the same time non ferrous metals are also gradually taking the centre stage and the time is not far when it will be regarded as the future. India is one of the richest reserves of all the raw materials required for the metal industry i.e. land, capital, cheap labour, power, coal etc.

II. Opportunities and Threats

For market players of Metal industry, a major cause of volatility is the cost of raw materials, which has been exacerbated by the change from annual to shorter-term price contracts. Shortages in supply have enabled suppliers to re-engineer the pricing mechanisms. However, this has created challenges for market players. They now have to deal not only with the increased volatility in raw material prices, but also with how to maintain margins with fluctuating demand. These developments are significantly affecting the earnings of the Metal industry and try to achieve stability in Metal market.

III. Segment wise Performance:

During the year the Company has not achieved a notable progress in its operations but due to its future expansion plans, projects and emerging opportunities your directors expect increase in its revenue and income. Our Company's operations belong to a single segment and therefore no segment wise performance given.

IV. Recent Trend and Future Outlook:

The sector in which the Company has been operating is developing faster and provides ample growth opportunities. Further due to rise in foreign direct investment in the sector, Company will be able to develop projects at fast pace and looking forward for better development and high investment returns.

V. Internal Control system and their adequacy

The Company has adequate system of internal control commensurate with its size and operations to ensure orderly and efficient conduct of the business. These controls ensure safeguard of assets, reduction and detection of frauds and error, adequacy and completeness of the accounting record and timely preparation of reliable financial information.

VI. Financial performance with respect to operational performance

The financial performance of the Company for the year 2020-21 is described hereinunder.

(Amount in Rupees)

FINANCIAL RESULTS	F.Y 2020-21	F.Y 2019-20
Total Revenue from Operations (Net) (Incl. Changes in Inventories)	48,49,32,763	43,56,18,643
Total Expenditure (Excluding Depreciation)	47,88,09,181	43,13,79,793
Gross Profit/(Loss)	61,23,582	42,38,850
Less:		
Depreciation	22,49,086	22,74,076
Provision for Taxation		-
Earlier year's Tax		
Deferred Tax liabilities	(1,68,171)	(1,03,838)
Current Tax	2,00,000	6,18,080
Short/(Excess) Provision written back	81,394	94,695
MAT Credit	(1,22,343)	-
Profit/ (Loss) after Tax (PAT)	38,83,616	13,55,837
Other Comprehensive Income	28,712	(77,552)
Total Comprehensive Income	39,12,328	12,78,285

VII. Material developments in Human Resources/Industrial Relations front, including the number of people employed.

Your Company has undertaken certain employees' Development initiative which have very positive impact on the moral and team spirit of the employees. The Company has continued to give special attention to Human Resource/ Industrial Relations development. Industrial relations remained cordial throughout the year and there was no incident of strike, lock-out etc.

VIII. In today's complex business environment, almost every business decision requires executives and managers to balance risk and reward. Effective risk management is therefore critical to an organization's success. Globalization, with increasing integration of markets, newer and more complex products & transactions and an increasingly stringent regulatory framework has exposed organisations to newer risks. As a result, today's operating environment demands a rigorous and integrated approach to risk management. Timely and effective risk management is of prime importance to our continued success. Increased competition and market volatility has enhanced the importance of risk management. The sustainability of the business is derived from the following:

- (1) Identification of the diverse risks faced by the company.
- (2) The evolution of appropriate systems and processes to measure and monitor them.
- (3) Risk management through appropriate mitigation strategies within the policy framework.
- (4) Monitoring the progress of the implementation of such strategies and subjecting them to Periodical audit and review.
- (5) Reporting these risk mitigation results to the appropriate managerial levels.

IX. Cautionary Statement:-

Statement in this Management Discussion and Analysis describing the company's objectives, projections, estimated and expectations are "forward looking statements" Actual results might differ, materially from those anticipated because of changing ground realities

Regd. Office:
103, SUN Square,
Nr. Klassic Gold Hotel,
Off. C.G.Road,
Navrangpura,
Ahmedabad -380009

By Order of the Board
For, **Shree Metalloys Limited**

Date: 28th August, 2021
Place: Ahmedabad

Sd/-
Pratik R. Kabra
Chairman & Managing Director
DIN: (00006358)

Annexure-“A”**FORM NO. AOC-2**

Form for Disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub section (1) of section 188 of the Companies Act, 2013 including certain arms length transaction under third proviso thereto.

(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014)

1. Details of Contracts or arrangements or transactions not at arm's Length basis:-

Sr. No.	Name(s) of the related party and nature of relationship	Nature of Contract s/Arrangements / Transactions	Duration of The Contracts /Arrangements/Transactions	Salient terms of the contracts or arrangements or transactions including the value, if any	Justification for entering into such contracts or arrangements or transactions	Date(s) of Approval by the Board	Amount paid as advances, if any:	Date on which the special resolution was passed in general meeting as required under first proviso to section 188
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
NIL								

2. Details of contracts or arrangements or transactions at Arm's length basis:-

Sr. No.	Name(s) of the related party and nature of relationship	Nature of Contracts/ Arrangements/ Transactions	Duration of The Contracts/ Arrangements/ Transactions	Salient terms of the contracts or arrangements or transactions including the value, if any	Date(s) of approval by the Board	Amount paid as advances, if any:
	(a)	(b)	(c)	(d)	(e)	(f)
1.	Shree Extrusion Ltd.	▪ Sales of Goods	Renewable On yearly basis	Rs. 25,76,40,778 /-	29/10/2020	-
2.	Metal Alloys Corporation	▪ Sales of Goods	Renewable On yearly basis	Rs. 3,60,10,281 /-	29/10/2020	-
3.	Shree Extrusion Ltd	▪ Purchase	Renewable On yearly basis	Rs. 39,68,000 / -	29/10/2020	-
4.	Pratik Kabra	▪ Rent	Renewable On yearly basis	Rs. 420000/-	29/10/2020	-

Place: Ahmedabad
Date: 28th August, 2021

For and on behalf of the Board of Directors

Sd/-
Pratik R. Kabra
Chairman & Managing Director
(DIN: 00006358)

“ANNEXURE - B”

The ratio of the remuneration of each director to the median employee’s remuneration and other details in terms of Sub Section 12 of Section 197 read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014:

Sr. No.	Requirements	Disclosure	
I.	The ratio of remuneration to each director to the median remuneration of the employees for the financial year	MD/WTD	N/A
		Other Director	N/A
II.	The percentage increase in remuneration of each director, Chief Financial Officer, Chief Executive Officer, Company Secretary in the financial year	MD/WTD	N/A
		Other Director	N/A
III.	The percentage increase in the median remuneration of employees in the financial year	N/A	
IV.	The number of permanent employees on the rolls of the Company as on 31 st March, 2021	7	
V.	Average percentile increase already made in the salaries of employees other than the managerial personnel in the last financial year and its managerial remuneration and justification thereof and point out if there are any exceptional circumstances for increase in the managerial remuneration.	Nil	
VI.	Affirmation that the remuneration is as per the remuneration policy of the Company	Yes, it is confirmed	

Place: Ahmedabad

For and on behalf of the Board of Directors

Date: 28th August, 2021

Sd/-
Pratik R. Kabra
Chairman & Managing Director
(DIN: 00006358)

ANNEXUR-D NOMINATION AND REMUNERATION POLICY

1. OBJECTIVE

The Nomination and Remuneration Committee and this Policy are in compliance with Section 178 of the Companies Act, 2013 read along with the applicable rules thereto and Regulation 19 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015.

The Key Objectives of the Committee would be:

- a) To guide the Board in relation to appointment and removal of Directors, Key Managerial Personnel and Senior Management.
- b) To evaluate the performance of the members of the Board and provide necessary report to the Board for further evaluation of the Board.
- c) To recommend to the Board on remuneration payable to the Directors, Key Managerial Personnel and Senior Management.

2. DEFINITIONS

(a) Key Managerial Personnel:

Key Managerial Personnel means—

- i. Chief Executive Officer or the Managing Director or the Manager;
- ii. Company Secretary;
- iii. Whole-Time Director;
- iv. Chief Financial Officer; and
- v. such other officer as may be prescribed

(b) Senior Management:

Senior Management means personnel of the Company who are members of its core management team excluding the Board of Directors. This would also include all members of management one level below the executive directors including all functional heads.

3. ROLE OF COMMITTEE

The role of the Committee *inter-alia* will be the following:

- a) To formulate a criteria for determining qualifications, positive attributes and independence of a Director.
- b) To recommend to the Board the appointment and removal of Senior Management.
- c) To carry out evaluation of Director's performance and recommend to the Board appointment / removal base on his / her performance.
- d) To recommend to the Board on (i) policy relating to remuneration for Directors, Key Managerial Personnel and Senior Management and (ii) Executive Directors remuneration and incentive.

e) To make recommendations to the Board concerning any matters relating to the continuation in office of any Director at any time including the suspension or termination of service of an Executive Director as an employee of the Company subject to the provision of the law and their service contract.

f) Ensure that level and composition of remuneration is reasonable and sufficient, relationship of remuneration to performance is clear and meets appropriate performance benchmarks.

g) To devise a policy on Board diversity.

h) To develop a succession plan for the Board and to regularly review the plan.

4. MEMBERSHIP

a) The Committee shall consist of a minimum 3 non-executive directors, majority of them being independent.

b) Minimum two (2) members shall constitute a quorum for the Committee meeting.

c) Membership of the Committee shall be disclosed in the Annual Report.

d) Term of the Committee shall be continued unless terminated by the Board of Directors.

5. CHAIRMAN

a) Chairman of the Committee shall be an Independent Director.

b) Chairperson of the Company may be appointed as a member of the Committee but shall not be a Chairman of the Committee.

c) In the absence of the Chairman, the members of the Committee present at the meeting shall choose one amongst them to act as Chairman.

d) Chairman of the Nomination and Remuneration Committee meeting could be present at the Annual General Meeting or may nominate some other member to answer the shareholders' queries.

6. FREQUENCY OF MEETINGS

The meeting of the Committee shall be held at such regular intervals as may be required.

7. SECRETARY

a) The Company Secretary of the Company shall act as Secretary of the Committee.

8. VOTING

a) Matters arising for determination at Committee meetings shall be decided by a majority of votes of members present and voting and any such decision shall for all purposes be deemed a decision of the Committee.

b) In the case of equality of votes, the Chairman of the meeting will have a casting vote.

9. NOMINATION DUTIES

The duties of the Committee in relation to nomination matters include:

- a) Ensuring that there is an appropriate induction & training programme in place for new Directors and members of Senior Management and reviewing its effectiveness;
- b) Ensuring that on appointment to the Board, Non- Executive Directors receive a formal letter of appointment in accordance with the Guidelines provided under the Companies Act, 2013;
- c) Identifying and recommending Directors who are to be put forward for retirement by rotation;
- d) Determining the appropriate size, diversity and composition of the Board;
- e) Setting a formal and transparent procedure for selecting new Directors for appointment to the Board;
- f) Developing a succession plan for the Board and Senior Management and regularly reviewing the plan;
- g) Evaluating the performance of the Board members and Senior Management in the context of the Company's performance from business and compliance perspective;
- h) Making recommendations to the Board concerning any matters relating to the continuation in office of any Director at any time including the suspension or termination of service of an Executive Director as an employee of the Company subject to the provision of the law and their service contract;
- i) Delegating any of its powers to one or more of its members or the Secretary of the Committee;
- k) Considering any other matters as may be requested by the Board.

10. REMUNERATION DUTIES

The duties of the Committee in relation to remuneration matters include:

- a) To consider and determine the Remuneration Policy, based on the performance and also bearing in mind that the remuneration is reasonable and sufficient to attract retain and motivate members of the Board and such other factors as the Committee shall deem appropriate all elements of the remuneration of the members of the Board.
- b) To approve the remuneration of the Senior Management including key managerial personnel of the Company maintaining a balance between fixed and incentive pay reflecting short and long term performance objectives appropriate to the working of the Company.
- c) To consider any other matters as may be requested by the Board.
- d) Professional indemnity and liability insurance for Directors and senior management.

11. MINUTES OF COMMITTEE MEETING

Proceedings of all meetings must be minutes and signed by the Chairman of the Committee at the subsequent meeting. Minutes of the Committee meetings will be tabled at the Subsequent Board and Committee meeting.

Place: Ahmedabad

Date: 28th August, 2021

For and on behalf of the Board of Directors

Sd/-
Pratik R. Kabra
Chairman & Managing Director
(DIN: 00006358)

Annexure-C**SECRETARIAL AUDIT REPORT****Form No. MR-3**For the financial year ended on 31stMarch, 2021

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

To,
The Members,
SHREE METALLOYS LIMITED,
103, Sun Square, Nr. Klassic Gold Hotel, OFF.
C.G.Road, Navrangpura,
Ahmedabad-380009, Gujarat.

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **SHREE METALLOYS LIMITED** (CIN:L67120GJ1994PLC023471)(hereinafter called "the company"). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

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

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31stMarch, 2021 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the Rules made there under;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the Rules made there under;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-Laws framed there under;
- (iv) Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowing. (**not applicable to the company during the audit period**)
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-
 - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
 - (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 (**not applicable to the company during the audit period**).
 - (d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (**not applicable to the company during the audit period**) ;

- (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 ***(not applicable to the company during the audit period)***;
 - (f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
 - (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 ***(not applicable to the company during the audit period)***;
 - (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 ***(not applicable to the company during the audit period)***;
- (vi) I have relied on the representations made by the Company and its officers for systems and mechanism formed by the Company for compliances of other specific applicable Acts, Laws and Regulations to the Company as mentioned hereunder;
- a) Local taxes as applicable in the State of Gujarat.

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

- i. Secretarial Standards issued by The Institute of Company Secretaries of India;
- ii. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

I further report that:

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors.

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

Board takes decision by majority of directors while the dissenting directors' views are captured and recorded as part of the minutes.

I further report that:

There are adequate systems and processes in the company commensurate with the size and operations of the company to monitor and ensure compliance with applicable Laws, Rules, Regulations and guidelines.

I further report that:

During the audit period, there were no instances of:

- (i) Public/Rights/Preferential issue of Shares/debentures/sweat equity.
- (ii) Redemption/buy-back of securities.
- (iii) Merger/ amalgamation/ reconstruction etc.
- (iv) Foreign technical collaborations.

For, **Nikhil Suchak & Associates**
Company Secretaries

Place:- Gandhinagar
Date:-28th August, 2021
UDIN: A040614C000850995

Nikhil Suchak
Proprietor
ACS:-40614
COP No. :- 18938

Note: This report is to be read with my letter of even date which is annexed as Annexure -1 herewith and forms and integral part of this report.

Annexure - 1 to Secretarial Audit Report

To,
The Members,
SHREE METALLOYS LIMITED,
103, Sun Square, Nr. Klassic Gold Hotel, OFF.
C.G.Road, Navrangpura,
Ahmedabad-380009, Gujarat.

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

1. Maintenance of secretarial records is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required, I have obtained the Management representations about the compliance of Laws, Rules and Regulations and happening of events etc.
5. The compliance of the provisions of corporate and other applicable Laws, Rules, Regulations, Standards is the responsibility of management. My examination was limited to the verification of procedures on test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For, **Nikhil Suchak & Associates**
Company Secretaries

Place:-Gandhinagar
Date:-28th August, 2021

Nikhil Suchak
Proprietor
ACS:-40614
COP No. :- 18938

CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTOR

(pursuant to Regulation 34(3) and Schedule V Para C clause (10)(i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,
The Members of
M/S. SHREE METALLOYS LIMITED
103, SUN SQUARE,
NR. KLASSIC GOLD HOTEL, OFF. C.G.ROAD,
AHMEDABAD Ahmedabad
GJ 380009 IN

We, M/S. NIKHIL SUCHAK & ASSOCIATES Practising Company Secretaries, have examined the relevant registers, records, forms, returns and disclosures received from the Directors of SHREE METALLOYS LIMITED office at 103, SUN SQUARE, NR. KLASSIC GOLD HOTEL, OFF. C.G.ROAD, AHMEDABAD GJ 380009 IN (herein after referred to as a 'the Company'), produced before Certificate, in accordance with Regulation 34(3) read with Schedule V Para-c, Sub Clause 10(i) of the Securities Exchange Board of India (Listing obligation and Disclosure Requirements) Regulations, 2015.

In our opinion and to the best of our information and according to the verifications (including Directors Identification Number (DIN) status at the portal www.mca.gov.in) as considered necessary and explanations furnished to by the Company & its officers, we hereby certify that none of the directors on the board of the company as stated below for the financial year ending on 31st March 2021 have been debarred or disqualified from being appointed or continuing as Director of the companies by the securities and Exchange Board of India, Ministry Of Corporate Affairs or any such other Statutory Authority.

Sr. No.	Name of Director	DIN	Date of Appointment
1	PRATIK RADHESHYAM KABRA	00006358	13/11/2007
2	TAGARAM LUMBHARAM CHOWDHARY	00483173	14/11/2018
3	GOVINDLAL MANGILAL DUDANI	07775287	25/09/2017
4	LEENA VIJAYAN	08551144	30/08/2019

Ensuring the eligibility of for the appointment / continuity of every director on the Board is the responsibility of the management of the Company. Our responsibility is to express an opinion on these based on our verification. This certificate is neither an assurance as to the future viability of the company nor of the efficiency or effectiveness with which the management has conducted the affairs of the company.

For, **Nikhil Suchak & Associates**
Company Secretaries

Place:-Gandhinagar
Date:-28th August, 2021

Nikhil Suchak
Proprietor
ACS:-40614
COP No. :- 18938

INDEPENDENT AUDITOR’S REPORT

**To
The Members of
Shree Metalloys Limited**

Report on the Audit of the Financial Statements

Opinion

We have audited the accompanying financial statements of **SHREE METALLOYS LIMITED** (“the Company”) which comprise the Balance Sheet as at March 31, 2021 and the Statement of Profit and Loss (including the Other Comprehensive Income), Statement of Changes in Equity and the Statement of Cash Flows for the year then ended, and notes to financial statement, including a summary of significant accounting policies and other explanatory information (herein referred to as the “financial statements”).

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the Companies Act, 2013 (the “Act”) in the manner so required and give a true and fair view in conformity with the Indian Accounting Standards (“Ind AS”) prescribed under section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended, and other accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2021, the profit and total comprehensive income, changes in equity and its cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit of the financial statements in accordance with the Standards on Auditing (“SA”s) specified under section 143(10) of the companies Act, 2013. Our responsibilities under those Standards are further described in the Auditor’s Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India (“ICAI”) together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the companies Act, 2013 and the Rules made 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 Ind AS financial statement.

Key Audit Matter

We have determined that there are no key audit matters to communicate in our audit report.

Information Other than the Financial Statements and Auditors' Report Thereon

The Company's Management and Board of Directors are responsible for the other information. The other information comprises the information included in the company's Annual Report, but does not include the financial statements and our auditor's report thereon.

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

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that if there is a material misstatement of this other information, we are required to report that fact. Based on the representations received from the Company's Management and Board of Directors, we expect to receive the 'Other Information' subsequent to the date of our audit report. Accordingly, we are unable to comment on any inconsistencies or uncorrected misstatements, if any, in such 'Other Information'.

Management's Responsibility for the Ind AS Financial Statements

The Company's Board of Directors is responsible for the matters stated in Section 134(5) of the Companies Act, 2013 with respect to the preparation and presentation of these Ind AS financial statements that give a true and fair view of the financial position, financial performance including other comprehensive income, cash flows and changes in equity of the Company in accordance with the accounting principles generally accepted in India, including the 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 the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the

financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management and Board of Directors 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. Those charged with governance are also responsible for overseeing the Company's financial reporting process.

Auditor's Responsibility for Audit of the Financial Statements

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

As part of an audit in accordance with SAs, we exercise professional judgment 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 control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the 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.

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 reasonably knowledgeable user of the financial statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the standalone financial statements.

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

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

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 reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by Section 143(3) of the Act, based on our audit we report that:
 - (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the 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 and proper returns adequate for the purpose of our audit have been received from the branches not visited by us;
- (c) In our opinion, the aforesaid Ind AS financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Indian Accounting Standards) Rules, 2015, as amended;
- (e) On the basis of written representations received from the directors of the Company 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 with reference to standalone financial statements of the Company and the operating effectiveness of such controls, refer to our separate Report in “Annexure A”. Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company’s internal financial controls over financial reporting
- (g) In our opinion, the managerial remuneration for the year ended 31 March 2021 has been paid/provided by the Company to its directors in accordance with the provisions of section 197 read with Schedule V to the Act;
- (h) With respect to the other matters to be included in the Auditor’s Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended 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 financial statements.
 - ii. The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts;
 - iii. There has been no delay in transferring amounts, required to be transferred, to the Investor Education and Protection Fund by the Company.

2. As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government in terms of Section 143(11) of the Act, we give in "Annexure B" a statement on the matters specified in paragraphs 3 and 4 of the Order.

For Talati & Talati LLP
Chartered Accountants
FRN: 110758W/W100377

Place : Ahmedabad
Date : 16.06.2021

Anand Sharma
(Partner)
Membership No: 129033
UDIN :21129033AAAAES4220

Annexure A to Independent Auditors' Report

(Referred to in paragraph 1(f)] under the heading of "Report on Other Legal and Regulatory Requirements" of our report of even date.)

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

We have audited the Internal Financial Controls over financial reporting of Shree Metalloys Limited ("the Company") as of March 31, 2021 in conjunction with our audit of the Ind AS financial statements of the Company for the year ended on that date.

Management's Responsibility for Internal Financial Controls

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

Auditors' Responsibility

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

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

including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

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

Meaning of Internal Financial Controls over Financial Reporting

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

Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

Opinion

In our opinion, 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.

For, Talati & Talati LLP
Chartered Accountant
(Firm Regn No: 110758W/W100377)

Place : Ahmedabad
Date : 16.06.2021

Anand Sharma
(Partner)
Membership No: 129033
UDIN :21129033AAAAES4220

Annexure 'B' to the Independent Auditor's Report

With reference to the "Annexure B" referred to in the Independent Auditor's Report to the members of the Company on the Ind AS Financial statements for the year ended 31st March, 2021, we report the following:

(Referred to in paragraph 2 under the heading of "Report on Other Legal and Regulatory Requirements" of our report of even date.)

- (i) In respect of its fixed assets:
 - (a) The Company is maintaining proper records showing full particulars, including quantitative details and situation of fixed assets;
 - (b) As explained to us, the fixed assets have been physically verified by the management during the year and there is a regular programme of verification which, in our opinion, is reasonable having regard to the size of the Company and the nature of its assets. No material discrepancies were noticed on such verification.
 - (c) Based on our audit procedures and on the basis of information and explanations given to us by the management, the title deeds of immovable properties are held in the name of the Company.
- (ii) The inventories have been physically verified during the year by the management. In our opinion, the frequency of verification is reasonable. As explained to us, there were no material discrepancies noticed on physical verification of inventories as compared to the book records.
- (iii) During the year the Company has not given any loans secured or unsecured to the companies, firms, LLP or other parties covered in the register maintained under section 189 of the Companies Act, 2013. Hence Clause (iii) (a), (b) and (c) are not applicable to the Company.
- (iv) Based on our audit procedures and on the basis of information and explanations given to us by the management, provisions of section 185 and 186 of the Companies Act, 2013 in respect of loans, investments, guarantees and security have been complied with.
- (v) In our opinion and according to the information and explanations given to us, the Company has not accepted any deposit and hence the provisions of Section 73 to 76 or any other relevant provisions of the Companies Act and the Companies (Acceptance of Deposits) Rules, 2014, with regard to the deposits accepted are not applicable to the Company. Therefore, the provisions of clause (v) of paragraph 3 of the Order are not applicable to the company.
- (vi) The Company is not required to maintain cost records under sub-section (1) of section 148 of

Companies Act, 2013. Therefore, the provisions of clause (vi) of paragraph 3 of the Order are not applicable to the Company.

(vii) In respect of statutory dues:

(a) According to the records of the Company, the Company is generally regular in depositing with appropriate authorities undisputed statutory dues including Provident Fund, Employees' State Insurance, Income Tax, Sales Tax, Service Tax, Duty of Customs, Duty of Excise, Value Added Tax, Cess and any other statutory dues applicable to it. According to the information and explanations given to us, no undisputed amounts payable in respect of the aforesaid statutory dues were in arrears as at 31st March, 2018 for a period of more than six months from the date they became payable.

(b) According to the information and explanations given to us, there are no dues of Income-tax, Sales tax, Service tax, Goods and Service tax, Duty of customs, Duty of excise, Value added tax and Cess as at 31st March, 2021, which have not been deposited with the appropriate authorities on account of any dispute.

(viii) Based on our audit procedures and on the basis of information and explanations given to us by the management, we are of the opinion that the company has not defaulted in repayment of dues to the financial institution, banks, Government or debenture holders as at the balance sheet date.

(ix) In our opinion and according to the information and explanation given to us, neither any moneys raised by Initial public offer/ further public offer (including debt instruments) nor any term loans has been availed by the company, hence purpose of question of proper utilization does not arise.

(x) Based on the audit procedures performed and representation obtained from management we report that, no case of material fraud by the Company or on the Company by its officer or employee has been noticed or reported for the year under audit.

(xi) Based on our audit procedures and on the basis of information and explanations given to us by the management, managerial remuneration has been paid or provided in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Companies Act.

(xii) The Company is not a Nidhi Company, therefore; the provisions of clause (xii) of paragraph 3 of the Order are not applicable to the Company.

- (xiii) Based on our audit procedures and on the basis of information and explanations given to us by the management, all transactions with the related parties are in compliance with sections 177 and 188 of Companies Act,2013 where applicable and the details have been disclosed in the Financial Statements , as required by the applicable accounting standards;
- (xiv) Based on our audit procedures and on the basis of information and explanations given to us by the management, the Company has not made any preferential allotment or private placement of shares or fully or partlyconvertible debentures during the year under review. Therefore, the provisions of clause (xiv) of paragraph 3 of the Order are not applicable to the company.
- (xv) Based on our audit procedures and on the basis of information and explanations given to us by the management, the company has not entered into any non-cash transactions with directors or persons connected with him. Therefore the provisions of section 192 of Companies act, 2013 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.

For Talati & Talati LLP
Chartered Accountants
(Firm Regn No: 110758W/W100377)

Place : Ahmedabad
Date : 16.06.2021

Anand Sharma
(Partner)
Mem No: 129033
UDIN :21129033AAAAES4220

SHREE METALLOYS LIMITED

CIN : L67120GJ1994PLC023471

Balance Sheet as at 31st March, 2021

Particulars	Note No.	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
ASSETS			
(1) Non- current assets			
(a) Property, Plant and Equipment	4	13,237,552	15,485,438
(b) Financial assets			
i) Investment	5	198,000	159,200
(c) Other non-current assets	6	292,192	793,638
(2) Current Asset			
(a) Inventories	7	8,296,848	3,742,277
(b) Financial assets			
(i) Trade receivables	8	83,427,301	35,911,110
(ii) Cash and cash equivalents	9	908,966	21,705,906
(ii) Bank Balances other than (ii) above			-
(c) Other current assets	10	2,398,956	1,124,215
Total Assets		108,759,815	78,921,784
EQUITY AND LIABILITIES			
EQUITY			
(a) Equity share capital	11	52,563,000	52,563,000
(b) Other equity	12	21,542,715	17,630,387
LIABILITIES			
(1) Non Current Liabilities			
(a) Deferred Tax Liability(Net)	13	666,933	825,016
(b) Financial Liabilities			
(i) Borrowings	14	486,970	907,603
(2) Current liabilities			
(a) Financial liabilities			
(i) Borrowings	14	30,479,914	-
(ii) Trade payables	15	1,702,429	5,547,643
(b) Other current liabilities	16	1,130,149	539,681
(c) Provisions	17	187,705	908,454
Total Equity and Liabilities		108,759,815	78,921,784

The accompanying Notes 1 to 32 are integral part of these Financial Statements.

As per our report of even date attached.

For and on behalf of the Board of Directors,

For TALATI & TALATI LLP
Chartered Accountants
Firm Regn.No.110758W/W100377

Pratik Kabra
Managing Director
(DIN - 00006358)

Nimish Bavishi
Chief Financial Officer

Anand Sharma
Partner
Membership No.129033
Place: Ahmedabad
Date: 16-06-2021

Leena Vijayan
Director
(DIN - 08551144)
Place: Ahmedabad
Date: 16-06-2021

Sonali Panchal
Company Secretary
AWBPP2990D

SHREE METALLOYS LIMITED

CIN : L67120GJ1994PLC023471

Statement of Profit and Loss for the period ended 31st March, 2021

Sr. No.	Particulars	Note No.	Year Ended 31st March, 2021 Rs.	Year Ended 31st March, 2020 Rs.
I	Revenue from Operations	18	484,604,818	435,094,110
II	Other Income	19	327,945	524,533
III	Total Income (I+II)		484,932,763	435,618,643
IV	Expenses			
	Purchases of Stock-in-Trade		475,677,371	417,685,126
	Changes in Inventories of Finished goods, Stock-in-Trade and Work-in-progress	20	(4,554,570)	3,712,957
	Employee Benefits Expense	21	2,066,003	2,096,923
	Finance Costs	22	1,021,166	3,285,834
	Depreciation and Amortization Expense	4	2,249,086	2,274,076
	Other Expenses	23	4,599,211	4,598,953
	Total Expenses (IV)		481,058,267	433,653,869
V	Profit before tax (III- IV)		3,874,496	1,964,774
VI	Tax expense :			
	(1) Current Tax	24	200,000	618,080
	(2) Deferred Tax		(168,171)	(103,838)
	(3) Short/(Excess) Provision written back		81,394	94,695
	(4) MAT Credit		(122,343)	-
VII	Profit for the period (V -VI)		3,883,616	1,355,837
VIII	Other Comprehensive Income			
	A (i) Items that will not be reclassified to profit or loss		38,800	(104,800)
	(ii) Income tax relating to items that will not be reclassified to profit or loss		(10,088)	27,248
	B (i) Items that will be reclassified to profit or loss			
	(ii) Income tax relating to items that will be reclassified to profit or loss			
	Sub-total (A+B)		28,712	(77,552)
IX	Total Comprehensive Income for the period (VII + VIII) (Comprising Profit and Other Comprehensive Income for the period)		3,912,328	1,278,285
X	Earnings per equity share (Face Value of ` 10/- each) Basic & Diluted	25	0.74	0.26

The accompanying Notes 1 to 32 are integral part of these Financial Statements.

As per our report of even date attached.

For and on behalf of the Board of Directors,

For TALATI & TALATI LLP
Chartered Accountants
Firm Regn.No.110758W/W100377

Pratik Kabra
Managing Director
(DIN - 00006358)

Nimish Bavishi
Chief Financial Officer

Anand Sharma
Partner
Membership No.129033
Place: Ahmedabad
Date: 16-06-2021

Leena Vijayan
Director
(DIN - 08551144)
Place: Ahmedabad
Date: 16-06-2021

Sonali Panchal
Company Secretary
AWBPP2990D

SHREE METALLOYS LIMITED

CIN : L67120GJ1994PLC023471

Cash Flow Statement for the year ended 31st March,2021

	Particulars	For the year ended 31st March, 2021 Rs.	For the year ended 31st March, 2020 Rs.
A.	CASH FLOW FROM OPERATING ACTIVITIES		
	Net Profit Before Tax	3,874,496	1,964,774
	Adjustment for		
	Add :		
	Interest and Finance Charges	1,021,166	240,000
	Depreciation	2,249,086	2,274,076
	Less:		
	Profit on sale of Property, Plant and Equipment	-	-
		3,270,252	2,514,076
	Operating Profit Before Working Capital Changes	7,144,748	4,478,850
	(Increase) / Decrease in Current Assets		
	Trade and Other Receivables	(47,516,191)	59,931,603
	Inventories	(4,554,571)	3,712,957
	Loans and advances	(1,152,398)	30,987,889
	Increase / (Decrease) in Current Liabilities		
	Trade and Other Payables	(4,195,439)	(23,585,587)
	Other current Liabilities	-	-
	Cash Generated From Operations		
	Direct Taxes Paid	61,450	-
	NET CASH INFLOW / (OUTFLOW) FROM OPERATING ACTIVITIES (A)	(50,335,301)	75,525,712
B.	CASH FLOW FROM INVESTING ACTIVITIES		
	Purchase of Property, Plant and Equipment	(1,200)	(70,999)
	Proceeds from Property, Plant and Equipment	-	-
	Increase/Decrease in deposits	501,446	-
	NET CASH INFLOW / (OUTFLOW) FROM INVESTING ACTIVITIES (B)	500,246	(70,999)
C.	CASH FLOW USED IN FINANCING ACTIVITIES		
	Proceeds from Long Term Borrowings	-	-
	Repayment of long Term Borrowings	(420,633)	(373,812)
	Proceeds - Repayment of Short Term Borrowings	30,479,914	(61,597,722)
	Interest and Finance Charges paid	(1,021,166)	(240,000)
	NET CASH INFLOW / (OUTFLOW) FROM FINANCING ACTIVITIES (C)	29,038,115	(62,211,534)
	Net Increase / (Decrease) in Cash and Cash Equivalents (A+B+C)	(20,796,940)	13,243,179
	Add : Cash and Cash Equivalents balance as at 1st April	21,705,906	8,462,727
	Cash and Cash Equivalents as at 31st March	908,966	21,705,906

The accompanying Notes 1 to 32 are integral part of these Financial Statements.

As per our report of even date attached.

For and on behalf of the Board of Directors,

For TALATI & TALATI LLP
Chartered Accountants
Firm Regn.No.110758W/W100377

Pratik Kabra
Managing Director
(DIN - 00006358)

Nimish Bavishi
Chief Financial Officer

Anand Sharma
Partner
Membership No.129033
Place: Ahmedabad
Date: 16-06-2021

Leena Vijayan
Director
(DIN - 08551144)
Place: Ahmedabad
Date: 16-06-2021

Sonali Panchal
Company Secretary
AWBPP2990D

Shree Metalloys Limited
CIN : L67120GJ1994PLC023471
Notes to the Financial Statements as at 31st March, 2021

Note - 4 Property, Plant and Equipment

(Amount in Rs.)

Sr. No.	Particulars	Building	Plant and Equipments	Vehicles	Office Equipments	Computers	Total
1	Cost of Assets						
	As at 1st April, 2019	2,733,831	22,864,726	3,654,375	235,675	302,426	29,791,033
	Addition	-	62,000	-	8,999	-	70,999
	Disposal / Adjustments	-	-	-	-	-	-
	As at 31st March, 2020	2,733,831	22,926,726	3,654,375	244,674	302,426	29,862,032
	Addition	-	-	-	1,200	-	1,200
	Disposal / Adjustments	-	-	-	-	-	-
	As at 31st March 2021	2,733,831	22,926,726	3,654,375	245,874	302,426	29,863,232
2	Depreciation						
	As at 1st April, 2019	495,212	9,506,254	1,665,561	142,969	292,522	12,102,518
	Charge for the year	103,677	1,888,698	266,842	14,859	-	2,274,076
	Disposal / Adjustments						
	As at 31st March, 2020	598,889	11,394,952	1,932,403	157,828	292,522	14,376,594
	Charge for the period	103,691	1,861,776	266,849	16,770	-	2,249,086
	Disposal / Adjustments						
	As at 31st March 2021	702,580	13,256,728	2,199,252	174,598	292,522	16,625,680
3	Net Block						
	As at 1st April, 2019	2,238,619	13,358,472	1,988,814	92,706	9,904	17,688,515
	As at 31st March, 2020	2,134,942	11,531,774	1,721,972	86,846	9,904	15,485,438
	As at 31st March 2021	2,031,251	9,669,998	1,455,123	71,276	9,904	13,237,552

Note - 5 Investment

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
	Non current Investments		
A	<u>Investments in Equity Instruments (Valued at Fair Value through OCI)</u>		
1	Fully paid Equity Shares: (Quoted)		
a)	800 Equity Shares of Riddhi Siddhi Gluco Biols Ltd of Rs. 10 each (31st March, 2021 800 Equity Shares) (1st April, 2020 800 Equity Shares)	198,000	159,200
	Total	198,000	159,200
	Aggregate Cost of Quoted Investments	17,044	17,044
	Aggregate Market Value of Quoted Investments	198,000	159,200

Note - 6 Other Non-Current Assets

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Advances other than Capital Advances		
	Security Deposits	292,192	793,638
	Total	292,192	793,638

Note - 7 Inventories

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	As taken, valued & certified by the management		
	At lower of cost or net realisable value		
	Stock in trade	8,296,848	3,742,278
	Total	8,296,848	3,742,278

Inventories are hypothecated to secure working capital facilities from Punjab National Bank, Ranjit Road Jamnagar Branch.

Note - 8 Trade Receivables

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Unsecured , Considered Good		
	(a) Outstanding for more than six months	-	-
	(b) Others	83,427,301	35,911,110
	Total	83,427,301	35,911,110

Trade receivable are hypothecated to secure working capital facilities from Punjab National Bank, Ranjit Road Jamnagar Branch.

Note - 9 Cash & Cash Equivalents

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Cash on Hand	322,338	297,764
2	Balances with Banks	586,628	21,408,142
	Total	908,966	21,705,906

Note - 10 Other Current Assets

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Advances other than capital advances		
	(a) Security Deposits		
	(b) Other Advances		
	(i) Balance with Government Authorities	2,002	468,579
	(ii) Advances to Suppliers	1,814,328	-
	(iii) Prepaid Expenses	42,560	89,313
2	Others		
	Interest Accrued on Fixed Deposits	-	-
	Interest Accrued on Deposits	-	91,598
	MAT Credit	122,343	-
	Other Advance	417,723	474,725
	Total	2,398,956	1,124,215

Note - 11 Equity Share Capital

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	AUTHORIZED SHARE CAPITAL 10000000 Equity Shares of Rs.10/- each (Previous Year 10000000 Equity Shares of Rs.10/-each)	100,000,000	100,000,000
	Total	100,000,000	100,000,000
2	ISSUED , SUBSCRIBED & FULLY PAID UP CAPITAL 5256300 Equity Shares of 10/- each (Previous Year 5256300 Equity Shares of Rs.10/-each fully paid up)	52,563,000	52,563,000
	Total	52,563,000	52,563,000

11.1 The reconciliation of the number of Equity Shares outstanding as at 31st March 2021 is set out below :

Particulars	As at 31st March, 2021		As at 31st March, 2020	
	No. of shares	Rs.	No. of shares	Rs.
Add: Shares outstanding at the beginning of the year	5,256,300	5,256,300	5,256,300	52,563,000
Shares issued during the year	-	-	-	-
Shares outstanding at the end of the year	5,256,300	5,256,300	5,256,300	52,563,000

11.2 Rights, preferences and restrictions attached to Equity Shares

The company has one class of equity shares having a par value of Rs.10 each. Each shareholder is eligible for one vote per share held. In the event of liquidation, the equity shareholders are eligible to receive the remaining assets of the Company after distribution of all preferential amounts, in proportion to their shareholding.

11.3 The details of shareholders holding more than 5% shares are set out below

Name of the shareholders	As at 31st March, 2021		As at 31st March, 2020	
	No. of Shares	% of holding	No. of Shares	% of holding
Radheshyam L Kabra	802,500	15.27	802,500	15.27
Girjaben R Kabra	536,300	10.20	536,300	10.20
Govindram Laluram Kabra	496,000	9.44	496,000	9.44
Pratik Radheshyam Kabra	439,419	8.36	439,419	8.36
Hansaben Govindram Kabra	350,000	6.66	350,000	6.66
Dhwani Vishal Maheshwari	424,913	8.08	424,913	8.08
Jinal Pratik Kabra	451,555	8.59	451,555	8.59
Neha Ramprakash Kabra	300,000	5.71	300,000	5.71

Note - 12 Other Equity

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
A	Retained Earnings		
	Balance as per last Financial year	17,747,759	16,391,922
	Add : Profit for the year	3,883,616	1,355,837
	Adjustments as per Ind AS		
	Fair Valuation of Investments	-	-
	DTA created as per Fair Valuation of Investments	-	-
		21,631,375	17,747,759
B	Other Comprehensive Income		
	Balance as per last Financial year	(117,372)	(39,820)
	Add/ (Less) :		
	Fair value of Investments	38,800	(104,800)
	Deferred tax on Fair Value of Investments	(10,088)	27,248
		(88,660)	(117,372)
	Total	21,542,715	17,630,387

Note - 13 Deferred Tax Liability(Net)

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	DEFERRED TAX LIABILITIES : Arising on account of timing difference - Fixed Assets : Impact of difference between Tax Depreciation and Depreciation / amortization charged for the financial reporting TOTAL DEFERRED TAX LIABILITIES (A)	954,050 954,050	1,122,220 1,122,220
	Less :		
2	DEFERRED TAX ASSETS : Arising on account of timing difference - Fair Valuation of Equity Instruments - MAT Credit Entitlement TOTAL DEFERRED TAX ASSETS (B)	287,117 - 287,117	297,204 - 297,204
	Total (A-B)	666,933	825,016

13.1 Reconciliation of deferred tax liabilities(Net):

Particulars	31st March, 2021	31st March, 2020
Opening balance	825,016	956,102
Tax (income)/expense during the period recognised in profit or loss	(168,171)	(103,838)
Tax (income)/expense during the period recognised in other comprehensive income	10,088	(27,248)
Tax (income)/expense during the period recognised directly in other equity	-	-
Closing balance	666,933	825,016

13.2 Movements in DTA:

Particulars	Fair Valuation of Equity Instruments	MAT credit Entitlement	Total
At 1st April 2019	269,957	-	269,957
charged/credited: to Profit or Loss	-	-	-
to other comprehensive income	27,248	-	27,248
At 31st March 2020	297,205	-	297,205
charged/credited: to Profit or Loss	-	-	-
to other comprehensive income	(10,088)	-	(10,088)
At 31st March 2021	287,117	-	287,117

13.3 Movements in DTL:

Particulars	Assets : Impact of difference between Tax Depreciation and Depreciation / amortization charged for the financial reporting	Total
At 1st April, 2019	1,226,056	1,226,056
charged/credited: to Profit or Loss	(103,835)	(103,835)
to other comprehensive income	-	-
At 31st March, 2020	1,122,221	1,122,221
charged/credited: to Profit or Loss	(168,171)	(168,171)
to other comprehensive income	-	-
At 31st March, 2021	954,050	954,050

Note - 14 Borrowings

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Non Current borrowings		
	(a) From Banks	486,970	907,603
		486,970	907,603
2	Current borrowings		
	(a) From Banks *	30,479,914	-
		30,479,914	-
	Total	30,966,884	907,603

*Secured by the pari-passu charge over inventories and book debts and equitable mortgage of immovable properties of Directors/ Guarantors.

Note - 15 Trade Payable

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Other than Micro, Small and Medium Enterprises*	1,702,429	5,547,643
	Total	1,702,429	5,547,643

* The Company has not received information from the Suppliers regarding their status under The Micro, Small and Medium Enterprises Development Act, 2006. Hence, disclosures, if any relating to amounts unpaid as at the balance sheet date together with interest paid or payable as per the requirement under the said Act, have not been made.

Note - 16 Other Current Liabilities

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Current maturities of Long Term Debts	414,363	380,082
2	Other Payables*	715,786	159,599
	Total	1,130,149	539,681

* Includes Statutory Dues

Note - 17 Provisions

Sr. No.	Particulars	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Provision for Expenses	220,639	244,668
2	Provision for Income Tax (Net of Advance Tax)	(32,934)	663,786
	Total	187,705	908,454

Note: 18 Revenue from Operations

Sr. No	PARTICULARS	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Sales of Product Domestic Sales	484,604,818	435,094,110
	Total	484,604,818	435,094,110

Note: 19 Other Income

Sr. No	PARTICULARS	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Interest Income	270,493	199,955
2	Other Non Operating Income : Gain on Exchange Rate Fluctuation	-	98,263
	Other Income	57,452	226,315
	Total	327,945	524,533

Note: 20 Changes in Inventories of Finished Goods, Work-In-Progress And Stock-In-Trade

Sr. No	PARTICULARS	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Opening Stock Stock-in-Trade	3,742,278	7,455,234
	Total (A)	3,742,278	7,455,234
2	Closing Stock Stock-in-Trade	8,296,848	3,742,278
	Total (B)	8,296,848	3,742,278
	Total (A-B)	(4,554,570)	3,712,956

Note: 21 Employee Benefits Expense

Sr. No	PARTICULARS	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Salary & Wages	2,066,003	2,096,923
	Total	2,066,003	2,096,923

Note: 22 Finance Costs

Sr. No	PARTICULARS	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Interest Expense	497,966	3,045,834
2	Processing Charges	523,200	240,000
	Total	1,021,166	3,285,834

Note: 23 Other Expenses

Sr. No	PARTICULARS	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Administrative Expense		
	Repair & Maintenance	52,153	35,609
	Clearing and Forwarding	-	97,541
	Electricity Expense	622,226	547,898
	Custom duty	-	335,549
	-As Auditor		
	Statutory Audit Fees	30,000	30,000
	Tax auditor	15,000	15,000
	Labour charges	712,885	434,001
	Rent Expense	709,167	721,740
	Insurance Expenses	155,329	76,887
	Fees & Taxes	349,800	375,800
	Water charges	76,444	86,199
	Legal Expense	489,897	397,767
	Telephone Expenses	17,657	15,073
	Printing and Stationary	50,312	16,730
	Transportation Charges	542,245	645,007
	Membership fees	15,900	19,440
	Loading and Unloading	41,945	700
	Business Promotion	44,938	49,952
	Petrol Expenses	55,723	95,598
	General Consumables	-	3,800
	Commission expenses	280,220	-
	Refreshment Expenses	-	68,902
	Computer Expense	16,143	9,876
	Promoter Reclassification Fees	50,000	-
	Interest and Penalties	56,442	-
	Miscellaneous expenses	46,513	28,482
	LC Charges	-	379,259
	Bank Charges	70,215	25,672
	Software expense	7,080	9,257
	Packing and forwarding charges	13,100	40,400
	Warehouse charges	35,092	11,000
		4,556,426	4,573,139
2	Selling & Distribution		
	Website Expense	25,541	25,814
	Subscription Expenses	17,244	-
		42,785	25,814
	Total	4,599,211	4,598,953

Note - 24 Current Tax

Sr. No	PARTICULARS	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	Current Tax	200,000	618,080
	Total	200,000	618,080

Note - 25. Earning Per Share

Sr. No	PARTICULARS	Year Ended 31st March, 2021 Rs.	Year Ended 31st March, 2020 Rs.
1	Net Profit attributable to the Equity Shareholders (A)	3,883,616	1,355,837
2	Weighted average number of Equity Shares outstanding during the period (B)	5,256,300	5,256,300
3	Nominal value of Equity Shares (Rs.)	10	10
4	Basic/Diluted Earnings per Share (Rs.) (A/B)	0.74	0.26

Note - 26 Related party disclosures

(A) Key management personnel (KMP):

Sr. No.	Name	Designation
1	Pratik R Kabra	Managing Director
2	Govindlal M Dudani	Director
3	Leena Vijayan	Independent Woman Director
4	Tagaram Chowdhary	Independent Director
5	Sonali Panchal	Company Secretary
6	Nimish H Bavishi	CFO

(B) Other related parties:

Sr. No.	Particulars	Nature of relationship
1	Shree Extrusions Ltd	Entities under same management
2	Mercury Metals Limited	Entity over which KMP has significant Influence
3	Kabra Agro Farms Pvt. Ltd.	
4	Metal Alloys Corporation	Entity owned by KMP.
5	Radheshyam L. Kabra	Relatives of KMP
6	Ramprakash L. Kabra	

26.1 Disclosures of Transactions between the Company and Related Parties and the status of outstanding balances as on 31st March, 2021:

In Rs.

Sr. No.	Nature of Transaction	Key management personnel	Other related parties
1	Revenue from operations (Previous Year)	-	293,651,059
2	Purchase (Previous Year)	-	12,681,240
			3,968,000
3	Rent Expenses (Previous Year)	420,000	-
		(420,000)	-
4	Sale of Machinery (Previous Year)	-	-
5	Salary, Bonus and Perquisites (Previous Year)	-	-
		-	-
	Total (Previous Year)	420,000	297,619,059
		(420,000)	12,681,240
	Amount receivable at the year end (As at 31st March, 2019)	-	-
		-	-
	Amount payable at the year end (As at 31st March, 2017)	-	-
		-	-

26.2 Disclosures in respect of transactions with related parties during the year:

In Rs.

Sr.No.	Particulars	Related Parties	Year ended 31st March,2021	Year ended 31st March,2020
1	Revenue from Operations	Shree Extrusion Ltd	257,640,778	5,836,256
		Metal Alloys Corporation	36,010,281	6,844,984
2	Purchase	Shree Extrusion Ltd	3,968,000	-
3	Rent Expenses	Pratik Kabra	420,000	420,000
4	Sale of Machinery	Shree Extrusion Ltd	-	-

26.3 All transactions during the year with related parties are at arms length and unsecured. No amount has been recognised as bad or doubtful in respect of transactions with the related parties.

Note - 27 Operating Segment**(a) Information about Reportable segment:**

The group operates mainly in the trading of Metals and all other activities are incidental thereto, which have similar risk and return . Hence there is no separate reportable segment .

(b) Major customers

The details of the major customers generating more than or equal to 10% of the total revenue for the year are given in the following table.

Sr. No.	Particulars	Percentage of total revenue %
1	Shree Extrusion Ltd	53.29%
2	Ramdev Sales Corporation	15.45%
Total		68.74%

(c) Information about the Geographical segment

The geographical information analysis the groups revenues and non current assets by the company's country of domicile (India) and other countries. In presenting the geographical information , segment revenue has been based on geographical location of the customers and segment assets have been based on the geography .

Sr. No.	PARTICULARS	Year Ended 31st March, 2021 Rs.	Year Ended 31st March, 2020 Rs.
1	Revenue		
	Revenue from External Customers		
	India	484,604,818	435,094,110
	Other countries	-	-

Non current assets

Sr. No.	PARTICULARS	As at 31st March, 2021 Rs.	As at 31st March, 2020 Rs.
1	India	13,529,744	16,279,076
2	Other Countries	-	-

(A) Break-up of Revenues

Sr. No.	PARTICULARS	Year Ended 31st March, 2021 Rs.	Year Ended 31st March, 2020 Rs.
1	Revenue from operations	484,604,818	435,094,110
2	Other income	327,945	524,533

(B) Non Current Assets

Non current assets Excludes financial instruments and deferred tax assets.

Note - 28. Contingent Liabilities and Commitments (To the extent not provided for)**(Rs. in Lacs)**

Sr. No.	Particulars	As at 31st March, 2021	As at 31st March, 2020
1	a. Guarantees / Letter of credit		
2	v) Guarantee/ Undertaking issued by the company's banker towards import of material under buyer's credit	-	-
Total		-	-

Note - 29

(A) Financial Risk Management Objectives and Policies

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

The Company is exposed to market risk, credit risk and liquidity risk. The Company's senior management oversees the management of these risks and ensures that Company's financial risks are identified, measured and governed in accordance with the Company's policies and risk objectives. The Board of Directors reviews and agrees policies for managing each of these risks which are summarized below.

(i) Market Risk

Market risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk that affects the Company comprises of one element: Interest rate risk. Financial instruments affected by market risk include loans, borrowings and deposits.

Interest Rate Risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Company's exposure to the risk of changes in market interest rates relates primarily to short term debt obligations with fixed interest rates.

(ii) Credit Risk

Credit risk is the risk that counterparty will not meet its obligations under a financial instrument or customer contract leading to a financial loss. The Company is exposed to credit risk from its operating activities and from its financing activities including deposits with banks and other financial instruments.

Trade Receivables

Customer credit risk is managed by the Company's policy, procedures and control relating to customer credit risk management. Credit quality of a customer is assessed based on an extensive credit rating and individual credit limits are defined in accordance with this assessment. Outstanding customer receivables are regularly monitored. The maximum exposure to credit risk at the reporting date is the carrying value of each class of financial asset disclosed in respective note. The Company does not hold collateral as security.

Cash deposits

Credit risk from balances with banks is managed by the Company in accordance with its policies. These policies are set to minimize concentration of risks and therefore mitigate financial loss through counterparty's potential failure to make payments.

(iii) Liquidity Risk

The Company manages its liquidity risk by using liquidity planning and balancing funds requirement vis-a-vis funds available. Various lines of credit available are used to optimize funding cost and ensuring that adequate funds are available for business operations.

(B) Capital Risk Management

The Company's objectives when managing capital are to:

- safeguard their ability to continue as a going concern so that they can continue to provide return for shareholders and benefits for other stakeholders.
- maintain an optimal capital structure to reduce the cost of capital.

The Company monitors capital on the basis of the following debt equity ratio

Particulars	As at 31st March, 2021	As at 31st March, 2020
	Rs.	Rs.
Total Debt	33,799,462	6,994,927
Adjusted net debt	33,799,462	6,994,927
Total Equity		
Equity	74,105,715	70,193,387
Total debt to total equity ratio	0.46	0.10

Note - 30 Financial Instruments :

The Company uses the following hierarchy for determining the fair value of financial instruments by valuation technique :

Level 1 : Quoted (unadjusted) prices in active markets for identical assets or 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 are inputs and have a significant effect on the recorded fair value that are not based on observable market data.

A. Financial Assets

In Rs.

Particulars	Note	Instruments carried at		Total carrying amount	Total Fair Value	Level
		Fair Value	Amortized cost			
		FVTOCI	Carrying amount			
As at 31st March 2020						
Investments (Quoted)	5	159,200	-	159,200	159,200	Level 1
Investments (Unquoted)	5	-	-	-	-	Level 3
Trade receivables	8	-	35,911,110	35,911,110	35,911,110	
Cash and cash equivalents	9	-	21,705,906	21,705,906	21,705,906	
Bank balances other than above		-	-	-	-	
Total		159,200	57,617,016	57,776,216	57,776,216	
As at 31st March 2021						
Investments (Quoted)	5	198,000	-	198,000	198,000	Level 1
Investments (Unquoted)	5	-	-	-	-	Level 3
Trade receivables	8	-	83,427,301	83,427,301	83,427,301	
Cash and cash equivalents	9	-	908,966	908,966	908,966	
Bank balances other than above		-	-	-	-	
Total		198,000.00	84,336,267	84,534,267	84,534,267	

B. Financial liabilities :

In Rs.

Particulars	Note	Instruments carried at		Total carrying amount	Total Fair Value
		Fair Value	Amortized cost		
		FVTPL	Carrying amount		
As at 31st March 2020					
Borrowings	14	-	907,603	907,603	907,603
Trade payables	15	-	5,547,643	5,547,643	5,547,643
		-	6,455,246	6,455,246	6,455,246
As at 31st March 2021					
Borrowings	14	-	30,966,884	30,966,884	30,966,884
Trade payables	15	-	1,702,429	1,702,429	1,702,429
Total		-	32,669,313	32,669,313	32,669,313

Note - 31 There are no transaction in Current Account of Bhuj Mercantile Co-operative Bank Limited due to account becoming dormant because of non-updating of KYC documents. Further, no bank statement has been provided during the year for the same account.

Note - 32 Previous Year's figures have been regrouped / reclassified wherever necessary to confirm to current year presentation.

As per our report of even date attached.

For and on behalf of the Board of Directors,

For TALATI & TALATI LLP
Chartered Accountants
Firm Regn.No.110758W/W100377

Pratik Kabra
Managing Director
(DIN - 00006358)

Nimish Bavishi
Chief Financial Officer

Anand Sharma
Partner
Membership No.129033
Place: Ahmedabad
Date: 16-06-2021

Leena Vijayan
Director
(DIN - 08551144)
Place: Ahmedabad
Date: 16-06-2021

Sonali Panchal
Company Secretary
AWBPP2990D