

**36<sup>th</sup>**

**Annual Report  
For the Year Ended  
31<sup>st</sup> March, 2022**



**ASHIRWAD STEELS  
&  
INDUSTRIES LIMITED**

**BOARD OF DIRECTORS**

Mr. Baninder Singh Sahni, Chairman & Independent Director  
Mr. Dalbir Chhibbar, Managing Director  
Mrs. Sushma Chhibbar, Director  
Mr. Vishesh Chhibbar, Director  
Mr. Puranmal Agarwal, Director  
Mr. Neeraj Chhabra, Independent Director

**STATUTORY AUDITORS**

M/s. M. R. Singhwi & Company, Chartered Accountants  
4/A, Metcalfe Street, 3<sup>rd</sup> Floor, Kolkata – 700013.

**BANKERS**

HDFC Bank Ltd., Kolkata State Bank of India, Jamshedpur and Nalgonda  
Corporation Bank, Raigarh, Chhattisgarh.

**COMPANY SECRETARY  
& COMPLIANCE  
OFFICER**

Mrs. Anamika Sinha Roy  
Email: csashirwad@gmail.com  
Email: compliance.ashirwad@gmail.com

**AUDIT COMMITTEE  
MEMBERS**

Mr. Neeraj Chhabra, Independent Director  
Mr. Baninder Singh Sahni, Independent Director  
Mr. Puranmal Agarwal, Director

**NOMINATION & REMUNERATION  
COMMITTEE MEMBERS**

Mr. Neeraj Chhabra, Independent Director  
Mr. Baninder Singh Sahni, Independent Director  
Mr. Vishesh Chhibbar, Director

**STAKEHOLDERS RELATIONSHIP  
COMMITTEE**

Mr. Baninder Singh Sahni  
E-mail: compliance.ashirwad@gmail.com  
Mr. Vishesh Chhibbar (Director)  
E-mail : ashirwadsteels@gmail.com  
Mr. Puranmal Agarwal (Director)  
Email: ashirwadsteels@gmail.com

**REGISTERED & HEAD OFFICE**

6, Waterloo Street,  
5<sup>th</sup> Floor, Suite No.506,  
Kolkata - 700 069, West Bengal  
Phone: 091-033-22430376  
E-mail: ashirwadsteels@gmail.com  
Website: www.ashirwadsteels.com

**COMPANY'S CORPORATE  
IDENTIFICATION NUMBER(CIN)**

L51909WB1986PLCO40201

**WORKS**

**HYDROCARBON GAS BOTTLING PLANTS :-**

1.Uluberia Industrial Growth Centre,  
Uluberia, Howrah-711315, West Bengal

2.Village: Kisnapur  
Near Urdana Check Post  
Raigarh- 496001, Chhattisgarh.

**REGISTRARS & TRANSFER  
AGENTS:**

Niche Technologies Pvt. Ltd.  
3A, Auckland Place,  
7<sup>th</sup> Floor, Room No. 7A & 7B, Kolkata-700017  
Ph.No.91-033-22806616/17/18 Telefax: 91-033-22806619  
E-mail: nichetechpl@nichetechpl.com

**ASHIRWAD STEELS & INDUSTRIES LIMITED**  
6, Waterloo Street, 5<sup>th</sup> Floor, Suite No. 506, Kolkata-700069, West Bengal  
CIN:L51909WB1986PLC040201

**NOTICE**

Notice is hereby given that the 36<sup>th</sup> Annual General Meeting of the Company will be held on Friday, the 17<sup>th</sup> June , 2022 at 12:00 PM, through Video Conferencing ("VC") or Other Audio Visual Means ("OAVM") to transact the following business:-

**ORDINARY BUSINESS :**

- 1. To receive, consider and adopt the Directors Report and the Audited financial statements of the company for the financial year ended 31.03.2022 along with Auditor's Report thereon and accordingly to consider adoption of the following Resolution as an Ordinary Resolution:**

"Resolved that the audited financial statements of the company for the year ended 31st March, 2022, including Balance Sheet as at 31st March 2022, the statement of Profit & Loss Account, statement of changes in equity and statement of Cash Flow for the financial year ended 31st March, 2022, together with the Reports of the Auditors of the Company thereon along with the annual report of the board of directors to the shareholders be and the same are hereby taken on record and approved."

- 2. To re-appoint Director, Mr. Vishesh Chhibbar (DIN:03553892) who retires by rotation at the ensuing Annual General Meeting and being eligible has offered himself for reappointment and accordingly to consider adoption of the following resolution, as an Ordinary Resolution:-**

"Resolved that Mr. Vishesh Chhibbar (DIN:03553892), who retires by rotation and being eligible for re-appointment, be and is hereby re-appointed as a director of the company."

- 3. To re-appoint Director, Mr. Purnamal Agarwal (DIN:00587723) who retires by rotation at the ensuing Annual General Meeting and being eligible has offered himself for reappointment and accordingly to consider adoption of the following resolution, as an ordinary resolution:-**

"Resolved that Mr. Purnamal Agarwal (DIN: 00587723) who retires by rotation and being eligible for re-appointment, be and is hereby re-appointed as a director of the company."

- 4. To appoint new statutory Auditors namely C.K.CHANDAK & CO. , Chartered Accountants in place of outgoing statutory auditors namely M.R. Singhwi & company, Chartered Accountants whose five year term expires with the conclusion of ensuing 36<sup>th</sup> AGM of the company by passing the following resolution as an ordinary resolution with or without modifications:-**

"Resolved that pursuant to provisions of section 139,142 and other applicable provisions of the companies act,2013, if any, read with the companies ( Audit and Auditors/s rules, 2014 ) , including any statutory enactments or modifications thereto ; M/s C.K.CHANDAK & CO. , chartered accountants (Proprietor Sri Chandra Kumar Chandak bearing membership no-054297 and having firm's registration number 326844E) be and are hereby appointed as the statutory Auditors of the company for a period of five years for the financial year 2022-2023 to 2026-27 and to hold office from the conclusion of this 36<sup>th</sup> AGM of the company till the conclusion of the 41<sup>th</sup> AGM of the company on such terms and conditions and at a remuneration as may be fixed by the Board of directors from year to year in consultation with the Auditors " .

**Place: Kolkata**  
**Dated : 02<sup>nd</sup> May, 2022**  
**Regd. Office: 6, Waterloo Street,**  
**5<sup>th</sup> floor, Suite No.506,**  
**Kolkata-700069**

**By Order of the Board**  
**Ashirwad Steels & Industries Ltd.,**

**Anamika Sinha Roy**  
**Company Secretary**  
**Membership no: 52535**

**NOTES : (Forming part of Notice convening the said 36<sup>th</sup> Annual General Meeting):**

1. As you are aware, in view of the situation arising due to COVID-19 global pandemic, the general meetings of the companies shall be conducted as per the guidelines issued by the Ministry of Corporate Affairs (MCA) vide Circular No. 14/2020 dated April 8, 2020, Circular No.17/2020 dated April 13, 2020 and Circular No. 20/2020 dated May 05, 2020 and circular no. 02/2022 dated 13.01.2022 ; The forthcoming 36th AGM will thus be held through video conferencing (VC) or other audio visual means (OAVM) from a common venue. Hence, Members can attend and participate in the ensuing AGM and also vote through VC/OAVM without physical presence of the Members at the common venue.
2. In compliance with applicable provisions of the Companies Act, 2013 ("the Act") read with the MCA Circulars and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the 36th Annual General Meeting of the Company is being conducted through Video Conferencing ("VC") (hereinafter referred to as "AGM"). In accordance with the Secretarial Standard -2 on General Meeting issued by the Institute of Company Secretaries of India (ICSI) read with Guidance/Clarification dated April, 15, 2020 issued by ICSI, the proceedings of the AGM shall be deemed to be conducted at the Registered Office of the Company which shall be the deemed Venue of the AGM.
3. 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 MCA Circulars dated April 08, 2020, April 13, 2020 and May 05, 2020 and 13.01.2022, 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 Central Depository Services (India) Limited (CDSL) for facilitating voting through electronic means, as the authorized e-Voting's agency. The facility of casting votes by a member using remote e-voting as well as the e-voting system on the date of the AGM will be provided by CDSL.
4. The Members can join the 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 AGM through VC/OAVM will be made available to at least 1000 members on first come first served basis. This limit 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 AGM without restriction of first come first serve mode.
5. The attendance of the Members attending the AGM through VC/OAVM will be counted for the purpose of ascertaining the quorum under Section 103 of the Companies Act, 2013.
6. Pursuant to MCA Circular No. 14/2020 dated April 08, 2020, , the facility to appoint proxy to attend and cast vote for the members is not available for this AGM. However, in pursuance of Section 112 and Section 113 of the Companies Act, 2013, representatives of the members such as the President of India or the Governor of a State or body corporate can attend the AGM through VC/OAVM and cast their votes through e-voting.
7. In line with the Ministry of Corporate Affairs (MCA) Circular No. 17/2020 dated April 13, 2020, the Notice of AGM along with Annual Report for the financial year, 2021-22 is being sent only through electronic mode to those whose email addresses are registered with the company/depositories. Members may note that the Notice and Annual Report has been uploaded on the website of the Company at [www.ashirwadsteels.com](http://www.ashirwadsteels.com). The Notice as well as the Annual Report for FY: 2021-22 can also be accessed from the websites of the Stock Exchange i.e. BSE Limited at [www.bseindia.com](http://www.bseindia.com). The AGM Notice is also disseminated on the website of CDSL (agency for providing the Remote e-Voting facility and e-voting system during the AGM) i.e. [www.evotingindia.com](http://www.evotingindia.com).
8. Members are requested to send in their queries at least ten days in advance to the Company at the Registered Office of the Company to facilitate clarifications during the Annual General meeting.
9. The register of Members and Share transfer books of the company will remain closed from Saturday, 11<sup>th</sup> June , 2022 to Friday, the 17<sup>th</sup> June, 2022 (both days inclusive) for the purpose of AGM.

**10. VOTING THROUGH ELECTRONIC MEANS:****THE INTRUCTIONS TO SHAREHOLDERS FOR REMOTEE-VOTING AND E-VOTING DURING AGM THROUGH VC/OAVM ARE AS UNDER:**

- (i) The voting period begins on Tuesday, 14<sup>th</sup> June, 2022 at 9 AM and ends on Thursday, 16<sup>th</sup> June, 2022 at 5 PM. During this period shareholders of the Company, holding shares either in physical form or in dematerialized form, as on the voting cut-off date of Friday, 10<sup>th</sup> June, 2022 may cast their vote electronically. The e-voting module shall be disabled by CDSL for voting thereafter.
- (ii) Shareholders who have already voted prior to the meeting date would not be entitled to vote at the meeting venue.
- (iii) Pursuant to SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated 09.12.2020 and circular dated 15.01.2022 under Regulation 44 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entities are required to provide remote e-voting facility to its shareholders, in respect of all shareholders' resolutions. However, it has been observed that the participation by the public non-institutional shareholders/retail shareholders is at a negligible level.

Currently, there are multiple e-voting service providers (ESPs) providing e-voting facility to listed entities in India. This necessitates registration on various ESPs and maintenance of multiple user IDs and passwords by the shareholders.

In order to increase the efficiency of the voting process, pursuant to a public consultation, it has been decided by the authorities to enable e-voting to all the demat account holders, by way of a single login credential, through their demat accounts/ websites of Depositories/ Depository Participants. Demat account holders would be able to cast their vote without having to register again with the ESPs, thereby, not only facilitating seamless authentication but also enhancing ease and convenience of participating in e-voting process.

- (iv) In terms of SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Pursuant to above said SEBI Circular, Login method for e-Voting and joining virtual meetings for Individual shareholders holding securities in Demat mode is given below:-

Type of shareholders	Login Method
Individual Shareholders holding securities in Demat mode with CDSL	<p>Users who have opted for CDSL Easi / Easiest facility, can login through their existing user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are <a href="https://web.cdslindia.com/myeasi/home/login">https://web.cdslindia.com/myeasi/home/login</a> or visit <a href="http://www.cdslindia.com">www.cdslindia.com</a> and click on Login icon and select New System My easi.</p> <p>After successful login the Easi / Easiest user will be able to see the e-Voting option for eligible companies where the E-voting is in progress as per the information provided by company. On clicking the evoting option, the user will be able to see e-Voting page of the e-Voting service provider for casting his/her vote during the remote e-Voting period or joining virtual meeting &amp; voting during the meeting. Additionally, there is also links provided to access the system of all e-Voting Service Providers i.e. CDSL/NSDL/KARVY/LINKINTIME, so that the user can visit the e-Voting service providers' website directly.</p> <p>If the user is not registered for Easi/Easiest, option to register is available at <a href="https://web.cdslindia.com/myeasi/Registration/EasiRegistration">https://web.cdslindia.com/myeasi/Registration/EasiRegistration</a></p> <p>Alternatively, the user can directly access e-Voting page by providing Demat Account Number and PAN No. from a e-Voting link available on <a href="http://www.cdslindia.com">www.cdslindia.com</a> home page. The system will authenticate the user by sending OTP on registered Mobile &amp; Email as recorded in the Demat Account. After successful authentication, user will be able to see the e-Voting option where the evoting is in progress and also able to directly access the system of all e-Voting Service Providers.</p>

<p>Individual Shareholders holding securities in demat mode with NSDL</p>	<p>If you are already registered for NSDL IDeAS facility, please visit the e-Services website of NSDL. Open web browser by typing the following URL: <a href="https://eservices.nsd.com">https://eservices.nsd.com</a> either on a Personal Computer or on a mobile. Once the home page of e-Services is launched, click on the "Beneficial Owner" icon under "Login" which is available under 'IDeAS' section. A new screen will open. You will have to enter your User ID and Password. After successful authentication, you will be able to see e-Voting services. Click on "Access to e-Voting" under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider name and you will be re-directed to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting &amp; voting during the meeting.</p> <p>If the user is not registered for IDeAS e-Services, option to register is available at <a href="https://eservices.nsd.com">https://eservices.nsd.com</a>. Select "Register Online for IDeAS "Portal or click at <a href="https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp">https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp</a></p> <p>Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <a href="https://www.evoting.nsd.com/">https://www.evoting.nsd.com/</a> either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting &amp; voting during the meeting</p>
<p>Individual Shareholders (holding securities in demat mode) login through their Depository Participants</p>	<p>You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. After Successful login, you will be able to see e-Voting option. Once you click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting &amp; voting during the meeting.</p>

Important note: Members who are unable to retrieve User ID/ Password are advised to use Forget User ID and Forget Password option available at abovementioned website.

Helpdesk for Individual Shareholders holding securities in demat mode for any technical issues related to login through Depository i.e. CDSL and NSDL

Login type	Helpdesk details
<p>Individual Shareholders holding securities in Demat mode with CDSL</p>	<p>Members facing any technical issue in login can contact CDSL helpdesk by sending a request at <a href="mailto:helpdesk.evoting@cdslindia.com">helpdesk.evoting@cdslindia.com</a> or contact at 022- 23058738 and 22-23058542-43.</p>
<p>Individual Shareholders holding securities in Demat mode with NSDL</p>	<p>Members facing any technical issue in login can contact NSDL helpdesk by sending a request at <a href="mailto:evoting@nsdl.co.in">evoting@nsdl.co.in</a> or call at toll free no.: 1800 1020 990 and 1800 22 44 30</p>

(v) Login method for e-Voting and joining virtual annual general meeting for shareholders other than individual shareholders holding in Demat form & physical shareholders.

- 1) The shareholders should log on to the e-voting website [www.evotingindia.com](http://www.evotingindia.com).
- 2) Click on "Shareholders" module.
- 3) Now enter your User ID
  - a. For CDSL: 16 digits beneficiary ID,
  - b. For NSDL: 8 Character DP ID followed by 8 Digits Client ID,
  - c. Shareholders holding shares in Physical Form should enter Folio Number registered with the Company.
- 4) Next enter the Image Verification as displayed and Click on Login.

- 5) If you are holding shares in demat form and had logged on to [www.evotingindia.com](http://www.evotingindia.com) and voted on an earlier e-voting of any company, then your existing password is to be used.
- 6) If you are a first-time user follow the steps given below:

For Shareholders holding shares in Demat Form other than individual and Physical Form	
PAN	Enter your 10 digit alpha-numeric *PAN issued by Income Tax Department (Applicable for both demat shareholders as well as physical shareholders)  Shareholders who have not updated their PAN with the Company/Depository Participant are requested to use the sequence number sent by Company/RTA or contact Company/RTA.
Dividend Bank Details OR Date of Birth (DOB)	Enter the Dividend Bank Details or Date of Birth (in dd/mm/yyyy format) as recorded in your demat account or in the company records in order to login. If both the details are not recorded with the depository or company, please enter the member id / folio number in the Dividend Bank details field as mentioned in instruction (v).

- (vi) After entering these details appropriately, click on "SUBMIT" tab.
- (vii) Shareholders holding shares in physical form will then directly reach the Company selection screen. However, shareholders holding shares in demat form will now reach 'Password Creation' menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password is to be also used by the demat holders for voting for resolutions of any other company on which they are eligible to vote, provided that company opts for e-voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.
- (viii) For shareholders holding shares in physical form, the details can be used only for e-voting on the resolutions contained in this Notice.
- (ix) Click on the EVSN for Ashirwad steels & Industries limited on which you want to vote.
- (x) On the voting page, you will see "RESOLUTION DESCRIPTION" and against the same the option "YES/NO" for voting. Select the option YES or NO as desired. The option YES implies that you assent to the Resolution and option NO implies that you dissent to the Resolution.
- (xi) Click on the "RESOLUTIONS FILE LINK" if you wish to view the entire Resolution details.
- (xii) After selecting the resolution, you have decided to vote on, click on "SUBMIT". A confirmation box will be displayed. If you wish to confirm your vote, click on "OK", else to change your vote, click on "CANCEL" and accordingly modify your vote.
- (xiii) Once you "CONFIRM" your vote on the resolution, you will not be allowed to modify your vote.
- (xiv) You can also take a print of the votes cast by clicking on "Click here to print" option on the Voting page.
- (xv) If a demat account holder has forgotten the login password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.
- (xvi) Facility for Non – Individual Shareholders and Custodians –Remote Voting
  - Non-Individual shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodians are required to log on to [www.evotingindia.com](http://www.evotingindia.com) and register themselves in the "Corporates" module.
  - A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com).
  - After receiving the login details a Compliance User should be created using the admin login and password. The Compliance User would be able to link the account(s) for which they wish to vote on.
  - The list of accounts linked in the login should be mailed to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) and on approval of the accounts they would be able to cast their vote.
  - A scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.
  - Alternatively Non Individual shareholders are required to send the relevant Board Resolution/ Authority letter etc. together with attested specimen signature of the duly authorized signatory who are authorized to vote, to the Scrutinizer and to the Company at the email address viz; [ca.aksaraf@yahoo.co.in](mailto:ca.aksaraf@yahoo.co.in) or [csashirwad@gmail.com](mailto:csashirwad@gmail.com), if they have voted from individual tab & not uploaded same in the CDSL e-voting system for the scrutinizer to verify the same.

**INSTRUCTIONS FOR SHAREHOLDERS ATTENDING THE AGM THROUGH VC/OAVM & E-VOTING DURING MEETING ARE AS UNDER:**

1. The procedure for attending meeting & e-Voting on the day of the AGM is same as the instructions mentioned above for Remote e-voting.
2. The link for VC/OAVM to attend meeting will be available where the EVSN of Company will be displayed after successful login as per the instructions mentioned above for Remote e-voting.
3. Shareholders who have voted through Remote e-Voting will be eligible to attend the meeting. However, they will not be eligible to vote at the AGM.
4. Shareholders are encouraged to join the Meeting through Laptops / iPads for better experience.
5. Further shareholders will be required to allow Camera and use Internet with a good speed to avoid any disturbance during the meeting.
6. 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.
7. Shareholders who would like to express their views/ask questions during the meeting may register themselves as a speaker by sending their request in advance at least 10 days prior to meeting mentioning their name, demat account number/folio number, email id, mobile number at (company email id). The shareholders who do not wish to speak during the AGM but have queries may send their queries in advance 10 days prior to meeting mentioning their name, demat account number/folio number, email id, mobile number at ashirwadsteels@gmail.com. These queries will be replied to by the company suitably by email.
8. Those shareholders who have registered themselves as a speaker will only be allowed to express their views/ask questions during the meeting. Due to limitations of transmission and coordination during the AGM, the Company may have to dispense with or curtail the Speaker Session, hence shareholders are encouraged to send their questions etc. 10 days in advance prior to meeting mentioning their name, demat account number/folio number, email id, mobile number at ashirwadsteels@gmail.com.
9. Only those shareholders, who are present in the 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 available during the AGM.
10. If any Votes are cast by the shareholders through the e-voting available during the AGM and if the same shareholders have not participated in the meeting through VC/OAVM facility, then the votes cast by such shareholders shall be considered invalid as the facility of e-voting during the meeting is available only to the shareholders attending the meeting.

**PROCESS FOR THOSE SHAREHOLDERS WHOSE EMAIL/MOBILE NO. ARE NOT REGISTERED WITH THE COMPANY/DEPOSITORIES.**

1. For Physical shareholders- please provide necessary details like 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 Company/RTA email id.
2. For Demat shareholders -, Please update your email id & mobile no. with your respective Depository Participant (DP)
3. For Individual Demat shareholders – Please update your email id & mobile no. with your respective Depository Participant (DP) which is mandatory while e-Voting & joining virtual meetings through Depository.

If you have any queries or issues regarding attending AGM & e-Voting from the CDSL e-Voting System, you can write an email to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) or contact at 022-23058738 and 022-23058542/43.

All grievances connected with the facility for voting by electronic means may be addressed to Mr. Rakesh Dalvi, Sr. Manager, (CDSL, ) Central Depository Services (India) Limited, A Wing, 25th Floor, Marathon Futurex, Mafatjal Mill Compounds, N M Joshi Marg, Lower Parel (East), Mumbai - 400013 or send an email to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) or call on 022-23058542/43.

4. The voting rights of shareholders shall be in proportion to their shares of the paid up equity share capital of the Company as on the voting eligibility cut-off date of 10<sup>th</sup> June, 2022. A person who is not a member as on cut-off date should treat this notice for information purpose only.
5. The Company is sending through email, the AGM Notice and the Annual Report to the shareholders whose name is recorded as on 06-05-2022, (cut off date for dispatch) in the Register of Members or in the Register of Beneficial Owners maintained by the depositories.
6. The shareholders shall have one vote per equity share held by them as on the voting eligibility cut-off date of 10<sup>th</sup> June 2022. The facility of e-voting would be provided once for every folio / client id, irrespective of the number of joint holders.
7. Since the Company is required to provide members the facility to cast their vote by electronic means, shareholders of the Company, holding shares either in physical form or in dematerialized form, as on the voting eligibility cut-off date of 10<sup>th</sup> June, 2022 for this purpose and not casting their vote electronically, may only cast their vote at the Annual General Meeting through the E-voting facility provided specifically for the AGM as per procedure outlined in this notice.
8. Investors who become members of the Company subsequent to the dispatch of the Notice / Email and holds the shares as on the voting eligibility cut-off date i.e. 10.06.2022 are requested to send the written / email communication to the Company's at RTA at nichetechpl@nichetechpl.com by mentioning their Folio No. / DPID and Client ID to obtain the Login-ID and Password for e-voting. The RTA will do their best to accommodate and execute such requests so that the Shareholder can participate in the e-voting which commences on Tuesday, the 14<sup>th</sup> June, 2022 (09:00 AM) and ends on Thursday, 16<sup>th</sup> June, 2022 (05:00 PM). Mr. Arvind Saraf, (Chartered Accountant having Certificate of Practice Number 056138; E-Mail :ca.aksaraf@yahoo.co.in) has been appointed as the Scrutinizer to scrutinize the remote e-voting process and voting/polling at the AGM in a fair and transparent manner. The Scrutinizer will submit his consolidated Report after the conclusion of AGM on the total votes cast in favour or against the resolutions, if any, to the Chairman of the Company or a person authorized by him in writing, who shall countersign the same and declare the results of the voting on the day of AGM or the next day of the AGM after it is concluded or within such time as specified under the Companies Act, 2013 after also taking into account the E-votes cast on the resolutions by the members who participate in the AGM through VC and/or OAVM mode .
9. The Results declared along with the Scrutinizer's Report shall be placed on the Company's website www.ashirwadsteels.com. The result will also be communicated to the listed stock exchanges viz. BSE Ltd. within 48 hours of the conclusion of the AGM or such time as permitted under the law.

**10. Annexure to Item No.2 of the ordinary business of this Notice:-**

A brief resume of the Director retiring by rotation and seeking re-appointment at the forthcoming Annual General Meeting is as under :-

<b>Name of the Director</b>	<b>Mr. Vishesh Chhibbar</b>	<b>Mr. Puranmal Agarwal</b>
Date of Birth	31-03-1990	06.08.1951
Nationality	Indian	Indian
Date of last Appointment on board by members in AGM	27-07-2020	06.08.2021
Qualification	B. Com (Hons)	B. Com
Experience/Expertise in financial areas	Over eight years of experience in handling Finance, Accounts, Company Law matters , general Administration and	Over 49 years of experience in running various businesses and industries with exposure to Finance, Planning, Execution of Projects, Overall Management.
Shareholding in the Company (No. of Equity Shares held)	50,100	3,250

List of Directorship held in other companies	Doyang Wood Products Ltd. MKC Engineers Pvt. Ltd. Chhibbar Business & Fiscals Pvt. Ltd. MeghdootVyapaar Pvt. Ltd. PunarvasuVyapaar Pvt. Ltd. Sohini Suppliers Private Limited (All unlisted Companies)	Greenhood Spices & Foods Private Limited Ilex Private Limited Howrah Gases Limited MSP Cement Limited MSP Cokes Private Limited Prateek Mines & Minerals Private Limited Sanee Capital and Leaseing Private Limited MSP Steels Limited
Relationship with other Directors	Mr. Vishesh Chhibbar is the son of Mr. Dalbir Chhibbar, the Managing Director of the Company and Mrs. Sushma Chhibbar a non-executive Director of the Company	Mr. Puranmal Agarwal is not related to any other director of the company.

11. All documents referred to in the accompanying Notice are open for inspection only through electronic mode on all working days before the date of Annual General Meeting.

**Place: Kolkata**  
**Dated: 02 nd May, 2022**  
**Regd. Office: 6, Waterloo Street,**  
**5<sup>th</sup> floor, Suite No.506,**  
**Kolkata-700 069.**

**By Order of the Board**  
**Ashirwad Steels & Industries Ltd.,**

**Anamika Sinha Roy**  
**Company Secretary**  
**M: 52535**

**ASHIRWAD STEELS & INDUSTRIES LIMITED**

CIN:L51909WB1986PLC040201  
 6, Waterloo Street, 5<sup>th</sup> Floor, Suite No. 506, Kolkata-700069, West Bengal  
 Website: www.ashirwadsteels.com Ph: 2243 0372  
 E-mail: ashirwadsteels@gmail.com

**BOARD OF DIRECTORS REPORT TO THE SHAREHOLDERS**

Your Directors present their 36th Annual Report on the business and operations of the Company and its Audited Statements of Accounts together with Auditors' Report for the financial year ended 31<sup>st</sup> March, 2022.

	<b>Current year (31.03.2022) (Rs in Lakhs)</b>	<b>Previous year (31.03.2021) (Rs in Lakhs)</b>
<b>1. <u>SUMMARY OF FINANCIAL RESULTS AND PERFORMANCE OF THE COMPANY:</u></b>		
Income from Operations (Including other Income)	412.51	475.50
Profit/(Loss) before and also after exceptional and Extra-ordinary items and before taxes	477.56	(34.81)
Add / (Less): Tax Expenses for the year	71.44	0.12
Add / (Less): Deferred Income Tax (Assets)	(55.68)	(3.32)
<b>Net Profit / (Loss) for the year after tax</b>	<b>461.80</b>	<b>(31.49)</b>
Add: Other Comprehensive income	29.29	100.35
<b>Total Comprehensive income (including Post Tax Profit/(Loss) for the year)</b>	<b>491.09</b>	<b>68.86</b>

**2. DIVIDEND:**

Your Directors do not recommend any dividend for the year under review.

**3. RESERVES**

No amount has been transferred to the reserve by the Board during the year under review.

**4. THE COMPANY'S WORKING/STATE OF AFFAIRS DURING THE FINANCIAL YEAR UNDER REVIEW**

The company's overall working performance during the financial year (2021-2022) under review has been quite dismal. The company could not and did not operate its sponge iron plant at Jamshedpur for several reasons which inter alia include extremely high and unaffordable prices of raw materials being iron ore and coal, high freight cost, spiraling but unremunerative selling prices of sponge and almost doubling of working capital requirements due to very high input costs. The plant's commercial operations were thus found to be not profitable and it was regularly incurring maintenance and administrative expense putting financial burden on the company. The board of directors thus considering this plant to be virtually a white elephant having been incurring losses year after year; decided in their wisdom and prudence to sell/dispose off this plant. Accordingly after having identified a suitable and serious buyer; your board of directors sold off this sponge iron plant on slump sale basis, as a going concern, on as is where is basis along with all its assets and liabilities, to the aforesaid buyer through an agreement for sale and transfer executed on 25-01-2022. The necessary approval of the shareholders of the company for such sale and disposal of the said sponge iron plant was duly taken through postal ballot process vide postal ballot notice dated 03-01-2022 and necessary disclosure of such sale of the plant was duly made as per SEBI Regulation 30 (2) of Listing Obligations & Disclosure Requirements (Regulations) 2015 to the BSE limited and on the website of the company. The said deal has been fully completed within March, 2022 and the settled consideration value has been realized.

The company is thus now completely out of the business of iron & steel having already sold the loss making sponge iron plant located at district, Nalgonda, Telangana, during the financial year 2018-2019

The iron & steel business and industry has now become highly capital intensive with virtually no survival of small and standalone units as those of your company . Now only large players with adequate financial resources and having undertaken backward and forward integration steps can or will survive in the future .

Your Board is now actively and seriously making efforts to identify any other diversified business or industry which your company can undertake or start within the limitations of it's finances. Every business and industry in any field in the small or medium scale is experiencing and witnessing a cut throat competition. Thus for your company to embark upon a new business may take long and indefinite time. Meanwhile the company has invested it's surplus funds in shares and securities, loans and in bank fixed deposits to be deployed in a new business as and when it is initiated.

Further, the Company had entered in to a Business Transfer Agreement on 03.01.2019 (FY 2018-2019) with M/s. SHV Energy Pvt. Ltd. to sell them the Company's LPG Bottling Plant, at Uluberia, Howrah, by way of a slump sale on a going concern basis subject to the consent and approval of the West Bengal Industrial Infrastructural Development Corporation (WBIIDC), Kolkata. The said business transfer agreement has since been cancelled and substituted by two fresh bilateral agreements dated 24-01-2022 with the same consideration value. The said deal has been delayed and not yet completed as consent from WBIIDC was being awaited. Finally the company has received the in principle approval and consent of the WBIIDC for such sale and transfer of the LPG bottling plant in the month of Januray,2021and hopefully with completion of other necessary formalities , this deal is likely to be completed very shortly .

The Company's LPG Bottling Plant at Raigarh continues to be inoperative, as usual, as the commercial operations thereon are not remunerative and economically viable. The Board has taken authority from the members through Postal Ballot to dispose off the said Plant but unfortunately no buyer/purchaser has come forward till date. The Board considers that only the free-hold land of the said Plant has commercial value and the plant & equipments, being very old and obsolete, have only scrap value.

However, during the financial year under review, the Company's revenue from operations net of taxes stood at Rs 108.00 lacs (previous year Rs.157.53 lacs) and the other income stood at Rs 833.54 lacs which mainly comprise of gains/surplus on sale of sponge iron plant (previous year Rs. 317.97 lacs) and hence the total income stood at Rs 412.51 lacs (previous 475.50 lacs). The company has earned a net a profit/surplus of Rs 461.80, after taxes (previous year net loss of Rs. 31.49 lacs). The Other Comprehensive Income (OCI) for the year stood as Rs 29.29 lacs (previous year Rs. 100.35 lacs). The total comprehensive income for the year stood at Rs 491.09 lacs (previous year Rs. 68.86 lacs).

Your Board continues to make its best possible efforts to improve the overall financial performance of your Company.

5. **CHANGE IN NATURE OF BUSINESS OF THE COMPANY:**

None during the year.

6. **MATERIAL CHANGES AND COMMITMENTS AFTER THE END OF THE FINANCIAL YEAR 31.03.2022 TILL THE DATE OF THIS BOARD REPORT:**

None

7. **SIGNIFICANT MATERIAL ORDERS PASSED BY REGULATORS OR COURTS OR TRIBUNALS AGAINST THE COMPANY:**

None.

8. **ADEQUACY OF INTERNAL FINANCIAL CONTROLS WITH REFERENCE TO COMPANY'S FINANCIAL STATEMENTS:**

In the opinion of the Board, the Company has adequate Financial Controls in place with respect to Company's Financial Statements and Operations. Kindly refer to Annexure 'B' of the Statutory Auditors report dated 02<sup>ND</sup> May, 2022.

9. **DETAILS OF NAMES OF COMPANIES WHICH HAVE BECOME OR CEASE TO BE THE COMPANY'S SUBSIDIARY COMPANIES/ JOINT VENTURE/ ASSOCIATE COMPANIES DURING THE YEAR UNDER REVIEW AND THEIR FINANCIAL PERFORMANCE:**

The Company neither has nor had in the past any subsidiary, associate or joint venture Company.

10. **FIXED DEPOSIT :**

The Company has not accepted any deposits during the year from the Public under section 73 or 74 (Chapter V) of the Companies Act, 2013 nor did it receive the same in any of the previous years and hence there are no overdue/outstanding Deposits or any interest payable thereon and therefore the prescribed details under the Companies Act, 2013 are not required to be furnished.

**11. STATUTORY AUDITORS :**

M/s. M. R. Singhwi & Company, Chartered Accountant, were appointed as the Statutory Auditors of the Company for a period of five years b from financial year 2017-18 to 2021-22 ( corresponding to 32<sup>nd</sup> AGM to 36<sup>th</sup> AGM) and accordingly they will vacate their office on the conclusion of forthcoming 36<sup>th</sup> AGM of the company .

Your board of directors proposed to appoint M/S C.K.CHANDAK & CO., chartered accountants (Proprietor Sri Chandra Kumar Chandak bearing membership no-054297 and having firm's registration number 326844E) as the new statutory auditors of your company for a period of five years for the Financial Year 2022-23 to FY 2026-27 and to hold office from the conclusion of the ensuing 36<sup>th</sup> AGM of the company till the 41<sup>st</sup> AGM of the company. Your board recommend their appointment and the resolution towards their appointment is enclosed in the Notice convening the ensuing 36<sup>th</sup> AGM as an ordinary resolution.

**12. AUDITOR'S REPORT :**

The observations made in the Auditor's Report are self-explanatory and do not call for any further comments u/s 134(3)(f) of the Companies Act, 2013. The Auditors have not made any materially significant qualifications in their Report and their opinion is unmodified.

**13. EXTRACT OF THE ANNUAL RETURN OF FINANCIAL YEAR ENDED 31.03.2022:**

The draft MGT -7 for the year ended 31<sup>st</sup> March, 2022 is available on the company's website [www.ashirwadsteels.com](http://www.ashirwadsteels.com)

**14. CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, EXPORTS AND FOREIGN EXCHANGE EARNINGS AND OUTGOINGS.**

The information's required under Section 134(3)(m) of the Companies Act, 2013 read with Rule 8 of the Companies (Accounts) Rules 2014, are as under:-

**(A) CONSERVATION OF ENERGY :**

The company has sold out its Sponge Iron industrial units and its lone industrial unit being LPG bottling plant at raigarh is lying closed for last several years and hence the company has nothing to report under this head.

**(B) TECHNOLOGY ABSORPTION:**

For the reasons as stated above the company has nothing to report under this head.

**(C) FOREIGN EXCHANGE EARNINGS AND OUTGO :**

Earnings: Nil (Previous Year: Nil)  
Outgo : Nil (Previous Year : Nil)

**(D) Annual Evaluation:**

Pursuant to the provisions of the Sec 134 (3) (p) of the Companies Act, 2013 and clause 2(f)(9) of chapter II of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter in this board report called and referred to as "SEBI LODR REGULATIONS"); your Board has carried out an annual performance evaluation of its own performance, the performance of each Individual Director as well as the evaluation of the working of its Audit, Nomination and Remuneration Committees as per a suitably conceived manner. During the year under review, the Independent Directors had their exclusive meeting on 25-01-2022 inter alia, to discuss the Performance evaluation of Non Independent Directors and Board of Directors as a whole and also of the Managing Director and the Chairman of the Company and Evaluation of the quality of flow of information between the Management and Board for effective performance by the Board and the same were generally found to be satisfactory. As mandated by SEBI (LODR) Regulation 17(10); the Board as a whole has carried out the performance evaluation of each of the Independent Directors of the Company, without the participation of the particular Independent Director whose performance is being evaluated, and fulfillment of the prescribed criteria of their independence and the Board is satisfied with the same.

**15. CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY:**

As per criteria prescribed under section 135 of the Companies Act, 2013; the CSR is not applicable to the Company in respect of the financial year 2021-22 covered under this Report.

**16. DIRECTORS :****A) Changes in Directors and Key Managerial Personnel:**

Mrs. Sushma Chhibbar and Mr. Puranmal Agarwal were re-appointed as the directors of the company through E-VOTING in the last 35<sup>th</sup> AGM.

Mr. Puranmal Agarwal and Mr. Vishesh Chhibbar are the Directors who retire by rotation at the forthcoming 36th AGM and who being eligible have offered themselves for re-appointment in the ensuing 36th AGM. The brief resume about Mr. Puranmal Agarwal, Director, and Mr. Vishesh Chhibbar , Director seeking re-appointment is annexed with the notice of AGM. Your Board recommends their reappointment. There has been no change in the board of directors of your company during the year under review.

**B) Declaration by an Independent Director(s) and Re-appointment, if Any:**

Declaration given by Independent Directors meeting the criteria of independence as provided in sub-section (6) of Section 149 of the Companies Act, 2013 and Rule 5 of the Companies (Appointment and Qualification of Directors) Rules, 2014 has been received and taken on record.

**17. BOARD MEETINGS HELD DURING THE YEAR:-**

During the year the Board of Director's Meetings were held on six occasions e.g. on 21-06-2021, 10-08-2021, 01-11-2021, 03-01-2022, 20-01-2022 and 25-01-2022. The Independent Directors held their separate exclusive meeting on 25-01-2022.

**18. AUDIT COMMITTEE, NOMINATION & REMUNERATION COMMITTEE, STAKEHOLDERS RELATIONSHIP COMMITTEE :**

There has been no change in the composition of Audit Committee, Nomination & Remuneration Committee and Stakeholders Relationship Committee of the company during the year under review. These committees however are functioning and attending to their duties with the existing members.

**19. LOANS, GUARANTEES AND INVESTMENTS:**

Regarding loans given by the Company please refer to Note No.12 and for investments made by the Company, please refer to the Note No.5 in the annual Financial Statements of Accounts. The loans given during the year have been received back along with interest. A loan of Rs 150.00 Lacs given to one body corporate during the Financial Year 2021-2022 has been written off as bad debt along with interest accrued as being considered no more recoverable. The Company has not given any guarantee of any kind to any person or to any Bank or Financial Institution. During the year company had invested in the shares of various listed and quoted companies and all the said investments were sold off within the year except of one company.

**20. RELATED PARTY TRANSACTIONS AS REQUIRED UNDER SECTION 188(1) COMPANIES ACT, 2013:**

The company has paid Rs. 3.00 lacs to a related party as office rent and has also paid Rs.9.00 lacs as remuneration to the Managing Director. These Related Party transactions are in the normal course and are not considered to be material and hence approval of the same from the shareholders is not required. There are no other related party transactions. Please refer to Form AOC-2 annexed with this Board Report and which forms part of it. The details of payment made to other related parties as defined under Ind-AS Accounting Standards are as per Note No.31(5) on financial statements.

**21. MANAGERIAL/DIRECTOR'S REMUNERATION:**

The particulars of the same are as mentioned in the Corporate Governance Report annexed to this Board Report.

**22. SECRETARIAL AUDIT REPORT AND SECRETARIAL COMPLIANCE REPORT :**

Annual Secretarial Audit Report for the Financial year ended 31<sup>st</sup> March, 2022, along with Annexure 'A', dated 02.05.2022 (in the prescribed Form No.MR-3) as given by the secretarial auditors, M/s Patnaik & Patnaik, Company Secretaries, is annexed hereto and forms part of this Board Report as Annexure – 1

The Secretarial Compliance report dated 02.05.2022 for the financial year ended 31<sup>st</sup> March, 2022, in relation to compliance of applicable SEBI Regulations/Circulars/guidelines issued there under, pursuant to requirement of regulation 24A of listing regulations; as issued by the aforesaid secretarial auditors is also annexed as Annexure "2" and forms part of this Board report. With respect to the said auditors observation about the dematerialisation of shares under promoter's group; the board wish to submit that only a very negligible 33500 number of shares representing just 0.268% are yet to be dematerialized due to some unavoidable pending legal issues concerning transmission of shares upon death of some shareholders and for some other unavoidable reasons. Management is constantly following up the matter and it is hoped that the pending shares shall be dematerialized shortly.

**23. CORPORATE GOVERNANCE :**

The Company files quarterly Corporate Governance Report with BSE Ltd. as required under SEBI LODR REGULATION-27. Corporate Governance Report along with the certificate dated 02.05.2022 of the Secretarial Auditors confirming compliance of conditions of Corporate Governance as required under the relevant Regulations of SEBI LODR Regulation – 2015 is annexed to and forms part of this Board Report.

**24. RISK MANAGEMENT POLICY:**

As the company has sold off its sponge iron units and the other unit being LPG bottling plant at raigarh is lying closed for several years and the other bottling plant at Uluberia, Howrah is also pending completion of sale to the buyer M/s SHV Energy Private Limited; the company does not carry any risk associated with industrial and business activities. However unsecured loans advanced by the company and the investment in shares and securities do carry certain degree of market risk. However, the company has laid down procedures to inform the Board of Directors about Risk Assessments and its minimization procedures. The Board has also framed and implemented the Risk Management Plan for the Company to the extent it was possible, feasible and practical. The formation of Risk Management Committee is not applicable to the Company as the requirement is applicable to only top 500 listed entities on BSE Ltd. as per Regulation 21 of SEBI LODR REGULATIONS, 2015.

**25. DISCLOSURES ABOUT REMUNERATION TO DIRECTORS VIS-À-VIS EMPLOYEES AND OTHER PARTICULARS AS REQUIRED UNDER SECTION 197 OF THE COMPANIES ACT 2013 READ WITH RULE 5 OF COMPANIES (APPOINTMENT & REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014:**

- A. During the year under review a remuneration of Rs 9,00,000/- was paid to Managing Director and Director's sitting fees of Rs.48,000/- was paid to the Independent Directors for attending the Board Meetings and none of the other directors received any remuneration and therefore, the computation of ratio of remuneration of each Director to the median remuneration of the employees of the Company are not furnished. The remuneration paid and/or payable to the Key Managerial Personnel's is very reasonable and commensurate with their performances. The remuneration paid to the employees is as per the remuneration policy of the Company, which is dynamic in nature and changes as per the financial performance of the Company and of an individual employee including their work experience, competency, job profile, skill and seniority.
- B. No employee of the Company during the financial year was in receipt of remuneration aggregating to Rs.102 lacs or more if employed for the whole year and Rs. 8.5 lacs per month if employed for a part of the financial year. No employee of the Company is holding 2% or more of the Equity Shares of the Company. The number of permanent employees as at year-end were six and the ratio of remuneration paid to Managing Director to median remuneration of the employees was 3.86:1.

**26. DISCLOSURE UNDER SEXUAL HARRASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION & REDRESSAL) ACT, 2013:**

The Board of Directors and/or the Management of the Company has not received any complaint on this account from any of the employees of the Company or from any other person.

27. **DIRECTORS' RESPONSIBILITY STATEMENT:-**

The Director's Responsibility Statement referred to in clause (c) of sub-section (3) of Section 134 of the Companies Act, 2013, states:-

- i. That in the preparation of the annual accounts for the financial year ended 31<sup>st</sup> March, 2022, the applicable accounting standards had been followed along with proper explanation relating to material departures.
- ii. That the Directors had selected such accounting policies and applied them consistently and made judgments and estimates that were reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year and of the profit of the Company for the year under review.
- iii. That the Directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities.
- iv. That the Directors have prepared the accounts for the financial year ended 31<sup>st</sup> March, 2022 on a going concern basis.
- v. That the Directors had laid down internal financial controls, which are to be followed by the Company, and that such internal financial controls are adequate and were operating effectively.
- vi. That the Directors had devised proper systems to ensure compliance with provisions of all applicable laws and that such systems were adequate and operating effectively.

28. **ACKNOWLEDGEMENT:**

Your Directors would like to convey their sincere appreciation for the assistance and co-operation received from the Stakeholders during the year under review. Your Directors also wish to place on record their appreciation for the contribution of the employees.

Place: Kolkata  
Dated: 02<sup>nd</sup> May, 2022

**For and on behalf of the Board**  
**Ashirwad Steels & Industries Limited**

**Dalbir Chhibbar**  
**Managing Director**  
**(DIN: 00550703)**

**Vishesh Chhibbar**  
**Director**  
**(DIN: 03553892)**

**MANAGEMENT DISCUSSION AND ANALYSIS REPORT (Part of Board/Annual Report)**

As per SEBI disclosure regulation 34(3) and schedule V (clause-B)  
(For the Financial Year ended 31st March, 2022)

**(a) Industry Structure and Developments:**

The company has sold off both its Sponge Iron Plants being located at Dist. Nalgonda, Telengana and Jamshedpur and is thus completely out of the Iron & Steel Business. Besides the company has two LPG bottling plants of which one located at Raigarh , Chattisgarh is lying closed and inoperative for last several years and the other one situated at Uluberia Industrial Growth Centre, Howrah ,West Bengal has been sub lease to M/s SHV Energy Private Limited with monthly receipt of lease rent. The said plant has also been sold to the aforesaid company vide fresh agreements dated 24-01-2022 and deal for the same is expected to be completed very shortly upon receipt of long awaited approval from M/s WBIIDC. Thus the company has no trading or industrial activities and has accordingly it has nothing to report on this account.

**(b) Opportunities and Threats :**

For the reasons and facts as stated above in sub para (a) . The company has nothing to report under this account.

**(c) Segment-wise Product-wise performance:**

For the reasons and facts as stated above in sub para (a) . The company has nothing to report under this account.

**(d) Outlook:**

For the reasons and facts as stated above in sub para (a) . The company has nothing to report under this account.

**(e) Risks & Concerns :**

For the reasons and facts as stated above in sub para (a). The company has nothing to report under this account.

The company however carries certain degree of risk in its investment in shares and on unsecured loans provided. However adequate precautions have taken to avoid unnecessary risks.

**(f) Internal Control System and its Adequacy:**

The Company has proper and adequate system of internal controls commensurate with its size and nature of operations to provide reasonable assurance that all assets are safeguarded, transactions are authorized, recorded and reported properly and applicable statutes are duly complied with. The Company has constituted an Audit Committee to monitor the adequacy and efficacy of internal control systems.

The adequacy of these compliances and their effectiveness is subject to statutory audit and the same has been adequately reported by the Auditors in their report as required under the relevant provisions of the Companies Act, 2013. The Company also has an Internal Audit System.

**(g) Discussions on financial performance with reference to operational Performance:**

During the year under review the Company's operational and financial performance has been quite dissatisfactory., the Company's revenue from operations net of taxes stood at Rs 108.00 lacs (previous year Rs.157.53 lacs) and the other income stood at Rs 833.54 lacs which mainly comprise of gains/surplus on sale of sponge iron plant (previous year Rs. 317.97 lacs) and hence the total income stood at Rs 941.54 lacs (previous 475.50 lacs). The company has earned a net a profit/surplus of Rs 461.80, after taxes (previous year net loss of Rs. 31.49 lacs). The Other Comprehensive Income (OCI) for the year stood as Rs 29.29 lacs (previous year Rs. 100.35 lacs). The total comprehensive income for the year stood at Rs 491.09 lacs (previous year Rs. 68.86 lacs).

**(h) Material Developments in HRD and industrial Relations Front:**

Your Directors recognize the value of employees as valuable assets. Developing, motivating, and retaining talented employees is a key responsibility and policy of your Company's management. The total no. of people employed by the company was six at year end.

**i) Cautionary Statements:**

For the reasons and facts as stated above in sub para (a) . The company has nothing to state under this account

**Place: Kolkata**  
**Dated: 02<sup>nd</sup> May, 2022**

**For and on behalf of the Board**

**Dalbir Chhibbar**  
**Managing Director**  
**(DIN : 00550703)**

**Vishesh Chhibbar**  
**Director**  
**(DIN: 03553892)**

**REPORT ON CORPORATE GOVERNANCE (Part of Board Report)**

As per SEBI disclosure regulations 34(3) and as per Schedule V-Clause – C to F of the said regulations (For the Financial year ended 31<sup>st</sup> March, 2022)

The Report on compliance of the conditions of corporate governance in accordance with the aforesaid Regulations of SEBI by your Company is given below:

**1. Company's Philosophy and Code of Governance**

We believe that good Corporate Governance is a key driver of sustainable corporate growth and long term value creation of our stakeholders. Corporate Governance involves being responsive to aspirations of our stakeholders besides ensuring compliance with regulatory requirements. The company has always the spirit of various legislations as guiding principles and proposes to go well beyond statutory compliance by establishing such systems and procedures as are required to make the management transparent and institutionally sound, to the extent required and practical. We are committed to conduct the business upholding the core values like transparency, integrity, honesty, accountability and compliance of all the statutes. We recognize that this is a conscious and continuous process across the organization, which enables the company to adopt best practices by incorporating improvements based on the past experience.

**2. Board of Directors:****(a) Composition:**

As at 31<sup>st</sup> March, 2022 the Board of Directors consisted of a Managing Director, two non-executive Directors, one non-executive woman Director and two non-executive independent Directors.

**(b) Category, their Directorship and Committee Membership in other Companies as on 31.03.2022:**

The Board of your Company is comprised of the following Directors:

<b>Name of Directors</b>	<b>Category</b>	<b>Member of Board of other Companies</b>	<b>Member of Committees of Other companies</b>	<b>No. of equity shares held in Ashirwad Steels &amp; Industries Ltd.</b>
Baninder Singh Sahni	Chairman (Non-Executive Independent Director)	-	-	Nil
Dalbir Chhibbar	Managing Director	7	-	108725
Puranmal Agarwal	Non-Executive Director	8	-	3250
Sushma Chhibbar	Non executive Director	6	-	112000
Vishesh Chhibbar	Non executive Director	6	-	50100
Neeraj Chhabra	Non Executive Independent Director	1	-	Nil

Note : No convertible instruments are held by any of the Directors including non-executive Directors.

**(c) Relationship of Directors with one another:-**

Sushma Chhibbar is the wife of Dalbir Chhibbar and Vishesh Chhibbar is the son of Dalbir and Sushma Chhibbar. Independent directors have no relationship with other Directors.

**(d) Board Meetings held during the year:**

During the year the Board of Director's Meetings were held on six occasions on 21-06-2021, 10-08-2021, 01-11-2021, 03-01-2022, 20-01-2022 and 25-01-2022. The Independent Directors held their separate exclusive meeting on 25-01-2022.

**(e) Meeting of the Independent Directors and their evaluation of Board**

The Independent Directors met on 25<sup>th</sup> January, 2022 and without the presence of non-Independent Directors of the Company. The Independent Directors *inter alia* evaluated the performance of the Non-Independent Directors and the Board of Directors as a whole, evaluated the performance of the Chairman, the Managing Director, the Members of the Board and discussed aspects relating to the quality, quantity and timeliness of the flow of information between the Company, the Management and the Board.

**(f) Attendance of Directors at the Board Meetings held during the Financial Year 2021-2022 and at the last Annual General Meeting (AGM)**

Name of Directors	No. of Board Meetings Held	No. of meetings attended/entitled	Date of meeting(s) not attended	Attended last AGM on
1. Puranmal Agarwal	6	6	None	Yes
2. Dalbir Chhibbar	6	6	None	Yes
3. Vishesh Chhibbar	6	6	None	Yes
4. Sushma Chhibbar	6	6	None	Yes
5. Neeraj Chhabra	6	6	None	Yes
6. Baninder Singh Sahni	6	6	None	Yes

**(g) Information about Directors seeking re-appointment:-** It is mentioned in the main part of the Board's Report under Para- 16.

**(h) Change in Directors and Key Managerial Personnels:**

This has been covered in the Main part of the Board's Report under Para- 16.

**3. Code of Conduct:**

**(A)** The Company has laid down a Code of Conduct as specified under Regulation 17(5) of the SEBI LODR REGULATIONS-2015 for all its Board Members including Independent Directors and Senior Management Personnel for avoidance of conflicts of interest. The code of conduct has suitably incorporated the duties of Independent Directors as laid down in the Companies Act, 2013 and under SEBI(LODR) Regulations. The declarations with regard to compliance of Code of Conduct have been received for the year ended 31<sup>st</sup> March, 2022 from all Board Members and Senior Management Personnel.

The Board periodically reviews all compliance reports as are prepared and applicable to the company and also ensures rectification of non-compliances, if any. The minimum and necessary informations as required under SEBI LODR Regulation 17(7)[Part A of Schedule II] was placed before the Board of Directors. The members of Board and the Senior Managerial Personnel of the company have affirmed compliance with this code of conduct within prescribed days from the close of Financial Year ended March, 2022. There were no material, financial and commercial transactions, in which Board Members and Senior Management Personnel had personal interest, which could lead to potential conflict of interest with the Company during the year except related party transactions as disclosed in this Board Report.

**(B) CERTIFICATE ON COMPLIANCE WITH CODE OF CONDUCT**

(Pursuant to Regulation – 17(5) and Regulation 34(3) read with Clause-D of schedule – V of SEBI LODR Regulations - 2015)

A declaration signed by the Managing Director (MD) on behalf of the Board of Directors is given below:-

"I, Dalbir Chhibbar, the Managing Director, as provided under the SEBI (LODR) Regulations, 2015, declare that all the Board Members and Senior Management Personnel have affirmed compliance with the Code of Conduct of the company for the year ended 31<sup>st</sup> March, 2022 and the copy of such code of conduct is available on the website of the company at [www.ashirwadsteels.com](http://www.ashirwadsteels.com)"

Place :Kolkata  
Dated: 02<sup>nd</sup> May, 2022

**Dalbir Chhibbar**  
**Managing Director**  
**(DIN: 00550703)**

**(C) CMD AND CFO CERTIFICATION**

The CMD and the CFO of the Company have given the necessary Compliance certificate dated 02/05/2022 as required under Regulation 17(8)[and under Part B of Schedule II] of the SEBI LODR regulations which is reproduced as under-

**SUB: COMPLIANCE CERTIFICATE (FOR THE FINANCIAL YEAR 2021-2022)  
(PURSUANT TO 17(8) AND PART B OF SCHEDULE II OF THE SEBI LODR REGULATIONS – 2015)**

To,  
The Board of Directors  
Ashirwad Steels & Industries Ltd.  
6, Waterloo Street,  
Kolkata 700069.

Dear Sirs,

I, Dalbir Chhibbar, the Managing Director of the company, and Mr. Chandra Prakash Srivastava, the Chief Financial Officer (CFO) of the Company submit hereunder the compliance certificate as above for your information, perusal and for doing the needful.

- A. We have reviewed financial statements and the cash flow statement of Ashirwad Steels & Industries Ltd. for the Financial year ended 31.03.2022 and that to the best of our knowledge and belief:
- (1) These statements do not contain any materially untrue statement or omit any material fact or contain statements that might be misleading:
  - (2) These statements together present a true and fair view of the Company's affairs and are in compliance with the existing applicable accounting standards, applicable laws and regulations.
- B. There are, to the best of our knowledge and belief, no transactions entered into by the Ashirwad Steels & Industries Ltd. during the year that are fraudulent, illegal or violative of the Company's code of conduct.
- C. We accept responsibility for establishing and maintaining internal controls for financial reporting of the company and that we have evaluated the effectiveness of internal control systems of the company pertaining to financial reporting and we have disclosed to the Auditors and the Audit Committee, deficiencies in the design or operation of such internal controls, if any, of which we are aware and the steps we have taken or propose to take to rectify these deficiencies.
- D. We have indicated to the auditors and the Audit Committee:-
- (1) Significant changes, if any, in the internal control over financial reporting during the year;
  - (2) Significant changes in accounting policies during the year and that the same have been disclosed in the notes to the financial statements; and
  - (3) Instances of significant fraud of which we have become aware and the involvement therein, if any, of the management or any employee having a significant role in the Company's internal control system with respect to financial reporting.

Thanking you.

**Place : Kolkata  
Date: 02-05-2022**

**DalbirChhibbar  
(Managing Director)  
(DIN 00550703)**

**Chandra Prakash Srivastava  
Chief Financial Officer**

**(D) Secretarial Auditor's Certificate on Corporate Governance**

(Pursuant to SEBI LODR Regulations -2015)

To,  
The Members,  
Ashirwad Steels & Industries Ltd

We have examined the compliance of the conditions of Corporate Governance by Ashirwad Steels & Industries Ltd. for the year ended 31<sup>st</sup> March, 2022, as stipulated in Regulations 17 to 27, clauses (b) to (i) of Regulation 46(2) and Para C, D and E of Schedule V of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations").

The compliance of conditions of corporate governance is the responsibility of the management. Our examination was limited to procedures and implementation thereof, adopted by the Company for ensuring the compliance of the conditions of the Corporate Governance. It is neither an audit nor an expression of opinion on the financial statements of the Company. This certificate 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.

On the basis of our findings from the examination of the records produced and explanations and information furnished to us and the representation made by the Management, we certify that the Company has complied with the conditions of Corporate Governance as stipulated in the SEBI (LODR) Regulations, 2015 for the financial year ended 31<sup>st</sup> March, 2022.

For **Patnaik & Patnaik**  
Company Secretaries  
Unique Code: P2017WB064500

Sd/-  
**S. K. Patnaik**  
Partner  
FCS No.: 5699, C.P. No.:7117  
Peer Review Cert. No. 1688/2022  
UDIN: F005699D000253122

Place: Kolkata  
Date: 2<sup>nd</sup> May 2022

**(E) Certificate of non-disqualification of Directors issued by the Company Secretaries :-**

**CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS**  
*[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  
 Ashirwad Steels & Industries Ltd  
 6 Waterloo Street, 5<sup>th</sup> Floor, Room No 506,  
 Kolkata- 700069

We have examined the relevant registers, records, forms, returns and disclosures received from the Directors of Ashirwad Steels & Industries Ltd (CIN L51909WB1986PLC040201) and having its Registered Office at 6 Waterloo Street, 5<sup>th</sup> Floor, Room No 506 Kolkata- 700069 (hereinafter referred to as 'the Company'), produced before us by the Company for the purpose of issuing this 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 Obligations 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 us 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 31<sup>st</sup> March, 2022 have been debarred or disqualified from being appointed or continuing as Directors of 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 in Company
1.	Dalbir Chhibbar	00550703	15/10/1990
2.	Sushma Chhibbar	00550898	06/05/2006
3.	Puran Mal Agrawal	00587723	26/12/1992
4.	Vishesh Chhibbar	03553892	21/03/2016
5.	Neeraj Chhabra	07256565	18/01/2016
6.	Baninder Singh Sahni	08748313	19/06/2020

Ensuring the eligibility 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 **Patnaik & Patnaik**  
 Company Secretaries  
 Unique Code: P2017WB064500

**S. K. Patnaik**  
 Partner  
 FCS No.: 5699, C.P. No.:7117  
 Peer Review Cert. No. 1688/2022  
 UDIN: F005699D000253023

Place: Kolkata  
 Date: 2<sup>nd</sup> May 2022

**4. AUDIT COMMITTEE**

In terms of Section 177 of the Companies Act, 2013 and SEBI LODR Regulation – 18; the company has formed an Audit Committee. The members of the committee remained the same as last year. The following persons continued to be its members :-

- |                             |                                    |
|-----------------------------|------------------------------------|
| 1. Mr. Neeraj Chhabra       | Independent Director (Chairperson) |
| 2. Mr. Baninder Singh Sahni | Independent Director               |
| 3. Mr. Puranmal Agarwal     | Director                           |

The Audit Committee at its discretion invite the CFO, the Internal Auditors and representative of the Statutory Auditors at the meetings as and when required.

**Brief Description of Terms of Reference:**

The terms of reference of the Audit Committee are as contained under the SEBI LODR REGULATION- 18, SCHEDULE-V (Part-C) and Schedule-II (Part-C) and as stipulated under Section 177 of the Companies Act, 2013.

The Audit Committee met five times during the year on 21-06-2021, 10-08-2021, 01-11-2021, 20-01-2022 and 25-01-2022 in compliance of the terms of duties, functions and authorities as specified in the Companies Act, 2013 and as per terms of their appointment. All members of the Audit Committee, while they were members of the same, have attended every meeting of the Audit Committee held during the year and hence there was no absenteeism.

**The Audit Committee's terms of reference and powers include:**

- a. To investigate any activity within its terms of reference,
- b. To seek information from any employee,
- c. To obtain outside legal or other professional advice,
- d. To secure attendance of outsiders with relevant expertise, if it considers necessary.

**Role of the Audit Committee includes following amongst others :**

- a. Oversight of the company's financial reporting process and the disclosure of its financial information's to ensure that the financial statements are correct, sufficient and credible.
- b. Recommending to the Board, the appointment, re-appointment and, if required, the replacement or removal of statutory auditor and the fixation of audit fee and also approval for payment for any other services,
- c. Reviewing with Management, the annual financial statements before submission to the Board for approval.
- d. Reviewing with the Management, the quarterly financial statements before submission to the Board for approval.
- e. Reviewing with the Management, the performance and Report of that statutory and internal Auditors and adequacy of internal control systems.
- f. Discussion with statutory Auditors before the audit commences, about the nature and scope of audit as well as to have a post-audit discussion to ascertain any area of concern.
- g. To investigate any activity within its terms of reference, seek any information from any employee of the Company, to obtain outside legal or other professional advice and secure attendance of outsiders with relevant expertise if it is considered necessary.
- h. Carrying out any other function as is mentioned in the terms of reference of the Audit Committee including scrutiny of Inter Corporate Loans and investments and dealings in Derivatives of Listed equity Shares under future and options segment of National Stock Exchange and Bombay Stock Exchange.
- i. The Audit Committee also reviews the following informations:
  - (i) Management discussion and analysis on financial condition and results of operations;
  - (ii) Statement of significant related party transactions;
  - (iii) Management letters / letters of internal control weaknesses issued by the Internal and statutory Auditors, if any; and
  - (iv) The appointment, removal and terms of remuneration of the Statutory and Internal Auditors.

The Board has not disagreed with any major/material recommendations of the Audit Committee.

**5. NOMINATION & REMUNERATION COMMITTEE:-**

In terms of Section 178 of the Companies Act, 2013 and SEBI LODR Regulations No.19 and Schedule V (Part-C) and Schedule II (Part-D);the Company has a "Nomination & Remuneration Committee". The members of the said committee are as under:-

- |    |                          |                                    |
|----|--------------------------|------------------------------------|
| 1. | Mr. Neeraj Chhabra       | Independent Director (Chairperson) |
| 2. | Mr. Baninder Singh Sahni | Independent Director               |
| 3. | Mr. Vishesh Chhibbar     | Non-Executive Director             |

which formulates criteria for determining the qualification, experience, background, exposure, positive attributes and independence for the appointment and/or removal of Directors, Key Managerial Personnel and Senior Managerial Persons ascertaining their reasonable remuneration commensurate with their qualification, job requirements meeting the appropriate performance benchmark to run the company successfully utilizing the existing resources to its optimum and evaluates their performance from time to time and report their suggestion to the Board.

The Nomination & Remuneration Committee met during the year under review on 21-06-2021 and no member of the Committee was absent.

**6. STAKEHOLDERS RELATIONSHIP (GREIVANCE) COMMITTEE AND COMPLIANCE OFFICER :**

In terms of Section 178(5) of the Companies Act, 2013, and SEBI disclosure regulation no. 20 and Schedule V (Part-C) and Schedule II ( Part D );the Board has constituted a Stakeholders Relationship Committee. The members of the said committee are as under:-

- |    |                          |                                    |
|----|--------------------------|------------------------------------|
| 1. | Mr. Baninder Singh Sahni | Independent Director (Chairperson) |
| 2. | Mr. Puranmal Agarwal     | .. Non-Executive Director          |
| 3. | Mr. Vishesh Chhibbar     | .. Non-Executive Director          |

All the Committee Members shall consider and resolve the grievances of shareholders of the Company as and when the same are received by the company from shareholders and maintain proper records for the same and present the same to the Board. Mr. Baninder Singh Sahni can be reached and communicated through his E-mail ID compliance.ashirwad@gmail.com and Shri Puranmal Agarwal and Shri Vishesh Chhibbar can be reached at the E-mail ID : ashirwadsteels@gmail.com. This Committee performs the role as specified in the aforesaid SEBI (LODR) Regulation No. - 20 and read with Part D of schedule II and also Clause – 6 of Part–C Schedule V.

**The Details of shareholder complaints/ grievances during the year were as under:-**

1. No. of Complains Received – NIL
2. No. of complains Solved - NIL
3. No. of complains pending as on close of financial year – NIL

The stakeholders relationship committee met 21-06-2021, no member of the committee was absent in any of the said meeting. Mrs. Anamika Sinha Roy, the Company Secretary, is also the compliance officer of the company.

**7.THE VIGIL MECHANISM :-**

The Board has formulated a Vigil Mechanism for the Directors and it's employees to report it's genuine concerns and under such mechanism the affected persons shall inform the matter to the Chairman of the Company who has been assigned with a duty to ensure compliance with the Vigil Mechanism and also to ensure adequate safeguard against victimization of any Director or any employee or any other person who avails the Vigil Mechanism. The Vigil Mechanism also provides for direct access to the Chairperson of the Audit Committee in appropriate cases.

**8.Remuneration of Directors**

- (a) Remuneration is paid to the Managing Director as per package approved by the Board and the members in the Annual General Meeting.

The Managing Director's remuneration package, during the financial year 2021-22, as approved by the members through E-Voting and in the AGM held on 17.09.2019, was briefly as under Subject to his discretion to take all in full or in part or to forego the same.

- (i) Salary Rs.100,000/- per month up to 16.05.2019 and Rs 2,50,000 per month from 17.05.2019
- (ii) House Rent Allowance or free furnished accommodation
- (iii) Medical and Hospital expense for self and family
- (iv) Leave travel allowance, Club Fees, Provident Fund, Gratuity, Gas, Water, Telephone at home, Two Motor Cars with Driver, etc.

- (b) Details of remuneration paid to the Directors for the year ended 31<sup>st</sup> March, 2022 are as under:-
- Remuneration paid to Managing Director for the financial year 2021-2022 was Rs.9,00,000/-.
  - Sitting fees paid to independent directors of the company aggregating to Rs. 48,000/- for the full year.
  - No remuneration has been paid to any of the non-executive Directors during the year.

#### **9. Shareholders/Investors Grievances and Redressal:**

- The Company has appointed M/s Niche Technologies Pvt. Ltd., a SEBI registered Registrar as its Share Transfer Agent for both physical as well as electronic modes. The shares of the Company are traded on Bombay Stock Exchange (BSE Ltd.) and as the complaints from the Shareholders are nil; the Company's Stakeholders Committee oversee the shareholders complaints/ grievances.
- Mrs Anamika Sinha Roy, the Company Secretary is the Compliance Officer of the Company.
- During the financial year 2021-22; the Company did not receive any complaints from the shareholders and No complaint from shareholders was pending as on 31.03.2022.

#### **10. Details of General Body Meetings as specified under SEBI disclosure regulation 34(3) read with Schedule V – Para – C(7) :**

- (a) **Location, date and time, where last three AGMs held :**

<b>AGM</b>	<b>Financial Year</b>	<b>Date</b>	<b>Time</b>	<b>Place of AGM</b>
33 <sup>rd</sup>	2018-2019	17.09.19	11.00AM	6, Waterloo Street, 5 <sup>th</sup> floor, Suite No.506, Kolkata-700069. (Registered Office)
34 <sup>th</sup>	2019-2020	27.07.20	11.00AM	6, Waterloo Street, 5 <sup>th</sup> floor, Suite No.506, Kolkata-700069. (Through Video Conferencing without physical presence and deemed to be held at the registered office)
35 <sup>th</sup>	2020-2021	06.08.21	12.00PM	6, Waterloo Street, 5 <sup>th</sup> floor, Suite No.506, Kolkata-700069. (Through Video Conferencing without physical presence and deemed to be held at the registered office)

#### **11. Means of communication**

##### **(Pursuant to Regulation 34 (3) read with Clause-8 of Schedule V of SEBI LODR Regulations – 2015) :**

- (a) The quarterly results of the Company are communicated to the Stock Exchange(BSE Ltd.) on time and are also uploaded on Companies Website and are regularly published in the following newspapers:

- Financial Express / Business Standard(English)
- Sangbad nazar (Bengali)

- (b)The Company's Website is [www.ashirwadsteels.com](http://www.ashirwadsteels.com).

#### **12. General Shareholders' information**

##### **(As per regulation 34(3) and 53 read with clause 9 to 13 of Part-C of Schedule-V)**

##### **(a) AGM : Date, time and venue :**

The forthcoming 36th Annual General Meeting of your Company will be held on Friday, the 17<sup>th</sup> June 2022, at 12.00 P.M through Video Conferencing ("VC") or Other Audio Visual Means ("OAVM") at a common venue but shall be deemed to be held at its Registered Office at 6, Waterloo Street, 5<sup>th</sup> floor, Suite No.506, Kolkata-700 069 . The Notice for holding the said Annual General Meeting along with Annual Report etc. shall be emailed to only members. Members are requested to use the option of e-voting on proposed resolutions through facilities provided by Central Depository of Securities Ltd.(CDSL) with procedure as detailed in the Notice convening the Annual General Meeting. Those who do not use E-Voting facility during the E-voting period can cast their Votes online at the time of the AGM as per procedure given in the

notice of AGM. **Members holding shares are again requested to register their email address with RTA/their own depositaries so that they can receive the Annual Report and any other communication from the company through email. They are also requested to complete their KYC with PAN and BANK A/c details as it is made mandatory by SEBI.**

(b) Financial Year of the Company:- 1<sup>st</sup> April to 31<sup>st</sup> March each year.

(c) No dividend has been declared by the board for the financial year- 2021-2022.

(d)The Company's shares are listed on the Bombay Stock Exchange (BSE Ltd.) and the Annual Listing fees for the Financial year ended March 2022 and also for current Financial year -2022-23 has been paid.

(e) The Stock Code of the Company is 526847. The International Security Identification Number (ISIN) of the Company's Equity Shares is INE338C01012. The Company's Corporate Identification Number (CIN) is L51909WB1986PLC040201 allotted by R.O.C- Kolkata.

(f) **Market Price Data& performance of share price compared to BSE & SENSEX:**

The monthly High and Low Equity Share prices of the Company as traded at The Bombay Stock Exchange (BSE Ltd.) from 1<sup>st</sup> April, 2021 to 31<sup>st</sup> March, 2022 are given below:

<b><u>Month</u></b>	<b><u>High Price</u></b>	<b><u>Low Price</u></b>
	<b>Per share (Rs.)</b>	<b>Per share (Rs.)</b>
April, 2021	15.77	09.98
May, 2021	16.81	13.12
June, 2021	15.00	12.36
July, 2021	15.15	10.81
August, 2021	14.99	10.01
September, 2021	12.08	09.11
October, 2021	10.90	08.80
November, 2021	18.62	08.60
December, 2021	16.30	12.50
January, 2022	22.25	16.35
February, 2022	21.30	13.30
March, 2022	18.55	13.51

(g) The performance of Company's market share price with comparison to BSE Sensex on year to year basis:

The Company's market price has fallen by 14.33% from being high of Rs. 15.77 in the month of April 2021 to Low of Rs 13.51 in the month of March, 2022; whereas BSE sensex has risen by 18.00% (Sensex being 49,509 on 01.04.2021 and closed at 58,568 on 31.03.2022).

(h) The securities of the Company have never been suspended from trading by the Stock Exchange.

(i)**Registrar and Share Transfer Agents**

The details of the Registrar and Share Transfer Agent (RTA) of the Company are as follows:-

M/s. Niche Technologies Private Limited

3 A, Auckland place,

7<sup>th</sup> floor, Room No. 7A & 7B, Kolkata-700017

Ph. No: 91-033-2235 7270/71

E-mail [nichetechpl@nichetechpl.com](mailto:nichetechpl@nichetechpl.com)

Accordingly, all communications on matters relating to share transfer, non-receipt of share certificate, etc. be sent to Niche Technologies Private Limited. Correspondence on these matters may also be sent to the Company at its Registered Office at 6, Waterloo Street, 5<sup>th</sup> floor, Suite No.506, Kolkata-700 069.

(j) **Share Transfer System :**

After the request for transfer/transmission of shares is approved by the authorized officials of the Company, the same is sent to the Registrar and Share Transfer Agents for completing the necessary procedural formalities and dispatch to the shareholders. Transfer of shares, if found to be in order in all respects, are normally effected within a period of 15 days from the date of receipt of shares. The transfer of shares is registered and effected on 7<sup>th</sup>, 14<sup>th</sup>, 21<sup>st</sup> and 28<sup>th</sup> of each month of the year and for the month of February the same could be 28<sup>th</sup> or 29<sup>th</sup> whichever is applicable.

(k) **Distribution of Shareholding as at 31<sup>st</sup>March,2022**

<b><u>Category of share holder</u></b>	<b><u>No. of Equity Shares held</u></b>	<b><u>% of Shares held</u></b>
(A) <b>Promoter's Holding</b>	8446409	67.57
(B) <b><u>Non Promoter's Holding</u></b>		
Institutional Investors	8700	0.07
Private Corporate Bodies	1501307	12.01
Indian Public	2387685	19.10
NRI/OCBs	1,48,211	1.18
Others	7688	0.01
<b>Total</b>	<b><u>12500000</u></b>	<b><u>100</u></b>

**Note:** Promoters have not pledged any of their shares with any Agency/Bank and/or Financial Institutions.

**DISTRIBUTION OF EQUITY SHARES (AS ON: 31/03/2022)**

<b>SI No.</b>	<b>No. of Shares</b>	<b>No. of Holders</b>	<b>% to total</b>	<b>Total Shares</b>	<b>% to total</b>
1	1 - 500	5114	90.7703	5,04,267	4.0341
2	501- 1000	213	3.7806	1,76,979	1.4158
3	1001-5000	215	3.8161	4,79,897	3.8392
4	5001-10000	23	0.4082	1,72,671	1.3814
5	10001-50000	39	0.6922	11,12,203	8.8976
6	50001- 100000	13	0.2307	9,70,258	7.7621
7	100001- And above	17	0.3017	90,83,725	72.6698
	Totals	<b>5634</b>	<b>100.00</b>	<b>1,25,00,000</b>	<b>100.00</b>

(l) **Dematerialisation of shares and liquidity:**

The Company had signed tripartite agreements with NSDL, CDSL, Registrar, and Share Transfer Agents in November, 2000. Dematerialization facility is available for shareholders. Out of the total number of 1,25,00,000 shares of the company ;12126162 number of shares (97.00%) have been dematerialized as on 31.03.2022.

(m) The Company has not till date issued any GDRs/ADRs/warrants or any convertible instruments pending for conversion and thus none was outstanding as on 31.03.2022.

(n) Commodity price risk or Foreign Exchange Risk and hedging activities: NIL

(o) **Plant Locations:**

**Hydrocarbon/LPG  
Gas Bottling Plants** 1) Uluberia Industrial Growth Centre, Uluberia, Howrah, West Bengal, Pin – 711 315 (Leased out and also under sale)

2) Village:Kisnapur, Near Urdana Check Post, Raigarh-496001 (Chhattisgarh).

(p) **Address for correspondence:**

The Shareholders may address their communications, suggestions, grievances and queries to:

1. Mrs Anamika Sinha Roy (Company Secretary & Compliance Officer) E-mail: csashirwad@gmail.com
2. Mr. Baninder Singh Sahni (Chairperson of Stakeholders Relationship Committee)  
C/o. Ashirwad Steels & Industries Limited  
6, Waterloo Street, 5<sup>th</sup> floor, Suite No.506,  
Kolkata-700 069, West Bengal.  
Phone No. 91-033-22430376  
E-mail : compliance.ashirwad@gmail.com Website : www.ashirwadsteels.com

**13. Other disclosures and statements (Pursuant to Schedule – V of SEBI’s LODR Regulations 2015, to the extent applicable) and other matters**

- (a) Related Party Transactions – The Company has paid Rs.3,00,000/- as office rent to a Related Party & has also paid Rs. 9,00,000/- as remuneration to Dalbir Chhibbar, the Managing Director in the ordinary course and such payments are not considered as material requiring approval of the shareholders.
- (b) There are no non-compliance by the Company in respect of matters related to Capital Market during the last three years.
- (c) The company has established a Vigil Mechanism and it ensures that no person is unnecessarily victimized nor in appropriate cases is denied access to the chairperson of the Audit Committee.
- (d) The Company has not yet adopted discretionary requirements as specified in SEBI (LODR) Regulation 34(3) read with Part – E of Schedule II.
- (e) The Practicing Company Secretary Mr. Shankar Patnaik, partner of Patnaik & Patnaik, Company Secretaries , has given a certificate regarding compliance of conditions of corporate governance and the same is annexed to this Board report and forms part of the Board Report.
- (f) The Managing Director of the Company has given a declaration and certificate that Members of board of Directors and Senior Management employees have affirmed compliance with the prescribed Code of conduct for them.
- (g) The extract of the Annual Return pursuant to Section 92(3) of the Companies Act 2013 read with Rule – 12 of the Cos.(Management & Administration) Rules 2014 in the prescribed Form : MGT 9 is annexed to and forms part of this Board Report. The Annual Return of the previous financial year ended 31.03.2022 in the prescribed form MGT – 7 was duly certified by M/s. Patnaik & Patnaik, Company Secretaries, in the prescribed Form : MGT – 8 on 10.11.2020
- (h) Half-yearly declaration of results of financial performances including summary of the significant events are not sent to the shareholders of the Company as quarterly results are regularly published in newspapers.
- (i) To the best of knowledge of your Board; there are no shares lying in the demat suspense account or unclaimed suspense account.

- (j) The Company maintains a Website under the name [www.ashirwadsteels.com](http://www.ashirwadsteels.com)
- (k) The Company does not have any stock options scheme at present for employees or any other directors. The Company has also put in place a framework to avoid insider trading and abusive self-dealing and for equitable treatment of all shareholders. The Company has a policy, as approved by the Board, for preservation of documents specifying therein documents which shall be preserved permanently and other documents which shall be preserved for not less than 8 years with option to preserve in electronic mode.
- (l) As mandated by SEBI; the Company has framed policies with respect to Related Party Transactions, Preservation of Documents, Disclosure on Material Subsidiary, Disclosure of Materiality of events or informations and Code of Conduct for Independent Directors and such policies are available at the Company's Official Website i.e. [www.ashirwadsteels.com](http://www.ashirwadsteels.com) for the reference and benefit of all Stake Holders.
- (m) This Annual Report of the Board, to the best of its knowledge and belief, has been prepared and presented in accordance with applicable provisions, rules and requirements of Companies Act 2013, Companies (Accounts) Rules 2014, Companies (Indian Accounting Standards) Rules 2015 and SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015.

**Place: Kolkata**  
**Date : 02<sup>nd</sup> May, 2022**  
**Regd. Office: 6, Waterloo Street,**  
**Room No. 506, 5<sup>th</sup> floor,**  
**Kolkata – 700 069**

**For and on behalf of the Board**

**Dalbir Chhibbar**  
**Managing Director**  
**(DIN : 00550703)**

**Vishesh Chhibbar**  
**Director**  
**(DIN: 03553892)**

**INDEPENDENT AUDITOR'S REPORT  
TO THE MEMBERS OF ASHIRWAD STEELS & INDUSTRIES LIMITED**

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

**Opinion**

We have audited the financial statements of Ashirwad Steels & Industries Limited ("the Company"), which comprise the Balance Sheet as at March 31, 2022, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash Flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information (hereinafter 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 prescribed under section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended, ("Ind AS") and other accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2022, and total comprehensive income (comprising of profit and other comprehensive income), changes in equity and its cash flows for the year then ended.

**Basis for Opinion**

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies Act, 2013. Our responsibilities under those Standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India ("the ICAI") together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Act and the Rules made there under, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ICAI's Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**Emphasis of Matter**

We draw your attention to Note 31(1) and Note 31(2) to the financial statements which states that the Company has sold /disposed of its Sponge iron plant situated at Jamshedpur through an agreement for sale and transfer executed on 25-01-2022 at Rs 14.50 Crore via slump sale on a going concern basis due to unremunerative selling prices of sponge iron followed by the high input cost and recurring high maintenance and administrative expenditure.

We further draw your attention to Note 31(4) to the financial statements which states that the Company's LPG bottling plant situated at Raigarh continues to be inoperative and the Board has taken the authority from the members through postal ballot to dispose of the said plant. The Board considers that only the free-hold land of the said plant has commercial value and rest of the property, plant & equipment being very old and obsolete, have only scrap value. With this the Company is now completely out of the business of iron and steel, having sold the loss-making sponge iron plant located at district Nalgonda, Telangana during the financial year 2018-19.

However, the management is actively and seriously making efforts to identify any other diversified business or industry and till then the company has invested its surplus funds in shares and securities, loans and in bank fixed deposits to generate the alternate source of income for the company.

However, the management and the Board of directors have assessed the impact of these transactions and firmly believe the Company's ability to continue as a going concern.

We further draw your attention to Note 31(5) to the financial statements which explains the uncertainties and management's assessment of the financial impact due to the Covid-19 pandemic, for which a definitive assessment of the impact is dependent upon future economic conditions.

Our opinion is not modified in respect of these above matters.

## Key Audit Matters

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

### Description of Key Audit Matter

#### Evaluation of key tax matters

Sr. No.	Key Audit Matter	How the matter was addressed in our audit
1.	The Company operates in multiple jurisdictions and is subject to periodic challenges by local tax authorities on a range of tax matters during the normal course of business including indirect tax matters and other litigation(s). These involve significant judgment by the company to determine the possible outcome of the uncertain tax positions, consequently having an impact on related accounting and disclosures in the financial statements.	<p><b><u>Our audit procedures included the following substantive procedure;</u></b></p> <ol style="list-style-type: none"> <li>1. Obtain an understanding of key tax matters</li> <li>2. The audit team along with our internal tax experts read and analysed select key correspondences, external legal opinions/ consultation obtained by Company for key tax matters</li> <li>3. Evaluated the key assumptions made by the company in estimating the current and deferred tax balances,</li> <li>4. Assessed the company's estimate of the possible outcome of the disputed cases and pending litigations by considering legal precedence and other judicial rulings and;</li> <li>5. Assessed and tested the presentation and disclosures relating to taxes and litigations if any.</li> </ol>

#### Evaluation of Contingent liabilities (Refer note 31 (6) to the financial statements)

Sr. No.	Key Audit Matter	How the matter was addressed in our audit
2.	Claims against the Company not acknowledged as debts is disclosed in the financial statements. In this regard, the Bank Guarantee issued by the HDFC Bank in favour of Central Coal fields Ltd, dated 11-12.2013 for Rs 46.00 Lacs/- and renewed on 15.02.2022 for a period of upto 31-03-2023 against which the Company has pledged /created lien on its fixed deposits with the HDFC Bank Ltd. The existence of the payments against these claims requires management's judgement to ensure disclosure of most appropriate values of contingent liabilities.	<p><b><u>Our audit procedures include;</u></b></p> <ol style="list-style-type: none"> <li>1. Among others, assessing the appropriateness of the management's judgement in estimating the value of claims against the Company not acknowledged as debts as given in the Note 31 (6) to the financial statements.</li> </ol>

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

The Company's Board of Directors is responsible for the other informations. The other informations comprises the informations included in the Management's Discussion and Analysis, Board's Report including Annexure to Board's Report, Corporate Governance Report 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 during the course of our audit or otherwise appears to be materially misstated.

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

## **Management's Responsibility and those charged with governance for the Financial Statements**

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

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

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

## **Auditor's Responsibilities for the Audit of the Financial Statements**

Our objectives are to obtain reasonable assurance about whether the 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 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 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 control system in place and the operating effectiveness of such controls.
- *Evaluate the appropriateness of accounting policies used* and the reasonableness of accounting estimates and related disclosures made by management.
- *Conclude on the appropriateness of management's use of the going concern basis* of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the 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 financial statements*, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

Materiality is the magnitude of misstatements in the 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 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 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 the Companies (Auditor's Report) Order, 2020 ("the Order") issued by the Central Government in terms of Section 143(11) of the Act, applicable from 01<sup>st</sup> April, 2021, we give in the "Annexure B" a statement on the matters specified in paragraph 3 and 4 of the order, to the extent applicable.
- 2) As required by Section 143(3) of the Act, we report that:
  - a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
  - b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.

- c) The Balance Sheet, the Statement of profit and loss (including other comprehensive income), the Statement of Changes in Equity and the Statement of cash flow dealt with by this Report are in agreement with the relevant books of account.
- d) In our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act.
- e) On the basis of the written representations received from the directors taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2022 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 financials statements of the Company and the operating effectiveness of such controls, refer to our separate Report in “Annexure A”.
- g) With respect to the other matters to be included in the Auditor’s Report in accordance with Rule 11 of the Companies (Audit and Auditors) Amendment Rules, 2021, effective from 01<sup>st</sup> April 2022, in our opinion and to best of our information and according to the explanations given to us:
- i) The Company did not have any pending litigations as at March 31, 2022, which may affect on its financial position.
  - ii) The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses, during the year ended March 31, 2022.
  - iii) During the year no amounts were required to be transferred, to the Investor Education and Protection Fund by the Company, so the question of delay in transferring such sums does not arise.
  - iv) **Omitted by the Companies (Audit and Auditors) Amendment Rules 2021, effective from 01<sup>st</sup> April, 2021**
  - v) (i) The Management has represented that, to the best of its knowledge and belief, as disclosed in Note 32(14)(A) to the financial statements, no funds have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the Company to or in any other person(s) or entity(ies), including foreign entities (“Intermediaries”), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Company (“Ultimate Beneficiaries”) or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.
  - (ii) The Management has represented, that, to the best of its knowledge and belief, as disclosed in Note 32(14)(B) to the financial statements, no funds have been received by the Company from any person(s) or entity(ies), including foreign entities (“Funding Parties”), with the understanding, whether recorded in writing or otherwise, that the Company shall, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party (“Ultimate Beneficiaries”) or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.

**(iii)Unmodified Opinion:** Based on the audit procedures performed that have been considered reasonable and appropriate in the circumstances, nothing has come to our notice that has caused us to believe that the representations under sub-clause (i) and (ii) of Rule 11(e) contain any material mis-statement.

vi) No dividends were declared or paid during the year by the Company, hence compliance with Section 123 of the Companies Act, 2013 is not applicable

3) With respect to the matter to be included in the Auditor's Report under Section 197(16) of the Act: In our opinion and according to the information and explanations given to us, the remuneration paid by the Company to its directors during the current year is in accordance with the provisions of Section 197 of the Act read with Schedule V to the Act.

For and on behalf of

**M.R. SINGHWI & CO**

Chartered Accountants

Firm Registration Number: 312121E

**CA Mahesh Raj Singhwi**

Partner

Membership Number: 050650

UDIN: 22054613AJCEUG3096

Place: Kolkata

Date: 02.05.2022

**Annexure - A to the Independent Auditors' Report**

With reference to the Annexure A referred to *paragraph 2 (f) under* Report on Other Legal and Regulatory Requirements of the Independent Audit Report of even date to the members of the Company on the financial statements as on and for the year ended March 31, 2022, we report the following:

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

We have audited the internal financial controls with reference to financial statements of .

("the Company") as of March 31, 2022 in conjunction with our audit of the financial statements of the Company for the year ended on that date.

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

The Company's Management and the Board of Directors of the Company are responsible for establishing and maintaining internal financial controls based on the internal financial controls with reference to financial statements criteria established by the Company considering the essential component of stated in the Guidance Note 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 Act.

**Auditor's Responsibility**

Our responsibility is to express an opinion on the internal financial controls with reference to financial statements based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (the "Guidance Note") issued by the Institute of Chartered Accountants of India and the Standards on Auditing prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls with reference to financial statements. 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 with reference to standalone financial statements were established and maintained and whether 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 with reference to financial statements and their operating effectiveness. Our audit of internal financial controls with reference to financial statements included obtaining an understanding of such internal financial controls, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effective 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 with reference to financial statement.

**Meaning of Internal Financial Controls with reference to Financial Statements.**

A company's internal financial control with reference to financial statement 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 with reference to financial statement includes those policies and procedures that:-

- (i) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;

- (ii) 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
- (iii) 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 with Reference to Financial Statements**

Because of the inherent limitations of internal financial controls with reference to financial statements 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 the internal financial controls with reference to financial statements to future periods are subject to the risk that the internal financial control with reference to financial statements may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

### **Opinion**

In our opinion, the Company has, in all material respects, an adequate internal financial controls with reference to financial statements and such internal financial controls with reference to financial statements were operating effectively as at March 31, 2022, based on the internal control with reference to financial statements 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 (the 'Guidance Note').

For and on behalf of

### **M.R. SINGHWI & CO**

Chartered Accountants

Firm Registration Number: 312121E

### **CA Mahesh Raj Singhwi**

Partner

Membership Number: 050650

UDIN: 22054613AJCEUG3096

Place: Kolkata

Date: 02.05.2022

**Annexure - B to the Independent Auditors' Report**

Referred to in paragraph 1 of the Independent Auditor's Report of even date to the members of Ashirwad Steels & Industries Limited Company on the financial statements as of and for the year ended March 31, 2022, we report the following:

- i. In respect of the Company's Property, plant and equipment:
  - (a) The Company has maintained proper records showing full particulars, including quantitative details and situation of property, plant and equipment. Further the Company does not have intangible assets.
  - (b) The Company has physically verified all the major property, plant and equipment as per a phased program of verification. In our opinion, the periodicity of physical verification is reasonable having regard to the size of the Company and the nature of its assets. The discrepancies reported on such verification were not material and have been properly dealt in the books of accounts.
  - (c) According to the information and explanations given to us, and the records examined by us and based on the examination of the records/deeds provided to us, we report that the title deeds of all the immovable properties other than self-constructed immovable properties (Building and Factory sheds etc.) are held in the name of the Company.
  - (d) The Company has not revalued any of its property, plant and equipments during the year.
  - (e) No proceedings have been initiated or are pending against the Company for holding any benami property under the Benami Transactions (Prohibitions) Act, 1988 (45 of 1988) and rules made there under
- ii.
  - (a) The Company did not have any inventory as at the end of the year, hence physical verification of the inventory was not required.
  - (b) The Company has not been sanctioned working capital limits in excess of five crores, in aggregate, from banks or financial institutions on the basis of security of current assets during any point of time of the year
- iii.
  - (a) The Company has provided loans to the companies during the year and the aggregate amount provided during the year and balance outstanding as at balance sheet date are as follows;

**Rs In' lacs**

Particulars	Guarantees	Security	Loans	Advances in nature of loans
Aggregate amount granted during the year	NIL	NIL	50.00	None
Subsidiaries	Nil	Nil	Nil	None
Joint ventures	Nil	Nil	Nil	None
Associates	Nil	Nil	Nil	None
Others	Nil	Nil	50.00	None
Balance outstanding as at balance sheet date in respect of above cases				
Subsidiaries	Nil	Nil	Nil	None
Joint ventures	Nil	Nil	Nil	None
Associates	Nil	Nil	Nil	None
Others	Nil	Nil	1765.00	None

- b) According to the informations and explanations given to us and based on the audit procedures performed by us, we are of the opinion that the terms and conditions of loans granted by the company are not prejudicial to company's interest.
- c) According to the informations and explanations given to us and based on the procedures performed by us, the schedule of repayment of principal and payment of interest has not been stipulated and all the loans are repayable on demand and are generally regular
- d) According to the information and explanations given to us and based on procedures performed by us, the total amount overdue for more than 90 days are as follows;

No of cases	Rs In' Lacs		
	Principal amount overdue	Interest overdue	Total overdue
1	250.00	189.14	439.14

Further the company takes reasonable steps for recovery of the principal and interest amounts.

- e) The Company has not renewed or extended or granted fresh loans to settle the overdues of existing loans given to the same parties.
- f) The Company has not granted loans which are repayable on demand or without specifying any terms or period of repayment, to Promoters, related parties as defined in clause (76) of Section 2 of the Companies Act, 2013. Further details are as follows
- iv. In our opinion and according to the informations and explanations given to us, the Company has complied with the provisions of Sections 186 of the Act in respect of grant of loans, making investments and providing guarantees and securities, as applicable. No loan has been given to any director of the Company; hence Provisions of Section 185 of the Act is not applicable.
- v. In our opinion and according to the information and explanations given to us, the Company has not accepted any deposits from public within the meaning of sections 73 to 76 or any other relevant provisions of the Companies Act, 2013 and the rules framed there under and hence no reporting on this account is required. Further according to the information and explanations given to us, no order has been passed by the Company Law Board or National Company Law Tribunal or Reserve Bank of India or any Court or any other Tribunal for contravention of these Sections or any other relevant Provision(s) of the Act and the relevant rules thereunder:-
- vi. We have broadly reviewed the books of accounts of the Company and are of the opinion that prima facie, maintenance of cost records has not been specified for the Company, hence this clause is not applicable to the Company.
- vii. a) The Company is generally regular in depositing undisputed statutory dues including staff provident fund, Employees' State Insurance, Income Tax, Cess, Goods and Services Tax, and other material statutory dues as applicable to it and the extent of arrears of outstanding Statutory dues as on the last day of the financial year concerned is not for a period of more than six months from the date they become payable.
- b) According to the information and explanations given to us and the records of the Company examined by us, there are no dues referred to in (a) above, as on March 31, 2022 which has not been deposited on account of a dispute.
- viii. There are no amounts that are in nature of undisclosed transactions or amounts surrendered as income in assessments under the Income Tax Act, 1961

- ix. **a)** The Company has not taken any loans or borrowings from financial institution, banks, Government or from any lender, hence reporting under this clause of the Order is not applicable to the Company.
- b)** The Company is not declared willful defaulter by any bank or financial institution or other lender.
- c)** During the year the Company has not availed of or has been disbursed any term loans
- d)** The Company has not raised any funds during the year, hence this clause of the Order is not applicable to the Company
- e)** The Company does not have any subsidiaries, associates or joint ventures; hence this clause of the Order is not applicable to the Company.
- f)** The Company does not have any subsidiaries, associates or joint ventures; hence this clause of the Order is not applicable to the Company.
- x. **a)** In our opinion and according to the information and explanations given to us, the Company has not raised moneys by way of initial public offer or further public offer including debt instruments or term loans and hence reporting under this clause of the Order is not applicable to the Company
- b)** The Company has not made any preferential allotment or private placement of shares or convertible debentures during the year
- xi. **a)** To the best of our knowledge and according to the information and explanations given to us, no fraud by the Company or no material fraud on the Company by its officers or employees has been noticed or reported during the year.
- b)** There is no instance, during the year under consideration that necessitates reporting in Form ADT-4
- c)** There are no instances of whistle-blower complaints received during the year by the Company.
- xii. The Company is not a Nidhi Company, hence this clause of the Order is not applicable to the Company
- xiii. In our opinion and according to the information and explanations given to us, the Company is in compliance with the provisions of Section 177 and Section 188 of the Companies Act, 2013 where applicable for all transactions with the related parties and the details of the related party transactions have been disclosed in the financial statements as required by the applicable Accounting Standards.
- xiv. **a)** In our opinion and based on our examination, the Company has an internal audit system commensurate with the size and nature of its business. The Company has engaged a firm of Chartered Accountants to carry out internal audit and who submit their report to the Audit Committee and to the Board of Directors
- b)** The reports of the internal auditors for the period under audit have been considered by us.
- xv. In our opinion and according to the informations and explanations given to us, during the year the Company has not entered into any non-cash transactions with its directors or persons connected with them
- xvi. **a)** In our Opinion and according to the information and explanations given to us, the Company is not required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934
- b)** The Company has not conducted any Non-Banking Financial or Housing Finance activities

- without a valid Certificate of Registration (CoR) from the Reserve Bank of India as per Reserve Bank of India Act, 1934.
- c) The Company is not a Core Investment Company (CIC) as defined in the Regulations made by the Reserve Bank of India hence Para 3(xvi)(c) and Para 3(xvi)(d) of the Order is not applicable to the Company
- xvii. The Company has not incurred cash losses in the financial year and in the immediately preceding financial year.
- xviii. There has not been any resignation of the Statutory Auditors during the year.
- xix. According to the information and explanations given to us and on the basis of the financial ratios, ageing and expected dates of realization of financial assets and payment of financial liabilities, other information accompanying the financial statements, our knowledge of the Board of Directors and management plans and based on our examination of the evidence supporting the assumptions, nothing has come to our attention, which causes us to believe that any material uncertainty exists as on the date of the audit report that company is not capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date. We, however, state that this is not an assurance as to the future viability of the company. We further state that our reporting is based on the facts up to the date of the audit report and we neither give any guarantee nor any assurance that all liabilities falling due within a period of one year from the balance sheet date, will get discharged by the company as and when they fall due.
- xx. The Provisions of Section 135 of the Companies Act, 2013 is not applicable to the Company, hence reporting under {Para 3(xx)(a)} and {Para 3(xx)(b)} of the Order is not applicable to the Company.
- xxi. The Company does not have any subsidiaries or associates or joint ventures, the accounts of which are to be consolidated and as such there are no consolidated financial statements. Hence reporting under {Para 3(xxi)} of the Order is not applicable to the Company.

For and on behalf of

**M.R. SINGHWI & CO**

Chartered Accountants

Firm Registration Number: 312121E

**CA Mahesh Raj Singhwi**

Partner

Membership Number: 050650

UDIN: 22054613AJCEUG3096

Place: Kolkata

Date: 02.05.2022

## ASHIRWAD STEELS &amp; INDUSTRIES LIMITED

**BALANCE SHEET**  
as at March 31, 2022

(Rs in Lacs)

Particulars	Note No.	As at March 31, 2022	As at March 31, 2021
<b>I. ASSETS</b>			
<b>(1) Non-current assets</b>			
(a)Property, Plant and Equipment	4	61.43	464.75
(b)Capital Work in Progress	4 (B)	-	93.60
(c)Financial assets			
(i)Investments	5	521.31	898.17
(ii)Other financial assets	6	3,105.18	1,526.08
(d)Non-Current tax assets	7	54.90	33.95
(e)Other non-current assets	8	-	5.99
<b>Total Non-current assets</b>		<b>3,742.82</b>	<b>3,022.54</b>
<b>(2) Current assets</b>			
(a)Inventories	9	-	329.52
(b)Financial assets			
(i)Trade receivables	10	-	20.89
(ii)Cash and cash equivalents	11	296.90	79.21
(iii)Loans	12	1,765.00	1,921.50
(iv)Other financial assets	13	277.56	237.49
(c)Current tax assets (net)	14	19.46	67.37
(d)Other current assets	15	7.42	41.82
<b>Total Current Assets</b>		<b>2,366.34</b>	<b>2,697.79</b>
<b>Total Assets(1+2)</b>		<b>6,109.16</b>	<b>5,720.33</b>
<b>II. EQUITY AND LIABILITES</b>			
<b>(1) Equity</b>			
(a)Share Capital	16	1,250.00	1,250.00
(b)Other Equity	17	4,885.90	4,394.81
<b>Total Equity</b>		<b>6,135.90</b>	<b>5,644.81</b>
<b>(2) Non-current liabilities</b>			
(b)Deferred Tax liabilities ( net)	18	-29.17	21.18
<b>Total Non-current liabilities</b>		<b>-29.17</b>	<b>21.18</b>
<b>(3) Current liabilities</b>			
(a)Financial liabilities			
(i)Borrowings	19	-	-
(ii)Trade payables	20		
(a) Total outstanding dues of micro enterprises & small enterprises		-	-
(b) Total outstanding dues of creditors other than micro enterprises& small enterprises		-	
(c)Other current liabilities	21	2.42	54.34
<b>Total Current liabilities</b>		<b>2.42</b>	<b>54.34</b>
<b>Total Equity and Liabilities(1+2+3)</b>		<b>6,109.16</b>	<b>5,720.33</b>
<b>Notes forming part of the financial statements (The accompanying notes 1 to 33 are an integral part of the financial statements)</b>	<b>1 to 33</b>		
<b>As per our report of even date attached</b>			
<b>For M R Singhwi &amp; CO.</b> Chartered Accountants Firm Registration No: 312121E  <b>CA. Mahesh Raj Singhwi</b> Partner Membership No- 050650 Place of Signature : Kolkata Date : 02 <sup>nd</sup> May, 2022			<b>For and on behalf of the Board of Directors</b>  <b>Dalbir Chhibbar</b> Managing Director DIN:00550703  <b>Vishesh Chhibbar</b> Director DIN: 03553892  <b>Chandra Prakash Srivastava</b> Chief Financial Officer

## ASHIRWAD STEELS &amp; INDUSTRIES LIMITED

**STATEMENT OF PROFIT AND LOSS**

for the years ended March 31, 2022

(Rs in Lacs)

Particulars	Note No	Year ended March 31, 2022	Year ended March 31, 2021
<b>I Revenue from operations</b>	<b>22</b>	108.00	157.53
<b>II Other Income</b>	<b>23</b>	304.51	317.97
<b>III Total Income(I+II)</b>		<b>412.51</b>	<b>475.50</b>
<b>IV Expenses:</b>			
Cost of Materials consumed	<b>24</b>	-	-
Changes in inventories of finished goods	<b>25</b>	-	55.20
Employee benefits expense	<b>26</b>	32.82	34.28
Finance costs	<b>27</b>	1.31	5.23
Depreciation and amortization expense	<b>4</b>	35.24	35.95
Other expenses	<b>28</b>	396.44	379.65
<b>Total Expenses (IV)</b>		<b>465.81</b>	<b>510.31</b>
<b>V Profit before exceptional items and tax (III - IV)</b>		<b>(53.30)</b>	<b>(34.81)</b>
<b>VI Exceptional Items</b>	<b>31(1)</b>	<b>530.86</b>	-
<b>VII Profit before tax (V - VI)</b>		<b>477.56</b>	<b>(34.81)</b>
<b>VIII Tax expense :</b>	<b>29(a)</b>		
(1) Current tax		71.44	0.12
(2) Deferred tax		(55.68)	(3.44)
<b>Total tax expense</b>		<b>15.76</b>	<b>(3.32)</b>
<b>IX Profit for the year (VII - VIII)</b>		<b>461.80</b>	<b>(31.49)</b>
<b>X Other Comprehensive Income / Loss</b>	<b>30</b>		
(A) (i) Items that will not be reclassified to profit or loss			
(a) Fair value changes of Investments in equity shares		34.62	112.29
(ii) Income tax relating to items that will not be recycled to profit or loss		5.33	11.94
<b>Total other Comprehensive Income / Loss</b>		<b>29.29</b>	<b>100.35</b>
<b>XI Total Comprehensive Income for the year (IX + X)</b> <i>(Comprising of profit and other comprehensive income for the year)</i>		<b>491.09</b>	<b>68.86</b>
<b>XII Earnings per equity share ( Nominal value per share Rs 10 /-)</b>			
<b>Basic and diluted ( Refer Note no 31 (4) )</b> <b>Number of shares used in computing earnings per share</b>		<b>3.69</b>	<b>(0.25)</b>
<b>Basic and diluted ( Refer Note no 31 (4) )</b> <b>Notes forming part of the financial statements</b>	<b>1 to 31</b>	<b>12,500,000</b>	<b>12,500,000</b>
<b>(The accompanying notes 1 to 33 are an integral part of the financial statements)</b>			
<b>As per our report of even date attached</b> <b>For M R Singhwi &amp; CO.</b> <i>Chartered Accountants</i> Firm Registration No: 312121E  <b>CA. Mahesh Raj Singhwi</b> <i>Partner</i> Membership No- 050650 Place of Signature : Kolkata Date : 02 <sup>nd</sup> May, 2022	<b>For and on behalf of the Board of Directors</b>  <b>Dalbir Chhibbar</b> Managing Director DIN:00550703  <b>Vishesh Chhibbar</b> Director DIN: 03553892  <b>Chandra Prakash Srivastava</b> Chief Financial Officer		

**ASHIRWAD STEELS & INDUSTRIES LIMITED**  
**STATEMENT OF CHANGES IN EQUITY**  
for the years ended March 31, 2022

**(a). Equity Share capital:**

For the year ended March 31, 2022

For the year ended March 31, 2021

(Rs in Lacs)

Balance as at April 1, 2021	Changes in equity share capital during the year	Balance as at March 31, 2022	Balance as at April 1, 2019	Changes in equity share capital during the year	Balance as at March 31, 2021
1,250.00	-	1,250.00	1,250.00	-	1,250.00

**(b). Other equity :**

(Rs in Lacs)

	Reserves and Surplus			Other Comprehensive Income	Total other equity
	Securities premium Reserve	General Reserve	Retained Earnings		
Balance as at April 1, 2020	2,923.44	750.00	721.38	-	4,394.81
Changes in equity during the year ended March 31, 2022					
Profit for the year			461.80	29.29	491.09
Other Comprehensive income/loss for the year					
Transfer from/to other Comprehensive income/retained earnings			29.29	-29.29	-
Balance as at March 31, 2022	2,923.44	750.00	1,212.47	-	4,885.90

**(b).Other equity : ( Cont)**

(Rs in Lacs)

	Reserves and Surplus			Other Comprehensive Income	Total other equity
	Securities premium Reserve	General Reserve	Retained Earnings		
Balance as at April 1, 2020	2,923.44	750.00	652.52	-	4,325.95
Changes in equity during the year ended March 31, 2021	-	-	-	-	-
Profit for the year	-	-	-31.49	100.35	367.28
Other Comprehensive income/loss for the year	-	-		(120.04)	(120.04)
Transfer from/to other Comprehensive income/retained earnings	-	-	100.35	100.35	-
Balance as at March 31, 2021	2,923.44	750.00	721.38	-	4,394.81

**Notes forming part of the financial statements ( 1 to 33)***(The accompanying notes 1 to 33 are an integral part of the financial statements)*

As per our report of even date attached

For and on behalf of the Board of Directors

**For M R Singhwi & CO.**  
Chartered Accountants  
Firm Registration No: 312121E

**Dalbir Chhibbar**  
Managing Director  
DIN:00550703

**CA. Mahesh Raj Singhwi**  
Partner  
Membership No- 50650  
Place of Signature : Kolkata  
Date : 02<sup>nd</sup> May, 2022

**Vishesh Chhibbar**  
Director  
DIN: 03553892

**Chandra Prakash Srivastava**  
Chief Financial Officer

## ASHIRWAD STEELS &amp; INDUSTRIES LIMITED

**STATEMENT OF CASH FLOWS**  
for the years ended March 31, 2022

(Rs in Lacs)

Particulars	Year ended March 31, 2022	Year ended March 31, 2021	
<b>A. CASH FLOW FROM OPERATING ACTIVITIES</b>			
Profit before tax		<b>-53.30</b>	<b>(34.81)</b>
<i>Adjustments to reconcile profit before tax to net cash flow provided by operating activities</i>			
Depreciation and amortisation expense	35.24		35.95
Finance costs	1.31		5.23
Interest income	(291.79)		(302.74)
Interest on IT Refund	(2.17)		(3.80)
Income from Dividend	(3.39)		(6.51)
(Income)/loss from derivatives transactions	135.88		124.81
Sundry balances written back	1.55		1.14
Income from speculative transactions	(3.53)		(4.96)
Allowance for doubtful receivables/Loans (credit impaired)	112.50	(14.39)	49.65
			(101.23)
<b>Operating profit/loss before working capital changes</b>			<b>(136.04)</b>
<i>Adjustments to reconcile operating profit to cash flow provided by changes in working capital</i>			
Decrease/(increase) in trade and other receivables	20.89		67.64
Increase/Decrease in Inventories	329.52		57.69
Decrease/( Increase) in trade payables	-		(14.95)
Decrease/ Increase in other current and financial liabilities	(51.91)		(20.02)
Decrease / Increase in other current and financial assets	42.25		(56.33)
		340.74	34.04
<b>Cash generated from operations before exceptional items</b>		<b>273.05</b>	
<b>Exceptional items</b>		<b>530.86</b>	<b>(102.00)</b>
<b>Cash generated from operations</b>		<b>803.91</b>	
Tax Expense		15.76	-
<b>Net cash generated from operating activities</b> <b>A</b>		<b>788.15</b>	<b>(102.00)</b>
<b>B. CASH FLOW FROM INVESTING ACTIVITIES</b>			
Additions to property, plant & equipment	(129.99)		
Sale of Property Plant & Machinery	498.06		(1.46)
Capital work in progress	-		(93.60)
Capital advances	3.23		46.27
(Purchase)/ Sale of Investments	376.86		122.66
Interest on inter corporate deposits/ and other deposits	201.18		269.50
Long term deposits & advances	231.85		145.00
Short term loans ( other financial assets)	156.50		(142.65)
Income from Dividend	3.39		6.51
Income from sale of non current investments	34.62		117.70
Income/(Loss) from derivatives transactions	(135.88)		(124.81)
Sundry balances written back	(1.55)		(1.14)
Income from speculative transactions	3.53		4.96
<b>Net cash used in investing activities</b> <b>B</b>		<b>1,241.80</b>	<b>348.95</b>
<b>C. CASH FLOW FROM FINANCING ACTIVITIES</b>			

Interest Expense	(1.31)		(5.23)
Short term borrowings	-		199.40)
<b>Net cash (used in) financing activities C</b>		<b>(1.31)</b>	<b>(204.64)</b>
<b>Net decrease/ Increase in cash and cash equivalents (A+B+C)</b>		<b>2,028.64</b>	<b>42.32</b>
<b>Opening cash and cash equivalents</b>		<b>1,363.44</b>	<b>1,321.12</b>
<b>Closing cash and cash equivalents for the purpose of</b>		<b>3,392.08</b>	<b>1,363.44</b>
<b>Cash Flow Statement</b>			

**Notes:**

- 1) The above Cash Flow Statement has been prepared under the " Indirect Method " as set out in the Indian Accounting Standard(Ind AS)-7 on Statement of Cash Flows
- 2) Cash and cash equivalents do not include any amount which is not available to the Company for its use
- 3) Cash and cash equivalents as at the Balance Sheet date consists of:

(Rs In Lacs)

Particulars	As at 31st March 2022	As at 31st March 2021
<b>Balances with banks</b>		
On current accounts	288.09	67.32
Cash on hand	8.81	11.88
Closing cash and cash equivalents (Refer Note No 11)	296.90	79.21
<b>Add : Fixed deposits with banks ( with more than 12 months maturity)</b>	<b>3,095.18</b>	<b>1,284.23</b>
<b>Closing cash and cash equivalents for the purpose of cash flow statement</b>	<b>3,392.08</b>	<b>1,363.44</b>

For and on behalf of the Board of Directors

As per our report of even date attached

**For M R Singhwi & CO.**  
Chartered Accountants  
Firm Registration No: 312121E

**Dalbir Chhibbar**  
Managing Director  
DIN:00550703

**CA. Mahesh Raj Singhwi**  
Partner  
Membership No- 050650  
Place of Signature : Kolkata  
Date : 02<sup>nd</sup> May, 2022

**Vishesh Chhibbar**  
Director  
DIN: 03553892

**Chandra Prakash Srivastava**  
Chief Financial Officer

**ASHIRWAD STEELS & INDUSTRIES LIMITED****Notes forming part of the financial statements**(Financial year ended 31<sup>st</sup> March, 2022)**Note No : 1 Corporate Informations****Corporate Informations**

**ASHIRWAD STEELS & INDUSTRIES LIMITED ( "the Company") is a public limited company incorporated and domiciled in India.**

The registered office of the Company is situated at 6, Waterloo Street, 5th Floor, Room No. 506, Kolkata- 700 069, West Bengal, India.

The Company's shares are listed on the BSE Ltd., ( Bombay Stock Exchange ).

The Company's main business is to produce Sponge Iron, however the Company could not operate its sponge iron plant at Jamshedpur for several reasons which inter alia include extremely high and unaffordable prices of raw materials being iron ore and coal, high transportation cost, unremunerative selling prices of sponge iron and almost doubling of working capital requirements due to very high input costs. The plant's commercial operations were thus not profitable and it was regularly incurring maintenance and administrative expenses putting further burden to the company. The Board of directors decided in their wisdom and prudence to sell/dispose off the said sponge iron plant at Jamshedpur on a slump sale basis and as a going concern, on as is where is basis along with all its assets and liabilities of the said plant through an agreement for sale and transfer executed on 25-01-2022. The Company is thus now completely out of the business of iron and steel, having had already sold the loss making sponge iron plant located at district, Nalgonda, Telangana, during the financial year 2018-19. (Further refer note no 31 (1) (2) (3) & (4) for more details regarding the company's operation).

The financial statements for the year ended 31st March, 2022 were approved for issue by the Board of Directors of the Company in their meeting held on May 02, 2022 and is subject to the adoption by the shareholders in the ensuing 36th Annual General Meeting.

**Note No. : 2 Summary of basis of compliance, basis of preparation and presentation, Critical accounting estimates, assumptions and judgements and significant accounting policies****2.1 Basis of compliance**

The financial statements comply, in all material aspects, with Indian Accounting Standards ('Ind AS') notified under Section 133 of the Companies Act, 2013 ("Act") read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 (as amended) and other relevant provisions of the Act to the extent applicable and applicable guidelines issued by the Securities and Exchange Board of India ('SEBI')

**2.2 Basis of preparation and presentation**

These financial statements have been prepared in accordance with Ind AS on the historical cost basis except for Certain financial instruments which are measured at fair value at the end of each reporting period. Historical cost is generally based on the fair value of the consideration in exchange for goods and services. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

All assets and liabilities have been classified as current or non-current as per the Company's normal operating cycle and other criteria set out in Schedule III to the Companies Act, 2013. The Company has ascertained its operating cycle as 12 months for the purpose of current and non-current classification of assets and liabilities.

The financial statements including notes thereon are presented in Indian Rupees ("Rupees" or "Rs."), which is the Company's functional and presentation currency. All amounts disclosed in the financial statements including notes thereon have been rounded off to the nearest lacs and thousands as per the requirement of Schedule III to the Act, unless stated otherwise.

### 2.3 Critical accounting estimates, assumptions and judgements

The preparation of the financial statements requires management to make estimates, assumptions and judgements that effect the reported balances of assets and liabilities and disclosures as at the date of the financial statements and the reported amounts of income and expenses for the periods presented. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates considering different assumptions and conditions. Estimates and underlying assumptions are reviewed on an on going basis. Revisions to accounting estimates are recognised in the period in which the estimates are revised and future periods are affected. The estimates and assumptions that have a significant risk of causing a material adjustment to the carrying values of assets and liabilities within the next financial year are discussed below :-

#### 2.3.1 Deferred income tax assets and liabilities

Significant management judgment is required to determine the amount of deferred tax assets that can be recognised, based upon the likely timing and the level of future taxable profits. The amount of total deferred tax assets and liabilities could change if management estimates of projected future taxable income or if tax regulations undergo a change.

#### 2.3.2 Useful lives of property, plant and equipment ('PPE')

PPE represent a significant proportion of the asset base of the Company. The charge in respect of periodic depreciation is derived after determining an estimate of an asset's expected useful life and the expected residual value at the end of its life. The useful lives and residual value of the asset are determined by the management when the asset is acquired and reviewed periodically including at each financial year end. The lives are based on historical experience with similar assets as well as anticipation of future events, which may impact their lives, such as change in technology.

#### 2.3.3 Estimated fair value of unlisted securities

The fair values of financial instruments that are not traded in an active market and cannot be measured based on quoted prices Management uses its judgment to select a variety of method / methods and make assumptions that are mainly based on market conditions existing at the end of each financial year. The inputs to these models are taken from observable markets where possible, but where this is not feasible, a degree of judgement is required in establishing fair values. Judgements include considerations of inputs such as liquidity risk, credit risk and volatility. Changes in assumptions about these factors could effect the reported fair value of financial instruments.

#### 2.3.4 Provisions and contingencies

From time to time, the Company is subject to legal proceedings, the ultimate outcome of each being subject to uncertainties inherent in litigation. A provision for litigation is made when it is considered probable that a payment will be made and the amount can be reasonably estimated. Significant judgement is required when evaluating the provision including, the probability of an unfavourable outcome and the ability to make reasonable estimate of the potential loss. Litigation provisions are reviewed at each accounting period and revisions made for the changes in facts and circumstances. Contingent liabilities are disclosed in the notes forming part of the financial statements. Contingent assets are not disclosed in the financial statements unless an inflow of economic benefits is probable.

### 2.4 Property, plant and equipment (PPE)

An item of property, plant and equipment is recognised as an asset if it is probable that the future economic benefits associated with the item will flow to the company and its cost can be measured reliably. This recognition principle is applied to the costs incurred initially to acquire an item of PPE, and also costs incurred subsequently to add to, replace part of , or service it and subsequently carried at cost less accumulated depreciation and accumulated impairment losses, if any.

The cost of an asset includes the purchase cost of materials, including import duties and non-refundable taxes, and any directly attributable costs of bringing an asset to the location and condition of its intended use. The carrying amount of the replaced part is derecognized. All other repair and maintenance costs are recognized in the statement of profit and loss as incurred.

The present value of the expected cost for the decommissioning of an asset after its use is included in the cost of the respective asset if the recognition criteria for a provision is met.

When parts of an item of property, plant and equipment have different useful lives, they are accounted for as separate items (major components) of property, plant and equipment.

The cost and related accumulated depreciation are eliminated from the financial statements upon sale or retirement of the asset and the resultant gains or losses are recognized in the Statement of Profit and Loss.

**Depreciation methods, estimated useful lives and residual value**

Freehold land is not depreciated.

Lease-hold land are amortised over the lease term.

Depreciation on other items of PPE is provided on a straight-line basis to allocate their cost, net of their residual value over the estimated useful life of the respective asset as specified in Schedule II to the Companies Act, 2013, except for Power transmission lines and Mobile phones which are depreciated over a period of five years and three years respectively, if any the estimated useful lives are determined based on assessment made by technical experts, in order to reflect the actual usage of the assets. The management believes that these estimated useful lives are realistic and reflect fair approximation of the period over which the assets are likely to be used.

**The estimated useful lives considered are as follows:**

<b><u>Category</u></b>	<b><u>Useful life</u></b>
Buildings ( other than factory building)	60 years
Factory Building	30 years
Plant & Machinery	25 years
Electrical Installation & Equipment (for double shift)	20 years
Generator Set ( for Double Shift)	20 years
Laboratory Equipment	10 years
Weighing Machines, Tools & Implements, Pollution Equipments&Fire fightingequipments	25 years
Computer & Accessories	3 years
Office Equipments including Air Conditioners	5 years
Furniture & Fixtures	10 years
Motor Cars	8 years
Motor Cycles & Scooters	10 years

There exists no restrictions or any encumbrances on title by way of any security/ pledge of any property or plant & Equipment against any liability of the company.

The estimated useful lives, residual values and depreciation method are reviewed at-least at the end of each financial year and are adjusted ,wherever appropriate and required.

**Capital work in progress ('CWIP')**

Projects under commissioning and other CWIP are carried at cost, comprising direct cost, related incidental expenses and attributable borrowing cost, if any. Subsequent expenditures relating to property, plant and equipment are capitalised only when it is probable that future economic benefit associated with these will flow to the company and the cost of the item can be measured reliably.

Advances given to acquire property, plant and equipment are recorded as non-current assets and subsequently transferred to CWIP on acquisition of related assets.

**2.5 Non-current assets held for sale and discontinued operations**

Non-current assets (including disposal groups) are classified as held for sale if their carrying amount will be recovered principally through a sale transaction rather than through continuing use and a sale is considered highly probable.

Non-current assets classified as held for sale are measured at lower of their carrying amount and fair value less cost to sell.

Non-current assets classified as held for sale are not depreciated or amortised from the date when they are classified as held for sale.

Non-current assets classified as held for sale and the assets and liabilities of a disposal group classified as held for sale are presented separately from the other assets and liabilities in the Balance sheet.

A discontinued operation is a component of the entity that has been disposed off or is classified as held for sale and:

- Represents a separate major line of business or geographical area of operations and;
- Is part of a single co-ordinated plan to dispose of such a line of business or area of operations.

The results of discontinued operations are presented separately in the Statement of Profit and Loss.

## 2.6 Financial instruments

Financial assets and financial liabilities are recognised in the Balance sheet when the Company becomes a party to the contractual provisions of the instrument. The Company determines the classification of its financial assets and financial liabilities at initial recognition based on its nature and characteristics.

### a) Financial assets

#### i) Initial recognition and measurement

All financial assets are recognised initially at fair value plus, in the case of financial assets not recorded at fair value through profit or loss, transaction costs that are attributable to the acquisition of the financial asset.

The financial assets include equity, trade and other receivables, loans and advances, cash and bank balances and derivative financial instruments.

#### ii) Subsequent measurement

For the purpose of subsequent measurement, financial assets are classified in the following categories:

- 1) At amortised cost,
- 2) At fair value through other comprehensive income (FVTOCI), and
- 3) At fair value through profit or loss (FVTPL).

### Debt instruments

A financial asset or financial liability is initially measured at fair value plus, for an item not at fair value through profit and loss (FVTPL), transaction costs that are directly attributable to its acquisition or issue. Transaction costs of financial assets carried at fair value through profit and loss are expensed in the Statement of Profit and Loss.

Subsequent measurement of debt instruments depends on the Company's business model for managing the asset and the cash flow characteristics of the assets.

### There are three measurement categories into which Company classifies its debt instruments:

#### a) Amortised cost

A 'debt instrument' is measured at the amortised cost if both the following conditions are met:

- 1) The asset is held within a business model whose objective is to hold the asset for collecting contractual cash flows, and
- 2) Contractual terms of the asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

After initial measurement, such financial assets are subsequently measured at amortised cost using the effective interest rate (EIR) method. Amortised cost is calculated by taking into account any discount or premium on acquisition and fees or costs that are an integral part of the EIR.

#### b) Fair value through Other Comprehensive Income ('FVTOCI')

Assets that are held for collection of contractual cash flows and for selling the financial assets, cash flows represent solely payments of principal and interest, are measured at FVTOCI. Movements in the carrying amount are recorded through OCI, except for the recognition of impairment gains or losses, interest revenue which are recognised in the Statement of Profit & Losses.

#### c) Fair value through Profit and loss ('FVTPL')

Assets that do not meet the criteria for amortised cost or FVTOCI are measured at FVTPL. A gain or loss on a debt investment that is subsequently measured at FVTPL is recognised net in the Statement of Profit and Loss in the period in which it arises. Interest income from these financial assets is included in other income.

**Equity investments**

All equity investments in the scope of Ind AS 109 are measured at fair value.

Equity instruments included within the FVTPL category, if any, are measured at fair value with all changes recognized in profit or loss. The Company may make an irrevocable election to present in OCI subsequent changes in the fair value. The Company makes such election on an instrument-by-instrument basis. The classification is made on initial recognition and is irrevocable. If the Company decides to classify an equity instrument at FVTOCI, then all fair value changes on the instrument, excluding dividends, are recognized in OCI. There is no recycling of the amounts from OCI to profit or loss, even on sale of investment. However, the Company may transfer the cumulative gain or loss within equity.

**iii) De-recognition**

The Company derecognises a financial asset only when the contractual rights to the cash flows from the asset expires or it transfers the financial asset and substantially all the risks and rewards of ownership of the asset

**b) Financial liabilities****(i) Initial recognition and measurement**

All financial liabilities are recognised initially at fair value.

The financial liabilities include trade and other payables, loans and borrowings including bank overdrafts, derivative financial instruments etc.

**(ii) Subsequent measurement**

For the purpose of subsequent measurement, Financial liabilities are classified in two categories:

- 1) Financial liabilities at amortised cost, and
- 2) Derivative instruments at fair value through profit or loss (FVTPL)

**c) Financial Guarantee contracts**

Financial guarantee contracts are recognised as a financial liability at the time of issuance of guarantee. The liability is initially measured at fair value and are subsequently measured at the higher of the amount of loss allowance determined, or the amount recognised less, the cumulative amount of income recognised.

**d) Derivative financial instruments****Initial recognition and subsequent measurement**

Derivative financial instruments are initially recognised at fair value on the date on which a derivative contract is entered into and are subsequently re-measured at fair value.

Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative. Any gains or losses arising from changes in the fair value of derivatives are taken directly to profit or loss.

**e) Offsetting of financial instruments**

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

**f) Fair value measurement**

Fair value is a market-based measurement, not an entity-specific measurement. Under Ind AS, fair valuation of financial instruments is guided by Ind AS 113 "Fair Value Measurement."

For some assets and liabilities, observable market transactions or market information might be available. For other assets and liabilities, observable market transactions and market information might not be available. However, the objective of a fair value measurement in both cases is the same to estimate the price at which an orderly transaction to sell the asset or to transfer the liability would take place between market participants at the measurement date under current market conditions (i.e. an exit price at the measurement date from the perspective of a market participant that holds the asset or owes the liability).

Three widely used valuation techniques specified in the said Ind AS are the market approach, the cost approach and the income approach which have been dealt with separately in the said Ind AS.

Each of the valuation techniques stated as above proceeds on different fundamental assumptions, which have greater or lesser relevance, and at times there is no relevance of a particular methodology to a given situation. Thus, the methods to be adopted for a particular purpose must be judiciously chosen. The application of any particular method of valuation depends on the company being evaluated; the nature of industry in which it operates, the company's intrinsic strengths and the purpose for which the valuation is made.

In determining the fair value of financial instruments, the Company uses a variety of methods and assumptions that are based on market conditions and risks existing at each balance sheet date.

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

**Level 1:** Quoted prices (unadjusted) in active markets for identical assets or liabilities.

**Level 2:** Inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly or indirectly.

**Level 3:** Inputs for the assets or liabilities that are not based on observable market data (unobservable inputs)

**g ) Share capital**

An equity instrument is a contract that evidences residual interest in the assets of the Company after deducting all of its liabilities. Incremental costs directly attributable to the issuance of new equity shares are recognized as a deduction from equity, net of any tax effects.

**2.7 Impairment of Assets**

**a) Non-financial assets**

Property, plant and equipment are evaluated for recoverability whenever events or changes in circumstances indicate that the carrying amounts may not be recoverable.

An impairment loss is recognized for the amount by which the carrying amount of the asset exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use.

For the purpose of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (cash-generating units). In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

In determining fair value less costs of disposal, recent market transactions are taken into account. If no such transactions can be identified, an appropriate valuation model is used. These calculations are corroborated by valuation multiples, quoted share prices for publicly traded companies or other available fair value indicators.

If at the balance sheet date there is an indication that a previously assessed impairment loss no longer exists, the recoverable amount is reassessed and the impairment loss previously recognized is reversed such that the asset is recognized at its recoverable amount but not exceeding written down value which would have been reported if the impairment loss had not been recognized.

**b) Financial assets**

The Company recognizes loss allowances using the expected credit loss (ECL) model for the financial assets which are not fairvalued through profit or loss.

ECL impairment loss allowance is measured at an amount equal to lifetime ECL.

ECL impairment loss allowance (or reversal) recognized during the period is recognized as income or expense in the Statement of Profit and Loss. This amount is reflected under the head "Other expenses" in the profit or loss. ECL is presented as an allowance, i.e. as an integral part of the measurement of those assets in the Balance sheet. The allowance reduces the net carrying amount. Until the asset meets write-off criteria, the Company does not reduce impairment allowance from the gross carrying amount

**2.8 Inventories**

a) Inventories (other than By-products and scraps) are valued at lower of cost and net realisable value after providing for obsolescence and other losses, if any.

Cost of inventory comprises of purchase price, cost of conversion and other directly attributable costs that have been incurred in bringing the inventories to their respective present location and condition. Borrowing costs are not included in the value of inventories.

The cost of inventories is computed on FIFO ( First in First Out) basis.

Net realisable value (NRV) is the estimated selling price in the ordinary course of business less estimated costs of completion and the estimated costs necessary to make the sale.

b) By-products and scraps are valued at net realisable value ( if any)

## **2.9 Revenue recognition**

### **2.9.1 Sale of goods**

Revenue is recognised upon transfer of control of promised goods to customers in an amount that reflects the consideration which the Company expects to receive in exchange for those goods.

Revenue from the sale of goods is recognised at point in time when control is transferred to the customer which is usually on dispatch / delivery of goods, based on contracts with the customers.

Revenue is measured based on the transaction price, which is the consideration, adjusted for volume discounts, price, concessions, incentives, and returns, if any, as specified in the contracts with customers. Revenue excludes taxes collected from customers on behalf of the government. Accruals for discounts/incentives and returns are estimated (using the most likely method) based on accumulated experience and underlying schemes and agreements with customers. Due to the short nature of credit period given to customers, there is no financing component in the contract.

### **2.9.2 Interest income**

For all debt instruments measured either at amortised cost or FVTOCI, interest is recorded using EIR method.

### **2.9.3 Dividend Income**

Dividend income is accounted for when Company's right to receive the income is established.

## **2.10 Leases**

The determination of whether an arrangement is (or contains) a lease is based on the substance of the arrangement at the inception of the lease. The arrangement is, or contains, a lease if fulfillment of the arrangement is dependent on the use of a specific asset and the arrangement conveys a right to use the asset even if that right is not explicitly specified in an arrangement. For arrangements entered into prior to the transition date, i.e.1st April, 2017, the Company has determined whether the arrangements contain lease on the basis of facts and circumstances existing on the date of transition.

### **a) When the Company is a lessee**

A lease is classified at the inception date as a finance lease or an operating lease. Leases under which substantially all the risks and rewards of ownership are transferred to the Company are classified as finance leases.

Payment made under operating leases are recognized as expense in the Statement of Profit and Loss on a straight line basis over the lease term, unless the receipts are structured to increase in line with expected general inflation to compensate for the lessor's expected inflationary cost increase.

### **b) When the Company is a lessor**

Leases in which the Company does not transfer substantially all the risks and rewards of ownership of an asset are classified as operating leases. Where the escalation of lease rentals is in line with the expected general inflation so as to compensate the lessor for expected inflationary cost, the increases in the rentals is not straight lined.

The Company is not required to make any adjustments on transition to Ind AS 116 for leases in which it acts as a lessor.

### **Transition to Ind AS 116**

#### **Ind AS 116 - Leases:**

With effect from April 1, 2019 the Company has adopted Ind AS 116, Leases using the modified retrospective approach.

Ind AS 116 - Leases introduces a single, on- balance sheet lease accounting model for lessees.

A lessee recognises a right-of-use asset representing its right to use the underlying asset and a lease liability representing its obligation to make lease payments. There are recognition exemptions for short-term leases and leases of low-value items.

Lessor accounting remains similar to the current standard - i.e. lessors continue to classify leases as finance or operating leases it replaces existing leases guidance, Ind AS 17, Leases.

The Company evaluates if an arrangement qualifies to be a lease as per the requirements of Ind AS 116. Identification of a lease requires significant judgment. The Company uses significant judgment in assessing the lease term (including anticipated renewals) and the applicable discount rate.

However the company does not have any lease contracts as a lessee, hence there is no impact in the financial statements of the Company.

## **2.11 Employee benefits**

### **a) Short-term employee benefits**

Short-term employee benefits in respect of salaries and wages, including non-monetary benefits are recognised as an expense at the undiscounted amount in the Statement of Profit and Loss for the year in which the related service is rendered.

### **b) Defined contribution plans**

Payments to a defined contribution benefit scheme for eligible employees in the form of superannuation fund are charged as an expense as they fall due. The Company does not carry any further obligation, apart from the contributions made.

### **c) Defined benefit plans**

The Company does not have any obligation, towards defined benefit plans.

## **2.12 Segment Reporting**

The Company's Primary business segments are reflected based on the principal business carried out i.e. Iron and Steel. All other activities of the Company revolve around the main business. The risk and returns of the business of the Company is not associated with geographical segmentation, hence there is no secondary segment reporting based on geographical segmentation. As such there are no separate reportable segments as per Indian Accounting Standard "Operating Segments" (Ind AS 108).

## **2.13 Income tax**

Income tax expense comprises current tax and deferred tax and is recognized in the Statement of Profit and Loss except to the extent it relates to items directly recognized in Equity or in OCI.

### **a) Current income tax**

Current income tax assets and liabilities for the current and prior periods are measured at the amount expected to be recovered from or paid to the taxation authorities using the tax rates and tax laws that are enacted or substantively enacted by the balance sheet date and applicable for the period.

Current tax items in correlation to the underlying transaction relating to OCI and Equity are recognized in OCI and in Equity respectively.

Management periodically evaluates positions taken in the tax returns with respect to situations in which applicable tax regulations are subject to interpretation and establishes provisions where appropriate on the basis of amounts expected to be paid to the tax authorities.

The Company offsets current tax assets and current tax liabilities, where it has a legally enforceable right to set off the recognized amounts and where it intends either to settle on a net basis or to realise the assets and settle the liabilities simultaneously

### **b) Deferred income tax**

Deferred income tax is recognized using the balance sheet approach. Deferred income tax assets and liabilities are recognized for deductible and taxable temporary differences arising between the tax base of assets and liabilities and their carrying amount in financial statements, except when the deferred income tax arises from the initial recognition of goodwill or an asset or liability in a transaction that is not a business combination and affects neither accounting nor taxable profits or loss at the time of the transaction. Deferred tax assets are recognized for deductible temporary differences, the carry forward of unused tax credits and any unused tax losses to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilised. The carrying amount of deferred tax assets is reviewed at each balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax assets to be utilised. Unrecognized deferred tax assets are re-assessed at each balance

sheet date and are recognised to the extent that it has become probable that future taxable profits will allow the deferred tax asset to be recovered. Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the year when the asset is realized or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantively enacted at the balance sheet date. Deferred tax assets and deferred tax liabilities are offset if a legally enforceable right exists to set off deferred tax assets against deferred tax liabilities and the deferred taxes relate to the same taxable entity and the same taxation authority. Deferred tax assets include a credit for the Minimum Alternate Tax ('MAT') paid in accordance with the tax laws, which is likely to give future economic benefits in the form of availability of set off against future income tax liability. MAT asset is recognised as deferred tax assets in the Balance Sheet when the asset can be measured reliably, and it is probable that the that the future economic benefit associated with the asset will be realised.

#### **2.14 Provisions, contingent liabilities and contingent assets**

- a) A provision is recognized if, as a result of a past event, the Company has a present legal or constructive obligation that can be estimated reliably, and it is probable that an outflow of economic benefits will be required to settle the obligation. Provisions are not recognised for future operating losses. If the effect of the time value of money is material, provisions are determined by discounting the expected future cash flows at current pre-tax rate that reflects current market assessments of the time value of money and the risks specific to the liability. When discounting is used, the increase in the passage of time is recognized as finance costs. The amount recognized as a provision is the best estimate of the consideration required to settle the present obligation as at the balance sheet date, taking into account the risks and uncertainties surrounding the obligation. When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, the receivable is recognized as an asset, if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured reliably. The expense relating to provision is presented in the Statement of Profit and Loss, net of any reimbursement.
- b) A contingent liability is not recognised in the financial statements, however, is disclosed, unless the possibility of an outflow of resources embodying economic benefits is remote. If it becomes probable that an outflow of future economic benefits will be required for an item dealt with as a contingent liability, a provision is recognized in the financial statements of the period (except in the extremely rare circumstances where no reliable estimate can be made).
- c) A contingent asset is not recognized in the financial statements, however, is disclosed, where an inflow of economic benefits is probable. When the realisation of income is virtually certain, then the related asset is no longer a contingent asset, and is recognised as an asset.
- d) Provisions, contingent liabilities and contingent assets are reviewed at each balance sheet date.

#### **2.15 Dividend**

Final dividend (if declared) on shares is recorded as a liability on the date of approval by the shareholders and interim dividends(if declared) are recorded as a liability on the date of declaration by the Company's Board of Director's

#### **2.16 Earnings per Share**

- a) Basic earnings per share are computed by dividing the net profit/(loss) after tax by the weighted average number of equity shares outstanding during the year.
- b) Diluted earnings per share are computed by dividing the net profit/(loss) after tax by the weighted average number of equity shares considered for deriving basic earnings per share and also the weighted average number of equity shares which could be issued on the conversion of all dilutive potential equity shares.

### **2.17 Cash and cash equivalents**

Cash and cash equivalents in the Balance sheet comprise cash on hand, cheques on hand, balance with banks on current accounts and short term, highly liquid investments with an original maturity of three months or less and which carry insignificant risk of changes in value. For the purpose of the Cash Flow Statement, Cash and cash equivalents consist of Cash and cash equivalents, as defined above and net of outstanding book overdrafts as they are considered an integral part of the Company's cash management

### **2.18 Cash Flow Statement**

Cash flows are reported using the indirect method, whereby profit/loss before tax is adjusted for the effects of transactions of a non-cash nature, any deferrals or accruals of past or future operating cash receipts or payments and items of income or expenses associated with investing or financing flows. The cash flows from operating, investing and financing activities of the Company are segregated.

### **3 (a). Impact of Covid-19 Pandemic**

The business has been impacted during the year on account of COVID-19, however the Company has assessed the possible impact of COVID-19 in preparation of these financial statements, including but not limited to its assessment of liquidity and going concern assumption, the recoverable values of its financial and non-financial assets and impact on revenues and costs. The impact of COVID-19 may be different from the estimated as at the date of approval of these financial statements and the company will continue to closely monitor any material changes to future economic conditions, accordingly the financial statements and the company will continue to closely monitor any material changes to future economic conditions, accordingly the financial statements of the Company have been prepared on a going concern basis.

### **3(b). Code on Social Security, 2020**

The Code on Social Security, 2020 ('Code') relating to employee benefits during employment and post-employment received Indian Parliament approval and Presidential assent in September 2020. The Code has been published in the Gazette of India and subsequently on November 13, 2020 draft rules were published and invited for stakeholder's suggestions. However the date on which the Code will come into effect has not been notified. The Company will assess the impact of the Code when it comes into effect and record any related impact in the period the Code becomes effective.

## ASHIRWAD STEELS &amp; INDUSTRIES LIMITED

## NOTE NO : 4 PROPERTY, PLANT AND EQUIPMENT

(Rs in Lacs)

Particulars	Property , Plant and Equipment							Total
	Land (Free hold)	Land (Lease hold)	Buildings	Plant and Equipment	Office Equipment	Furniture and fixtures	Motor Vehicles	
<b>Gross block</b>								
<b>Gross carrying amount as at April 1, 2021</b>	2.16	29.90	127.38	1,077.62	15.60	0.82	26.06	1,279.54
Additions during the year	-	-	-	93.60	2.55	-	33.84	129.99
Disposals /Deductions during the year	-	14.60	103.56	1,111.60	1.90	0.59	5.64	1,237.98
<b>Gross carrying amount as at March 31, 2022</b>	2.16	15.30	23.82	59.53	16.24	0.23	54.26	171.54
<b>Depreciation /amortisation/ impairment</b>								
<b>Accumulated depreciation/ amortisation as at April 1, 2021</b>	-	9.44	86.64	687.53	13.39	0.71	17.08	814.79
Depreciation/ amortisation for the year		0.49	3.27	26.87	0.82	0.01	3.78	35.24
Disposals /Deductions during the year	-	5.46	70.74	655.84	1.85	0.56	5.46	740
<b>Accumulated depreciation/ amortisation as at March 31, 2022</b>	-	4.47	19.17	58.55	12.35	0.16	15.41	110.11
<b>Net carrying amount as at March 31, 2022</b>	2.16	10.83	4.65	0.98	3.89	0.07	38.85	61.43
<b>Net carrying amount as at April 1, 2021</b>	2.16	20.46	40.74	390.10	2.21	0.10	8.98	464.75
<b>Gross block</b>								
<b>Gross carrying amount as at April 1, 2020</b>	2.16	29.90	127.38	1,077.62	14.14	0.82	26.06	1,278.08
Additions during the year	-	-	-	-	1.46	-	-	1.46
Disposals /Deductions during the year	-	-	-	-	-	-	-	-
<b>Gross carrying amount as at March 31, 2021</b>	2.16	29.90	127.38	1,077.62	15.60	0.82	26.06	1,279.54
<b>Depreciation /amortisation/ impairment</b>								
<b>Accumulated depreciation/ amortisation as at April 1, 2020</b>	-	8.94	82.54	659.49	12.52	0.70	14.66	778.84
Depreciation/ amortisation for the year	-	0.50	4.11	28.04	0.87	0.01	2.42	35.95
Disposals /Deductions during the year	-	-	-	-	-	-	-	-
<b>Accumulated depreciation/ amortisation as at March 31, 2021</b>	-	9.44	86.64	687.53	13.39	0.71	17.08	814.79
<b>Net carrying amount as at March 31, 2020</b>	2.16	20.46	40.74	390.10	2.21	0.10	8.98	464.75
<b>Net carrying amount as at April 1, 2020</b>	2.16	20.96	44.85	418.13	1.63	0.11	11.40	499.24

## NOTE NO : 4 (B) Capital Work In Progress

(Rs in Lacs)

Particulars	Capital Work In Progress
	Plant and Equipment (WIP)
<b>Gross Carrying amount as at April 1, 2021</b>	93.60
Additions during the year	Nil
Transfer to Property plant, and equipment during the year	93.60
<b>Carrying amount as at March 31, 2022</b>	Nil

**Note No. : 5 Investments (Non - Current Assets)**

Particulars	Face Value	Number of Shares	As at March 31, 2022 (Rs in lacs)	Number of Shares	As at March 31, 2021 (Rs in lacs)
<b>(i) Equity instruments</b>					
<b>(1) Designated at fair value through other comprehensive income</b>					
<b>Fully paid up ( Quoted )</b>					
Navketan Merchants Ltd.	10	3,500	0.01	3,500	0.01
Goutam Resources Ltd.	10	20,000	0.20	20,000	0.20
Herald Commerce Ltd.	10	20,000	0.20	20,000	0.20
Electrosteel Steel Ltd.	1	1,000	0.39	1,000	0.25
Coal India Limited	10		0.00	15,000	19.55
Yes Bank Limited	2	150,000	18.45	150,000	23.40
<b>TOTAL (A)</b>			<b>19.26</b>		<b>43.62</b>
<b>(2) Designated at Cost as Fair value</b>					
<b>Fully paid up ( Unquoted )</b>					
ABS Merchants Pvt Ltd	10	288,460	150.00	288,460	150.00
Chhibbar Business & Fiscals Private Limited	10	1,850,000	352.06	1,850,000	352.06
<b>TOTAL (B)</b>			<b>502.05</b>		<b>502.05</b>
<b>(ii) Preference Shares ( Unquoted) Fully paid up</b>					
7.5% Non cumulative convertible Preference Shares of Regal Trading ( P ) Ltd	10	33,500	-	33,500	167.50
7.5% Non cumulative convertible Preference Shares of Sati Mansion ( P ) Ltd	10	30,000	-	30,000	150.00
7.5% Non cumulative convertible Preference Shares of Vinay Holding Pvt Ltd	10	7,000	-	7,000	35.00
<b>TOTAL (C)</b>			<b>-</b>		<b>352.50</b>
<b>TOTAL (D) ( A+B+C)</b>			<b>521.31</b>		<b>898.17</b>
Aggregate amount of Quoted Investments			19.26		43.62
Aggregate investment designated at fair value through other comprehensive income			521.31		898.17
Aggregate market value of Quoted Investments			19.26		43.62
Aggregate market value of Unquoted Investments			502.05		854.55

**Note No. : 6 Other financial assets**

Non-current (Unsecured, considered good)

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Carried at cost</b>		
Deposits & Advances ( note a)	10.00	241.85
<b>Others</b>		
Balances with banks	3095.18	1,284.23
<b>In Fixed Deposit Accounts</b>		
Deposits of more than 12 months maturity		
	<b>3,105.18</b>	<b>1,526.08</b>

## Note (a)

Security Deposits are payable on demand hence fair value approximates transaction value

## Note (b)

Balances with banks includes Fixed deposits under lien for Bank Guarantees of Rs 46.00 Lacs /- issued to Central Coalfields Ltd ( Rs 46.00 Lacs as on 31-03-2021)

## Note (c)

Balances with banks in deposits accounts include deposits under lien of Rs 3070.00 lacs /- (Rs. 1250.00 lacs as on 31.03.2021)

**Note No. : 7 Non-Current Tax Assets**

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
Income tax deducted at source	6.90	9.97
Income tax refundable	48.00	23.97
	54.90	33.95

**Note No. : 8 Other Non - Current Assets**

Non-current (Unsecured, considered good)

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Capital Advances</b>		
Advance against land	-	-
Other Capital advances	-	3.23
<b>Other deposits &amp; advances</b>		
Security deposits with Govt. Departments	-	2.76
	-	5.99

Note: There were no advances given to directors or other officers of the company or any of them either severally or jointly with any other persons or advances to firms or private companies respectively in which any director is a partner or a director or a member. Further these advances in P.Y 2020-21 were not in the nature of financial assets.

**Note No. : 9 Inventories**

(RS in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
Raw materials	-	324.07
Stores & spares	-	4.64
Finished goods : Sponge Iron	-	0.80
<b>Others</b>		
Fuel ( Diesel oil)	-	-
	--	<b>329.52</b>

**Note No. : 10 Trade and other receivables**

Current (Unsecured, considered good)

(RS in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>(i) Outstanding for a period exceeding six months from the due date for payment</b>	-	20.00
<b>(i) Outstanding for a period less than six months from the due date for payment</b>	-	0.89
Less: Allowance for imparied receivables	-	-
	-	<b>20.89</b>
<b>(iii) Trade receivables classification</b>		
Secured considered good	-	-
Unsecured considered good	-	20.89
Unsecured considered doubtful	-	-
Less: Allowance for impaired receivables	-	-
	-	<b>20.89</b>

**Note :**

- Due to short nature of credit period given to customers, there are no financing components in the contract
- There are no debts due by directors or other officers of the company either severally or jointly with anyother person or debts due by firms or private companies respectively in which any director is a partner or a director or a member
- Trade Receivables ageing Schedule:-

Particulars	Outstanding for following periods from due date of payment less than 6 months	6 months - 1 year	1-2 years	2-3 years	More than 3 years	Total
<b>(i) Undisputed - Trade receivables - considered good</b>						
F.Y 2021-22	-	-	-	-	-	-
F.Y 2020-21	0.89	20.00	-	-	-	20.89
<b>(ii) Undisputed - Trade receivables having significant increase in credit risk</b>						
F.Y 2021-22	-	-	-	-	-	-
F.Y 2020-21	-	-	-	-	-	-
<b>(ii) Undisputed - Trade receivables - Credit impaired</b>						
F.Y 2021-22	-	-	-	-	-	-
F.Y 2020-21	-	-	-	-	-	-
<b>(iv) Disputed - Trade receivables - considered good</b>						
F.Y 2021-22	-	-	-	-	-	-
F.Y 2020-21	-	-	-	-	-	-
<b>(v) Disputed - Trade receivables having significant increase in credit risk</b>						

F.Y 2021-22	-	-	-	-	-	-
F.Y 2020-21	-	-	-	-	-	-
(vi) Disputed - Trade receivables - Credit impaired						
F.Y 2021-22	-	-	-	-	-	-
F.Y 2020-21	-	-	-	-	-	-
<b>Total</b>						
F.Y 2021-22	-	-	-	-	-	-
F.Y 2020-21	0.89	20.00	-	-	-	20.89

**Note No. : 11 Cash and cash equivalents**

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Balances with banks</b>		
On current accounts	288.09	67.32
Cash on hand	8.81	11.88
	<b>296.90</b>	<b>79.21</b>

**Note:**

(i) Non-cash transactions

The Company has not entered into any non cash investing and financing activities.

**Note No. : 12 Loans**

Current (Unsecured)

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Other loans</b>		
Loan to Body Corporates	1877.50	1,959.00
Others	-	-
<b>Less: Impairment loans (bad and doubtful debts)</b>	112.50	37.50
	<b>1765.00</b>	<b>1,921.50</b>

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Loans Receivables considered good - Secured</b>		
Loans Receivables considered good - Unsecured	1877.50	1959.00
Loans Receivables which have significant increase in credit risk		
<b>Loans Receivables - Credit impaired</b>	112.50	37.50

- a) Inter-corporate loans are unsecured and receivable on demand. The purpose of utilization of loan by the borrowers are for general business purposes. Since loans are of short duration and repayable on demand hence transaction value approximates fair value.
- b) There are no debts due by directors or other officers of the company either severally or jointly with any other person or debts due by firms or private companies respectively in which any director is a partner or a director or a member
- c) Impairment of loans are on actual basis, further loss allowance for previous year was made as per general approach

**Note No. : 13 Other financial assets**

Current (Unsecured, considered good)

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
Interest accrued on Bank Fixed Deposits	51.20	46.09
Interest accrued on Security Deposit for Electricity	-	2.39
Interest Receivable on Loan Given	226.36	201.17
<b>Less: Impairment loss based on ECL*</b>	-	12.15
	<b>277.56</b>	<b>237.49</b>

\*Loss allowance for interest component was made as per general approach

**Note No. : 14 Current Tax Assets (net)**

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
Advance Tax (F.Y 2020-21 Rs 10.00 Lacs)	55.00	10.00
Tax deducted at Source	35.20	57.37
Less: Provision for Income Tax	70.74	-
	<b>19.46</b>	<b>67.37</b>

**Note No. : 15 Other current assets (Unsecured, considered good)**

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Advances other than Capital Advances</b>		
<b>a) Security deposits</b>	-	-
<b>b) Advances to related parties</b>	-	-
<b>c) Other Advances</b>		
i) Advance to Suppliers	-	1.57
ii) Advance for Expenses	1.21	0.20
iii) Advance to staff	2.10	
iv) Balances with Central Excise, Goods and Services Tax & Vat Authorities	4.11	40.04
	<b>7.42</b>	<b>41.82</b>

- a) There are no advances made/ due by directors or other officers of the company either severally or jointly with any other person or debts due by firms or private companies respectively in which any director is a partner or a director or a member

**Note No. : 16 Share capital**

Particulars	As at March 31, 2022		As at March 31, 2021	
	No of Shares	Rs in Lacs	No of Shares	Rs in Lacs
(a) Authorised Equity shares of par value 10 /- each	1,25,00,000	1,250.00	1,25,00,000	1,250.00
(b) Issued, subscribed and fully paid up Equity shares of par value 10 /- each	1,25,00,000	1,250.00	1,25,00,000	1,250.00
		1,250.00		1,250.00
<b>(c) Reconciliation of number and amount of equity shares outstanding</b>				
Particulars	As at March 31, 2022		As at March 31, 2021	
	No of Shares	Rs in Lacs	No of Shares	Rs in Lacs
Balance at the beginning of the year	1,25,00,000	1,250.00	1,25,00,000	1,250.00
Changes due to prior period errors	-	-	-	-
Restated balance at the beginning of the year	-	-	-	-
<b>Changes during the current year</b>	-	-	-	-
<b>Balance at the end of the year</b>	1,25,00,000	1,250.00	1,25,00,000	1,250.00
(d) The Company has only one class of equity shares. The holders of equity shares are entitled to receive dividend as declared from time to time and are entitled to one vote per share.				
(e) In the event of liquidation of the Company, the holders of equity shares will be entitled to receive remaining assets of the Company, after distribution of all preferential dues. The distribution will be in proportion to the number of equity shares held by the shareholders.				
(f) The company is neither a holding company nor a subsidiary company.				
(g) Shareholders holding more than 5 % of the equity shares in the Company.				
Name of the Shareholder	As at March 31, 2022		As at 31st March 2021	
	No of Shares held	% of holding	No of Shares held	% of holding
Chhibbar Business & Fiscals Pvt Ltd	2267633	18.14	2267633	18.14
Doyang Wood Products Ltd	1023434	8.19	931476	7.45
Sohini Suppliers Pvt Ltd	1910312	15.28	1910312	15.28
Punarvasu Vyapaar Pvt Ltd	881900	7.06	881900	7.06

## (h) Disclosure of shareholding of promoters

Name of the Promoter	As at 31st March 2022			As at 31st March 2021		
	No of Shares held	% of holding	% Change during the year	No of Shares held	% of holding	% Change during the year
ANIKA BURMAN	5000	0.06%	-	5000	0.06%	
DALBIR CHHIBBAR	108725	1.38%	-	108725	1.38%	
DILBAG RAI CHHIBBAR	2000	0.03%	-	2000	0.03%	
GITA DEVI AGARWAL	7000	0.09%	-	7000	0.09%	
KARANBIR CHHIBBAR	4500	0.06%	-	4500	0.06%	
MADAN MOHAN CHHIBBAR	2500	0.03%	-	2500	0.03%	
MADHU CHHIBBAR	10000	0.13%	-	10000	0.13%	
MALA CHHIBBAR	7500	0.10%	-	7500	0.10%	
MANISH AGRAWAL	20000	0.25%	-	20000	0.25%	
PARAMJIT CHHIBBAR	15600	0.20%	-	15600	0.20%	
PREMA AGRAWAL	10000	0.13%	-	10000	0.13%	
PURAN MAL AGRAWAL	3250	0.04%	-	3250	0.04%	
PURAN MAL AGRAWAL	1500	0.02%	-	1500	0.02%	
RAMANAND PURANMAL (HUF)	5000	0.06%	-	5000	0.06%	
SAKET AGRAWAL	20000	0.25%	-	20000	0.25%	
SULOCHNA DEVI AGARWAL	5000	0.06%	-	5000	0.06%	
SUMAN CHHIBBAR	50000	0.64%	-	50000	0.64%	
SURESH KUMAR AGRAWAL	1500	0.02%	-	1500	0.02%	
SURESH KUMAR AGRAWAL	17500	0.22%	-	17500	0.22%	
SUSHMA CHHIBBAR	112000	1.42%	-	112000	1.42%	
USHA AGRAWAL	5100	0.06%	-	5100	0.06%	
VINOD KUMAR AGRAWAL	5000	0.06%	-	5000	0.06%	
VISHESH CHHIBBAR	50100	0.64%	-	50100	0.64%	
YUDHBIR CHHIBBAR	3000	0.04%	-	3000	0.04%	
CHHIBBAR BUSINESS & FISCALS PVT LTD	2267633	28.82%	-	2267633	28.82%	
DOYANG WOOD PRODUCTS LIMITED	1023434	13.01%	-	931476	11.84%	
HOWRAH GASES LTD.	17000	0.22%	-	17000	0.22%	
MEGHDOOT VYAPAAR PRIVATE LIMITED	870000	11.06%	-	870000	11.06%	
PUNARVASU VYAPAAR PRIVATE LIMITED	881900	11.21%	-	881900	11.21%	
SOHINI SUPPLIERS PRIVATE LIMITED	1910362	24.28%	-	1910362	24.28%	
YOKOGAWA COMMOTRADE PRIVATE LIMITED	425900	5.41%	-	425900	5.41%	

(i) There are no shares reserved for issue under options and contracts / commitments for the sale of shares/ in investments

(j) For the period of 5 years immediately preceding the date as at which the Balance Sheet is prepared

Name of the Shareholder	As at March 31, 2022	As at 31st March 2020
	No of Shares	No of Shares
(a) Aggregate number and class of shares allotted as fully paid up pursuant to contract(s) without payment being received in cash	<b>NIL</b>	<b>NIL</b>
(b) Aggregate number and class of shares allotted as fully paid by way of bonus shares	<b>NIL</b>	<b>NIL</b>
(c) Aggregate number and class of shares bought back	<b>NIL</b>	<b>NIL</b>
(k) There were no securities issued having a term for conversion into equity / preference shares.		
(l) There are no calls unpaid in respect of Equity Shares issued by the Company		
(m) There are no forfeited shares by the Company		

## Note No. : 17 Other equity

(Rs In Lacs)

Particulars	As at March 31, 2022		As at March 31, 2021	
<b>(a) Securities Premium Reserve</b>				
Balance as per last account		2923.44		2923.44
<b>(b) General Reserve</b>				
Balance as per last account		750.00		750.00
<b>(c) Retained Earnings</b>				
Balance as per last account	721.38		652.52	
<b>Add: Net profit</b> for the Year	461.80		-31.49	
<b>Add</b> : Transfer from Other Comprehensive Income	29.29	1212.47	100.35	721.38
<b>(d) Other Comprehensive Income</b>				
Balance as per last account			-	
<b>Add</b> : Other Comprehensive Income for the Year	29.29		100.35	
<b>Less</b> : Transfer to retained earnings	(29.29)		(100.35)	-
		<b>4885.90</b>		<b>4394.81</b>

## Note :

- (i) Securities premium is used to record the premium on issue of shares. The reserve is eligible for utilization in accordance with the provisions of the Companies Act 2013.
- (ii) General reserve represents amounts appropriated out of retained earnings based upon the provisions of the Act prior to its amendment.
- (iii) Other Comprehensive income ('OCI') represents the cumulative gains and losses arising on the revaluation of equity instruments measured at fair value through Other Comprehensive income ('OCI') net of Taxes

**Note No. : 18 Deferred tax liabilities (net)**  
**As at March 31, 2022**

(Rs in Lacs)

Particulars	Opening Balance	Recognised in Profit or loss	Reclassified from equity to profit or loss	Recognised in Other Comprehensive Income	Closing Balance
<b>Tax effect of items constituting deferred tax liabilities</b>					
Depreciation	52.05	(55.68)	-	-	-3.63
Investment	(30.87)	-	-	5.33	(25.54)
	<b>21.18</b>	<b>(55.68)</b>		<b>5.33</b>	<b>-29.17</b>
<b>Tax effect of items constituting deferred tax assets</b>					
Carried forward tax losses / unabsorbed depreciation	-	-	-	-	-
	-	-	-	-	-
<b>Net deferred tax liabilities / expense</b>	<b>21.18</b>	<b>(55.68)</b>		<b>5.33</b>	<b>-29.17</b>
<b>As at March 31, 2021</b>					
<b>Tax effect of items constituting deferred tax liabilities</b>					
Depreciation	55.49	(3.44)	-	-	52.05
Investment	(42.81)	-	-	11.94	(30.87)
	<b>12.68</b>	<b>(3.44)</b>	-	<b>11.94</b>	<b>21.18</b>
<b>Tax effect of items constituting deferred tax assets</b>					
Carried forward tax losses / unabsorbed depreciation	-	-	-	-	-
	-	-	-	-	-
<b>Net deferred tax liabilities / expense</b>	<b>12.68</b>	<b>(3.44)</b>	-	<b>11.94</b>	<b>21.18</b>

Note:

In assessing the realisability of the deferred tax assets, management considers whether some portion or all of the deferred tax assets will not be realized.

The ultimate realisation of the deferred tax assets, carried forward losses and unused tax credits is dependent upon the generation of future taxable income during the periods in which the temporary difference become deductible. Management considers the scheduled reversals of deferred tax liabilities, projected future taxable income and the planning strategies in making this assessment. Based on the historical taxable income and projection of future taxable income over the periods in which the deferred tax assets are deductible, management believes that the Company will realise the benefits of those recognised deductible differences, carried forward losses and portion of unused tax credits.

**Note No. : 19 Borrowings (current)**

(Rs In Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
Bank overdraft*	-	-
	-	-

**There were no borrowings either in the current financial year or in the previous period**

**Note No. : 20 Trade & other payables (current)**

(Rs In Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Trade payables</b>		
(a) Total outstanding dues of micro-enterprises & small enterprises	-	-
(b) Total outstanding dues of creditors other than micro enterprises & small enterprises	-	-
<b>Other payables</b>		
(a) Total outstanding dues of micro-enterprises & small enterprises	-	-
(b) Total outstanding dues of creditors other than micro enterprises & small enterprises	-	-
	-	-

a) As required under Section 22 of the Micro, Small and Medium Enterprises Development Act, 2006 with respect to trade payables, since the company's operation in its manufacturing units are closed the company has no outstanding towards it.

b) Further pursuant to amendment in Schedule III as notified by the MCA on 24th March, 2022, the Company is required to disclose Aging Schedule of 'Trade Payables due for payment' as on the Balance sheet as under:-

(Rs In Lacs)

Particulars	Unbilled	Not Due	Outstanding for following periods from due date of payment				Total
			Less than 1 year	1-2 years	2-3 years	More than 3 years	
<b>(i) MSME</b>							
F.Y 2021-22	-	-	-	-	-	-	
F.Y 2020-21	-	-	-	-	-	-	
<b>(ii) Others</b>							
F.Y 2021-22	-	-	-	-	-	-	
F.Y 2020-21	-	-	-	-	-	-	
<b>(ii) Disputed dues - MSME</b>							
F.Y 2021-22	-	-	-	-	-	-	
F.Y 2020-21	-	-	-	-	-	-	
<b>(iv) Disputed dues - Others</b>							
F.Y 2021-22	-	-	-	-	-	-	
F.Y 2020-21	-	-	-	-	-	-	
<b>Total</b>							
F.Y 2021-22	-	-	-	-	-	-	
F.Y 2020-21	-	-	-	-	-	-	

c) Since the company did not carry out any operations relating to production and selling of its products, hence there were no trade payables as at the end of the current reporting period as well as for previous year's reporting period

**Note No. : 21 Other Current liabilities**

(Rs In Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
ESI Employer's contribution	-	0.02
ESI Employees contribution	-	0.00
Provident fund , admin charges etc	-	0.13
Creditors for Expenses	2.15	45.44
Statutory liabilities*	-	1.75
Others	0.27	0.00
Retention money for repairs	-	6.99
	<b>2.42</b>	<b>54.34</b>
<b>Note :</b>		<b>(Rs In Lacs)</b>
<b>(i) *Includes GST ( Goods &amp; Services Tax ) Rs In Lacs</b>	-	<b>1.52</b>

**Note No. : 22 Revenue from operations**

(Rs In Lacs)

Particulars	Year ended March 31, 2022	Year ended March 31, 2021
<b>(a) Sale of goods (Sponge Iron)</b>	-	65.53
<b>(b) Other operating revenue</b>		
Lease Rental Income	108.00	102.00
	108.00	167.53
Less : GST	-	10.00
<b>Revenue from operations</b>	<b>108.00</b>	<b>157.53</b>

(i) Sale of Goods post Introduction of GST :

The incidence of GST is on supply of goods or Services and it is recovered from the customer. Revenue includes only the gross inflows of economic benefits received or receivable by the entity on its own account. Amounts collected on behalf of third parties, i.e., Goods and Services Tax are not economic benefits which flow to the entity and do not result in increases in equity, and therefore they are excluded from Revenue

**Note No. : 23 Other income**

(Rs In Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Interest income on financial assets carried at cost</b>		
<b>Current Assets</b>		
Interest on Loans given	217.52	227.32
<b>Interest income on other financial assets</b>		
<b>Non current</b>		
Interest on Bank Fixed Deposits	72.50	72.82
Interest on Security Deposits	1.77	2.60
Interest income on Income Tax Refund	2.17	3.80
Income from Dividend	3.39	6.47
<b>Other non-operating income ( net of expenses directly attributable to such income )</b>		
Speculative Income	3.53	4.96
Sundry Balances written back	3.64	0.00
	<b>304.51</b>	<b>317.97</b>

**Note No. : 24 Cost of materials consumed**

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
Raw Material consumed	-	-
	-	-

**Note No. : 25 Changes in inventories of finished goods.**

(Rs In Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Opening Stock</b>		
<b>Finished Goods(Sponge Iron)</b>	-	56.00
Less : Closing Stock		
<b>Finished Goods(Sponge Iron)</b>	-	0.80
	-	<b>55.20</b>

**Note No. : 26 Employee benefits expense**

(Rs In Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
Salaries and wages, including bonus	26.87	28.17
Contribution to Provident fund, ESI , etc	1.07	1.09
Staff welfare Expenses	4.46	5.02
Ex-Gratia	0.05	-
Gratuity	0.37	-
	<b>32.82</b>	<b>34.28</b>

**Note No. : 27 Finance costs**

(Rs In Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
<b>Interest expense</b>		
Bank Overdraft	1.31	5.23
	<b>1.31</b>	<b>5.23</b>

**Note No. : 28 Other expenses**

(Rs in Lacs)

Particulars	As at March 31, 2022		As at March 31, 2021	
Consumption of stores and spare parts		2.45		4.88
Power and fuel		7.98		14.12
Rent		9.03		4.01
Stamp duty & registration fees (lease land)		2.59		
<b>Repairs &amp; Insurance</b>				
Factory Building		-		0.64
Plant and Equipment	65.80		145.19	
Others	0.27		0.24	
Insurance	0.80	66.86	0.43	146.50
<b>Rates &amp; Taxes (excluding Income Tax)</b>				
Other Rates & Taxes	1.02	1.02	2.14	2.14
<b>Payments to auditor</b>				
As auditor for statutory audit	0.60		0.60	
GST Audit Fees	-		1.05	
Internal Audit Fees	0.24		0.24	
Review Audit fees	0.20		0.20	
Secretarial Audit Fees	0.75	1.79	1.20	3.29
Loss in trade in derivatives (F&O)		135.88		124.81
Loss in currency derivative transactions		-		0.26
Interest expenses (WBIIDC)		18.84		
Professional & legal fees		4.18		0.85
Business promotion Expenses		-		0.00
Director sitting fees		0.48		0.32
Social Welfare Expenses		-		2.58
General Expenses		7.26		4.08
Listing Fees		3.00		3.00
Bank Guarantee charges		0.28		0.28
Custodial fees		0.90		0.90
Travelling & conveyances		1.48		2.68
Allowance for doubtful receivables/loans (credit impaired)		112.50		49.65
Sundry Debit Bal.Written Off		5.19		1.14
Miscellaneous Expenses		14.73		14.15
		<b>396.44</b>		<b>379.65</b>

**Note No. : 29 Tax Expense**

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
Current tax	70.74	-
Income tax of earlier	0.70	0.12
Deferred tax [Refer Note No. 18 ]	(55.68)	(3.44)
	<b>(15.76)</b>	<b>(3.32)</b>

**29 (b) Reconciliation of Tax Expenses****(Rs in Lacs)**

<b>Particulars</b>	<b>As at 31st March 2022</b>
1) Profit before tax for Computation	477.56
Add: Disallowances	
a) Expenses on transfer of land (stamp duty & registration) being debited to other expenses	2.59
b) Depreciation charged as per Companies Act	35.24
Total (A)	<b>515.39</b>
Less: Exceptional item shown in Statement of profit and loss being long term gain on sale of Jamshedpur sponge iron unit on a going concern basis via slump sale)	530.86
Less: Depreciation allowed as per Income tax act	5.83
Total (B)	536.69
Net taxable income of business as per Income Tax Act (A) - (B)	-21.31
2) Short term capital gain on realised income from investments designated in Other comprehensive income	40.05
3) Long term capital gain on sale of Jamshedpur sponge iron plant on slump sale basis and according to Income tax act	692.10
4) Business loss of earlier years	-382.32
4) (a) Business loss of current year	-21.31
Total business lossess (C)	-403.62
5) Set off of current year losses and brought forward business lossess with long term capital on sale of above mentioned unit as per IT Act (3) - (C)	288.48
6) Net taxable long term gain chargeable to tax	288.48
7) Net short term capital gain as per point 2 above	40.05
Tax on point no 6 @ 20%	58.00
Surcharge @ 7% and Cess @ 4% above	64.48
Tax on point no 7 @ 15%	6.01
Surcharge @ 7% and Cess @ 4% above	6.26
Total current tax payable as per books for FY: 2021-22	70.74
Note : Income Tax for earlier year : 70,021/-	0.70
<b>Total</b>	<b>71.44</b>

**Note No. : 30 Other Comprehensive Income****(Rs in Lacs)**

<b>Particulars</b>	<b>As at March 31, 2022</b>		<b>As at March 31, 2021</b>	
<b>Items that will not be reclassified to profit or loss</b>				
<b>Realised gain/ (loss) on sale of investments</b>	34.62		117.70	
Fair value changes of Investments in equity shares	-		(5.42)	
<b>Less:</b> Income tax relating to items that will not be reclassified to profit or loss	5.33	29.29	11.94	100.35
<b>Total other Comprehensive Income</b>		<b>29.29</b>		<b>100.35</b>

**Note No. : 31 Other disclosures**

- 1) Exceptional items of Rs 530.86 Lacs comprises of gain on sale of sponge iron plant situated at Jamshedpur on slump sale basis, as a going concern basis, on as is where is basis along with all its assets and liabilities through an agreement for sale and transfer executed on January 25, 2022. The necessary approval of the shareholders of the company for such sale and disposal of the said sponge iron plant was duly taken through postal ballot process vide postal ballot notice dated January 03, 2022 and necessary disclosure of such transaction was duly made as per SEBI Regulation 30 (2) of Listing Obligations and Disclosure Requirements (Regulations) 2015, as may be amended to the BSE Limited and on the website of the Company. The said deal has been fully consummated within March 2022 and the settled consideration value have been realized.
- 2) The company's overall working performance during the financial year (2021-2022) under review has been quite dismal. The company could not and did not operate its sponge iron plant at Jamshedpur for several reasons which inter alia include extremely high and unaffordable prices of raw materials being iron ore and coal, high freight cost, spiralling but unremunerative selling prices of sponge and almost doubling of working capital requirements due to very high input costs. The plant's commercial operations were thus found to be not profitable and it was regularly incurring maintenance and administrative expense putting financial burden on the company. The board of directors thus considering this plant to be virtually a white elephant having been incurring losses year after year; decided in their wisdom and prudence to sell/dispose off this plant. Accordingly the company had identified a suitable and serious buyer and the company disposed off this sponge iron plant on slump sale basis, as a going concern, on as is where is basis along with all its assets and liabilities, to the aforesaid buyer through an agreement for sale and transfer executed on 25-01-2022 on a lump sum consideration of Rs 14.50 crore. The necessary approval of the shareholders of the company for such sale and disposal of the said sponge iron plant was duly taken through postal ballot process vide postal ballot notice dated 03-01-2022 and necessary disclosure of such sale of the plant was duly made as per SEBI Regulation 30 (2) of Listing Obligations & Disclosure Requirements (Regulations) 2015 to the BSE limited and on the website of the company. The said deal has been fully completed within March, 2022 and the settled consideration value has been realized. Further the company is actively and seriously making efforts to identify any other diversified business or industry and till then the company has invested its surplus funds in shares and securities, loans and in bank fixed deposits to generate income for the company.
- 3) Further, the Company had entered into a Business Transfer Agreement on 03.01.2019 (FY 2018-2019) with M/s. SHV Energy Pvt. Ltd. to sell them the Company's LPG Bottling Plant, at Uluberia, Howrah, by way of a slump sale on a going concern basis subject to the consent and approval of the West Bengal Industrial Infrastructural Development Corporation (WBIIDC), Kolkata. The said business transfer agreement has since been cancelled and substituted by two fresh bilateral agreements dated 24-01-2022 with the same consideration value. The said deal has been delayed and not yet completed as consent from WBIIDC was being awaited. Finally the company has received the in principle approval and consent of the WBIIDC for such sale and transfer of the LPG bottling plant in the month of January, 2021 and hopefully with completion of other necessary formalities, the said deal is likely to be completed very shortly.
- 4) The Company's LPG Bottling Plant at Raigarh continues to be inoperative, as usual, as the commercial operations thereon are not remunerative and economically viable. The Board has taken authority from the members through Postal Ballot to dispose off the said Plant but unfortunately no buyer/purchaser has come forward till the date of approval of the financial results of the company. The Board considers that only the free-hold land of the said Plant has commercial value and the plant & equipments, being very old and obsolete, have only scrap value. However the management and the Board of Directors of the company have assessed the impact of these transactions and firmly believes the company's ability to continue as a going concern.
- 5) The business has been impacted during the year on account of COVID-19, however the Company has assessed the possible impact of COVID-19 in preparation of these financial statements, including but not limited to its assessment of liquidity and going concern assumption, the recoverable values of its financial and non-financial assets and impact on revenues and costs. The impact of COVID-19 may be different from that estimated as at the date of approval of these financial statements and the company will continue to closely monitor any material changes to future economic conditions, accordingly the financial statements of the Company have been prepared on a going concern basis.

**6. Contingent liabilities and commitments (to the extent not provided for)****Contingent liabilities:-**

(Rs in Lacs)

Particulars	As at March 31, 2022	As at March 31, 2021
a) Bank Guarantee issued by the HDFC Bank in favour of Central Coal fields Ltd. Being Bank Guarantee No.014GT01133450003 dated 11.12.2013 for Rs.46,00,000/- and renewed on 15.02.2022 for a period upto 31.03.2023 against which the company has pledged/created lien on it's fixed deposits with the HDFC Bank Ltd.	46.00	46.00

**7) As per the requirements of section 22 of the Micro, Small and Medium Enterprises Development Act, 2006 with respect to trade payables, the Company has no outstanding towards it.**

**8) Disclosures as required by Indian Accounting Standard (Ind AS) 37:- Provisions, Contingent liabilities and Contingent assets.**

**(i) Nature of provision**

Provision for contingencies represent provision towards various claims made/anticipated in respect of duties and taxes and other litigation claims against the Company based on the Management's assessment.

**(ii) Movement in provision:-**

Particulars	Duties & Taxes	Other Litigation Claims	Total
<b>Balance as at 1st April, 2021</b>	NIL		
Provided during the year			
Used during the year	NIL		
Reversed during the year			
<b>Balance as at 31st March, 2022</b>	NIL		
Non-current			
Current	NIL		
<b>Balance as at 1st April, 2020</b>	NIL		
Provided during the year			
Used during the year	NIL		
Reversed during the year			
<b>Balance as at 31st March, 2021</b>	NIL		
Non-current			
Current	NIL		

**(9) Earnings per share - The numerators and denominators used to calculate Basic / Diluted earnings per share**

Particulars	For the year 2021-2022	For the year 2020-2021
<b>(a) Amount used as the numerator</b>		
Profit after Tax - (Rs in Lacs) (A)	461.80	-31.49
<b>(b) Weighted average number of equity shares outstanding used as the denominator for computing Basic Earnings</b>		
Per Share (B)	12500000	12500000
<b>Add: Weighted average number of dilutive potential equity shares</b>	-	-
<b>(C) Weighted average number of equity shares outstanding used as the denominator for computing Basic Earnings</b>		
Per Share (C)	12500000	12500000
<b>(d) Nominal value of equity shares (Rs)</b>	10.00	10.00
<b>Basic earnings per share (A)/(B)</b>	<b>3.69</b>	<b>-0.25</b>
<b>Diluted earnings per share (A)/(C)</b>	<b>3.69</b>	<b>-0.25</b>

10) **Related parties and their relationship (as defined under Ind AS -24) Related party disclosures :****(I) Holding Company**

NIL

**(II) Subsidiary Company**

NIL

**(III) Key Managerial Personnel (KMP)**

1. Baninder Singh Sahani (Non-Executive, Independent Director & Chairman)
2. Dalbir Chhibbar ( Managing Director)
3. Neeraj Chhabra (Independent Director)
4. Sushma Chibbar (Non-Executive Director)
5. Vishesh Chibbar (Non-Executive Director)
6. Puranmal Agarwal (Non-Executive Director)
7. Chandra Prakash Srivastava (CFO)
8. Anamika Sinha Roy (Company Secretary)

**(IV) Other related parties****Entities where Key Management Personnel and their relative have significant influence**

- 1) Chhibbar Business & Fiscal Private Limited

**Related party transactions**

The Company has entered into transaction with related parties, during the year with particulars as under:-

<b>Name of the related party</b>	<b>Relationship</b>	<b>Nature of transaction</b>	<b>Amount (Rs.) (Lacs) F.Y 2021-22</b>	<b>Balance Rs.(Lacs) as on 31.03.22</b>	<b>Amount (Rs.) (Lacs) F.Y 2020-21</b>
Dalbir Chhibbar	Key Management Personnel (Managing Director)	Remuneration Paid	9.00	Nil	9.00
Chandra Prakash Srivastava	CFO	Remuneration Paid	3.12	0.24	3.12
Anamika Sinha Roy	CS	Remuneration Paid	2.64	0.22	2.64
Baninder Singh Sahani ( Appointment w.e.f 19th June 2020)	Non-Executive Independent Director	Sitting fees	0.24	Nil	0.16
Neeraj Chhabra	Independent Director	Sitting fees	0.24	Nil	0.16
Chhibbar Business & Fiscals Private Ltd.	Related Party	Office Rent Paid	3.00	Nil	3.00

**Details of Remuneration paid/payable to KMP**

Year ended 31st March 2022

(Rs in Lacs)

Particulars	Dalbir Chhibbar (Managing Director)	Chandra Prakash Srivastava (CFO)	Anamika Sinha Roy (Company Secretary)	Total
Short-term employee benefits				
Salary	9.00	3.12	2.64	14.76
Commission	-	-	-	-
Perquisites	-	-	-	-
Post-employment benefits	-	-	-	-
Contribution to Provident Fund, Gratuity and other funds	-	-	-	-
Ex-Gratia	-	-	-	-

**Details of Remuneration paid/payable to KMP**

Year ended 31st March 2021

(Rs in Lacs)

Particulars	Dalbir Chhibbar (Managing Director)	Chandra Prakash Srivastava (CFO)	Anamika Sinha Roy (Company Secretary)	Total
Short-term employee benefits				
Salary	9.00	3.12	2.64	14.76
Commission		-	-	-
Perquisites	-	-	-	-
Post-employment benefits	-	-	-	-
Contribution to Provident Fund, Gratuity and other funds	-	-	-	-
Ex-Gratia	-	-	-	-

- a) The transaction with related parties have been entered at an amount which are not materially different from those on normal commercial terms. The transactions with related parties are made on terms equivalent to those that prevail in arm's length transactions.
- b) The remuneration of directors is determined by the Nomination & Remuneration Committee having regard to the performance of individuals and market trends.

**11) Disclosures under Schedule V to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:**

The Company does not have any holding or subsidiary Company. The other necessary disclosures are furnished in the Report of the Board of Directors dated 2nd May, 2022 and annexed to the Annual Report for the financial year ended 31.03.2022. Please refer to the same.

**Note No. : 32 Other disclosures****Additional Regulatory Information**

**Amended Schedule III requires additional regulatory information to be provided in financial statements.**

**These are as follows;**

**1) Title deeds of Immovable Property**

Title deeds of immovable properties in the case of freehold land, (for description refer note no 4) are held in the name of the Company. In case of leasehold land (refer note no 4) where the company is the lessee, the lease agreements are duly executed in favour of the Company (being a lessee)

**2) Fair valuation of Investment property**

The company has not classified any property as Investment property, hence fair valuation of Investment property by a registered valuer as defined under Rule 2 of Companies (Registered Valuers and Valuation) Rules, 2017 does not arise

**3) Revaluation of Property, Plant and Equipment and Right -of- Use Assets**

The Company has not revalued any of its Property, Plant and Equipment (including Right-of-Use Assets) during the current reporting period and also reporting period and also for previous year's reporting period.

**4) Loans or advances to specified persons**

The Company has not granted any loans or advances to promoters, directors, KMPs and the related parties (as defined under the Companies Act 2013, either severally or jointly with any other person, that are (a) repayable on demand, or (b) without specifying any terms or period of repayment.

**5) Capital Work in Progress**

The Company incurred Rs 93.60 lacs towards Capital work in progress in one of the plant situated in Jamshedpur during the previous year i.e., 2020-21, however during the current reporting period the same was capitalized to such plant situated at Jamshedpur and the entire unit which was situated at Jamshedpur was sold off on a slump sale and on going concern basis (for details refer note no 31 (1) to this financial statements

**6) Intangible Assets under development**

The Company does not have any intangible assets under development during the current and previous year reporting period

**7) Details of Benami Property held : Additional Disclosure**

The Company does not hold any Benami Property and hence there were no proceedings initiated or pending against the Company for holding any benami property under the Benami Transactions (Prohibitions) Act, 1988 and the Rules made there under, hence no disclosure is required to be given as such.

**8) Borrowings secured against current assets**

The Company does not have any borrowings from banks or financial institutions on the basis of security of current assets the financial statements; hence no disclosure is required as such.

**9) Wilful Defaulter**

The Company has not been declared as willful defaulter as at the date of the balance sheet or on the date of approval of the financial statements, hence no disclosure is required as such.

**10) Relationship with Struck off Companies**

The Company does not have any transactions with Companies which are struck off under Section 248 of the Companies Act, 2013 or Section 560 of the Companies Act, 1956, hence no disclosure is required as such

**11) Registration of Charges or Satisfaction with Registrar of Companies (ROC)**

There are no charges against the companies which are yet to be registered or satisfaction yet to be registered with

ROC beyond the statutory period, hence no disclosures are required as such

#### **12) Compliance with number of layers of companies**

The Company does not have investment in any downstream companies for which it has to comply with the number of layers prescribed under Clause (87) of Section 2 of the Companies Act, 2013 read with Companies (Restriction on number of layers) Rules, 2017, hence no disclosure is required as such

#### **13) Utilization of Borrowings**

The Company does not have any outstanding balances towards the borrowings from banks and financial institutions at the balance sheet date, hence no further disclosure is required as such

#### **14) Utilization of Borrowed Funds and Share Premium**

(A) The Company has not advanced or loaned or invested funds (either borrowed funds or Share premium or any other sources or kind of funds) to any other person(s) or entity(ies), including foreign entities (intermediaries) with the understanding (whether recorded in writing or otherwise) that the intermediary shall;

a) Directly or indirectly lent or invest in other person(s) or entity (ies) identified in any manner whatsoever by or on behalf of the company (Ultimate Beneficiaries) Or b) Provide any guarantee, security or the like to or on behalf of the Ultimate Beneficiaries.

Hence no disclosure is required as such.

(B) The Company has not received any fund from any person(s) or entity(ies), including foreign entities (Funding Parties) with the understanding (whether recorded in writing or otherwise) that the company shall;

a) Directly or indirectly lend or invest in other person(s) or entity(ies) identified in any manner whatsoever by or on behalf of the Funding Party (Ultimate Beneficiaries) Or

b) Provide any guarantee, security or the like to or on behalf of the Ultimate Beneficiaries. Hence no disclosure is required as such.

#### **15) Undisclosed Income**

The Company does not have any undisclosed Income which was not recorded in the books of accounts and which has been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 such as, search or survey or any other relevant provisions. Also the Company does not have previously unrecorded income and related assets which were required to be properly recorded in the books of accounts during the year

#### **16) Details of Crypto Currency Or Virtual Currency**

The Company has not traded or invested in Crypto Currency or Virtual Currency during the financial year, hence disclosure requirements for the same is not applicable

#### **17) Corporate Social Responsibility Activities**

The Company is not required to comply with the provisions of Section 135 of the Companies Act, 2013

**Analytical Ratios**

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
1	Current Ratio	Current Assets	Current Liabilities	977.83:1	Current Assets	Current Liabilities	49.65:1	1867%	Since major current liabilities were paid off during the current period and further company's operation is ceased, so current liabilities are minimum
		2,366.34	2.42		2,697.79	54.34			

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
2	Debt Equity Ratio	Total Debt	Shareholders Equity		Total Debt	Shareholders Equity	0	0	NA
		0	6135.90		0	5644.81			

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
3	Debt Service Coverage Ratio	Earnings available for debt service (Note 1)	Debt Service (Note 2)	391:83:1	Earnings available for debt service (Note 1)	Debt Service (Note 2)	1:22:1	32017%	Since the company is non-operational so the finance cost is at bare minimum, further due to disposal of Sponge iron plant at Jamshedpur, there has been a one time gain of Rs 530.86 Lacs, hence earning available for debt service during the current period is high with negligible interest cost!NA
		514.11	1.31		6.37	5.23			

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
4	Return on Equity	Net profit after taxes 461.80	Average Shareholder's equity 5890.36	7.84%	Net profit after taxes -31.49	Average Shareholder's equity 5610.381	-0.56%	1500%	Return on equity is high as compared to previous year because of gain on sale of sponge iron plant at Jamshedpur during the current period

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
5	Inventory Turnover Ratio	Sales 108.00	Average Inventory	-	Sales 157.535	Average Inventory 329.5158	0.48%	-100.00%	Company is non-operational during the current period hence there were no sales and no inventory

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
6	Trade Receivables Turnover Ratio	Net credit purchases 0	Average trade receivables 0	-	Net credit purchases 63.53	Average trade receivable 109.42	0.60	-100.00%	Company is non-operational during the current period hence there were no sales and no receivables

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
7	Trade Payables Turnover Ratio	Net credit purchases 0	Average trade payables 0	-	Net credit purchases 0	Average trade payables 0	0	0	N.A

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
8	Net Capital Turnover Ratio	Net Sales	Average working capital	-	Net Sales	Average working capital		-100.00%	Company is non-operational during the current period hence there were no sales during the current period
		0	2363.91		65.53	2643.91	0.02		

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
9	Net Profit Ratio	Net profit after taxes	Net sales	427.59%	Net profit after taxes	Net sales		2239%	Net profit margin ratio is high because of gain on disposal of sponge iron plant at Jamshedpur
		461.800	108		-31.49	157.53	-19.99%		

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
10	Return on Capital Employed	EBIT	Capital employed (Note 3)	7.80%	EBIT	Capital employed (Note 3)		1601.70%	EBIT is high due to gain on disposal of sponge iron plant at Jamshedpur
		478.87	6135.90		(29.57)	5666.00	-0.52%		

Serial No	Particulars	Numerator	Denominator	Ratio	Numerator	Denominator	Ratio	% Variance	Reason for Variance
		Current year	Current year	Current year	Previous year	Previous year	Previous year		
11	Return on Investment	Net return on Investment (Note 4)	Cost of Investment (Note 4)	7.55%	Net return on Investment (Note 4)	Cost of Investment (Note 4)		1472.00	Since company's primary business operations are closed and the company has deployed surplus funds in shares & securities and bank fixed deposits till the time the company explores new business or industry
							-055%		

**Notes**

- 1) Earnings available for debt service = Net profit before taxes + Non-cash operating expenses (depreciation) + Interest + Other adjustments like loss on sale of fixed assets
- 2) Debt Service = Interest & lease payments + Principal Repayments
- 3) Capital employed = Tangible net worth + Total debt + Deferred tax liability
- 4) Net Return on Investment = Value of Investment at the end of the period - Value of Investment at the beginning of the period
- 5) Cost of Investment = Value of Investment at the beginning of the period

**Note No. : 33 Other disclosures****1) Financial instruments - Accounting, Classification and Fair value measurements**

This section gives an overview of the significance of financial instruments for the Company and provides additional information on balance sheet items that contain financial instruments.

The details of significant accounting policies, including the criteria for recognition, the basis of measurement and the basis on which income and expenses are recognised in respect of each class of financial asset, financial liability and equity instrument are disclosed in Note 2 to the financial statements.

**A) Financial instruments by category****As at 31st March, 2022****(Rs in Lacs)**

Particulars	Refer Note No	FVTOCI	FVTPL	Amortized cost	Total carrying value
<b>1) Financial Assets</b>					
(i) Investments	5	521.31	-	-	521.31
(ii) Trade and other receivables	10	-	-	-	0.00
(iii) Cash and cash equivalents	11	-	-	296.90	296.90
(iv) Loans	12	-	-	1,765.00	1,765.00
(v) Other financial assets (Non-current)	6	-	-	3,105.18	3,105.18
(vi) Other financial assets (Current)	13	-	-	277.56	277.56
<b>TOTAL</b>		<b>521.31</b>	<b>-</b>	<b>5,445</b>	<b>5,965.95</b>
<b>2) Financial Liabilities</b>					
(i) Borrowings	19	-	-	-	-
(ii) Trade payables	20	-	-	-	-
<b>TOTAL</b>		<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

**As at 31st March, 2021**

Particulars	Refer Note No	FVTOCI	FVTPL	Amortized cost	Total carrying value
<b>1) Financial assets</b>					
(i) Investments	5	398.17	-	-	398.17
(ii) Trade receivables	10	-	-	20.89	20.89
(iii) Cash and cash equivalents	11	-	-	79.21	79.21
(iv) Loans	12	-	-	1,921.50	1,921.50
(v) Other financial assets (Non-current)	6	-	-	1,526.08	1,526.08
(vi) Other financial assets (Current)	13	-	-	237.49	237.49
<b>TOTAL</b>		<b>398.17</b>	<b>-</b>	<b>3,785.17</b>	<b>4,683.34</b>
<b>2) Financial Liabilities</b>					
(i) Borrowings	19	-	-	-	-
(ii) Trade payables	20	-	-	-	-
<b>TOTAL</b>		<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

**B. Fair value hierarchy**

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

**(2) The Company uses the following fair value hierarchy for determining and disclosing the fair value of financial instrument:**

**Level 1:** Quoted prices (unadjusted) in active markets for identical assets or liabilities. This category consists of investment in quoted equity shares

**Level 2:** Inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly or indirectly.

**Level 3:** Inputs for the assets or liabilities that are not based on observable market data (unobservable inputs). Fair values are determined in whole or in part, using a valuation model based on assumptions that are neither supported by prices from observable current market transactions in the same instrument nor are they based on available market data. This level of hierarchy includes Company's investment in equity shares which are unquoted or for which quoted prices are not available at the reporting dates. Carrying value of investments in unquoted shares approximates cost at which they are purchased.

**(i) Financial assets measured at fair value on a recurring basis as at 31st March, 2022:**

Particulars	Refer Note No	Level 1	Level 2	Level 3	Total
<b>1) Financial assets</b>					
<b>1</b>					
<b>(i) Investments in Equity Instruments</b>	5	19.26	-	502.05	521.31
<b>TOTAL FINANCIAL ASSETS</b>		19.26	-	-	521.31
<b>(ii) Financial assets measured at fair value on a recurring basis as at 31st March, 2021:</b>					
					(Rs In Lacs)
Particulars	Refer Note No	Level 1	Level 2	Level 3	Total
<b>1) Financial assets</b>					
<b>At FVTOCI</b>					
<b>(i) Investments in Equity Instruments</b>	5	43.62	-	854.55	898.17
<b>TOTAL FINANCIAL ASSETS</b>		<b>43.62</b>	-	-	<b>898.17</b>

**There have been no transfer between Level 1 and Level 2 either during the year ended 31st March 2022 or during the year ended 31st March 2021**

- (i) Investments carried at fair value are generally based on market price quotations these investments in equity instruments are not held for trading. Instead, they are held for long term strategic purpose. The Company has chosen to designate these investments in equity instruments at FVOCI since; it provides a more meaningful presentation. Cost of certain investments in equity instruments have been considered as an appropriate estimate of fair value because of wide range of possible fair value measurements and cost represents the best estimate of fair value within that range.
- (ii) Fair value of cash and cash equivalents, bank balances other than cash and cash equivalents, trade and other receivables, loans and other current & Non-current financial assets, and other current financial liabilities approximate their carrying amounts due to the short term maturities of these instruments
- (ii) Management uses its best judgement in estimating the fair value of its financial instruments. However, there are inherent limitations in any estimation technique. Therefore, for substantially all financial instruments, the fair value estimates presented above are not necessarily indicative of the amounts that the Company could have realised or paid in sale transactions as of respective dates. As such, fair value of financial instruments subsequent to the reporting dates may be different from the amounts reported at each reporting date.

**Note No. : 33 Other disclosures****1) Financial risk management objectives and policies**

The Company does not have financial liabilities for the current reporting period except for certain non -fund based Bank overdraft The Company's principal financial assets include Trade receivables, Cash and cash equivalents, loans repayable on demand, fixed deposits with banks and other financial assets.

The Company is exposed to liquidity risk & market risk The company's Senior management under the supervision of Board of Directors oversees the management of these risks, and the appropriate financial risk governance framework for the Company. The senior management provides assurance that the Company's financial risk activities are governed by appropriate policies and procedures and that financial risks are identified, measured and managed in accordance with the Company's policies and risk objectives.

**(A)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 comprises of interest rate risk, credit risks and other risks, such as regulatory risk and commodity price risk.

**(I)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 inmarket interest rates. The Company's exposure to the risk of changes in market interest rates relates primarily to the Company's obligations towards Bank overdraft with floating interest rates. But since it is for short duration it doesn't cast significant risk owing to this exposure. To mitigate the interest rate risk, the Company maintains an impeccable track record and ensures long term relation with the lenders to raise adequate funds at competitive rates. Company has access to low cost borrowings, because of its healthy balance sheet and presently the company does not have any borrowings as on the reporting date.

**(II) Regulatory risk**

Risk is inherent in every business activity and Sponge iron Industry is no exception. The Steel Industry displays strong commodity characteristics and is subject to cyclical price movements in business cycle. The company is exposed to risks from overall market , cheaper import of steel, changes in Government policies , law of the land, Taxation increases its cost of inputs like iron ore, coal, power, diesel, freight etc which effects the financial performance of the company.

**(III)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 impairment for financial assets are based on assumptions about risk of default and expected loss rates. The Company uses judgement in making these assumptions and selecting the inputs to the impairment calculation, based on the Company's past history, existing market conditions as well as forward looking estimates at the end of each balance sheet date. Financial assets are written off when there is no reasonable expectation of recovery, however, the Company continues to attempt to recover the receivables. Where recoveries are made, these are recognised in the Statement of Profit and Loss based on Company's past history and the model under which company operates doesn't cast significant credit risk leading to impairment of its financial assets in case of loans the company applies general approach to measure the expected credit loss .

**3) Balances with banks**

Credit risk from balances with banks is managed in accordance with the Company's policy.

**4) Capital Management**

The Company's capital management is intended to create value for shareholders by facilitating the meeting of long term and short term goals of the Company. The Company determines the amount of capital required on the basis of annual business plan coupled with long term and short term Strategic investments and expansion plans. At present the Company is non-operational (refer no no 31 (1) (2) & (3) and the Company has deployed its surplus funds in shares and securities and with bank fixed deposits. and by providing short term loans. Further the management of the company is evaluating the future business plans either in the same or in different industry. For the purpose of the Company's capital management, capital includes issued equity capital, securities premium and all other equity reserves attributable to the equity shareholders of the Company. The Company's objective when managing capital is to safeguard its ability to continue as a going concern so that it can continue to provide returns to shareholders and other stake holders. The Company manages its capital structure and makes adjustments in light of changes in the financial condition and the requirements of the financial covenants. To maintain or adjust the capital structure, the Company may adjust the dividend payment to shareholders, return capital to shareholders (buy back its shares) or issue new shares.

In order to achieve this overall objective, the Company's capital management, amongst other things, aims to ensure that it meets financial covenants if any from time to time.

- 5)** Previous period figures have been re-grouped/ re-classified wherever necessary, to confirm to current period's classification and in order to comply with the requirements of the amended Schedule III to the Companies Act, 2013 effective April, 2021

**ANNEXURE "1" to Para-22 of Ashirwad Steels and Industries Ltd.'s  
Board of Director's Report for the financial year ended 31.03.2022**

**FORM NO. MR-3**

**Secretarial Audit Report**

for the Financial Year ended 31<sup>st</sup> March, 2022

*[Pursuant to Section 204(1) of the Companies Act, 2013 and Rule No.9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014]*

To,  
The Members,  
Ashirwad Steels & Industries Limited

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Ashirwad Steels & Industries Limited** (Hereinafter called the Company). Secretarial audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the 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 authorised representatives during the conduct of secretarial audit, we hereby report that in our opinion, the Company has, during the audit period covering the financial year ended on 31<sup>st</sup> March, 2022 ("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.

We have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31<sup>st</sup> March, 2022 according to the provisions of:

- (i) The Companies Act, 2013 ("the Act") and the rules made thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 ("SCRA") and the rules made thereunder;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment and Overseas Direct Investment;
- (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, 2018 (Not applicable to the company during the audit period);
  - d] 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); and
  - h] The Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 (Not applicable to the company during the audit period).
- (vi) The other laws, as informed and certified by the Management of the Company, which are specifically applicable to the Company namely:
- a] The Food Safety and Standards Act, 2006 and the rules and regulations made thereunder;
  - b] Legal Metrology Act, 2009 and the rules made thereunder;
  - c] The West Bengal Sales Tax Act, 1944;
  - d] Bengal Excise Act, 1909;
  - e] The Environment (Protection) Act, 1986, read with the Environment (Protection) Rules, 1986;
  - f] The Water (Prevention & Control of Pollution) Act, 1974, read with Water (Prevention & Control of Pollution) Rules, 1975;
  - g] The Air (Prevention & Control of Pollution) Act, 1981 read with Air (Prevention & Control of Pollution) Rules, 1982;
  - h] The Factories Act, 1948 and allied state laws.

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

- (i) The Secretarial Standards (SS-1 and SS-2) issued by The Institute of Company Secretaries of India;
- (ii) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

**We report that**, during the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above subject to the following observations:

- 1) *Hundred percent of shareholdings of the promoters and promoters group in not in dematerialized form as mentioned under Regulation 31(2) of The Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.*

**We further report that**, the Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

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

As per the minutes of the meetings duly recorded and signed by the Chairman, the decisions of the Board were unanimous and no dissenting views have been recorded.

**We 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.

**We further report that** during the audit period, the company has not undertaken any specific events / actions that can have a major bearing on the Company's affairs in pursuance of the above referred laws, rules, regulations, guidelines, standards, etc.

For **Patnaik & Patnaik**  
Company Secretaries  
Unique Code: P2017WB064500

**S. K. Patnaik**  
Partner  
FCS No.: 5699, C.P. No.:7117  
Peer Review Cert. No. 1688/2022  
UDIN: F005699D000253166

Place: Kolkata  
Date: 2<sup>nd</sup> May 2022

*[Note: This Report is to be read with our letter of declaration which is annexed hereto as "Annexure -A" and forms an integral part of this Report.]*

## Annexure - A

To,  
The Members,  
Ashirwad Steels & Industries Limited

Our Report is to be read along with this letter.

- (i) Maintenance of secretarial record is the responsibility of the Management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
- (ii) We have followed the audit practices and processes as 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. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
- (iii) We have not verified the compliance by the Company of applicable financial laws such as direct and indirect tax laws and maintenance of financial records and books of accounts since the same have been subject to review by the statutory financial auditors, tax auditors and other designated professionals.
- (iv) The status of compliance of other laws as listed at (vi) in our Report, we relied upon the statement provided by the Management.
- (v) Wherever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events, etc.
- (vi) The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of Management. Our examination was limited to the verification of the same on test basis.
- (vii) 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 **Patnaik & Patnaik**  
Company Secretaries  
Unique Code: P2017WB064500

**S. K. Patnaik**  
Partner  
FCS No.: 5699, C.P. No.:7117  
Peer Review Cert. No. 1688/2022  
UDIN: F005699D000253166

Place: Kolkata  
Date: 2<sup>nd</sup> May 2022

**ANNEXURE "2" of Para-22 of Ashirwad Steels and Industries Ltd.'s Board of Director's Report  
for the financial year ended 31.03.2022**

**Secretarial Compliance Report of M/s. Ashirwad Steels & Industries Limited for the year  
ended 31<sup>st</sup> March, 2022**

We, Patnaik & Patnaik, Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by M/s. Ashirwad Steels & Industries Limited ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31<sup>st</sup> March, 2022 ("Review Period") in respect of compliance with the provisions of:

- a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable to the company during the review period);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 (Not applicable to the company during the review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not applicable to the company during the review period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the company during the review period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013 (Not applicable to the company during the review period);

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;  
 (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder; and based on the above examination, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder; except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/Circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	The listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board [Regulation 31(2) of The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.]	As on 31 <sup>st</sup> March, 2022, the promoters of the company were holding 8446409 number of equity shares (comprising of 67.571% of the total capital of the company). Out of which 33500 numbers of shares (comprising of 0.268% of the total capital of the company) has not been dematerialized.	0.268% of the total capital of the company out of promoters holding is not in dematerialized form.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records;
- (c) There were no actions taken against the listed entity/ its promoters/ directors (the Company does not have any material subsidiary) either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records.

(d) The listed entity has taken the following actions to comply with the observations made in the previous reports:-

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	58500 equity shares comprising of 0.47% of the total paid-up capital of the company out of promoters holding is not in dematerialized form.	31 <sup>st</sup> March 2019, 31 <sup>st</sup> March, 2020 & 31 <sup>st</sup> March, 2021	During the financial year 2021-22 promoters have dematerialized 25000 equity shares of the Company. The management is taking necessary steps for dematerialisation of the balance shares which is held up due to some legal & technical hurdles/issues.	Partially complied, but the company is making regular efforts to complete the compliance in this respect.

For **Patnaik & Patnaik**  
Company Secretaries  
Unique Code: P2017WB064500

**S. K. Patnaik**  
Partner  
FCS No.: 5699, C.P. No.:7117  
Peer Review Cert. No. 1688/2022  
UDIN: F005699D000253309

Place: Kolkata  
Date: 2<sup>nd</sup> May 2022

**ANNEXURE to the Ashirwad Steels and Industries Ltd.'s  
Board of Director's Report for the financial  
year ended 31.03.2022**

**Form No. AOC-2**

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

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 arm's length transactions under third proviso thereto.

**1. Details of contracts or arrangements or transactions not at arm's length basis:**

- (a) Name(s) of the related party and nature of relationship: None  
 (b) Nature of contracts/arrangements/transactions: None  
 (c) Duration of the contracts / arrangements/transactions: None  
 (d) Salient terms of the contracts or arrangements or transactions including the value, if any: None  
 (e) Justification for entering into such contracts or arrangements or transactions: None  
 (f) Date of approval by the Board: None  
 (g) Amount paid as advances, if any: None  
 (h) Date on which the special resolution was passed in general meeting as required under first proviso to section 188: None

**2. Details of material contracts or arrangement or transactions at arm's length basis:**

(a) Name(s) of the related party and nature of relationship:	<b>Dalbir Chhibbar, Managing Director</b>	<b>Chhibbar Business &amp; Fiscals Pvt. Ltd, (Part of Promoter Group)</b>
(b) Nature of contracts/arrangements/transactions:	Payment of Remuneration	Payment of office Rent
(c) Duration of the contracts / arrangements/transactions:	5 years	Perpetual
(d) Salient terms of the contracts or arrangements or transactions including the value, if any:	As per package approved by BOD & Members in AGM. Remuneration paid Rs. 9,00,000/- p.a.	Rs. 3,00,000 p.a.
(e) Date(s) of approval by the Board, if any:	Approved by the members in the AGM held on 17/09/2019.	
(f) Amount paid as advances, if any:	----	----

**For and on behalf of Board of Director**

Place: Kolkata  
Date: 02.05.2022

**Dalbir Chhibbar**  
Managing Director  
DIN:00550703

**Vishesh Chhibbar**  
Director  
DIN: 03553892