BEEKAY
Inspired by Steel

De-risking the business

Beekay Steel Industries Limited
Annual Report 2018-19

Forward looking statement

In this Annual Report, we have disclosed forward-looking information to enable investors to comprehend our prospects and take informed investment decisions. This report and other statements - written and oral - that we periodically make, contain forward-looking statements that set out anticipated results based on the management's plans and assumptions. We have tried wherever possible to identify such statements by using words such as 'anticipates', 'estimates', 'expects', 'projects', 'intends', 'plans', 'believes' and words of similar substance in connection with any discussion of future performance. We cannot guarantee that these forward-looking statements will be realised, although we believe we have been prudent in our assumptions. The achievement of results is subject to risks, uncertainties and even inaccurate assumptions. Should known or unknown risks or uncertainties materialise, or should underlying assumptions prove inaccurate, actual results could vary materially from those anticipated, estimated or projected. Readers should bear this in mind. We undertake no obligation to publicly update any forward-looking statements, whether as a result of new information, future events or otherwise.

De-risking the business

In the cyclical steel sector, our principal priority is to create a de-risked business model.

This has been our focus across the last few years; this is what we pursued in 2018-19; this is what we seek across the foreseeable future.

We have made de-risking our focus with the objective to be the last person standing during a slowdown and among the first to recover when prospects revive.

Our progressive de-risking made it possible for the Company to enhance margins, competitiveness, revenue visibility and shareholder value.

Enhancing profitability for the moment and business sustainability for the future.

The fundamentals of Beekay Steel

Vision

To be a quality leader in customised rolled products and bright bars through integrated production infrastructure, continuous process improvements, systematic training and motivation of personal and an uncompromising commitment to customers' needs.

Values

Customer and stakeholder satisfaction

We continue to adhere to and live by the core values established in our early days – to know, serve and trust, strive for perfection and promote all interests. Our collective identity is maintained by our shared commitment to these values. We promote the interests of all our stakeholders. Our thorough knowledge of their needs enables us to serve them better. Our engagement with and service to our customers and stakeholders builds mutual trust, enhanced by continually striving for perfection and promoting their interests and of society in general. The values we share serve as a compass for everyone in our organisation, guiding our behaviour and representing the foundation of our culture.

Management

The senior management Beekay Steel comprises Mr. Suresh Chand Bansal (Executive Chairman), Mr. Mukesh Chand Bansal (Managing Director), Mr. Vikas Bansal (Executive Director), Mr. Manav Bansal (Whole-time Director and Chief Financial Officer) and Mr. Gautam Bansal (Whole-time Director). The cumulative management experience of the senior management as on March 31, 2019 stood at 150 person years.

Legacy

Beekay Steel has emerged as a respected player in the Indian steel sector. The Company scaled its capacity to 2,32,000 metric tonnes per annum (MTPA) of hot-rolled sections and structural steel. Further, the Company sustained its production capacity of bright bars at 28,000 MTPA and TMT bars at 5,00,000 MTPA as on March 31, 2019.

Diversification

The Company possesses one of the widest ranges of steel products in the country - from bright bars to structural steel and from TMT bars to sections. The Company capitalised on this diversified portfolio to emerge as a ~₹1,000 Crore company.

Quality-consciousness

The Company services customers with quality products through a robust quality control system, comprising the procurement of raw materials and dispatch of finished goods.

Certifications

The Company is accredited with the ISO 9001:2015 and ISO 14001:2015 certifications, guaranteeing a stringent compliance with established qualitative and environmental norms, respectively. The Company was certified for ISO TS 16949, validating its quality management system in addressing the growing needs of the automobile and automobile accessories sector and also for 45001:2018 (Occupational Health & Safety Management system).

Customers

Over the past 50 years, we have developed a rich experience and expertise in steel rolling and bright bars for long products and sections for global equipment builders and leading Indian companies like Tata Steel, SAIL, RINL, Hindalco and BHEL, among others.

Employees

Beekay is driven towards employee welfare and has a high employee retention, which stood at 95% in 2018-19. The Company comprises more than 600 employees (full-time) with an average age of 40-42 years as on March 31, 2019.

Brand

On the back of its rich experience, the Company has emerged as one of the respected players in the eastern and southern regions of the country. The Company also has a diversified portfolio of products which helps it cater to diverse product demand, making the brand synonymous with customer-centricity.

Listing

The Company was listed on Bombay Stock Exchange (BSE) with a market capitalisation of ₹495 Crores as on March 31, 2019.

Our journey over the years

1974
Commercialised a rolling mill unit in Howrah.

1981
Acquired Radice Ispat (India) Limited.

1998
Acquired AKC Steel Industries Limited.

1999
Commenced production in Chengalpet (Tamil Nadu) under Radice Ispat (India) Limited.

2001
Commenced production in Jamshedpur Unit.

2002
Commenced production at Radice Ispat (India) Limited in Vizag.

2003
Commenced production in Venkatesh Steel & Alloys Private Limited in Vizag.

2006
Amalgamated Radice Ispat (India) Limited and Venkatesh Steel with Beekay Steel.

2007
Commenced production in Beekay Structural Steel unit in Vizag

2008
Commenced production in Beekay Special Steel unit in Vizag.

2013
Commenced production in TMT Bar division at Parwada in Vizag.

2018
Successfully crossed the ₹990 Crore mark in revenues.

2019
Commenced production in Unit II of Beekay Special Steel in Vizag.

Financial highlights

Revenues (₹ Crores)

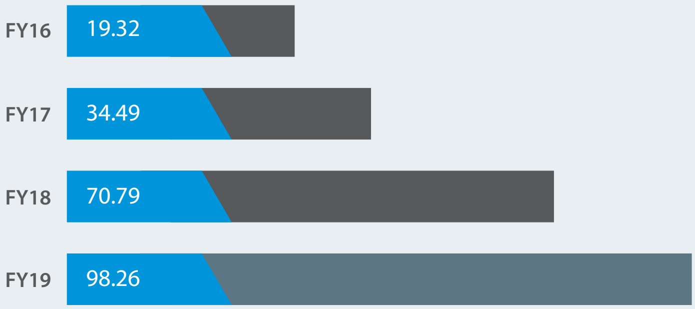
Definition: Growth in sales net of taxes.

Why this is measured: It highlights the service acceptance and reach of the Company.

Performance: Aggregate sales in 2018-19 stood at ₹960 Crores.

Value impact: Creates a robust revenue growth engine, which aids in building profits.

Profit after tax (₹ Crores)



Definition: Profit earned during the year after deducting all expenses and provisions.

Why this is measured: It highlights the strength of the business model in generating value for shareholders.

Performance: The Company reported a 39% increase in profit after tax in 2018-19.

Value impact: Ensures that adequate cash is available for reinvestment and allows the Company's growth engine to sustain.

EBITDA margin (%)

Definition: EBITDA margin is a profitability ratio used to measure a company's operating efficiency.

Why this is measured: The EBITDA margin provides an idea of how much a company earns (before accounting for interest and taxes) on each rupee of sale.

Performance: The Company reported a 452 bps increase in EBITDA margin in 2018-19 while enriching its product basket with superior products and improved operating efficiency.

Value impact: Demonstrates adequate buffer in the business, which, when multiplied by scale, enhances surpluses.

RoCE (%)

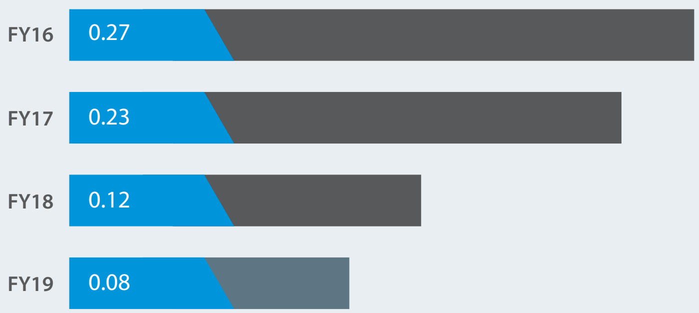
Definition: It is a financial ratio that measures a company's profitability and the efficiency with which its capital is employed in the business.

Why this is measured: RoCE is a useful metric for comparing profitability across companies based on the amount of capital they use – especially in capital-intensive sectors.

Performance: The Company increased RoCE by 122 bps to 24.78% in 2018-19.

Value impact: Enhanced RoCE can potentially drive valuations and perception.

Debt-equity ratio (x)



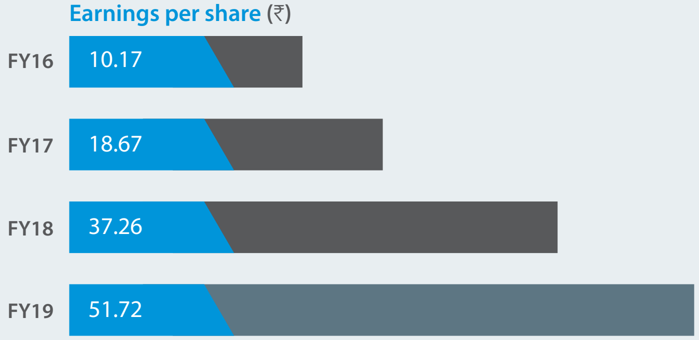
Definition: This is derived through the ratio of debt to net worth (less revaluation reserves).

Why this is measured: A measure of the Company's financial health, indicating its ability to remunerate shareholders over debt providers.

Performance: The Company's gearing strengthened from 0.27 in 2015-16 to 0.08 in 2018-19.

Value impact: Enhanced shareholder value by keeping the equity side constant; enhanced flexibility in progressively moderating debt cost.

Earnings per share (₹)



Definition: It is the portion of a company's profit allocated to each outstanding share of common stock.

Why this is measured: This figure depicts the actual value a company has created for its shareholders.

Performance: The Company's EPS grew from ₹10.17 in 2015-16 to ₹51.72 in 2018-19.

Value impact: Adds value in the hands of the shareholders through enhanced earnings per share.

Chairman's overview

"It would be reasonable to estimate moderate growth in the Company's revenues and profits"

Overview

I am pleased to present the performance of the Company for 2018-19.

The performance was our best ever across 50 years of existence. The improvement was on account of a 30% upturn in steel product realisations between December 2017 and March 2018. This was one of the sharpest increases seen over the last decade, the benefits of which translated through the year under review. Your Company capitalised on this increase by offering a judicious product mix and a critical mass of output. The result was that while revenues decreased 3.23% to ₹960 Crores, the Company reported a 39% growth in profit tax. This profitable growth, where the percentage increase in the bottom line was higher than the percentage growth of the topline, validated the robustness of the Company's business model.

The China factor

The sharp improvement in realisations and the health of the country's steel sector was based on the decision of the Chinese government to regulate its environment. The country focused on regulating the growth of its unorganised sector, came down heavily on manufacturing facilities with loose emission and effluent standards and forced the closure of a number of such units. The consequent decline in steel output in China helped moderate the export of steel products from that country. Besides, a number of countries imposed higher customs tariffs on steel imports from China. With a lower global steel surplus than in the previous years in the face of a growing steel appetite, steel realisations improved. This scenario benefited a country like India, where imports moderated, realisations strengthened and a larger quantum of steel could now be exported to the ASEAN where there was a larger demand-supply gap on account of China's lower presence.

Our B2B footprint

During the last financial year, 36% of the Company's revenues were derived from the B2B segment. This segment comprised structurals and sections with downstream applications in the country's engineering, infrastructure and automotive sectors, servicing the specialised needs of marquee companies like BHEL, Tata Steel, L&T, TVS Group, Raymonds, Amtek Group and others.

Engineering and infrastructure: At Beekay, we derived 55% of our B2B revenues from heavy structurals and sections marketed to the engineering and infrastructure industries. As a conscious policy, the Company resisted the conventional industry approach of manufacturing as much as possible and the dumping products. The Company strengthened its business through a differentiated approach: it manufactured products and bid selectively without compromising profitability. The result was an appreciable increase in average delivered volumes per month of 6500 tonnes as against 4500 tonnes in the previous year and a sustained monthly average of around 8000 tonnes from the second half of the financial year under review.

Automotive: At Beekay, 45% of the B2B revenues were derived from the manufacture of products addressing the needs of India's automotive sector. This segment addressed the demanding alloy steel requirements of automotive manufacturers. The business grew 8% by volume during the course of the year, riding the growth of the country's automotive sector. The business was affected by the slowdown in the automotive sector from the last quarter of the year under review. This segment of the business reported a capacity utilisation of around 80% and, going ahead, the Company will seek to plug the decline in demand from the automotive sector by marketing across a wider spread of industries.

Our 2018-19 surplus allocation

₹290 Crores cash on hand, March 31, 2019

₹150 Crores in greenfield expansion in three years in Odisha (commissioning 2021-22)

₹60 Crores in greenfield TMT plant in Vizag (2 Lakh MTPA, commissioning in 2020-21)

Rest in working capital, reducing debt

The Company reported a one-time raw material inventory gain of ₹22 Crores during 2018-19

Our deeper B2C presence

During the year under review, 65% of the Company's revenues were derived from B2C engagements. This business comprised the manufacture and marketing of TMT, utilised extensively in the construction industry. Structurals and sections also figured in the B2C segment, marketed through the Company's trade channels. At Beekay, we intend to increase our trade sales over the next few years on the back of longstanding relationships with distributors, coupled with an expanding distributor network.

Construction: At Beekay, we derived 54% of our B2C revenues from products like TMT bars, used in the construction industry. Over the last few years, the Company widened and deepened its TMT bar presence in coastal Andhra Pradesh in proximity to the Company's manufacturing facility. During the year under review, the Company strengthened its engagement with trade partners, planned its distribution circuit better and deepened its access into consuming markets. This larger distribution provided the Company with the room to increase output (as opposed to the conventional route of dumping as much as one had manufactured, affecting realisations), strengthen economies of scale and provide adequate product availability to service the growing needs of the market. Going ahead, the Company will increase its TMT volumes and proportion of revenues derived from this product.

Cost management

At Beekay, we have consistently focused on selective backward integration with the objective to moderate costs and enhance our control on variables, affecting our profitability. This is an ongoing priority on account of the fact that nearly 22% of the cost of steel manufacture for the Company is on account of fuel, any reasonable moderation in which can translate into an attractive increase in profitability.

During the year under review, the Company invested in coal pulverisers, strengthening the Company's transition from the consumption of furnace oil to coal. This switch was prompted by a sharp increase in furnace oil from ₹18 per litre to ₹38 per litre following an increase in crude oil costs during the year. The pulverisers resulted in a superior combustion of coal for billet heating and the result was that fuel costs per tonne of manufactured steel declined during the year, resulting in a notional saving of ₹12 Crores.

The cumulative impact of this priority is that the cost of fuel within the Company has progressively declined from ₹1,300 per tonne of the finished product to ₹800 per tonne today, benefiting the Company through an annual saving of ₹12 Crores and providing operational flexibility to address changes in marketplace dynamics.

Increasing our production

At Beekay, we recognise that competitiveness is derived form the ability to achieve a high utilisation of our manufacturing assets. The higher we produce translates into a superior coverage of our fixed costs, strengthening our competitiveness.

The Company debottlenecked and modernised the Jamshedpur TMT manufacturing facility, effectively increasing annual output by 35000 tonnes. The increase will be visible in the Company's production from 2019-20 onwards, strengthening economies of manufacture, brand spending and distribution.

Strengthening our financials

At Beekay, we believe that it would have been usual for the Company to allocate its business surplus across additional capacities. The Company generated ₹114 Crores in cash profit during the year under review but invested only ~ ₹22 Crores in capital expenditure. The rest of the accruals were invested in strengthening the Company's fiscal efficiency.

During the year under review, the Company replaced working capital debt with accruals. This switch helped moderate interest outflow from ₹18.49 Crores in 2017-18 to ₹15.77 Crores in 2018-19. Correspondingly, interest cover strengthened from 7.22 times to 11.34 times, influencing an increase in EBITDA margin by 452 bps to 18.98%.

Taking the business ahead

At Beekay, we will allocate a major portion of our surplus into strengthening our business and graduating into the next league.

During the year under review, we established a new medium and light structural and sections mill within our Beekay Special Steel manufacturing premises in Vizag. This new plant will strengthen customer confidence in working closely with the Company. In turn, we believe, that this will translate into higher wallet share.

We intend to manufacture light and medium structurals for engineering and infrastructure sector and sections for the automotive sector within this plant. A part of the product mix from this plant will comprise structurals; where we earlier produced heavy structurals, we will now produce light and medium structurals, diversifying our product basket. By the virtue of addressing products warranting deeper quality requirements, your Company will strengthen its customer engagement that translates into repeat engagement and higher revenue visibility.

The ₹22 Crores plant was funded completely through accruals and is expected to become profitable from the current financial year.

Outlook for 2019-20

The scenario for the steel industry is mixed at the present juncture. Following the elections of 2019, political uncertainty has declined. National capital expenditure is expected to revive, bank stress is expected to moderate, credit disbursement is expected to revive and the expectation of improved national liquidity is expected to strengthen the country's consumption engine.

Even as the national steel appetite continues to grow, some of the traditionally large downstream consumers like automobiles are in a state of slowdown, making it imperative to reallocate one's portfolio.

The Company will continue to service the outsourcing requirements of its large institutional partner, accounting for 72% of total volumes. The Company will focus on increasing the non-conversion manufacturing proportion of revenues through increased TMT branding, stronger B2B engagements and increased revenues from pan-India sales offices.

The benefits of the TMT capacity expansion will be felt during the full course of the year. The Company may select to manufacture a larger proportion of TMT products under its brand as opposed to a higher proportion of conversion manufacturing during the year under review. The increased output will help the Company address the outsourcing requirements of its large institutional buyer. Besides, the Company will strengthen its B2C business (TMT bars) through increased brand spending and higher exports. The benefits of the coal pulveriser investment will be reflected through the year. A rating upgrade from A minus to A is expected to moderate debt cost. The Company is expected to become net debt-free during the current financial year.

In view of this optimistic scenario, it would be reasonable to estimate moderate growth in the Company's revenues and profits (without factoring the one-time inventory gain of 2018-19), strengthening our business sustainability.

Suresh Chand Bansal, *Chairman*

Our three-year organisational strategy

The Company expects to emerge as a 1 milion MTPA Company in two years.

The incremental growth beyond 6,00,000 MTPA is expected to be derived from one greenfield project and the increased capacity utilisation of existing facilities.

The Company's product mix will comprise an even balance of proprietary and conversion businesses.

The Company's product mix will comprise an even balance of customised and standardised products.

The Company will invest in a stronger marketing team.

The Company will invest in growth through de-risking.

How we have transformed our business

The Company serviced the non-conversion steel needs of mid-sized companies

The Company altered its business strategy in 2018-19.	The Company increased share of business with BHEL, L&T and other EPC contractors.	The Company engaged around stronger trade terms and higher realisations without comprising margins.	This increased volumes, strengthened economies and business surplus.

The Company relied on manual and human gut-feel in decision-making

The Company implemented SAP, effective from April 2020, resulting in improved transparency and boosted digitalisation across the Company.	SAP implementation will strengthen controls.	The Company will launch smartphone applications for field executives.	These digitalisation initiatives will strengthen informed decision-making.

A moderate B2C presence in coastal Andhra Pradesh

The Company intends to increase TMT capacity in Vizag.	The Company is widening and deepening its AP geographic footprint.	The Company is increasing its brand spend in Andhra Pradesh.	This combination is expected to enhance retail TMT offtake.

The Company's B2C revenues were 65% of revenues in 2018-19

The Company is focusing on increasing B2C revenues.	The broad-basing will comprise retail and institutional customers.	The broad-basing will strengthen revenue mix, de-risking and sustainability.	The Company intends to increase B2C revenues to 75% on a larger revenue outlay.

The Company had ₹282 Crores debt in 2015-16 (₹181 Crores in 2018-19)

The Company moderated debt to de-risk the business.	20% of the Company's 2018-19 accruals were allocated for debt reduction.	Debt-equity ratio strengthened from 0.27 to 0.08 across four years.	The Company expects to emerge as net debt-free in 2019-20.

The Company was largely manufacturing-driven until a few years ago

The Company selected to strengthen its marketing orientation.	The Company recruited a larger number of marketing professionals.	The Company's focus is on increasing customer number and mix (B2B/B2C).	This broad-basing will enhance organisational stability.

The Company derives 85% of its B2C revenues from Andhra Pradesh

The Company strives to enhance its presence in Andhra Pradesh and foray into new geographies like Telangana, Karnataka and Tamil Nadu.	The Company intends to commission TMT bar capacity in Odisha, which could enhance its Eastern India presence.	The enhanced supply could widen the Company's TMT footprint.	The enhanced footprint could create a second TMT B2C engine starting in two years.

Our business model

Sectoral context

Rising incomes: The per capita income in real terms (at 2011-12 prices) during 2018-19 was estimated at ₹92,565 compared to ₹87,623 in 2017-18 – a growth rate of 5.6% compared to 5.7% in the previous year.

Infrastructure growth: In 2014, India allocated an infrastructure outlay of ₹10 trillion for five years, which by 2019 increased to ~₹21 trillion. Consequently, the order books of most infrastructural companies grew by 3x, enhancing revenue visibility. A robust order book growth, coupled with a lower tolerance for project delays, resulted in an infrastructure boom that accelerated growth of the steel sector.

Affordable housing: India's national housing shortage is estimated at 40 million units. Housing per capita consumption is estimated at 0.50 square metres per person compared to China's 2.6 square metres per person, Europe's 5 to 6 square metres per person and Brazil's 3.4 square metres per person. This indicates the headroom available in India's affordable housing segment, which could catalyse the market for long steel products.

Real estate: The Central Government introduced landmark reforms (RERA, GST, Insolvency and Bankruptcy Code and adoption of REITs, among others) to create a credible ecosystem marked by transparency, accountability and customer assurance. As a result, the realty sector's growth is projected at US$ 650 billion by 2025 and more than US$ 850 billion by 2028, strengthening steel demand.

Automobile sector: India produced 26.27 million vehicles including passenger vehicles, commercial vehicles, three-wheelers, two-wheelers and quadra-cycles in 2018-19 compared to 24.98 million in 2017-18, a growth of 5.2% y-o-y. Riding this growth, steel sector prospects improved.

Beekay's responsiveness

Diversified engagement: The Company is engaged in three verticals: job work (conversion) for one of India's largest steel companies, generating consistent revenues. The Company is engaged in manufacturing special steel and structural steel, which find downstream applications in the automobile component manufacturing industry and supplying to steel behemoths respectively. Beekay is also engaged in manufacturing TMT bars for retail consuming segments.

Opportunity focused: The Company widened its product basket through the manufacture of products of different sizes and grades, strengthening its one-stop customer proposition. On the back of a diversified portfolio coupled with a rich legacy of 50 years in the steel industry, the Company intends to leverage the opportunities arising in the industry on account of low per capita steel consumption across the country.

Longstanding engagements: The Company engaged with prominent clients, addressing their core needs. The Company leverages longstanding relationships with B2B business partners to enhance revenues. Nearly 35% of the Company's B2B business revenues was generated from companies with whom the Company enjoyed relationships for five years and more in 2018-19.

Customer relationship management: The Company shifted from a dealer-centric approach to a distributor-driven business model, engaging with around seven distributors instead of ~150 dealers. This approach helped the Company penetrate markets deeper.

Cutting-edge technology: The Company debottlenecked its manufacturing process, coal pulverisers and other technologies during the year under review, validating its backward integration to moderate conversion costs. The Company reduced power costs from ₹1200-1300 per tonne to ₹800 per tonne in 2018-19.

Brand recall: The Company grew its B2C business of TMT bars around the 'Beekay Turbo TMT' brand. This brand was promoted across hoardings, radio, bus advertisements, TV tickers and wall paintings across Andhra Pradesh. The Company undertook extensive branding initiatives to increase the share of TMT bar revenues in the sales mix.

People retention: Beekay reported decent employee retention of 95% as on March 31, 2019. The retention rate at the senior managerial level stood at 96% for the same period.

Outcomes

Growth-oriented: Grew PAT from ₹70.79 Crores during 2017-18 to ₹98.26 Crores in 2018-19.

De-risked: Optimised debt-equity ratio from 0.27 in 2015-16 to 0.08 in 2018-19.

Reliable: Attracted a stronger credit rating from A- in 2017-18 to A in 2018-19.

Management discussion and analysis

Indian economic overview

India emerged as the sixth-largest and retained its position as the fastest-growing trillion-dollar economy through the course of the year (except in the last quarter of 2018-19). However, after growing 7.2% in 2017-18, the Indian economy was expected to grow at 6.8% in 2018-19 as per the third advanced estimates of the Central Statistics Office released in May 2019.

The principal developments during the year under review comprised a sustained increase in per capita incomes, decline in national inflation, steadying interest rates, and weakened consumer sentiment starting from the second half of the financial year. The weaker sentiment was on account of a large non-banking financial company announcing its inability to address liabilities. This affected credit expansion, financial markets and consumer sentiment, which resulted in a slower GDP growth, declining to 5.8% by the fourth quarter of 2018-19.

In 2018, the country attracted ~US$ 38 billion in foreign inflows. India witnessed a 23-notch jump to a record 77th position in the World Bank's latest report on the ease of doing business that captured the performance of 190 countries. The commencement of the US-China trade war opened a new opportunity for India. Inflation (including food and energy prices) was estimated at 2.6% on an annual basis, one of the lowest in years and well below the Reserve Bank of India's medium-term target of 4%. The rupee rebounded after touching a low of ₹74.45 to a dollar to close the financial year at ₹69.44. During the fiscal under review, the Indian Government continued to invest deeper in digitisation, renewable energy capacity generation and infrastructure building.

Key government initiatives`

Bank recapitalisation scheme: In addition to infusing ₹2.1 Lakh Crores in public sector units, the Indian Government announced a capital infusion of ₹41,000 Crores through the recapitalisation bonds in 2018-19.

Expanding infrastructure: The Government of India invested ₹1.52 trillion to construct 6,460 kilometres of roads in 2018. Its expenditure of ₹5.97 trillion (US$ 89.7 billion) towards infrastructural development for 2018-19 is expected to strengthen the national economy.

Increasing MSPs: The Indian Government fixed MSPs of 22 mandated kharif and rabi crops and FRP for sugarcane. The Indian Government committed to provide a 50% return over the cost of production for all mandated crops, strengthening the rural economy.

Budgetary allocation: India's defence budget is projected to surpass ₹300,000 Crores (US$ 42.19 billion) in 2019-20 for the first time ever.

The Insolvency and Bankruptcy code (Amendment), Ordinance 2018: Passed in June 2018, the ordinance provides significant relief to home-buyers by recognising their status as financial creditors. The major beneficiary comprised MSMEs, empowering the Indian Government to provide them a special dispensation under the code.

Pradhan Mantri Kisan Samman Nidhi: The Indian Government announced in February 2019 the Pradhan Mantri Kisan Samman Nidhi, a scheme promising an annual assured income of ₹6,000 (US$ 84.5) for any farmer owning ≤2 hectares of farmland. The Budget for fiscal year 2020 allocated ₹75,000 Crores for the scheme, benefiting ~120 million land-owning farmer households.

Direct Benefit Transfer: The Direct Benefit Transfer initiative re-engineered the cash disbursement process in welfare schemes through simpler and faster flow of information/funds to ensure accurate targeting of beneficiaries, de-duplication and reduction of fraud. In 2018-19 alone, this scheme is estimated to have transferred >₹3, 14,465 Crores and the gains to have accrued since scheme implementation were estimated at more than ₹120,000 Crores.

Outlook

The Indian economy is expected to encounter a sluggish 2019-20 with a stronger outlook across the foreseeable future.

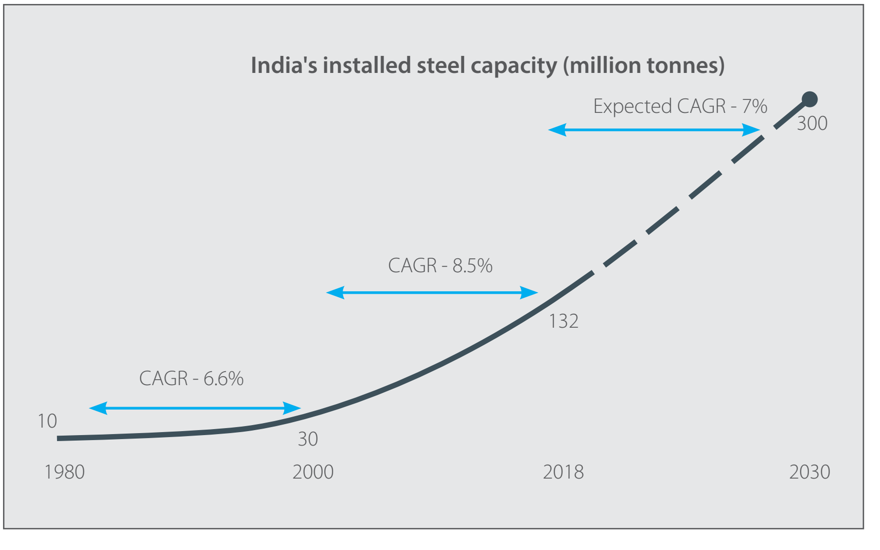
(Source: CSO, Fitch, Economic Times, Business Standard, IBEF, Business Today, India Today, Money control)

Indian steel industry overview

India emerged as the world's second-largest steel producer after China in 2018 while retaining its position of the third-largest finished steel consumer after China and the US.

India also emerged as the largest global producer of sponge iron. India had an installed capacity of 132 million tonnes in 2018 whereas the production for the period was pegged at 106.5 million tonnes compared to 101.5 million tonnes in 2017, registering a y-o-y growth of 4.9%.

India's per capita steel consumption rose from 59 kilograms in 2013-14 to 69 kilograms in 2017-18, way below the global average of ~214 kilograms. India is the fastest-growing market for stainless steel. The per capita consumption



of stainless steel in the country was estimated at 2 kilograms, compared to the global average of ~6 kilograms.

Domestic steel prices remained firm during the period between April and September 2018. Average prices of cold-rolled coils, hot-rolled coils and TMT bars increased by 27-29% y-o-y during the period under review. Per tonne prices of cold-rolled coils, hot-rolled coils and TMT bars averaged at ₹61,550, ₹55,716 and ₹49,139, respectively. Strong demand resulted in India emerging as a net importer of steel, imports increasing 12% y-o-y and exports declining 42% y-o-y as of November 2018.

The Indian steel sector is estimated to register robust growth over 12-18 months. The country's steel demand is estimated to grow 7.3% in 2019, riding robust GDP growth. Despite the burgeoning demand, India's steel production is projected to grow at a mere 2.5-3% by the end of 2018-19. Domestic steelmakers are expected to increase their capacity by ~16 million tonnes between 2018-19 and 2020-21. This capacity ramp-up and debottlenecking of stressed assets could lead to an industry-wide capex of ~₹750-800 billion between 2018-19 and 2020-21.

Looking ahead, the steel industry is expected to achieve 300 million tonnes of production capacity by 2030. Increased outlays for the railways sector, affordable housing push,and rising demand in capital goods and consumer durables could boost the domestic steel industry's growth.

(Source: Live Mint, Economic Times, PIB, Bloomberg, Ministry of Steel, Hindu Business Line, Business Standard, World Steel, ICRA)

Governmental initiatives

- The National Steel Policy strives to achieve a crude steel capacity of 300 million tonnes, production of 255 million tonnes and a per capita consumption of finished steel of ~160 kilograms by 2029-30.
- The housing and construction sector accounts for a large share of steel demand in India. This sector is expected to strengthen owing to government initiatives like Pradhan Mantri Awas Yojana, Sardar Patel Urban Housing Mission, 100 Smart Cities Mission by 2022, Pradhan Mantri Gram Sadak Yojana, Urban Infrastructure Development Scheme for Small & Medium Towns, National Heritage City Development and Augmentation Yojana, Bharatmala, Power for All, Development of Industrial Corridors & National Investment & Manufacturing Zones and 75,000-megawatt Clean Energy Initiative by 2022, among others.
- The Central Government announced a policy for giving preference to domestically-manufactured iron and steel products for government projects. The policy provides a minimum value addition of 15% in notified steel products, which are covered under preferential procurement.
- The Central Government allowed 100% FDI through the automatic route, a 20% safeguard duty on steel imports and an export duty of 30% on iron ore (lumps and fines).

(Source: Business Today

Import and export scenario of steel

In numbers (US$ billion)

Year	2014-15	2015-16	2016-17	2017-18	2018-19
Exports	8.68	5.49	8.68	11.24	4.22
Imports	12.34	11.25	8.24	10.43	5.33

*Till September, *Source: Ministry of Commerce*

The boost by 'Housing for All'

The Housing and Urban Affairs Ministry's budgetary provisions were pegged at ₹48,000 Crores in the Union Budget 2019-20, clocking ~12% y-o-y increase from 2018-19. The Pradhan Mantri Awas Yojana (PMAY-Urban),was allotted a lumpsum of ₹6,853.26 Crores in the 2019-20 Budget compared to ₹6,505 Crores in 2018-19. Furthermore,under PMAY-Urban, >81 Lakh houses with an investment of ~₹4.83 Lakh Crores was sanctioned. Of the 81 Lakh houses, construction for 47 Lakh houses has already been initiated.

Key downstream demand drivers

Construction and infrastructure: India's construction and infrastructure sector is the largest consumer of steel in India. It accounts for more than 60% of the total finished steel consumed in India. The demand for steel in India is estimated to grow at around 7.3% in 2019, following growing demand from the construction sector. Steady order inflow supported by increased governmental spending towards infrastructure has improved medium-term revenue visibility for most construction players. The construction companies are likely to witness significant opportunities from the railways, ports, urban infrastructure and aviation sectors, strengthening steel demand.

Engineering and fabrication: The engineering and fabrication sector accounted for the second largest share (more than 20%) of total finished steel consumed. This segment involves industries such as capital goods, consumer durables, electrical goods, general engineering and defence equipment, among others. Steel products including hot-rolled coils and sheets are used in general engineering, while galvanised sheets are used in the manufacture of consumer durables. Rapid urbanisation and growing per capita income could catalyse this industry's growth along with rising temperatures, pollution and evolving lifestyles.

Automotive: The automotive sector accounted for the third-largest share (around 10%) of the total finished steel consumed in India. The Budget catalysed the development of the rural economy by extending necessary incentives. The increase in the zero-tax income limit to ₹500,000 could strengthen the middle-class, catalysing sales of automotive products, especially two-wheelers, farm equipment and entry-level passenger vehicles, which could fuel growth of the steel industry. (Source: Economic Times, CARE, SIAM, ICRA)

SWOT analysis

Strengths	Weaknesses	Opportunities	Threats
Abundance of iron ore and other minerals	High cost of capital	Low per capita consumption	Slow industrial growth
Skilled manpower and low per unit labour cost	Low labour productivity	Unabated growth of the Indian economy	Technological obsolescence
	High cost of basic inputs like power	Burgeoning rural market	Substitution from aluminium and plastics
	High social costs	Governmental thrust on infrastructural development	Slowdown in countries, resulting in steel dumping
	Poor quality of basic infrastructure	Low international market penetration	
	Inefficient distribution network		

Financial performance

Though the Company's revenues went down by 3.26 % to ₹960 Crores in 2018-19, the Company's EBITDA stood at ₹182.30 compared to ₹143.49 in the previous year. Further, interest cost decreased to ₹15.77 Crores in 2018-19 compared to ₹18.49 Crores in the previous year. The Company reported a post-tax profit of ₹98.26 Crores in 2018-19 compared to a post-tax profit of ₹70.79 Crores in the previous year.

Human resources

Beekay Steel believes that its competitive advantage lies within its people. The Company's people bring to the stage a multi-sectoral experience, technological experience and domain knowledge. The Company's HR culture is rooted in its ability to subvert age-old norms in a bid to enhance competitiveness. The Company always takes decisions which are in alignment with the professional and personal goals of employees, thereby achieving an ideal work-life balance and enhancing pride association.

Risk management

Economic risk	A slowdown in the economy could affect the steel industry. The Indian economy grew an estimated 6.8% in 2018-19 and while the immediate outlook appears challenging, the medium-term and long-term perspectives appear positive. The Company intends to leverage the macroeconomic opportunities and the headroom of growth available in the steel sector owing to the low per capita consumption figures.
Currency volatility risk	Adverse forex movements can affect profitability in the event of product exports. To mitigate this risk, Beekay protected receivables through timely and effective hedging.
Employee risk	The steel industry is marked by attrition and inability to attract skilled professionals. The Company grew from a 376-employee organisation in 2014-15 to a 600 employee organisation in 2018-19. Nearly 85% of the employees were associated with the Company for more than five years; retention of senior management executives was a high 96% in 2018-19.
Funding risk	The Company may not be able to fund capex in a cost-effective manner. The Company optimised its debt-equity ratio to 0.08 in 2018-19 from 0.12 in 2017-18; interest cover was a robust 11.34x as on March 31, 2019. Timely debt repayment and moderate gearing helped mobilise additional debt at a cost-effective rate.
Competition risk	With the entry of new players, the Company's market share could be challenged. The Company is driven by its B2B business; any change in its share of business with customers could affect profitability. The Company mitigates this challenge by expanding its presence across new geographies and engaging with new customers while growing wallet share with existing customers.
Quality risk	A decline in product quality can affect the Company's brand and revenues. The Company ensured that its operations are in line with stringent quality norms specified by customers or quality agencies, and certifications (ISO 9001:2015 and ISO TS 16949).

Internal control systems and their adequacy

The internal control and risk management systems are structured and applied in accordance with the principles and criteria established in the corporate governance code of the organisation. It is an integral part of the general organisational structure of the Company and involves a range of personnel who act in a coordinated manner while executing their respective responsibilities. The Board of Directors offers its guidance and strategic supervision to the Executive Directors and management, monitoring and support committees. The control and risk committee and the head of the audit department work under the supervision of the Board-appointed Statutory Auditors.

Cautionary statement

This statement made in this section describes the Company's objectives, projections, expectation and estimations which may be 'forward looking statements' within the meaning of applicable securities laws and regulations. Forward–looking statements are based on certain assumptions and expectations of future events. The Company cannot guarantee that these assumptions and expectations are accurate or will be realised by the Company. Actual result could differ materially from those expressed in the statement or implied due to the influence of external factors which are beyond the control of the Company. The Company assumes no responsibility to publicly amend, modify or revise any forward-looking statements on the basis of any subsequent developments.

CORPORATE INFORMATION

BOARD OF DIRECTORS :	Mr. Suresh Chand Bansal - Executive Chairman Mr. Mukesh Chand Bansal - Managing Director Mr. Vikas Bansal - Executive Director Mr. Manav Bansal - Wholetime Director & CFO Mr. Gautam Bansal - Wholetime Director Mr. Vijay Kumar Bansal - Non Executive Director Mr. Bhal Chandra Khaitan - Independent Director Mr. Ravishankar Sridharan - Independent Director Mr. Srikumar Banerjee - Independent Director Ms. Shyanthi Dasgupta (Sengupta) - Independent Woman Director Mr. Bharat Kumar Nadhani - Independent Director
BANKERS :	State Bank of India Allahabad Bank Punjab National Bank Bank of Baroda YES Bank
COMPANY SECRETARY :	Mr. Rabindra Kumar Sahoo
STATUTORY AUDITORS :	M/s. Lihala & Co. Chartered Accountants 11, Crooked Lane, Kolkata-700069
SECRETARIAL AUDITORS :	Mr. Santosh Kumar Tibrewalla Practising Company Secretary 5A, N.C. Dutta Sarani, Kolkata - 700 001
REGISTERED OFFICE :	'Lansdowne Towers' 2/1A, Sarat Bose Road, 4th Floor, Kolkata: 700 020 Tel: (033) 4060 4444 Fax: (033) 2282 3322 Email: contact@beekaysteel.com Web: www.beekaysteel.com
REGISTRAR & SHARE TRANSFER AGENT :	M/s. Maheshwari Datamatics Pvt. Ltd. 23, R.N Mukherjee Road, Kolkata-700 001 Phone: (033) 2243-5029/5809 Fax : (033) 22484787 Email: mdpldc@yahoo.com
WORKS :	Jamshedpur (Jharkhand) Chennai (Tamil Nadu) Visakhapatnam (Andhra Pradesh) (a. Autonagar b. Bheemlipatnam c. Vellanki d. Parwada) Howrah (West Bengal)

DIRECTORS' REPORT TO THE SHAREHOLDERS

Dear Shareholders

The Board of Directors are pleased to present the Thirty Eighth (38th) Annual Report on the business and operations of your Company together with the Company's Audited Financial Statements (standalone and consolidated) for the financial year ended 31st March, 2019.

Financial Results

(₹ in Crores)

Particulars	Standalone		Consolidated	
	Financial Year 2018-19	Financial Year 2017-18	Financial Year 2018-19	Financial Year 2017-18
Operating Income	960.37	992.39	960.37	992.39
Profit before interest, depreciation & taxation	182.30	143.50	182.30	143.50
Finance Cost	15.77	18.50	15.77	18.50
Depreciation	16.37	14.99	16.37	14.99
Profit before taxation	150.16	110.01	150.16	110.01
- Current Tax	51.10	39.40	51.10	39.40
- Deferred Tax	0.80	(0.19)	0.80	(0.19)
Profit after taxation	98.26	70.80	98.26	70.80
Share of Profit/(Loss) from Associates	-	-	0.83	(0.18)
Balance brought forward	194.11	125.56	194.59	126.22
Profit available for appropriation	292.36	196.36	293.67	196.84
Appropriation				
Dividend-Equity Shares	1.90	1.90	1.90	1.90
Dividend Tax	0.39	0.39	0.39	0.39
Transfer to General Reserve				0
Remeasurement of net defined benefit plan(net of tax)	(0.07)	(0.04)	(0.07)	(0.04)
Balance carried forward	**290.14**	**194.11**	**291.45**	**194.59**

Financial highlights

- The Standalone Gross Revenue from operations for FY 2019 was ₹960.37 crores (Previous Year ₹992.38 crores)
- The Operating Profit stood at ₹182.30 crores as against ₹143.50 crores in the Previous year
- The Net Profit for the year stood at ₹150.16 crores against ₹110.01 crores reported in the previous year
- EPS of the Company for the year ended 31st March 2019 stood at ₹51.52 as compared to ₹37.12 in its previous year.

The Company continues to retain the overall growth in the turnover and the profit of the Company over the previous year driven mainly for increase in volume in TMT Bar segment, increase in volume of structurals, sections for engineering, infrastructure and automotive sectors with a steady growth in volume of job work business with its institutional partners. The Company is strengthening B2C (TMT Bars) segment through spending aggressively on advertisement and brand establishments. The conversion business of the Company, accounts 14%-16% of the revenue, provides stability to revenue and EBIDTA. Besides, efficiency improvement and cost optimization have been followed across all the functions of the organization.

There are no material changes or commitments affecting the financial position of the Company which have occurred between the end of the financial year and the date of this Report.

Dividend

Your Directors are pleased to recommend a dividend of 20% (₹2/-) per equity share of ₹10/- each (Previous year Re.1/-) for the Financial Year ended 31st March, 2019 subject to approval of the shareholders at the ensuing Annual General Meeting. The total outgo on account of dividend will be aggregating to ₹459.10 Lakhs (including Dividend Distribution Taxes).

Investor Education and Protection Fund (IEPF)

The unpaid and unclaimed dividend lying in the Unpaid Dividend Account becomes due to be transferred to Investor Education & Protection Fund ("IEPF") after a period of 7 (seven) years. Your Directors therefore suggest you to claim the unpaid dividend before the last date.

During FY 2018-19, on 4th December 2018, the Company has transferred unpaid and unclaimed dividend for the year 2010-11 of ₹2,63,598/- to IEPF in accordance with the provisions of Section 125 of the Companies Act, 2013 read with the Investor Education and Protection Fund (Accounting, Audit, Transfer and Refund) Rules, 2016 (including amendments thereof).

Pursuant to the provisions of Section 124 (6) of the Companies Act, 2013, Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016 (including amendments thereof) read with circulars and notifications issued thereunder, all the shares in respect of which dividend has not been paid or claimed for 7 consecutive years or more shall be transferred by the Company in the name of Investor Education and Protection Fund (IEPF).

In accordance with the aforesaid provisions, the Company is yet to transfer equity shares to Investor Education Protection Fund (IEPF), those who had not claimed dividend for a period of 7 years with effect from the F.Y. 2009-10, as per the IEPF Rules notified by the Central Govt. from time to time. Your Company has also initiates to transfer the equity shares of those shareholders who had not claimed dividend from FY 2010-11 till date of the report.

Any shareholder whose shares are transferred to IEPF can claim the shares, as per the IEPF rules made thereunder, by making an online application in Form IEPF-5 (available on www.iepf.gov.in) along with the fees prescribed to the IEPF authority with a copy to the Company.

Reminders are sent to the Shareholders who have not claimed their dividends and whose shares are due to be transferred to IEPF in accordance with provisions of Companies Act, 2013 and IEPF Rules made thereunder.

Share Capital

The paid up equity share capital as on March 31, 2019 stood at ₹19,09,09,270/- comprising of 19072052 shares of ₹10/-each fully paid shares and balance of ₹1,88,750/- is the amount of forfeited shares.

Your Company has not issued any equity shares, equity shares with differential rights, Sweat equity shares, Employees' Stock Options and did not purchase its own shares. Hence there is no information to be provided as required under Rule 4(4), Rule 8(13), Rule 12(9) and Rule 16(4) of the Companies (Share Capital and Debentures) Rules, 2014 and Section 62 of the Companies act 2013, respectively.

Finance

Cash and cash equivalents as at March 31, 2019 was ₹650.35 Lakhs (Previous year ₹521.05 Lakhs). The Company continues to focus on judicious management of its working capital, Receivables, inventories and other working capital parameters were kept under strict check through continuous monitoring.

Deposits

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

Transfer to Reserve

The Company has not transferred any amount to the General Reserves out of the profit for the financial year ended 31st March, 2019.

Particulars of Loans, Guarantees or Investments

The Company has neither given any loans or guarantees nor made any investment during the year under review. The overall limit is within the powers of the Board as applicable to the Company in terms of the applicable provisions of the Companies Act, 2013.

The particulars of loans, guarantees and investments have been disclosed in the notes of the Financial Statements for the year ended 31st March, 2019 and form a part of this Annual Report.

Internal Financial Controls

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

The internal control systems and procedures are designed to assist in the identification and management of risks, the procedure-led verification of all compliance as well as an enhanced control consciousness.

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

Corporate Social Responsibilities

The Company has a Corporate Social Responsibility Committee comprising of three directors, the details of which are mentioned in the corporate governance Report which form part of this Report.

In compliance with section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules 2014, the disclosures with respect to CSR Committee and expenditure made by the Company forms part of this Report and marked as **"Annexure "A"**. The Committee met 4 (four) times during the year to discharge its responsibilities. The CSR Policy may be accessed on the Company's website at the web link: https://www.beekaysteel.com .

Extract of Annual Return

The details forming part of the extract of the Annual Return in form MGT-9 as provided under section 92(3) of the Companies Act, 2013 and Rule 12 of the Companies (Management and Administration) Rules, 2014 is enclosed as **"Annexure- B"** and the same is placed on the website of the Company at the following link https://www.beekaysteel.com.

Pursuant to Section 134(3) (a) of the Companies Act, 2013 and amendments thereof, the Annual Return for the financial year 2018-19 is placed on the website of the Company at the following link https://www.beekaysteel.com.

Number of Meetings of the Board

The Board of Directors met 4 (Four) times during the year and the maximum interval between two meetings did not exceed 120 days. The gap between any two consecutive meetings did not exceed one hundred and twenty days in terms of the Regulation 17(2) of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with the Stock Exchanges, Secretarial Standards and the provision of Companies Act, 2013.

The details of the number of meetings of the Board held during the financial year 2018-19 also form part of the Corporate Governance Report.

Director's Responsibility Statement

Pursuant to the Directors Responsibility Statement as referred to in Sections 134(3) (c) & 134 (5) of the Companies Act, 2013 your Directors hereby confirm that :

(a) In the preparation of the annual accounts for the year ended 31st March, 2019, the applicable accounting standards have been followed with proper explanation relating to material departures, if any;

(b) The accounting policies adopted in the preparation of the annual accounts have been applied consistently except as otherwise stated in the Notes to Financial Statements and reasonable and prudent judgments and estimates have been made so as to give a true and fair view of the state of affairs of the Company at the end of the Financial Year 2018-19 and of the profit for the year ended 31st March, 2019;

(c) Proper and sufficient care has been taken for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013, for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;

(d) The annual accounts for the year ended 31st March, 2019, have been prepared on a going concern basis.

(e) That proper internal financial controls were in place and that the financial controls were adequate and were operating effectively.

(f) That systems to ensure compliance with the provisions of all applicable laws were in place and were adequate and operating effectively.

Declaration by Independent Directors

Mr. Bhal Chandra Khaitan, Mr. Ravishankar Sridharan, Mr. Srikumar Banerjee, Mrs. Shyanthi Dasgupta and Mr. Bharat Kumar Nadhani are Independent Directors on the Board of the Company. The Company has received declarations from all the Independent Directors of the Company confirming that they meet the criteria of independence as prescribed both under the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015 (hereinafter ' SEBI LODR Regulation').

Company's Policy on Director's Appointment and Remuneration

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

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

The criteria for identification of the Board Members including that for determining qualification, positive attributes, independence etc. are summarily given hereunder:

- The Board Member shall possess appropriate skills, qualification, characteristics and experience. The objective is to have a Board with diverse background and experience in business, government, academics, technology, human resources, social responsibilities, finance, law etc. and in such other areas as may be considered relevant or desirable to conduct the Company's business in a holistic manner.
- Independent Director shall be person of integrity and possess expertise and experience and/or someone who the Committee/Board believes could contribute to the growth/ philosophy/strategy of the Company.
- In evaluating the suitability of individual Board Members, the Committee takes into account many factors, including general understanding of the Company's business dynamics, global business, social perspective, educational and professional background and personal achievements.
- Director should possess high level of personal and professional ethics, integrity and values. He should be able to balance the legitimate interest and concerns of all the Company's stakeholders in arriving at decisions, rather than advancing the interests of a particular section.
- Director must be willing to devote sufficient time and energy in carrying out their duties and responsibilities effectively. He must have the aptitude to critically evaluate management's working as part of a team in an environment of collegiality and trust.
- The Committee evaluates each individual with the objective of having a group that best enables the success of the Company's business and achieves its objectives.

Credit Rating

During the year under review (2018-19) , India Rating and Research Private Limited (Ind-Ra), a wing of international rating agency FITCH Group, has upgraded and revised your Company's Long-Term Issuer Rating to "IND A-/Stable" from "IND BBB+" . The Outlook is Stable.

Related Party Transactions

All transactions entered with Related Parties during the financial year were on an arm's length basis and were in the ordinary course of business and the provisions of Section 188 of the Companies Act, 2013 are not attracted. Further, there are no materially significant related party transactions the Company's Promoters, Directors and others as defined in section 2(76) of the Companies Act, 2013 and the SEBI (LODR) Regulations, 2015 during the year under review.

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

Risk Management

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

Board Evaluation & Criteria for Evaluation

Pursuant to the provisions of the Companies Act, 2013 and SEBI LODR Regulations, 2015, the Board carried out an annual performance evaluation of its own performance, the individual Directors as well as the working of the Committees of the Board. The evaluation process inter alia considers attendance of Directors at Board and committee meetings, acquaintance with business, compliance with code of conduct, vision and strategy, which is in compliance with applicable laws, regulations and guidelines.

The performance evaluation of the Independent Directors was carried out by the entire Board. The performance evaluation of the Chairman and the Non- Independent Directors was carried out by Independent Directors.

The Directors were satisfied with the evaluation results, which reflected the overall engagement of the Board and its Committees with the Company. Details of the same are given in the Report on Corporate Governance annexed hereto. Details of the same are given in the Report on Corporate Governance annexed hereto.

Directors and Key Managerial Personnel

(i) **Directors – Retirement by Rotation:**

In accordance with the provisions of Section 152(6) and other applicable provisions of the Companies Act, 2013 and the Articles of Association of the Company, Mr. Vikas Bansal, (DIN: 00103065), & Mr. Gautam Bansal, (DIN : 00102957), Directors of the Company would retire by rotation from the Board and being eligible, offers themselves for re-appointment.

The above appointments are subject to the approval of the shareholders in the ensuing Annual General Meeting of the Company.

(ii) **Appointment / Re-appointment of Directors / Executive Directors:**

The present terms of appointment Mrs. Shyanthi Dasgupta (DIN: 07139909), as Independent Woman Director would expire on 30th March, 2020. Based on the recommendation of the Nomination & Remuneration Committee (NRC) and pursuant to the performance evaluation, the Board of Directors at its meeting held on 12th August, 2019 has re-appointed Mrs. Shyanthi Dasgupta as Independent Woman Director pursuant to the provisions of sections 149, 152 and other applicable provisions of the Companies Act, 2013 and the Companies (Appointment and Qualification of Director) Rules, 2014 subject to the approval of members by special resolution in the ensuing Annual General Meeting of the Company, not liable to retire by rotation, to hold office for a further period of 5 (Five) years being Second Term of her appointment commencing from 31st March, 2020. In accordance to the verification made by the Company and its Nomination Committee, the aforesaid Director is not debarred from holding of official Director pursuant to any SEBI Order.

Pursuant to the provisions of sections 149, 152 and other applicable provisions of the Companies Act, 2013 and the Companies (Appointment and Qualification of Director) Rules, 2014 Mr. Bharat Kumar Nadhani (DIN: 01842863) has been recommended by the NRC and then appointed as an Additional Director (Independent) by the Board of Directors at their meeting held on 29.04.2019. The Board recommended his appointment as Normal Independent Director by the Members of the Company at the ensuing AGM.

The profile and particulars of experience, attributes and skills of the appointed/re-appointed Directors are disclosed in the Notice convening the AGM to be held on Saturday, September 21, 2019.

(iii) **Cessation/Death of Director**

Mr. Brijesh Kumar Dalmia had resigned from the office of Independent Director with effective from 29th April, 2019 due to his pre-occupation. Mr. Dalmia was joined the Board as an Independent Director on November 29, 2006. The Board of Directors places on record its appreciation towards Mr. Dalmia's contributions during his tenure as an Independent Director of the Company.

Mr. Tapan Kumar Banerjee, Independent Director has suddenly passed away on 30th June, 2019. Mr. Banerjee was in the Board since 31st March, 2015. The Board of Directors places on record its appreciation towards Mr. Banerjee's contributions during his tenure as an Independent Director of the Company.

(iv) **Wholetime Key Managerial Personnel (KMP):**

Pursuant to the provisions of Section 203 of the Companies Act, 2013 Mr. Mukesh Chand Bansal, Managing Director, Mr. Manav Bansal, Wholetime Director & CFO, and Mr. Rabindra Kumar Sahoo, Company Secretary are continuing to be the Key Managerial Personnel of the Company. During the year under review, there has been no change in the Key Managerial Personnel.

None of the Directors of the Company are disqualified as per section 164(2) of the Companies Act, 2013 and rules made thereunder. The Directors have also made necessary disclosures to the extent as required under provisions of section 184(1) as applicable.

Details of significant and material orders passed by the Regulators, Courts and Tribunals impacting the going concern status and Company's operations in future

There have been no significant and material orders passed by the regulators or courts or tribunals impacting the going concern status and Company's operations in future.

Material changes affecting the Company

There have been no material changes and commitments affecting the financial position of the Company between the end of the financial year and date of this Report. There has been no change in the nature of business of the Company.

Vigil Mechanism / Whistle Blower Policy

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

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

Details relating to Remuneration of Directors, Key Managerial Personnel and Employees

Disclosure pertaining to remuneration and other details as required under Section 197(12) of the Companies Act, 2013 read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 is marked as **"Annexure– C"** which is annexed hereto and forms part of the Directors' Report.

Particulars of Employees

There is no such employee in the Company, the information of which is required to be furnished under provisions of the Companies Act, 2013 and Rule 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014. Having regard to the provisions of Section 136 of the Companies Act, 2013, the Annual Report excluding the aforesaid information is being sent to the members of the Company.

Company's Website

The website of your Company, www.beekaysteel.com, has been designed to present the Company's businesses up-front on the home page. The site carries a comprehensive database of information including the Financial Results of your Company, Shareholding pattern, Director's & Corporate Profile, details of Board Committees, Corporate Policies and business activities of your Company. All the mandatory information and disclosures as per the requirements of the Companies Act, 2013 and Companies Rules 2014 and as per the SEBI LODR Regulations, 2015 (erstwhile Listing Agreement) has been uploaded.

Performance & Financial Position of Associate

A K C Steel Industries Ltd. is an associate Company and is listed with CSE. The Company is dealing in machining job and trading of steel and has reported total revenue of ₹.6.66 Crores (Previous Year ₹4.29 Crores) and has earned a profit of ₹.298.15 Lakhs (Previous Year incurred a Loss of ₹64.05 Lakhs) during the year under review.

Auditors and Auditors' Report

Statutory Auditors:

The present Statutory Auditors, M/s. LIHALA & CO., Chartered Accountants, shall hold office for a period of Five years from the financial year 2018-19. With the amendment of Section 139 of the Companies Act, 2013 and Rule 3(7) of The Companies (Audit and Auditors) Rules, 2014 as amended by the Companies (Amendment) Act, 2017 effective from 7th May, 2018, the ratification of the Auditors in each of the Annual general meeting has been done away with and they would not be subject to ratification during continuation of in the office of the Statutory Auditors' of the Company.

The Notes on financial statement referred to in the Auditors' Report are self-explanatory and do not call for any further comments. The Auditors' Report does not contain any qualification, reservation, adverse remark or disclaimer.

Secretarial Auditor:

Pursuant to the provisions of Section 204 of the Companies Act, 2013 and The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, the Board had appointed Mr. Santosh Kumar Tibrewalla, Practicing Company Secretary to conduct Secretarial Audit of the Company for the Financial Year 2018-19. The Secretarial Audit Report for the Financial Year ended 31st March, 2019 is annexed herewith and marked as **"Annexure –D"**. The Report is self-explanatory and do not call for any further comments. The Secretarial Auditors Report does not contain any qualification, reservation, adverse remark or disclaimer.

Cost Auditors:

Pursuant to Section 148 of the Companies Act, 2013, in terms of the Central Government's approval, the Board of Directors on the recommendation of the Audit Committee has appointed M/s. Somnath Roy & Associates, Cost Accountants, as the Cost Auditor of the Company for the year 2019-20 in the place of outgoing Cost Auditors M/s. Musib & Co., Cost Accountants.

The Audit Committee has also received a Certificate from the Cost Auditors certifying their independence and arm's length relationship with the Company.

The Company submits it's Cost Audit Report with the Ministry of Corporate Affairs within the stipulated time period and the Cost Audit Report for the financial year 2017-18 has already been filed with MCA.

As per the requirements of the Section 148 of the Act read with the Companies (Cost Records and Audit) Rules, 2014 as amended from time to time, your Company is required to maintain cost records and accordingly, such accounts are made and records have been maintained.

Secretarial Standards

The Company has in place proper systems to ensure compliance with the provisions of the applicable secretarial standards issued by The Institute of Company Secretaries of India and such systems are adequate and operating effectively.

Corporate Governance

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

The Company continues to comply with the requirements of

SEBI LODR Regulations, 2015 and amendments thereto regarding Corporate Governance. The Report on Corporate Governance together with a certificate from Mr. S.K. Tibrewalla, Practicing Company Secretary regarding Compliance of Conditions of Corporate Governance, certification by M.D./CEO and the Management Discussion & Analysis Report are attached herewith which form part of this Annual Report.

Management Discussion and Analysis Report

The Management Discussion and Analysis as required in terms of the Listing Regulations is annexed to the report and forms an integral part of this report.

Stock Exchange Listing

The Equity Shares of your Company are listed on BSE Limited (nation-wide trading terminal). The applicable annual listing fees have been paid to the Stock Exchange till financial year 2019-20.

Code of Conduct

The Code of Conduct for Directors, KMPs and Senior Executives of the Company is already in force and the same has been placed on the Company's website: www.beekaysteel.com.

Code of Conduct for Prevention of Insider Trading

In terms of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 your Company has adopted the Code of Conduct for Prevention of Insider Trading and the same is also placed on the Company's website:www.beekaysteel.com.

Energy Conservation, Technology Absorption and Foreign Exchange Earnings and Outgo

Information in accordance with the provisions of Section 134(3)(m) of the Companies Act, 2013, read with 8(3) of the Companies (Accounts) Rules, 2014 regarding conservation of energy, technology absorption and foreign exchange earnings and outgo, are given in the "Annexure E", annexed hereto and forms a part of this report.

Consolidated Financial Statements

The Audited Consolidated Financial Statements of your Company for the Financial Year 2018-19, is prepared in compliance with the applicable provisions of the Companies Act, 2013, Accounting Standards as laid down by the Institute of Chartered Accountants of India and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and forms part of this Annual Report.

Further a statement containing the salient features of the financial statement of the Associate Company in the prescribed format, Form AOC-1 and forms part of this Annual Report and is annexed hereto and marked as **"Annexure-F"**.

In accordance with Section 136 of the Companies Act, 2013, the audited financial statements, including the consolidated financial statements and related information will be available on our website. These documents will also be available for inspection during business hours at the Registered office of the Company. The Company will also make available copy on specific request by any member of the Company, interested in obtaining the same.

In accordance to regulation 33 of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company opts to submit consolidated financial results only on Annual basis and the same has been intimated to the Stock exchange.

Disclosures as per applicable act and SEBI LODR regulation

i) **Composition of Audit Committee:**

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

ii) **Post Balance Sheet events:**

There is no other material changes in commitments affecting the financial position of the Company occurred since the end of the financial year 2018-19.

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

Your Company has only one Associate Company, i.e. M/s. AKC Steel Industries Ltd. and does not have any subsidiaries or joint ventures, during the year under review.

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

The Company on recommendation of its Nomination & Remuneration Committee has laid down a Nomination, Remuneration and Evaluation Policy, in compliance with the provisions of the Companies Act, 2013 read with the Rules made therein and the Listing Agreement with the stock exchanges (as amended from time to time). This Policy is formulated to provide a framework and set standards in relation to the followings:

a. Criteria for appointment and removal of Directors, Key Managerial Personnel (KMP) and Senior Management Executives of the Company.

b. Remuneration payable to the Directors, KMPs and Senior Management Executives.

c. Evaluation of the performance of the Directors.

d. Criteria for determining qualifications, positive attributes and independence of a Director.

There has been no change in the policy since last fiscal. The remuneration/ sitting fees paid to the Directors is as per the terms laid out in the Nomination and Remuneration Policy of the Company.

The detailed Nomination & Remuneration Policy of the Company is placed on the Company's website and can be viewed at www.beekaysteel.com.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

The Company has adopted a Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules thereunder. Internal Complaints Committee (ICC) has been set up to redress complaints received regarding sexual harassment. All employees (permanent, contractual, temporary, trainees) are covered under this Policy. The Policy is gender neutral. During the year under review, no complaints with allegations of sexual harassment were filed.

Industrial relations

The industrial relation during the year 2018-19 had been cordial. The Directors take on record the dedicated services and significant efforts made by the Officers, Staffs and Workers towards the progress of the Company.

Appreciation

The Board of Directors sincerely thanks and wishes to place on record its appreciation for the cooperation and assistance received from the Government of India, the State Governments of Andhra Pradesh, Tamil Nadu, West Bengal and Jharkhand; the financial institutions, banks, Auditors and the Employees of the Company for their whole-hearted co-operation and unstinted support. The Board of Directors want to express their deep-felt thanks and best wishes to all the shareholders for the continued support and the trust they have reposed in the Management. The Directors look forward to a better future and further growth of your Company.

Registered Office:
'Lansdowne Towers'
4th Floor, 2/1A, Sarat Bose Road
Kolkata – 700 020
Date: 12th August, 2019

For and on behalf of the Board
For Beekay Steel Industries Limited

Sd/-
Suresh Chand Bansal
Executive Chairman
(DIN:00103134)

Sd/-
Mukesh Chand Bansal
Managing Director
(DIN:00103098)

ANNEXURE – A TO DIRECTOR'S REPORT

THE ANNUAL REPORT ON CSR ACTIVITIES

I. Brief outline of the Company's CSR Policy: A brief outline of the Company's CSR policy, including overview of the projects or programmes proposed to be undertaken and reference to the web-link to the CSR policy and projects or programmes:

In line with the provisions of the Companies Act, 2013, the Company has framed its CSR policy for the development of programmes and projects for the benefit of weaker sections of the society and the same has been approved by the CSR Committee of the Board. Though the Company gives preference to local areas and areas around the Company units located for spending the amount earmarked for CSR, it also works for the upliftment of the underprivileged at large.

In line with the CSR policy and in accordance with Schedule VII to the Act, the Company has undertaken the following CSR activities.

- Promoting Education, skill development and literacy programmes;
- Promoting Healthcare including preventive healthcare, water and sanitation programmes;
- Ensuring Environment Sustainability and preservation of flora & fauna, animal welfare, agro forestry and social upliftment programmes;
- Other areas approved by the CSR Committee within the ambit of CSR Rules as amended from time-to-time.

The aforesaid projects have been carried out by the Company directly and/or through implementing agencies.

II. **Composition of the CSR Committee:**

Mr. Suresh Chand Bansal	Chairman
Mr. Brijesh Kumar Dalmia *	Member
Mr. Manav Bansal	Member
Mr. Ravishankar Sridharan *	Member
CS. Rabindra Kumar Sahoo	Secretary

*Mr. Brijesh Kumar Dalmia ceased to be a member of the Committee w.e.f. 13th February, 2019 and Mr. Ravishankar Sridharan appointed as a member in his place to the said Committee.

III. **Average net profit of the Company for last three financial years:** ₹64.83 Crores.

IV. **Required CSR Expenditure:** ₹129.66 Lakhs

V. **Details of CSR spend for the financial year:**

a) Amount spent for the financial year: ₹128.36 Lakhs; (P. Year we spent ₹92.07 Lakhs)

b) Amount unspent if any: N. A

c) Manner in which the amount spent during the financial year 2018-19: Manner in which the amount is spent is detailed in the Annexure-A.

VI. In case the Company has failed to spend the two percent of the average net profit of the last three financial years or any part thereof, the Company shall provide the reasons for not spending the amount in the Board report: **Not Applicable**

Vii **Responsibility Statement:**

It is hereby affirmed that the implementation and monitoring of CSR Policy is in compliance with CSR objectives and Policy of the Company.

Sd/-
(Mr. Suresh Chand Bansal)
(Chairman of CSR Committee)
(DIN: 00103134)

Sd/-
(Mr. Manav Bansal)
(Wholetime Director & CFO)
(DIN:00103024)

Place: Kolkata
Date: 12.08.2019

ANNEXURE – A TO REPORT ON CSR ACTIVITIES IN 2018-2019

Sl. No	CSR Project activity identified	Sector in which the project is covered	Projects programmes 1. Local area others 2. State district (Name of the District, State where project programme was undertaken	Amount Outlay (budget) project programme wise (₹ In Lac)	Amount spent on the projects programmes Sub-heads : 1. Direct expenditure on project programme 2. Overheads (₹ In Lac)	Cumulative spend up to the reporting period i.e. F.Y. 2018-19 (₹ In Lac)	Amount spent: Direct & through implementing agency
1	2	3	4	5	6	7	8
1	Promoting Education, Skill Development and Literacy Programmes	Infrastructure support to schools, institutions	Laharia, Dist:- Purulia,, Kolkata , West Bengal	80.00	64.25	64.25	Implementing Agency (Vivekananda Vidyavikash Parishad , Maharaja Agrasain Foundadtion, Haryana Shiksha Kendra & Purvanchal Kalyan Ashram)
			Jamshedpur (Jharkhand)		0.80	0.80	Direct
		Assistance to students and Education Support	Local Area (Visakhapatnam. Andhra Pradesh)		2.82	2.82	Implementing Agencies
		Literacy Programmes	All States of India		12.00	12.00	Implementing Agency (Friends of Tribal's Society & Paschim Bangiya Marawari Sammelan)
		Sub Total		**80.00**	**79.87**	**79.87**	
2	Promoting Health Care, Water & Sanitation	Health Care Infrastructure Development	Local Area (Kolkata, West Bengal)	40.00	21.30	21.30	Direct to Tata Medical Center & Shree Visunanand Hospital
					5.00	5.00	Implementing Agency (Savitri Devi Bansal Charitable Trust)
		Water & Sanitation Program	Local Area (Chengalpet, Tamilnadu & Visakhapatnam. Andhrapradesh)		9.58	9.58	Direct
		Sub Total		**40.00**	**35.88**	**35.88**	
3	Social Upliftment, Environmental Sustainability and Animal Welfare	Eradicating hunger, poverty and malnutrition	Local Area (Visakhapatnam, Andhrapradesh)	15.00	4.87	4.87	Implementing Agency
			Local Area (Visakhapatnam, AP)		1.00	1..00	Implementing Agency (Nitya Annadhanam Pathakham)
		Animal Welfare and Environment Program	Local Area (Kolkata, West Bengal)		5.00	5.00	Implementing Agencies (Savatri Devi Bansal Charitable Trust)
			Local Area (Jamshedpur, Jharkhand)		1.17	1.17	Implementing Agency (Yugantar Bharati)
		Sub Total		**15.00**	**12.04**	**12.04**	
		Total		**135.00**	**127.79**	**127.79**	
	Overhead of Project Costs				0.57		
	Total Amount Spent on Program & Overhead During FY'19				**128.36**		

ANNEXURE – B TO DIRECTOR'S REPORT

Form No. MGT-9

EXTRACT OF ANNUAL RETURN

as on the financial year ended on March 31, 2019

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

I.	**REGISTRATION AND OTHER DETAILS**	
i)	CIN	L27106WB1981PLC033490
ii)	Registration Date	28-03-1981
iii)	Name of the Company	Beekay Steel Industries Limited
iv)	Category / Sub-Category of the Company	Public Company / Limited by shares
v)	Address of the Registered office and contact details	2/1A, Sarat Bose Road, Lansdowne Towers, 4th Floor, Kolkata-700020 Tel: +91 33 40604444 Fax:+91 33 22833322 Email: contact@beekaysteel.com
vi)	Whether listed company	Yes
vii)	Name, Address and Contact details of Registrar and Transfer Agent, if any	Maheswari Datamatics Private Limited 23, R.N. Mukherjee Road, 5th Floor Kolkata-700001 Tel: 033 2248 2248, 2243 5029 Fax: +91 33 2248 4787
II.	**PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY**	
	All the business activities contributing 10% or more of the total turnover of the Company	As per Attachment A
III.	**PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES**	As per Attachment B
IV.	**SHARE HOLDING PATTERN (EQUITY SHARE CAPITAL BREAKUP AS PERCENTAGE OF TOTAL EQUITY)**	
i)	Category-wise Share Holding	As per Attachment C
ii)	Shareholding of Promoters	As per Attachment D
iii)	Change in Promoters' Shareholding	As per Attachment E
iv)	Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holders of GDRs and ADRs)	As per Attachment F
v)	Shareholding of Directors and Key Managerial Personnel	As per Attachment G
V.	**INDEBTEDNESS**	
	Indebtedness of the Company including interest outstanding/accrued but not due for payment	As per Attachment H
VI.	**REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**	
A.	Remuneration to Managing Director, Whole-time Directors and/or Manager	As per Attachment I
B.	Remuneration to other directors	As per Attachment J
C.	Remuneration to Key Managerial Personnel other than MD/MANAGER/WTD	As per Attachment K
VII.	**PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES**	As per Attachment L

ATTACHMENT - A

II. PRINCIPAL BUSINESS ACTIVITES OF THE COMPANY

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

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

Sl. No.	Name and Description of main products / services	NIC Code of the Product service	% to total turnover of the Company
1.	Steel	3311/3302	100%

ATTACHMENT - B

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

Sl. No.	Name and Address of the Company	CIN / GLN	Holding / Subsidiary / Associate	% of Shares held	Applicable Section
1.	A K C Steel Industries Limited	L27109WB1957PLC023360	ASSOCIATE	27.95	2(6)

ATTACHMENT - C

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

i) Category-wise Share Holding

Category of shareholding	No of Shares held at the beginning of the year [As on 01/Apr/2018]				No of Shares held at the end of the year [As on 31/Mar/2019]				% change during the Year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual/ HUF	8470408	11534	8481942	44.4731	8541408	9084	8550492	44.8326	0.3595
b) Central Govt									
c) State Govt(s)									
d) Bodies Corp.	4647408	0	4647408	24.3676	4647408	0	4647408	24.3676	0.0000
e) Banks/Fi									
f) Any other									
Sub-total (A)(1)	13117816	11534	13129350	68.8407	13188816	9084	13197900	69.2002	0.3595
(2) Foreign									
a) NRIs - Individuals									
b) Other - Individuals									
c) Bodies Corp.									
d) Banks/FI									
e) Any other									
Sub-total (A)(2)	0	0	0	0.0000	0	0	0	0.0000	0.0000
Total shareholding of Promoter (A)=(A)(1)+(A)(2)	13117816	11534	13129350	68.8407	13188816	9084	13197900	69.2002	0.3595
B. Public Shareholding									
1. Institutions									
a) Mutual Funds									
b) Banks/FI									

Category of shareholding	No of Shares held at the beginning of the year [As on 01/Apr/2018]				No of Shares held at the end of the year [As on 31/Mar/2019]				% change during the Year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
c) Central Govt									
d) State Govt(s)									
e) Venture Capital Funds									
f) Insurance Companies									
g) FIIs									
h) Foreign Venture Capital Funds									
i) Others (specify)									
Alternate Investment Funds									
Foreign Portfolio Investors									
Provident Funds / Pension Funds									
Qualified Foreign Investor									
Sub-total(B)(1):-	**0**	**0**	**0**	**0.0000**	**0**	**0**	**0**	**0.0000**	**0.0000**
2. Non-Institutions									
a) Bodies Corp.									
i) Indian	3504256	448548	3952804	20.7256	3556261	448548	4004809	20.9983	0.2727
ii) Overseas									
b) Individuals									
i) Individual shareholders holding nominal share capital upto ₹1 lakh	322561	364723	687284	3.6037	558866	283697	842563	4.4179	0.8142
ii) Individual shareholders holding nominal share capital in excess of ₹1 lakh	731377	273204	1004581	5.2674	438230	233604	671834	3.5226	-1.7448
c) Others (Specify)									
Non Resident Indians	7581	0	7581	0.0397	55011	0	55011	0.2884	0.2487
Qualified Foreign Investor									
Custodian of Enemy Property									
Foreign Nationals									
Clearing Members	4102	0	4102	0.0215	12585	0	12585	0.0660	0.0445
Trusts									
Foreign Bodies-D R									
Foreign Portfolio Investors									
NBFCs registered with RBI	0	0	0	0.0000	1000	0	1000	0.0052	0.0052
Employee Trusts									
Domestic Corporate Unclaimed Shares Account									
Investor Education and Protection Fund Authority	286350	0	286350	1.5014	286350	0	286350	1.5014	0.0000
Sub-total(B)(2):-	**4856227**	**1086475**	**5942702**	**31.1593**	**4908303**	**965849**	**5874152**	**30.7998**	**-0.3595**
Total Public Shareholding (B)=(B)(1)+ (B)(2)	**4856227**	**1086475**	**5942702**	**31.1593**	**4908303**	**965849**	**5874152**	**30.7998**	**-0.3595**
C. Shares held by Custodian for GDRs & ADRs									
Grand Total (A+B+C)	**17974043**	**1098009**	**19072052**	**100.0000**	**18097119**	**974933**	**19072052**	**100.0000**	**0.0000**

ATTACHMENT - D

ii) Shareholding of Promoters-

Sl No	Shareholder's Name	Shareholding at the beginning of the year [As on 01/Apr/2018]			Shareholding at the end of the year [As on 31/Mar/2019]			% change in share holding during the Year
		No. of Shares	% of total Shares of the Company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the Company	% of Shares Pledged / encumbered to total shares	
1	SURESH CHAND BANSAL	2013854	10.5592	0.0000	2013854	10.5592	0.0000	0.0000
2	BASHESHAR LAL BANSAL	1516710	7.9525	0.0000	0	0.0000	0.0000	-7.9525
3	MUKESH CHAND BANSAL	1193374	6.2572	0.0000	1193374	6.2572	0.0000	0.0000
4	VIKAS BANSAL	735998	3.8590	0.0000	953998	5.0021	0.0000	1.1431
5	MANAV BANSAL	1258196	6.5971	0.0000	1258196	6.5971	0.0000	0.0000
6	GAUTAM BANSAL	262856	1.3782	0.0000	812856	4.2620	0.0000	2.8838
7	INDU BANSAL	163518	0.8574	0.0000	459518	2.4094	0.0000	1.5520
8	ARUNA BANSAL	238398	1.2500	0.0000	446753	2.3424	0.0000	1.0924
9	BHAWANI BANSAL	124800	0.6544	0.0000	124800	0.6544	0.0000	0.0000
10	RITU BANSAL	300966	1.5780	0.0000	300966	1.5780	0.0000	0.0000
11	SARIKA BANSAL	11100	0.0582	0.0000	11100	0.0582	0.0000	0.0000
12	ISHITA BANSAL	0	0.0000	0.0000	30000	0.1573	0.0000	0.1573
13	SHAURYA BANSAL	0	0.0000	0.0000	26550	0.1392	0.0000	0.1392
14	KIRTI BHAGCHANDKA	205800	1.0791	0.0000	205800	1.0791	0.0000	0.0000
15	B.L.BANSAL - HUF	169800	0.8903	0.0000	169800	0.8903	0.0000	0.0000
16	SURESH CHAND BANSAL - HUF	125196	0.6564	0.0000	381551	2.0006	0.0000	1.3442
17	MUKESH CHAND BANSAL - HUF	152292	0.7985	0.0000	152292	0.7985	0.0000	0.0000
18	GOURI DUTTA BANSAL	9042	0.0474	0.0000	9042	0.0474	0.0000	0.0000
19	D P AGARWALLA	42	0.0002	0.0000	42	0.0002	0.0000	0.0000
20	RADICE STEELS AND ALLOYS LIMITED	2129754	11.1669	0.0000	2129754	11.1669	0.0000	0.0000
21	CENTURY VISION PVT.LTD.	1060938	5.5628	0.0000	1060938	5.5628	0.0000	0.0000
22	MANVIK ESTATES PRIVATE LIMITED	754920	3.9583	0.0000	754920	3.9583	0.0000	0.0000
23	TIRUMALA HOLDINGS PRIVATE LIMITED	559596	2.9341	0.0000	559596	2.9341	0.0000	0.0000
24	EMERALD SUPPLIERS PRIVATE LIMITED	142200	0.7456	0.0000	142200	0.7456	0.0000	0.0000
	TOTAL	13129350	68.8408	0.0000	13197900	69.2002	0.0000	0.3594

ATTACHMENT - E

iii) Change in Promoters' Shareholding (please specify, if there is no change)

Sl No	Name	Shareholding at the beginning [01/Apr/18]/end of the year [31/Mar/19]		Cumulative Shareholding during the year [01/Apr/18 to 31/Mar/19]	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
1	SURESH CHAND BANSAL				
	01/04/18	2013854	10.5592		
	31/03/19	2013854	10.5592	2013854	10.5592
2	BASHESHAR LAL BANSAL				
	01/04/18	1516710	7.9525		
	12.07.2018 (Transmission)	0	0.0000		
	31/03/19	0	0.0000	0	0.0000
3	MUKESH CHAND BANSAL				
	01/04/18	1193374	6.2572		
	31/03/19	1193374	6.2572	1193374	6.2572
4	VIKAS BANSAL				
	01/04/18	735998	3.8590		
	12.07.2018 (Transmission)	218000	1.1430		
	31/03/19	953998	5.0020	953998	5.0020
5	MANAV BANSAL				
	01/04/18	1258196	6.5971		
	31/03/19	1258196	6.5971	1258196	6.5971
6	GAUTAM BANSAL				
	01/04/18	262856	1.3782		
	12.07.2018 (Transmission)	550000	2.8838		
	31/03/19	812856	4.2620	812856	4.2620
7	INDU BANSAL				
	01/04/18	163518	0.8574		
	12.07.2018 (Transmission)	284000	1.4891		
	12.07.2018 (Gift/Transfer)	12000	0.0629		
	31/03/19	459518	2.4094	459518	2.4094
8	ARUNA BANSAL				
	01/04/18	238398	1.2500		
	12.07.2018 (Transmission)	208355	1.0924		
	31/03/19	446753	2.3424	446753	2.3424
9	BHAWANI BANSAL				
	01/04/18	124800	0.6544		
	31/03/19	124800	0.6544	124800	0.6544
10	RITU BANSAL				
	01/04/18	300966	1.5780		
	31/03/19	300966	1.5780	300966	1.5780
11	SARIKA BANSAL				
	01/04/18	11100	0.0582		
	31/03/19	11100	0.0582	11100	0.0582
12	ISHITA BANSAL				
	01/04/18	0	0.0000		
	29.09.2018 (Transfer)	30000	0.1573		
	31/03/19	30000	0.1573	30000	0.1573

Sl No	Name	Shareholding at the beginning [01/Apr/18]/end of the year [31/Mar/19]		Cumulative Shareholding during the year [01/Apr/18 to 31/Mar/19]	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
13	SHAURYA BANSAL				
	01/04/18	0	0.0000		
	29.09.2018 (Transfer)	26550	0.1392		
	31/03/19	26550	0.1392	26550	0.1392
14	KIRTI BHAGCHANDKA				
	01/04/18	205800	1.0791		
	31/03/19	205800	1.0791	205800	1.0791
15	B.L.BANSAL HUF				
	01/04/18	169800	0.8903		
	31/03/19	169800	0.8903	169800	0.8903
16	MUKESH CHAND BANSAL HUF				
	01/04/18	152292	0.7985		
	31/03/19	152292	0.7985	152292	0.7985
17	SURESH CHAND BANSAL HUF				
	01/04/18	125196	0.6564		
	12.07.2018 (Transmission)	256355	1.3441		
	31/03/19	381551	2.0005	381551	2.0005
18	D P AGARWALLA				
	01/04/18	42	0.0002		
	31/03/19	42	0.0002	42	0.0002
19	GOURI DUTTA BANSAL				
	01/04/18	9042	0.0474		
	31/03/19	9042	0.0474	9042	0.0474
20	RADICE STEELS AND ALLOYS LIMITED				
	01/04/18	2129754	11.1669		
	31/03/19	2129754	11.1669	2129754	11.1669
21	CENTURY VISION PVT.LTD.				
	01/04/18	1060938	5.5628		
	31/03/19	1060938	5.5628	1060938	5.5628
22	MANVIK ESTATES PRIVATE LIMITED				
	01/04/18	754920	3.9583		
	31/03/19	754920	3.9583	754920	3.9583
23	TIRUMALA HOLDINGS PRIVATE LIMITED				
	01/04/18	559596	2.9341		
	31/03/19	559596	2.9341	559596	2.9341
24	EMERALD SUPPLIERS PRIVATE LIMITED				
	01/04/18	142200	0.7456		
	31/03/19	142200	0.7456	142200	0.7456

ATTACHMENT - F

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

Sl No	Name	Shareholding at the beginning [01/Apr/18]/end of the year [31/Mar/19]		Cumulative Shareholding during the year [01/Apr/18 to 31/Mar/19]	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
1	JYOTIRMAY TRADING PRIVATE LIMITED				
	01/04/18	2457678	12.8863		
	31/03/19	2457678	12.8863	2457678	12.8863
2	SUN STAR BUSINESS PVT LTD				
	01/04/18	275802	1.4461		
	31/03/19	275802	1.4461	275802	1.4461
3	IDEAL GOODS AND SERVICES PRIVATE LIMITED				
	01/04/18	264000	1.3842		
	18.05.2018 - Transfer	-5000	0.0262	259000	1.3580
	06/07/2018 - Transfer	-10000	0.0524	249000	1.3056
	31/03/19	249000	1.3056	249000	1.3056
4	KANTA AGARWAL				
	01/04/18	532995	2.7946		
	13/04/2018 - Transfer	-7462	0.0391	525533	2.7555
	20/04/2018 - Transfer	-4760	0.0250	520773	2.7306
	27/04/2018 - Transfer	-865	0.0045	519908	2.7260
	25/05/2018 - Transfer	-6761	0.0354	513147	2.6906
	15/06/2018 - Transfer	-21559	0.1130	491588	2.5775
	29/06/2018 - Transfer	-4308	0.0226	487280	2.5549
	06/07/2018 - Transfer	-616	0.0032	486664	2.5517
	20/07/2018 - Transfer	-1960	0.0103	484704	2.5414
	10/08/2018 - Transfer	-1672	0.0088	483032	2.5327
	17/08/2018 - Transfer	-20000	0.1049	463032	2.4278
	31/08/2018 - Transfer	-23163	0.1214	439869	2.3064
	07/09/2018 - Transfer	-11937	0.0626	427932	2.2438
	28/09/2018 - Transfer	-10110	0.0530	417822	2.1908
	12/10/2018 - Transfer	-5000	0.0262	412822	2.1645
	02/11/2018 - Transfer	-5000	0.0262	407822	2.1383
	09/11/2018 - Transfer	-3639	0.0191	404183	2.1192
	16/11/2018 - Transfer	-12824	0.0672	391359	2.0520
	23/11/2018 - Transfer	-5014	0.0263	386345	2.0257
	07/12/2018 - Transfer	-1592	0.0083	384753	2.0174
	28/12/2018 - Transfer	-7492	0.0393	377261	1.9781
	04/01/2019 - Transfer	-22325	0.1171	354936	1.8610
	11/01/2019 - Transfer	-18757	0.0983	336179	1.7627
	18/01/2019 - Transfer	-4941	0.0259	331238	1.7368
	25/01/2019 - Transfer	-5051	0.0265	326187	1.7103
	08/03/2019 - Transfer	-5000	0.0262	321187	1.6841
	15/03/2019 - Transfer	-88894	0.4661	232293	1.2180
	29/03/2019 - Transfer	-18507	0.0970	213786	1.1209
	31/03/19	213786	1.1209	213786	1.1209

Sl No	Name	Shareholding at the beginning [01/Apr/18]/end of the year [31/Mar/19]		Cumulative Shareholding during the year [01/Apr/18 to 31/Mar/19]	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
5	VAISHALI RASAYANS PVT. LTD.				
	01/04/18	238074	1.2483		
	31/03/19	238074	1.2483	238074	1.2483
6	BABBU COMMERCIALS PVT LTD				
	01/04/18	171546	0.8995		
	31/03/19	171546	0.8995	171546	0.8995
7	ESTELLE CONSULTANT PVT LTD				
	01/04/18	171184	0.8976		
	31/03/19	171184	0.8976	171184	0.8976
8	ORTEM SECURITIES LIMITED				
	01/04/18	147100	0.7713		
	13/07/2018 - Transfer	-27500	0.1442	119600	0.6271
	20/07/2018 - Transfer	1575	0.0083	121175	0.6354
	27/07/2018 - Transfer	4506	0.0236	125681	0.6590
	03/08/2018 - Transfer	-581	0.0030	125100	0.6559
	31/03/19	125100	0.6559	125100	0.6559
9	PRACHI JINDAL				
	01/04/18	97998	0.5138		
	31/03/19	97998	0.5138	97998	0.5138
10	INVESTOR EDUCATION AND PROTECTION FUND AUTHORITY MINISTRY OF CORPORATE AFFAIRS				
	01/04/18	286350	1.5014		
	31/03/19	286350	1.5014	286350	1.5014

ATTACHMENT - G

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

(v) Shareholding of Directors and Key Managerial Personnel:

Sl No	Name	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of Shares	% of total Shares of the Company	No. of Shares	% of total Shares of the Company
A.	DIRECTORS :				
1	Shri Suresh Chand Bansal				
	As on 01.04.2018 & 31.03.2019	2139050	11.2156	23,95,405	12.5598
2	Shri Mukesh Chand Bansal				
	As on 01.04.2018 & 31.03.2019	1345666	7.0557	1345666	7.0557
3	Shri Vikas Bansal				
	As on 01.04.2018 & 31.03.2019	735998	3.8590	953998	5.0021
4	Shri Manav Bansal				
	As on 01.04.2018 & 31.03.2019	1258196	6.5971	1258196	6.5971
5	Shri Gautam Bansal				
	As on 01.04.2018 & 31.03.2019	262856	1.3782	812856	4.2620
6	Shri Vijay Kumar Bansal				

Sl No	Name	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of Shares	% of total Shares of the Company	No. of Shares	% of total Shares of the Company
	As on 01.04.2018 & 31.03.2019	0	0.00	0	0.00
7	Shri Brijesh Kumar Dalmia				
	As on 01.04.2018 & 31.03.2019	0	0.00	0	0.00
8	Shri Bhal Chandra Khaitan				
	As on 01.04.2018 & 31.03.2019	0	0.00	0	0.00
9	Shri Ravishankar Sridharan				
	As on 01.04.2018 & 31.03.2019	0	0.00	0	0.00
10	Shri Srikumar Banerjee				
	As on 01.04.2018 & 31.03.2019	0	0.00	0	0.00
11	Shri Tapan Kumar Banerjee			0	
	As on 01.04.2018 & 31.03.2019	0	0.00	0	0.00
12	Smt. Shyanthi Dasgupta				
	As on 01.04.2018 & 31.03.2019	0	0.00		0.00
B.	**KEY MANAGERIAL PERSONNEL (KMP) :**				
01	Shri Mukesh Chand Bansal				
	As on 01.04.2018 & 31.03.2019	1345666	7.0557	1345666	7.0557
02	Shri Manav Bansal				
	As on 01.04.2018 & 31.03.2019	1258196	6.5971	1258196	6.5971
03	Shri Rabindra Kumar Sahoo				
	As on 01.04.2018 & 31.03.2019	0	0.00	0	0.00

ATTACHMENT - H

V. INDEBTNESS

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

	Secured Loans Excluding Deposits	Unsecured Loans	Deposits	Total Indebtness
Indebtness at the beginning of the financial year				
i) Principal Amount as on 31.03.2018	1,503,971,717	246,250,000	0	1,750,221,717
ii) Interest due but not paid	0	66,154,143	0	6,61,54,143
iii) Interest accrued but not due as on 31.03.2018	0	0	0	0
TOTAL (i+ii+iii)	**1,503,971,717**	**312,404,143**	**0**	**1,816,375,860**
Change in Indebtness during the financial year *				
ADDITION	0	(14,350,000)	0	(595,899,573)
REDUCTION	(581,549,573)	(11,961,095)	0	(11,961,095)
Exchange Difference	0	0	0	0
Net Change	(581,549,573)	(26,311,095)	0	(607,860,668)
Indebtness at the end of the financial year				
i) Principal Amount as on 31.03.2019	922,422,144	231,900,000	0	1,154,322,144
ii) Interest due but not paid	0	54,193,048	0	54,193,048
iii) Interest accrued but not due as on 31.03.2019	0	0	0	0
TOTAL (i+ii+iii)	**922,422,144**	**286,093,048**	**0**	**1,208,515,192**

Note : Loan & Interest in Foreign currency is considered at closing Rate for respective years.

* Including refinance of foreign currency term loan.

ATTACHMENT - I

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

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

Sl. No.	Particulars of Remuneration	Name of MD / WTD / MANAGER					
		Mr. Suresh Chand Bansal (Executive Chairman	Mr. Mukesh Chand Bansal (Managing Director)	Mr. Vikas Bansal (Executive Director)	Mr.Manav Bansal (Whole-time Director & CFO)	Mr. Gautam Bansal (Whole Time Director)	Total Amount (₹ in Lakhs)
1.	Gross salary						
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	411.70	181.70	174.50	118.50	87.20	973.60
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	0.00	0.00	0.00	0.00	0.00	0.00
	(c) Profits in lieu of salary under section 17(3) of the Income- tax Act, 1961	0.00	0.00	0.00	0.00	0.00	0.00
2.	Stock Option	0.00	0.00	0.00	0.00	0.00	0.00
3.	Sweat Equity	0.00	0.00	0.00	0.00	0.00	0.00
4.	Commission						
	- as % of profit	0.00	0.00	0.00	0.00	0.00	0.00
	- others	0.00	0.00	0.00	0.00	0.00	0.00
5.	Others, please specify	0.00	0.00	0.00	0.00	0.00	0.00
	Total (A)	411.70	181.70	174.50	118.50	87.20	973.60
	Ceiling as per the Act	The remuneration is well within the limits prescribed under the Companies Act, 2013.					

ATTACHMENT - J

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

B. Remuneration to other directors :

1. Independent Directors :

Particulars of Remuneration	Shri Bhal Chandra Khaitan	Shri Brijesh Kumar Dalmia	Shri Ravishankar Sridharan	Shri Srikumar Banerjee	Shri Tapan Kumar Banerjee Raut	Smt. Shyanthi Dasgupta	Total Amount (₹ in Lakhs)
• Fee for attending board/committee meetings	0.20	0.28	0.10	0.18	0.20	0.10	1.06
• Commission	0	0	0.24	0	0	0	0
• Others	0	0	0	0	0	0	0
Total (B)(1)	0.20	0.28	0.10	0.18	0.20	0.10	1. 06

2. Other Non-Executive Directors

Particulars of Remuneration	Name of Director	Total Amount
	Shri Vijay Kumar Bansal	(₹ in Lakhs)
• Fee for attending board/committee meetings	0.02	0.02
• Commission	0	0
• Others	0	0
Total (B)(1)	0.02	0.02

Total (B)=(B1)+(B2) = ₹1.08 Lakhs

ATTACHMENT - K

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

(iv) Remuneration to Key Managerial Personnel other than MD/WTD/ Manager :

Sl. No.	Particulars of Remuneration	Name of MD / WTD / MANAGER			
		Shri Mukesh Chand Bansal (MD/CEO)	Shri Manav Bansal (Whole time Director & Chief Financial Officer)	Shri Rabindra Kumar Sahoo (Company Secretary)	Total Amouont (₹ in Lakhs)
1.	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	-	-	13.12	13.12
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	0.00	0.00
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	-	-	0.00	0.00
2.	Stock Option	-	-	0.00	0.00
3.	Sweat Equity	-	-	0.00	0.00
5	Commission				
	- as % of profit	-	-	0.00	0.00
	- others				
	Total	**-**	**-**	**13.12**	**13.12**

ANNEXURE – C TO DIRECTOR'S REPORT

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

i) The percentage increase in remuneration of each Director, Chief Financial Officer and Company Secretary during the financial year 2018-19, the ratio of the remuneration of each Director to the median remuneration of the employees of the Company for the financial year 2018-19 and the comparison of remuneration of each Key Managerial Personnel (KMP) against the performance of the Company are as under:

Sl No.	Name of Director/ KMP and Designation	Remuneration of Director/ KMP for financial year 2018-19 (₹ in Lakhs)	% increase in Remuneration in the financial year 2018-19	Ratio of remuneration of each Director/ to median remuneration of employees
1	Shri Suresh Chand Bansal - Executive Chairman	411.70	194.03%	254.13 : 1
2	Shri Mukesh Chand Bansal - Managing Director	181.70	88.76%	112.16 : 1
3	Shri Vikas Bansal - Executive Director	174.50	92.82%	107.72 : 1
4	Shri Manav Bansal - Wholetime Director & CFO	118.50	67.61%	73.19 : 1
5	Shri Gautam Bansal - Whole Time Director	87.20	24.57%	53.83 : 1
7	Shri Rabindra Kumar Sahoo - Company Secretary	13.12	21.82%	NA

Note: No other Director other than the Managing Director, Executive Chairman, Executive Director, Whole time Directors received any remuneration other than sitting fees during the financial year 2018-19.

ii) The median remuneration of employees of the Company during the financial year was ₹1.62 lakhs,

iii) In the financial year, there was an increase of 7.73% in the median remuneration of employees;

iv) There were 535 permanent employees on the rolls of Company as on March 31, 2019.

v) Average percentage increase made in the salaries of the employees other than the managerial personnel in the financial year 2018-19 was 12.22% whereas the increase in the managerial remuneration for the same financial year was 93. 56%

vi) It is hereby affirmed that the remuneration paid during the year ended 31st March, 2019 as per the Remuneration Policy of the Company.

Statement pursuant to Rule 5(2) & 5 (3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 :

List of Top 10 (Ten) Employees in terms of remuneration drawn:

Sl. no	Name	Designation	Qualification	Date of Commencement of Employment	Age	Remuneration 2018-19	Experience	Last employment held
1	RABINDRA KUMAR SAHOO	Company Secretary	B.COM(H), M.COM. (Specialization in Finance), LLB, FCS	22.12.2014	50	13,12,467	25	AKC Steel Industries Limited
2	ACHHELAL YADAV	Foreman-Production	-	01.02.2002	63	12,26,192	35	-
3	PRASUN DAS	AGM-Accounts	B.COM(H), MBA (Finance, UK) CA Inter, CIMA (CBA)	04.10.2010	53	11,26,981	28	SHELL PLC , U.K INC
4	RAJESH PATODIA	Sr. Manager (Finance & Accounts)	Chartered Accountant	01.11.2007	41	10,64,982	18	Meghalaya Cement Limited
5	ANUP KUMAR SHAW	Manager-Finance & Accounts	B.COM(H) & Chartered Accountant	03.08.2009	39	8,82,658	16	Enfield Ispat Limited (Sonthalia Group)
6	D VENKATESWARA RAO	Sr. Manager(HR & Admin)	MBA-HR	01.04.2013	59	8,77,490	26	Maa Mahamaya Industries Limited
7	RAJENDRA YADAV	Foreman	Diploma in Mechanical	01.11.2007	54	8,77,085	32	-
8	UMA SHANKAR SINGH	Foreman	-	01.12.1999	57	8,17,266	33	-
9	AJIT KHANDELWAL	Manager-Accounts	MBA-finance	17.11.2010	45	8,03,590	21	Stork Ferro And Mineral Industries Pvt. Ltd
10	D. MITRA	Sr. Manager -EDP	MBA-IT	01.09.2005	52	7,25,056	26	-

ANNEXURE – D TO DIRECTOR'S REPORT

SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2019

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

To,
The Members,
Beekay Steel Industries Ltd.
Lansdowne Towers, 4th Floor,
2/1A, Sarat Bose Road,
Kolkata – 700 020

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **M/s. Beekay Steel Industries Ltd.** (hereinafter called 'the Company') bearing **CIN: L27106WB1981PLC033490**. Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the **M/s. Beekay Steel Industries Ltd's** books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on 31st March, 2019, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by Beekay Steel Industries Ltd. ('the Company') for the financial year ended on 31st March, 2019, to the **extent Acts / provisions of the Acts applicable**, according to the provisions of:

(i) The Companies Act, 2013 (the Act) and the rules made thereunder;

(ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;

(iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;

(iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;

(v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'), to the extent applicable:-

(a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;

(d) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;

(e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

(f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

(g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

(h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 and

(i) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

I further report that, having regards to compliance system prevailing in the Company and on examination of the relevant documents and records in pursuance thereof, on test check basis and on representation made by the Company and its officers for compliances under other applicable Acts, laws and Regulations to the Company, the Company has complied with the laws applicable to the Company.

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

(i) Secretarial Standards issued by The Institute of Company Secretaries of India.

(ii) The Listing Agreements entered into by the Company with BSE Limited.

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

I further report that -

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors including women Director. The changes in the composition of the Board of Directors during the period under review and the composition of Board of Directors of the Company are in conformity with the provisions of the Act.

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

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

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

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

Place: Kolkata
Date: 12.08.2019

Signature :
Name of Company Secretary in practice:
Santosh Kumar Tibrewalla
FCS No.: 3811
C P No.: 3982

ANNEXURE – E TO DIRECTOR'S REPORT

Particulars pursuant to the provisions of Section 134 (3) (m) of the Companies Act, 2013 and rule 8(3) of the Companies (Accounts) Rules, 2014:

A) Conservation of Energy -

(i) Steps taken or impact on conservation of energy

The Company is committed to reduce energy consumption at its various plants. The Company has been continually reducing energy consumption in various stages of manufacturing operations and kept priority for energy consumption.

- For reduction in operating cost and better fuel efficiency we have implemented Bosch make "Pulverizing & Feeding Equipment" in our various plants.

(ii) Steps taken by the Company for utilizing alternate sources of energy

The Company is in the process of evaluating installation of Solar Power Plant of 10-20 MW. Power generated from this unit will be exchanged with the power consumed at our all units in Andhra Pradesh. As a measure of cost cutting the Company has used furnace oil when the price of coal in the market was high and subsequently switched to coal when the price of oil was high which result to conservation of energy and proper utilization of resources.

(iii) Capital investment on energy conservation equipments

Not ascertainable.

B) Technology Absorption -

(i) Efforts made towards technology absorption: up gradation/modernization of the plants and best technologies is absorbed and adapted to Indian working conditions to increase mill productivity, improvement in yield and product quality.

(ii) Benefits derived like product improvement, cost reduction

Product development or import substitution: The Company is constantly endeavoring to bring about further development in the product.

(iii) In case of imported technology (imported during the last three years reckoned from the beginning of the financial year)- } N.A.

a) Details of technology imported }

b) Year of import }

c) Whether the technology been fully absorbed }

d) If not fully absorbed, areas where absorption has not taken Place, reasons thereof: and }

(iv) The expenditure incurred on Research and Development

Expenses incurred are charged to respective heads are not allocated separately

C) FOREIGN EXCHANGE EARNINGS AND OUTGO

The Foreign exchange earned in terms of actual cash inflows during the year and the Foreign exchange outgo during the year in terms of actual outflows is as follow –

	2018-19 (₹ in Lakhs)	2017-18 (₹ in Lakhs)
Total Foreign Exchange Used and Earned :		
Earned (F.O.B.)	13115.61	27562.21
Used	59.66	15.97

ANNEXURE – F TO DIRECTOR'S REPORT

Form AOC-1

(Pursuant to first proviso to sub-section (3) of section 129 read with rule 5 of Companies (Accounts) Rules, 2014)

Statement containing salient features of the financial statement of subsidiaries or associate companies or joint ventures

Part A Subsidiaries

1. Names of subsidiaries which are yet to commence operations - Not Applicable
2. Names of subsidiaries which have been liquidated or sold during the year - Not Applicable

Part B Associates and Joint Ventures:

Statement pursuant to Section 129 (3) of the Companies Act, 2013 related to Associate Companies and Joint Ventures

Name of Associates or Joint Ventures	Name 1 : Associate AKC Steel Industries Ltd
1. Latest audited Balance Sheet Date	29.05.2019
2. Date on which the associate or joint venture was associated or acquired	01.04.1998
3. Shares of Associate or Joint Ventures held by the Company on the year end	27.95%
No.	Equity – 11,60,000 of ₹10/- each
Amount of Investment in Associates or Joint Venture	₹23,20,000/-
Extend of Holding (in percentage)	27.95% - Equity
4. Description of how there is significant influence	Holding more than 20% of total share capital pursuant to Section 2(6) of Companies Act, 2013
5. Reason why the associate/joint venture is not consolidated	N.A.
6. Net worth attributable to Shareholding as per latest audited Balance Sheet	₹7,51,00,814/-
7. Profit for the year	₹2,98,15,108/-
i. Considered in Consolidation	Yes
ii. Not Considered in Consolidation	N.A.

Other information :

1. Names of associates or joint ventures which are yet to commence operations - Not Applicable

2. Names of associates or joint ventures which have been liquidated or sold during the year - Not Applicable

For and on behalf of the Board of Directors
For Beekay Steel Industries Ltd.

Sd/-
(Suresh Chand Bansal)
Executive Chairman
DIN:00103134

Sd/-
(Mukesh Chand Bansal)
Managing Director
DIN: 00103098

Sd/-
(Manav Bansal)
Wholetime Director & Chief Financial Officer

Sd/-
(Rabindra Kumar Sahoo)
Company Secretary & Chief Compliance Officer

Place : Kolkata
Date : 12.08.2019

REPORT ON CORPORATE GOVERNANCE

The Directors present the Company's Report on Corporate Governance pursuant to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. Corporate Governance principles are based on the philosophy of accountability, integrity, transparency and value creation. Your Company, to achieve sustainable growth and value enhancement, has committed for a highest standard of ethics that leads to better Corporate Governance principles. Your Company is in compliance with the the Provisions stipulated under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations'), as applicable, with regard to corporate governance.

The report containing the details of Corporate Governance systems, processes and compliance at Beekay Steel Industries Ltd.

COMPANY'S PHILOSOPHY ON CORPORATE GOVERNANCE

Corporate Governance depends on Corporate Principles and Practices adopted by the Company in its day to day business activities whose ultimatum is to increase the long term value of the shareholders. Your Company ensures better standard of Corporate Governance guidelines to protect the rights of shareholders and timely disclosure of adequate and accurate information regarding our financials and performance of the Company. The core philosophy of your Company is to create and enhance shareholders' value while being a responsible corporate citizen.

It is imperative that your Company is committed to maintain a highest standard of Corporate Governance practices with all the stakeholders such as shareholders, employees, customers, business partners and continues to follow the principles of Corporate Governance, by adopting fair, transparent and ethical governance practices. Corporate governance practice is the formation and improvement of long-term sustainable value for all stakeholders through accountability, transparency and ethically driven business process. The Company is committed to attain the highest standards of Corporate Governance. VIZ. to protect the rights of its shareholders, to achieve long term growth, to enhance shareholders value and also value of other stakeholders. It is also imperative that the Company discloses timely, adequate and accurate information.

The Board of Directors of the Company has adopted strategy on board effectiveness and good ethical standards to govern the Company and deliberately creates a culture of leadership to provide a long-term vision to improve the quality of governance.

The Company Secretary plays a key role in ensuring that the Board (including committees thereof) procedures are followed and regularly reviewed. The Company Secretary ensures that all relevant information, details and documents are made available to the Directors and senior management for effective decision-making at the meetings. The Company Secretary is in charge to assist and advise the Board in the conduct of affairs of the Company, to ensure compliance with applicable statutory requirements and Secretarial Standards, to provide guidance to directors and to facilitate convening of meetings. He interfaces between the management and regulatory authorities for governance matters.

Code of Conduct

Your Company has framed Code of Conduct for the Directors (including Non-Executive and Independent Directors) and Senior Management Personnel and other Executives and Employees of the Company. The Directors and Senior Management Personnels have affirmed compliance of the said Code of Conduct as on 31st March, 2019. The Code is displayed on the Company's website: www.beekaysteel.com.

In accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, the Board of Directors of the Company has adopted the revised Code of Conduct for Prevention of Insider Trading and the Code of Corporate Disclosure Practices ('Insider Trading Code') and entrusted the Audit Committee to monitor the compliance of the code.

BOARD OF DIRECTORS

The Board of Directors of the Company comprises professionals drawn from diverse field. They bring with them wide range of skills and experience to the Board which enhance the quality of the Board's decision making process. The Board is at the core of our corporate governance practice and oversees and ensures that the Management serves and protects the long-term interests of all our the stakeholders. The Board of Directors along with its Committees provides leadership and guidance to the Management and directs and supervises the performance of the Company, thereby enhancing stakeholder value.

SIZE OF THE BOARD AS ON 31ST MARCH 2019

The policy of the Company is to have a perfect combination of Executive Directors, Non-Executive Directors and Independent Directors for proper functioning of governance and management.

The Board of Directors of the Company as on 31st March, 2019 comprised of 12 (Twelve) Directors having optimum combination of Executive and Non-Executive Directors and are in accordance with the Corporate Governance Practices.

The details of the total strength of the Board are as follows:-

Sl. No.	Name	Designation	Category (Whole-time / Non-executive / Independent)
1	Suresh Chand Bansal	Executive Chairman (EC)	Wholetime
2	Mukesh Chand Bansal	Managing Director (MD)	Wholetime
3	Vikas Bansal	Executive Director (ED)	Wholetime
4	Manav Bansal	Wholetine Director & CFO (WTD & CFO)	Wholetime
5	Gautam Bansal	Wholetine Director (WTD)	Wholetime
6	Vijay Kumar Bansal	Director	Non-Executive
7	Bhal Chandra Khaitan	Director	Independent
8	Brijesh Kumar Dalmia	Director	Independent
9	Ravishankar Sridharan	Director	Independent
10	Srikumar Banerjee	Director	Independent
11	Tapan Kumar Banerjee	Director	Independent
12	Shyanthi Dasgupta	Director	Independent

None of the Directors on the Board holds directorships in more than ten public companies. Further, none of them is a Member of more than ten committees or Chairman of more than five Committees across all public companies in which he/she is a director. None of our Directors serve as Director in more than Eight listed companies, as IDs in more than seven listed companies and none of the EDs serve as IDs on any listed company. Independent Directors are non-executive directors as defined under Regulation 16(1)(b) of the Listing Regulations read with Section 149(6) of the Act along with rules framed thereunder. In terms of Regulation 25(8) of Listing Regulations, they have confirmed that they are not aware of any circumstance or situation which exists or may be reasonably anticipated that could impair or impact their ability to discharge their duties. The necessary disclosures regarding Committee positions have been made by the Directors.

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

The Executive Directors on the Board serve in accordance with the terms of their contracts of service with the Company.

Expertise & Skills of the Board of Directors

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

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

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

Finance	Leadership in Corporate/ business finance is an important and inevitable function and efficient financial management is crucial for success and sustenance. It results in proficiency in financial management, procurement and utilisation of funds and controlling the financial activities and management of financial resources of the Company.
Strategy & Planning	Appreciation of long-term trends, strategic choices and experience in guiding and leading management teams to make decisions in uncertain environments.
Global Business	Understanding, of global business dynamics, across various geographical markets with an understanding of industry verticals, regulatory jurisdictions, economic conditions, cultures and a broad perspective on global market opportunities.

Leadership	Leadership experience leads to maximize efficiency and to achieve Company goals by understanding the opportunities and threats, processes, strategic planning and risk management and discussing the financial performance and long-term growth.
Procurement, Sales & Marketing	Experience in procurement of raw materials, production aspects, marketing technical aspect of production, quality control, purchase management and developing strategies to grow sales and market share, build brand awareness and enhance Company reputation.
Governance	Experience in developing governance practices, serving the best interests of all stakeholders, maintaining board and management accountability, building long-term effective stakeholder engagements, driving corporate ethics and values and observing appropriate governance practices.
Administration	Leadership in administration of a Company, results in long-term growth by planning, organising, directing and controlling the operations, creating rules and regulations and making decisions towards achieving a common goal or objective of the Company

a) Composition and Category of Directors

The composition of Board of the Company is in conformity of Corporate Governance Code. All Directors possess relevant qualifications and experience in different fields with wide range of skills and expertise including general Corporate Management, Finance, Accounting, Banking, Insurance, Operation and other allied fields which enable them to efficiently and effectively contribute their knowledge in the decision making process of the Company in the capacity as Directors. The Chairman is executive and a Promoter of the Company. The number of Independent Directors are 6 (Six) which is in compliance with the stipulated one half of the total number of Directors. All Independent Directors are persons of eminence and bring a wide range of expertise and experience to the Board thereby ensuring the best interest of stakeholders and the Company. All Independent Directors meet with the criteria of independence as prescribed under sub-section (6) of Section 149 of the Companies Act, 2013 and as per the SEBI LODR Regulations, 2015.

The Board has carried out performance evaluation of Independent Directors and recommended to continue the term of their appointment.

All the Five executive Directors are related to each other and no other Director is related to any other Director on the Board in terms of the definition of "relative" as defined in Section 2(77) of the Companies Act, 2013.

The details of composition of the Board as at 31.03.2019 are given as under:

Name of Directors	DIN	Designation	Category	Relationship with other Directors
Suresh Chand Bansal	00103134	EC	Promoters – Executive Directors	Brother of Mukesh Chand Bansal & Father of Vikas Bansal & Manav Bansal
Mukesh Chand Bansal	00103098	MD		Brother of Suresh Chand Bansal & Father of Gautam Bansal
Vikas Bansal	00103065	ED		Son of Suresh Chand Bansal & Brother of Manav Bansal
Manav Bansal	00103024	WTD & CFO		Son of Suresh Chand Bansal & Brother of Vikas Bansal
Gautam Bansal	00102987	WTD		Son of Mukesh Chand Bansal
Vijay Kumar Bansal	03120944	Director	NED	Not related to any Director
Bhal Chandra Khaitan	00343007	Director	Independent	
Brijesh Kumar Dalmia *	00013370	Director	Independent	
Ravishankar Sridharan	03120944	Director	Independent	
Srikumar Banerjee	03504452	Director	Independent	
Tapan Kumar Banerjee **	07108739	Director	Independent	
Shyanthi Dasgupta	07139909	Director	Independent	
Bharat Kumar Nadhani***	01842863	Additional Director	Independent	

*Ceased to be the Director of the Company w.e.f. 29.04.2019.

**Ceased to be the Director of the Company w.e.f. 30.06.2019 (sudden death).

***Appointed w.e.f. 29.04.2019.

The Independent Directors meet all the criteria's as provided in the Companies Act, 2013 and SEBI LODR Regulations, 2015. The appointment letters issued to every Independent Directors sets out their roles, responsibilities, fiduciary duties in the Company and the expectation of the Board from them along with other terms of their appointment. They have taken active part at the Board and Committee Meetings by providing valuable guidance to the Management on various aspects of business, policy direction, governance, compliance etc. and play critical role on strategic issues, which enhances the transparency and add value in the decision making process of the Board of Directors.

Selection of New Directors and Board Membership Criteria

The Nomination and Remuneration Committee ('NRC') works with the Board to determine the appropriate qualifications, positive attributes, characteristics, skills and experience required for the appointment of Directors in the Board as a whole and its individual members with the objective of having a Board with diverse backgrounds and experience in various fields including business, government, education and social service.

b) Attendance of each Director at the Board meetings and the last Annual General Meeting(AGM) held on 28-09-2018 and Number of other Directorships and Membership / Chairmanship of Committee of each Director in various Companies are mentioned in this report and also mentioned in the Notice of AGM.

c) Number of Board Meetings held and dates on which held

The Board meets at least once a quarter to review the quarterly financial results and other items on the agenda of the meeting. Additional meetings are held, whenever necessary. Committees of the Board of Directors usually meet in the same day before the Board meeting, or whenever the need arises for transacting business. The recommendations of the Committees are placed before the Board for necessary approval and noting.

During the Financial Year 2018-19, 4 (Four) Board Meetings were held on 30.05.2018, 13.08.2018, 12.11.2018 & 13.02.2019. The maximum gap between two Board Meetings did not exceed one hundred and twenty days in terms of Regulation 17 (2) of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Standards and the provision of the Companies Act, 2013.

(i) Attendance details of Directors for the year ended March 31, 2019 are given below:

Name of the Director	Category	No. of Board Meetings held	No. of Meetings Attended	Attendance percentage (%)
Suresh Chand Bansal	EC	4	4	100
Mukesh Chand Bansal	MD	4	4	100
Vikas Bansal	ED	4	3	75
Manav Bansal	WTD	4	3	75
Gautam Bansal	WTD	4	2	50
Vijay Kumar Bansal	NED	4	1	25
Bhal Chandra Khaitan	ID	4	4	100
Brijesh Kumar Dalmia	ID	4	4	100
Ravishankar Sridharan	ID	4	4	100
Srikumar Banerjee	ID	4	4	100
Tapan Kumar Banerjee	ID	4	4	100
Shyanthi Dasgupta	ID	4	4	100

EC-Executive Chairman, MD-Managing Director, ED-Executive Director, WTD-Wholetime Director, NED – Non-Executive Director; ID – Independent Director.

d) **Board Meetings, Board Committee Meetings & Procedures**

The Board of Directors of the Company oversees the overall functioning of the Company. The Executive Chairman, Managing Director and other Executive Directors are entrusted with wide range of functions from Finance, Accounting, Operation, Marketing & Administration and duly assisted by the Company Secretary including Senior Managerial Personnel in overseeing the functional matters of the Company.

The Board of Directors has constituted Five Standing Committees, the position of the Committees as on 31.03.2019 are given hereunder :-

1. Audit Committee

Mr. Bhal Chandra Khaitan	Independent Director	Chairman
Mr. Suresh Chand Bansal	Executive Chairman	Member
Mr. Srikumar Banerjee	Independent Director	Member

2. Stakeholders Relationship Committee

Mr. Tapan Kumar Banerjee	Independent Director	Chairman
Mr. Manav Bansal	Wholetime director & CFO	Member
Mrs. Shyanthi Dasgupta *	Independent Woman Director	Member
Mr. Brijesh Kumar Dalmia *	Independent Director	Chairman

*Mr. Brijesh dalmia ceased to be a member of the Committee w.e.f. 13th February, 2019 and Mrs. Shyanthi Dasgupta appointed as a member in his place to the said Committee.

3. Nomination & Remuneration Committeee

Mr. Bhal Chandra Khaitan	Independent Director	Chairman
Mr. Tapan Kumar Banerjee	Independent Director	Member
Mr. Srikumar Banerjee *	Independent Director	Member
Mr. Brijesh Kumar Dalmia *	Independent Director	Member

*Mr. Brijesh dalmia ceased to be a member of the Committee w.e.f. 13th February, 2019 and Mr. Srikumar Banerjee appointed as a member in his place to the said Committee.

4. Corporate Social Responsibility Committee

Mr. Suresh Chand Bansal	Executive Chairman	Chairman
Mr. Manav Bansal	Wholetime Director	Member
Mr. Ravishankar Sridharan *	Independent Director	Member
Mr. Brijesh Kumar Dalmia *	Independent Director	Member

*Mr. Brijesh dalmia ceased to be a member of the Committee w.e.f. 13th February, 2019 and Mr. Ravishankar Sridharan appointed as a member in his place to the said Committee.

5. Share Transfer Committee

Mr. Suresh Chand Bansal	Executive Chairman	Chairman
Mr. Vikas Bansal	Executive Director	Member
Mr. Gautam Bansal	Wholetime Director	Member

Dates for the Board Meetings in the ensuing quarter are decided well in advance and communicated to the Directors alongwith the agenda items and necessary documents & information were provided to all Directors before hand to make able the Board of Directors to take proper decision. The Wholetime Director & CFO, Mr. Manav Bansal makes presentation on the financial results as well as the future course of action of the Company. The Board provides and evaluates the strategic direction of the Company, management policies and their effectiveness and ensures that the long-term interests of the stakeholders are being served. After Board Meetings, the decision of the Board of Directors duly communicated to the concerned departments & officials for implementation etc.

The meetings are usually held at the Company's Registered Office at "Lansdowne Towers", 4th Floor, 2/1A, Sarat Bose Road, Kolkata – 700 020. The Board is also provided with Audit Committee observations on the Internal audit findings and matters required to be included in the Director's Responsibility Statement to be included in the Board's report in terms of clause (c) of sub-section 3 of Section 134 of the Companies Act, 2013.

The Company Secretary records the minutes of the proceedings of each Board and Committee meetings. The final minutes are entered in the Minutes Book within 30 days from conclusion of the meeting and are signed by the Chairman of the meeting/ Chairman of the next meeting. While preparing the Agenda, Notes on Agenda, Minutes etc. of the meeting(s), adequate care is taken to ensure adherence to all applicable laws and regulations including the Companies Act, 2013, read with the Rules made thereunder, Secretarial Standards and compliance thereof.

A strategy meet of the Board of Directors is generally held at appropriate intervals to formulate, evaluate and approve the business strategy of the Company. The Functional Heads give a brief presentation to the Board covering their respective areas of responsibility. The meeting focuses on strategic goals, financial management policies, management assurances and control aspects and the growth plan of the Company and compliance management.

e) Separate Meeting of Independent Directors

During the year under review all the Independent Directors met on 13th August, 2018, inter alia, to discuss:

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

The composition & attendance of the Independent Directors at this meeting are as follows:-

Name	No. of Meetings Held / No. of Meetings attended
Mr. Bhal Chandra Khaitan	1/1
Mr. Brijesh Kumar Dalmia	1/1
Mr. Ravishankar Sridharan	1/1
Mr. Srikumar Banerjee	1/1
Mr. Tapan Kumar Banerjee	1/1
Ms. Shyanthi Dasgupta	1/1

The Independent Directors of the Company meet once in a year without the presence of Executive and Non- Executive Directors or management personnel. This meeting is conducted in an informal and flexible manner to enable the Independent Directors to discuss matters pertaining to the affairs of the Company and put forth their views to the Chairman and Managing Director. The Independent Directors of the Company meet once in a year formally through a Meeting called Independent Directors Meeting.

f) Familiarization program for Directors including Independent Directors

The Company pursuant to the SEBI LODR Regulations, 2015, has taken initiatives to familiarize its Independent Directors (IDs) with the Company, their roles, rights, responsibilities in the Company, nature of the industry in which the Company operates, business model of the Company, etc., through various programs posted on the website of the Company: www.beekaysteel.com .

All new Directors (including Independent Directors) inducted to the Board are given a formal orientation. The familiarization programme for our Directors is customised to suit their individual interests and area of expertise. The Directors are encouraged to visit the plant and raw material locations of the Company and interact with members of Senior Management as part of the induction programme. The Senior Management make presentations giving an overview of the Company's strategy, operations, products, markets, group structure and subsidiaries, Board constitution and guidelines, matters reserved for the Board and the major risks and risk management strategy. This enables the Directors to get a deep understanding of the Company, its people, values and culture and facilitates their active participation in overseeing the performance of the Management.

The Independent Directors of the Company met once on 13th August , 2018 without the attendance of Non-Independent Directors and members of management to review the performance of Non-Independent Directors and the Board as a whole, to review the performance of the Chairperson of the Company, taking into account the views of Executive.

Directors and Non-Executive Directors, assessment of flow of information between the management of the Company & the Board of Directors effective performance of duties.

An ongoing familiarization programmee with respect to the business/ working of the Company for all Directors is a major contributor for meaningful Board level deliberations and sound business decisions.

By way of the familiarization programme undertaken by the Company, the Directors are shared with the nature of the industry in which the Company is presently functioning, the functioning of various business units, the Company's market share, the CSR activities which will be pursued by the Company and other relevant information pertaining to the Company's business.

The familiarization programme of the Company for its Independent Directors has been disclosed on the Company's website: www.beekaysteel.com.

The Board has carried out performance evaluation of Independent Directors and recommended to continue the term of their appointment.

The Directors of the Company are made aware of the Company's operation, their role, responsibilities and liabilities. At the time of appointment the Company communicates to the Directors their role, responsibilities and liabilities. The Company holds regular Board & Committee Meetings at its Registered Office to discuss and decide upon the various strategic and operational matters and Directors have an opportunity to interact with the Senior Company personnel. In addition to the above the Directors have full access to all the information's within the Company.

The performance of the Chairperson of the Company, taking into account the views of executive Directors and non-executive Directors and the Independent Directors also reviewed the quality, content and timeliness of the flow of information between the Management and the Board and its Committees which is necessary to effectively and reasonably perform and discharge their duties.

g) Details of Directors seeking appointment / re-appointment

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

The disclosure of relationships between directors inter se as required under SEBI (LODR), Regulations, 2015 and as per Secretarial Standard 2 as issued by the Institute of Company Secretaries of India are forms part of this report.

h) Whistle Blower/ Vigil Mechanism Policy

As per the requirements of the Companies Act, 2013 and the SEBI LODR Regulations, 2015 the Company had established a mechanism for employees to report concerns for unethical behavior, actual or suspected fraud, or violation of the code of conduct or ethics. It also provides for adequate safeguards against the victimization of employees who avail the said mechanism. This policy also allows the direct access to the Chairperson of the Audit Committee. The Audit Committee is committed to ensure the flawless work environment by providing a platform to report any suspected or confirmed incident of fraud/ misconduct.

BOARD COMMITTEES

Audit Committee

The primary objective of the Audit Committee is to monitor and provide an effective supervision of the Management's financial reporting process, to ensure accurate and timely disclosures, with the highest levels of transparency, integrity and quality of financial reporting. Audit Committee of the Board comprises three Directors. The Members possess adequate knowledge of Accounts, Audit, Finance, etc. The composition of the Audit Committee meets the requirements as per Section 177 of the Companies Act, 2013 and as per Regulation 18 (1) of SEBI LODR Regulations, 2015.

The Committee oversees the work carried out in the financial reporting process by the Management, the internal auditor, the statutory auditor and the cost auditor and notes the processes and safeguards employed by each of them. The Audit Committee is empowered to investigate any activities within its terms of reference, seek information from employees, obtain outside legal or other professional advice or secure attendance of outside experts of relevant field as and when necessitated. The Audit Committee also reviews such matters as referred to it by the Board.

Four (4) meetings of the Audit Committee were held during the financial year ended 31st March, 2019 on 30th May 2018, 13th August 2018, 12th November 2018 and 13th February 2019, as against the minimum requirement of four meetings. The composition and attendance details of the Committee for the year ended 31st March, 2019 are given hereunder:

Name of the Members	Category/ Designation	No. of Meetings held	No. of Meetings Attended	Attendance (%)
Mr. Bhal Chandra Khaitan	ID / Chairman	4	4	100
Mr. Suresh Chand Bansal	EC / Member	4	4	100
Mr. Srikumar Banerjee	ID / Member	4	4	100

EC-Executive Chairman, ID – Independent Director.

The Company Secretary acts as the Secretary to the Committee. The internal auditor reports functionally to the Audit Committee. The Executive Directors and Senior Management of the Company also attend the meetings as invitees whenever required to address concerns raised by the Committee Members.

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

The Committee oversees the work carried out in the financial reporting process by the Management, the internal auditor, the statutory auditor and the cost auditor and notes the processes and safeguards employed by each of them. The Committee further

Terms of reference

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

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

14. To review reports of Internal Auditors & discussion with internal auditors of any significant findings and follow up there on;
15. Reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the board;
16. Discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post-audit discussion to ascertain any area of concern;
17. To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non-payment of declared dividends) and creditors;
18. To review the functioning of the Whistle Blower mechanism;
19. Approval of appointment of CFO (i.e., the whole-time Finance Director or any other person heading the finance function or discharging that function) after assessing the qualifications, experience and background, etc. of the candidate;
20. Examining the financial statement and the auditor's report thereon;
21. Monitoring the end use of funds raised through public offers and related matters;
22. Carrying out any other function as is mentioned in the terms of reference of the audit committee;
23. To review -
    - o Management discussion and analysis of financial condition and results of operations;
    - o Statement of significant related party transactions, submitted by management;
    - o Management letters/letters of internal control weaknesses issued by the Statutory Auditors;
    - o The appointment, removal and terms of remuneration of the Internal Auditor.
    - o Internal audit reports relating to internal control weaknesses, etc.
    - o Secretarial audit report relating to suspected fraud or irregularity or a failure of compliance of any legislation.

NOMINATION & REMUNERATION COMMITTEE

The terms of reference and constitution of the Nomination and Remuneration Committee ('NRC') are strictly in compliance with the provisions of Section 178 of the Companies Act, 2013 and pursuant to Regulation 19 and Part D of Schedule II of SEBI LODR Regulations, 2015 and amendments thereto. The purpose of the NRC is to oversee the Company's nomination process, assisting the Board of Directors for identifying persons qualified to serve Board Members. The Committee has formulated the Criteria for Evaluation of the Board and non-independent directors for the purpose of review of their performance at a separate meeting of the Independent Directors. The Committee's responsibilities includes framing of specific remuneration package of Executive Directors and commission / sitting fees for Non-Executive Directors etc. and approval of remuneration to the managerial personnel as per the Company's policy on the same.

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

b. The composition of the Nomination & Remuneration Committee as at March 31, 2019 :

One (1) meeting of the NRC was held during the financial year ended 31st March, 2019 on 13th August 2018 . The composition and attendance details of the Committee for the year ended 31st March, 2019 are given hereunder:

Name of the Members	Category/ Designation	No. of Meetings held	No. of Meetings Attended	Attendance (%)
Mr. Bhal Chandra Khaitan	ID / Chairman	1	1	100
Mr. Brijesh Kumar Dalmia *	ID / Member	1	1	100
Mr. Tapan Kumar Banerjee	ID / Member	1	1	100
Mr. Srikumar Banerjee *	ID / Member	1	N.A.	N.A.

ID – Independent Director.

*Mr. Brijesh dalmia ceased to be a member of the Committee w.e.f. 13th February, 2019 and Mr. Srikumar Banerjee appointed as a member in his place to the said Committee.

The Board decided and fixes the powers and roles of the Committee from time to time. Mr. Rabindra Kumar Sahoo, Company Secretary is acting as Secretary of the Committee.

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

c. Performance Evaluation

Pursuant to the provisions of the Companies Act, 2013 and SEBI LODR Regulations, 2015, a Board Evaluation Policy has been framed and approved by the NRC and by the Board. The Board carried out an annual performance evaluation of its own performance, the Independent Directors individually as well as the evaluation of the working of the Committees of the Board. The performance evaluation of all the Directors was carried out by the Nomination and Remuneration Committee. The performance evaluation of the Chairman and the Non-Independent Directors was carried out by the Independent Directors.

The Executive Directors (EDs) compensation is based on the appraisal system wherein their individual goals are linked to the organizational goals. EDs are paid compensation as per the agreements entered into between them and the Company, subject to the approval of the Board and of the members in General Meeting and such other approvals, as may be necessary. The present remuneration structure of EDs comprises of salary, perquisites, allowances and contribution to PF etc. alongwith performance bonus. The Non-Executive Directors are paid compensation by way of sitting fees. The sitting fees payable to the Non-Executive Directors is based on the number of meetings of the Board & other Committees of the Board attended by them.

Policy for evaluation of Independent Directors and the Board

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

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

Remuneration to Directors

(a) Remuneration Policy /Criteria

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

ii. Non-Executive Directors : The Non-executive Directors (including Independent Directors) are paid sitting fees on uniform basis.

The Non-Executive Directors are remunerated by way of sitting fees. The sitting fees payable to the Non-Executive Directors is based on the number of meetings of the Board & other Committees of the Board attended by them. Directors of the Company were paid a sitting fee as under during the Financial Year 2018-19 for each meeting of the Board and Committees attended by them

iii. KMPs & Senior Management Personnel: The motto of determining policy for payment of remuneration to the KMPs and Senior Management Personnel are to motivate and retain them for longer term for the better perspective and growth of the Company. The criteria also oversee the industry trend, quality and experience of the personnel. These factors not only contribute to the Company but make their job satisfaction.

(b) Remuneration & Sitting Fees

The Non-Executive Directors are remunerated by way of sitting fees. The sitting fees payable to the Non-Executive Directors is based on the number of meetings of the Board & other Committees of the Board attended by them. Directors of the Company were paid a sitting fee as under during the Financial Year 2018-19 for each meeting of the Board and Committees attended by them :

Board	₹2,000/-
Audit Committee	
Nomination & Remuneration Committee	
Stakeholders Relationship Committee	
Corporate Social Responsibility Committee	
Separate Meeting of the Independent Directors	

The details of remuneration paid /payable to the Executive Directors & Wholetime Directors and Sitting Fees paid/ payable to Non-Executive Directors as at 31.03.2018 are given hereunder:-

Name of Directors	Remuneration Paid/Payable for the year ended 31st March, 2019				Service Terms	
	Salary (₹)	Bonus	Benefits (₹)	Sitting Fees (₹)	Pay Scale per Month (₹)	Revised/ Effective From
Mr. Suresh Chand Bansal	8400000	32500000	270000	--	7,00,000	01-10-2018
Mr. Mukesh Chand Bansal	5400000	12500000	270000	--	4,50,000	01-01-2017
Mr. Vikas Bansal	4680000	12500000	270000	--	3,90,000	01-10-2018
Mr. Manav Bansal	4080000	7500000	270000	--	3,40,000	01-04-2019
Mr. Gautam Bansal	3720000	5000000	-	--	3,10,000	01-04-2016
Mr. Bhal Chand Khaitan	--		--	20,000	--	--
Mr. Vijay Kumar Bansal	--		--	2,000	--	--
Mr. Brijesh Kumar Dalmia	--	--	--	28,000	--	--
Mr. Ravishankar Sridharan	--	--	--	10,000	--	--
Mr. Srikumar Banerjee	--	--	--	18,000	--	--
Mr. Tapan Kumar Banerjee	--	--	--	20,000	--	--
Ms. Shyanthi Dasgupta	--	--	--	10,000	--	--

Notes :

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

Shares and convertible instruments are held by Non-executive Directors

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

Name of Directors	No. of Shares held as on 31-03-2019
Mr. Bhal Chandra Khaitan	Nil
Mr. Vijay Kumar Bansal	Nil
Mr. Brijesh Kumar Dalmia	Nil
Mr. Ravishankar Sridharan	Nil
Mr. Srikumar Banerjee	Nil
Mr. Tapan Kumar Banerjee	Nil
Ms. Shyanthi Sengupta	Nil

Mr. Vikas Bansal

Mr. Vikas Bansal is a Director of the Company and a Commerce Graduate. He is 48 years of age. He has 25 years of rich experience in corporate planning, operational management & general administration etc. He is the Executive Director of Beekay Steel Industries Ltd. and also holds the position of Director in 9 more public and private Companies. He holds 9,53,998 equity shares of the Company.

Mr. Gautam Bansal

Mr. Gautam Bansal is a Director of the Company and a Commerce Graduate and MBA from University of Wales, UK. He is 39 years of age. He has 17 years of rich experience in corporate planning, financial management, Operational Management, general administration etc. He is the whole-time Director of Beekay Steel Industries Ltd. and also holds the position of Director in 5 more public and private Companies. He holds 8,12,856 equity shares of the Company.

STAKEHOLDERS RELATIONSHIP COMMITTEE

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

The main tasks of Stakeholders Relationship Committee (SRC) considers and resolves the shareholders' and investors grievances like transfer / transmission of Shares, dematerialisation & rematerialisation of shares, non-receipt of dividends/interests, issue of new/duplicate certificates, non- receipt of Dividend, Balance Sheet and such other grievances as may be raised by the security holders from time to time. The Company has registered with SCORES of SEBI for Redressal of Investors' Grievances on-line.

The terms of reference of the Stakeholders Relationship Committee are as follows:

1) To review the reports submitted by the Registrars and Share Transfer Agents of the Company at Half yearly intervals.
2) To interact periodically and as & when required with the Registrars and Share Transfer Agents to ascertain and look into the quality of the Company's Shareholders/ Investors grievance redressal system and to review the report on the functioning of the said Investor grievances redressal system.
3) To consider and resolve the grievances of the security holders of the Company.
4) To periodically report to the Board about serious concerns if any.
5) To follow-up on the implementation of suggestions for improvement.
6) Service standards adopted by the Company in respect of services rendered by our Registrars & Transfer Agent.
7) Measures and initiatives taken for reducing quantum of unclaimed dividends and ensuring timely receipt of dividend/ annual report/notices and other information by Shareholders.

Four (4) meetings of the SRC were held during the financial year ended 31st March, 2019 on 30th May 2018, 13th August 2018, 12th November 2018 and 13th February 2019. The composition and attendance details of the Committee for the year ended 31st March, 2019 are given hereunder:

Name of the Members	Category/ Designation	No. of Meetings held	No. of Meetings Attended	Attendance (%)
Mr. Brijesh Kumar Dalmia *	ID / Chairman	4	3	100
Mr. Manav Bansal	WTD/ Member	4	3	75
Mr. Tapan Kumar Banerjee	ID / Chairman	4	4	100
Mrs. Shayanthi Dasgupta*	ID / Member	4	1	100

ID – Independent Director. WTD_Wholetime Director

*Mr. Brijesh dalmia ceased to be a member of the Committee w.e.f. 13th February, 2019 and Mrs. Shyanthi Dasgupta appointed as a member in his place to the said Committee.

Mr. Rabindra Kumar Sahoo, Company Secretary of the Company is acting as Secretary of the Committee. The Company Secretary is the Compliance Officer for complying with the requirements of SEBI Regulations and the Listing Agreement as entered with the Stock Exchanges in India and amended from time to time. His address and contact details are as given below:

Address : Lansdowne Towers, 4th Floor, 2/1A, Sarat Bose Road, Kolkata-700020
Phone : 033-4060 4432
Fax : 033-2283 3322
Email : contact@beekaysteel.com/rksahoo@beekaysteel.com

Investor Grievance Redressal

Shareholders' Complaints

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

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

No request for Share transfer remains pending for registration for more than 15 days except on technical difficulty on the instrument of transfer/transmission. No complaint / query is received by the Company during the financial year and no complaint is pending as on 31st March, 2019.

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

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

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

The purpose of our Corporate Social Responsibility (CSR) Committee is to formulate and recommend to the Board, a CSR Policy, which shall design the initiatives to be undertaken by the Company, recommend the amount of expenditure to incur CSR activities and to monitor from time to time the CSR activities and Policy of the Company. The CSR Committee is responsible for compliance of its scope mentioned in its term of reference in relation to CSR affairs and ensure orderly and efficient execution of the CSR project, programs or activities and issue necessary direction pertaining to it. The CSR Committee comprises of two executive Directors & One Independent Non-executive Director viz. Mr. Suresh Chand Bansal, Mr. Manav Bansal and Mr. Brijesh Kumar Dalmia. Mr. Suresh Chand Bansal is the Chairman of the Committee.

Mr. Rabindra Kumar Sahoo is the Secretary of the Committee.

The CSR policy is available on our website at www.beekaysteel.com

The terms of reference and constitution of the Corporate Social Responsibility Committee are in compliance with the provisions of the Companies Act, 2013 and rules made there under.

The Broad terms of reference of CSR committee are as follows:

- Formulate and recommend to the board, a corporate social responsibility (CSR) policy which shall indicate a list of CSR projects or programs which a Company plans to undertake falling within the purview of the Schedule VII of the Companies Act, 2013, any other related provisions, if any, of the Companies Act, 2013 and the rules made there under and as may be amended;
- Recommend the amount of expenditure to be incurred on the activities within the purview of the Schedule VII of the Companies Act, 2013, as may be amended;
- Monitor the implementation of CSR policy of the Company from time to time;
- To institute a transparent monitoring mechanism for implementation of the CSR Projects or programs or activities under taken by the Company.
- Oversee the Company's conduct with regard to its corporate and societal obligations and its reputation as a responsible corporate citizen; and
- Oversee activities impacting the quality of life of various stakeholders.
- To carry out such other functions as may from time to time, be authorized by the Board and/or required by any Statutory Authority, by the way of amendment and/or otherwise, as the case maybe, to be attended by this Committee.

Four (4) meetings of the CSR Committee were held during the financial year ended 31st March, 2019 on 30th May 2018, 13th August 2018, 12th November 2018 and 13th February 2019. The composition and attendance details of the Committee for the year ended 31st March, 2019 are given hereunder:

Name of the Members	Category/ Designation	No. of Meetings held	No. of Meetings Attended	Attendance (%)
Mr. Suresh Chand Bansal	EC / Chairman	4	4	100
Mr. Manav Bansal	WTD/ Member	4	3	75
Mr. Brijesh Kumar Dalmia *	ID / Member	4	3	100
Mr. Ravishankar Sridharan*	ID / Member	4	1	100

EC_Executive Chairman, WTD_Wholetime Director, ID – Independent Director.

*Mr. Brijesh dalmia ceased to be a member of the Committee w.e.f. 13th February, 2019 and Mr. Ravishankar Sridharan appointed as a member in his place to the said Committee.

SHARE TRANSFER COMMITTEE

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

The Share Transfer Committee (STC) comprises of 3 Directors all of whom are Executive Directors. Twenty (20) meetings of the STC were held during the financial year ended 31st March, 2019 on 09.05.2018. 06.06.2018, 12.07.2018, 12.09.2018, 20.09.2018, 25.10.2018, 01.11.2018, 15.11.2018, 22.11.2018, 29.11.2018, 06.12.2018, 13.12.2018, 20.12.2018, 27.12.2018, 10.01.2019, 07.02.2019, 25.02.2019, 07.03.2019, 22.03.2019 & 30.03.2019 The composition and attendance details of the Committee for the year ended 31st March, 2019 are given hereunder:

Name of the Members	Category/ Designation	No. of Meetings held	No. of Meetings Attended	Attendance (%)
Mr. Suresh Chand Bansal	EC / Chairman	20	20	100
Mr. Vikas Bansal	ED / Member	20	20	100
Mr. Gautam Bansal	WTD/ Member	20	20	100

EC- Executive Chairman, ED- Executive Director, ID – Independent Director.

Generally, the meetings of the Committee are held whenever necessary for transfer / transmission of shares, issue of duplicate share certificates, change of name/status, transposition of names, sub-division/ consolidation of share certificates, de-materialisation/ re-materialisation of shares, etc. Mr. Rabindra Kumar Sahoo, Company Secretary of the Company is acting as Secretary of the Committee.

As at 31st March, 2019, 1,80,97,119 nos. of equity shares constitutes 94.89% (previous year 1,79,76,493 numbers of equity shares – 94.24%) of the Company's equity shares are held in dematerialized form.

GENERAL BODY MEETINGS

i. General Meetings

a) Annual General Meetings (A.G.M.):

Date, Location and time of Annual General Meeting held in last three years :

Financial Year	Type of Meeting	Date & Time of Meeting	Venue of Meeting	If Special Resolution(s) Passed
2017-18	37th A.G.M.	28-09-2018 at 2.30 P.M.	ROTARY SADAN' , S.S. Hall, 94/2, Chowringhee Road, Kolkata – 700 020	Yes
2016-17	36th A.G.M.	15-09-2017 at 10.30 A.M.	'EEPC India Conference Room', EEPCINDIA, Vanijya Bhavan, ITFC Building, Ground Floor, 1/1, Wood Street, Kolkata: 700 016.	Yes
2015-16	35th A.G.M.	17-09-2016 at 10.30 A.M	'EEPC India Conference Room', EEPCINDIA, Vanijya Bhavan, ITFC Building, Ground Floor, 1/1, Wood Street, Kolkata: 700 016.	No

b) Extraordinary General Meeting

No Extraordinary General Meeting of the members was held during the years 2016-17, 2017-18 & 2018-19. No Special Resolution was passed through Postal Ballot Meeting during the financial year 2018-19. 10 (Ten) Special Resolutions were passed by the Company during the last three AGMs.

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

In compliance with section 108 of the Companies Act, 2013 read with rule 20 of the Companies (Management and Administration) Rules, 2014 and Regulation 44 of SEBI (LODR) Regulations, 2015 Members of the Company were provided with the facility to cast their vote electronically through the e-voting services provided by CDSL, on all resolutions set forth in the Notice of 37th Annual General Meeting. Members were also given options to cast their vote physically in that Annual General Meeting.

DISCLOSURES

i) **Disclosures on materially significant related party transactions i.e. transactions of the Company of material nature, with its promoters, Directors or the management, their subsidiaries or relatives, etc. that may have potential conflict with the interests of listed entity at large**

All material transactions entered into with related parties as defined under the Act and SEBI LODR Regulations 2015 during the financial year were in the ordinary course of business. No related party transactions of materially significant nature were entered into by the Company with its promoters, the Directors or the management, their subsidiaries or relatives, etc. which could conflict with the interests of the Company.

None of the transactions with any of the related parties were in conflict with the interest of the Company.

ii) **Details of non-compliance by the Listed Entity, penalties, strictures imposed on the Listed Entity by Stock Exchange(s) or Securities and Exchange Board of India or any Statutory Authority, on any matter related to the capital markets, during the last three years**

The Company has complied with various rules and regulations prescribed by the Stock Exchange, Securities and Exchange

Board of India or any other Statutory Authority on any matter related to the capital markets during last three years. No penalty or strictures have been imposed by them on the Company during last three years.

iii) Vigil Mechanism / Whistle Blower Policy

The Company has adopted the Whistle Blower Policy/ Vigil Mechanism Policy in line with Section 177 of the Companies Act, 2013 and Regulation 22 of the SEBI LODR Regulations, 2015, which is a mandatory requirement, to safeguard against victimization & unfair treatment of employees. The Company has adopted a whistle blower policy and has established the necessary vigil mechanism for employees and Directors to report concerns about unethical behavior to the Chairman of the Audit Committee. No person has been denied access to the chairman of the audit committee. The said policy has also been put up on the website of the Company.

iv) **Risk Management:** The Company has identified risk involved in respect to its products, quality, cost, location and finance. It has also adopted the procedures / policies to minimize the risk and the same are reviewed and revised as per the needs to minimize and control the risk. The report is also placed before the Board of Directors of the Company.

v) Reconciliation of Share Capital Audit

A qualified Practicing Company Secretary has carried out a share capital audit to reconcile the total admitted equity share capital with the National Securities Depository Limited (NSDL) and the Central Depository Services (India) Limited (CDSL) and the total issued and listed equity share capital. The audit report confirms that the total issued / paid-up capital is in agreement with the total number of shares in physical form and the total number of dematerialised shares held with NSDL and CDSL. The report in compliance with regulation 55A of the SEBI (Depositories and Participants) Regulations, 1996 was placed in the Board Meeting held subsequent to the report. The Audit Report is disseminated to the Stock Exchange on quarterly basis.

vi) Policy for determining 'material' Subsidiary

The Company does not have any material non-listed Indian Subsidiary as defined in Regulations 16 and 24 of SEBI (LODR), Regulations, 2015. **The Company has one associate Company in terms of the provision of Section 2(26) of the Companies Act, 2013**.

MEANS OF COMMUNICATION

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

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

Website: The Company's web site is www.beekaysteel.com where the quarterly / annual results and other statutory & non-statutory information are displayed.

No presentation has been made to Institutional Investors or Analysts.

GENERAL INFORMATIONS FOR MEMBERS:

a. Annual General Meeting :

(Date, Time & Venue)
Date : 21-09-2019
Day : Saturday .
Time : 11.30 A. M.,
Venue : 'ROTARY SADAN'
S.S. Hall,
94/2, Chowringhee Road,
Ground Floor,
Kolkata: 700 020

b. Dividend payment : A dividend of ₹2.00/- (20%) has been recommended by the Board of Directors for approval of the Members for the Financial Year ended on 31-03-2019.

DETAILS OF UNCLAIMED & UNPAID DIVIDEND

The Company has transferred unclaimed & unpaid Dividend for the financial year 2010-11 an amount of ₹2,63,598/- to Investor Education & Protection Fund (IEPF) on 04.12.2018.

The last dates for claiming of unpaid and unclaimed dividend lying in the Unpaid Dividend Account for the respective years are as follows:

Year	AGM Date	Last Date for Claiming of Dividend	Due Date for Transfer to IEPF	Amount as on 31.03.2019 (₹)
2014-15	26.09.2015	25.09.2022	03.12.2022	7,09,620
2015-16	17.09.2016	16.09.2023	24.11.2023	4,58,777
2016-17	15.09.2017	14.09.2024	22.11.2024	4,42,224
2017-18	28.09.2018	27.09.2025	05.12.2025	2,08,672

FILING OF UNCLAIMED DIVIDEND WITH MINISTRY: As per the Investor Education & Protection Fund (IEPF) Rules, 2012, the detailed list of shareholders in respect of unpaid and unclaimed dividend are filed with the Ministry of Corporate Affairs ("MCA") every year within the due time period. The same has also been updated in the website of the Company for your reference.

c. Date of Book Closure

14.09.2019 to 21.09.2019 (Both days inclusive) - For AGM & payment of Dividend

d. Financial Year & Calendar

Financial Year 2019-20	-	April-March
Unaudited Results for the quarter ending 30th June, 2019	-	By middle of August, 2019
Unaudited Results for the quarter ending 30th Sept., 2019	-	By middle of November, 2019
Unaudited Results for the quarter ending 31st Dec., 2019	-	By middle of February, 2020
Audited Annual Accounts for 2019-20	-	By end of May, 2020
Annual General Meeting for the year Ending 31st March, 2020	-	Middle of Sept, 2020

e. Listing

Equity Shares of your Company are listed with the BSE Ltd. The shares of the Company have been delisted voluntarily from the Calcutta Stock Exchange Ltd. under the SEBI Delisting Regulation, 2009 with effect from 1st April, 2016. Vide SEBI exit notice to U.P. Stock Exchange, Kanpur on June, 2015, the U.P. Stock Exchange, Kanpur has stopped its operation as a Stock Exchange. The names and address of the Stock Exchange and the Company's Stock Code is given below.

--The BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400001.(Stock Code 539018).

-- No listing fees is due as on date to BSE Limited.

f. Market price Data

The equity shares of the Company were listed with BSE Ltd. on 25.03.2015 under direct listing route. Monthly High/Low price during the last Financial Year 2018- 19 at the BSE Ltd. depicting liquidity of the Equity Shares is given hereunder :

Month	Share Price (₹)		Month	Share Price (₹)	
	High	Low		High	Low
April, 2018	425.00	353.00	October, 2018	418.00	295.15
May, 2018	377.90	275.25	November, 2018	434.00	370.00
June, 2018	328.90	252.00	December, 2018	404.75	350.00
July, 2018	311.85	255.00	January, 2019	388.95	310.00
August, 2018	406.00	280.00	February, 2019	348.75	305.00
September, 2018	379.95	320.00	March, 2019	384.95	298.00

g. **Performance in comparison**

Share price performance in comparison to BSE Sensex for the financial year 2018-19.

Month	BSE SENSEX (Closing)	Monthly Closing Price at BSE
April 2018	35,160.36	373.60
May 2018	35,322.38	330.85
June 2018	35,423.48	262.75
July 2018	37,606.58	311.85
August 2018	38,645.07	364.65
September 2018	36,227.14	330.00
October 2018	34,442.05	380.75
November 2018	36,194.30	378.60
December 2018	36,068.33	354.65
January 2019	36,256.69	322.00
February 2019	35,867.44	317.65
March 2019	38,672.91	317.20

h. **Registrar and Share Transfer Agent**

M/s. Maheshwari Datamatics Pvt. Ltd.,
23, R.N. Mukherjee Road, 5th Floor, Kolkata – 700 001.
Phone Nos.: 91-33-2243-5029/ 2248-2248 Fax No. 91-33-2248-4787,
E-Mail: mdpldc@yahoo.com
Website: www.mdpl.in
Contact Person: Mr. Rajagopal.

i. **Shares Transfer System**

Share Transfer process is delegated to the Registrars and Share Transfer Agents. The Shares Transfer Committee is empowered to approve the Share transfers. Transfer Committee Meeting is held as and when required.

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

j. **Distribution of Shareholdings as on 31st March, 2019.**

Share Limit Notional Value of (₹)		No of Live Accounts	Percentage to Live Accounts	Total No. of Shares	Percentage of Total Shares
From	To				
1	5000	1496	74.5763	156675	0.8215
5001	10000	182	9.0728	130887	0.6863
10001	20000	172	8.5743	229173	1.2016
20001	30000	45	2.2433	113819	0.5968
30001	40000	13	0.6481	44969	0.2358
40001	50000	19	0.9472	85971	0.4508
50001	100000	23	1.1466	174998	0.9176
100001	Above	56	2.7916	18135560	95.0897
Grand Total		2006	100.0000	19072052	100.0000

k. **Share Holding Pattern as on 31st March, 2019**

Category	No. of Shares	Percentage of Holding
Promoters & Associates	13197900	69.2002
Mutual Funds & UTI	0	0
Banks, Financial Institutions, Insurance Companies (Central/ State Govt, Institutions, Govt. Institutions)	0	0
FIIs	0	0
Private Corporate Bodies	4004809	20.9983
Indian Public	1527982	8.0116
NRIs / OCBs	55011	0.2884
Investor Education & Protection Fund Authority, Ministry of Corporate Affairs	286350	1.5014
Total	**19072052**	**100.00**

l. Dematerialisation of Shares: nos. 1,80,97,119 of equity shares constitutes 94.89% (previous year- 1,79,74,043 nos. of equity shares i.e., 94.24%) of the total paid-up equity share capital are held in dematerialized form with Central Depository Services (India) Ltd. (CDSL) and National Securities Depository Ltd. as on 31-03-2019. The Company's ISIN No. is INE213D01015.

m. **Outstanding Instruments**

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

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

n. **Commodity Price Risk :** Not applicable to the Company as Company is not associated Foreign Exchange Risk and with hedging activities. Hedging activities]

o. **Plant Locations**

Locations	Name & Address of the Manufacturing Units
Jamshedpur(Jharkhand)	Beekay Steel Industries Ltd. Large Scale Sector, Adityapur Industrial Area, Gamharia, Seraikela-Kharsawan, Jharkhand – 832 108
Chengalpet (Tamilnadu)	Beekay Steel Industries Ltd. 10, Kumarawadi Village, Madhuranthagam Taluk, Kancheepuram, Chengalpet: 603 107
Visakhapatnam (Andhra Pradesh)	Radice Ispat India, Vizag Plot No.194, Survey No.272, Vellanki Village, Anandapuram Mandal, Bheemlipatnam, Visakhapatnam: 531 163
	Beekay Structural Steels, Plot No. 19-21 & 24-26, Block-E, Autonagar, Visakhapatnam: 530 012
	Venkatesh Steel & Alloys, Plot No.28, Block-E, Autonagar, Visakhapatnam: 530012.
	Beekay Special Steels, Unit - I Survey No.231/3,4,7, Vellanki Village, Anandapuram Mondal, Visakhapatnam: 531153
	Beekay Special Steels – Unit - II Survey No. 233/1,2 & 4 Vellanki Village, Anandapuram Mondal, Visakhapatnam: 531153
	Beekay Structural Steels (TMT Division), Plot No. 67B/68B, Industrial Park, APIIC, Bonangi Village, Parwada, Visakhapatnam–531 021, Andhra Pradesh
Howrah (West Bengal)	Beekay Steel Industries Ltd. 286, 287, G.T. Road, Salkia, Howrah 711 106

p. Address for Correspondence
Beekay Steel Industries Ltd., '
Lansdowne Tower', 4th Floor,
2/1A, Sarat Bose Road, Kolkata 700 020.
Phone Nos. (033) 30514444, Fax No: (033) 2283 3322,
e-mail:contact@beekaysteel.com

q. Compliance Officer
Mr. Rabindra Kumar Sahoo, Company Secretary,
Beekay Steel Industries Ltd.
'Lansdowne Towers' 4th Floor,
2/1A, Sarat Bose Road, Kolkata: 700 020,
Phone Nos. (033) 4060 4444, Fax No: (033) 2283 3322
E-mail: rksahoo@beekaysteel.com

OTHER DISCLOSURES

i) Details of compliance with mandatory requirements and adoption of non-mandatory requirements of the Corporate Governance
The Company has complied with all the applicable mandatory requirements of the applicable Regulations of SEBI (LODR) Regulations, 2015 and has adopted the following non-mandatory requirements of the aforesaid clause :-

Reporting of Internal Auditor : The Internal Auditors reports directly to the Audit Committee.

The Company has taken cognizance of other non - mandatory requirements as set out in applicable Regulations of SEBI (LODR) Regulations, 2015 and shall consider adopting the same at an appropriate time.

ii) Web link where policy on dealing with related party transactions
Policy on dealing with related party transaction is displayed at the website of the Company www.beekaysteel.com.

iii) Disclosures of commodity price risks and commodity hedging activities
The Company is not associated with hedging activities.

iv) Accounting Treatment in preparation of financial statement :
The Company has followed the guidelines of accounting standards as prescribed by the Institute of Chartered Accountants of India in preparation of financial statement.

v) Certification from Company Secretary
A certificate from Company Secretary in practice is required under Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 is annexed hereto which forms part of this report

vi) CEO / CFO certification
The CEO / CFO certification as required under Regulation 17(8) of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 is annexed hereto which forms part of this report.

vii) Management Discussion and Analysis Report
The Management Discussion and Analysis Report as required under Regulation 34(2)(e) of Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 is annexed hereto which forms part of this report.

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

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

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

a. Office to Non-executive Chairperson : - Since the Company is headed by Executive Chairman, maintenance of separate office is not required.

b. Your Company is under process of updating its system for sending a half-yearly declaration of financial performance including summary of the significant events in last six months to each household of shareholders.

c. The financial statement of your Company is continued to be with unmodified audit opinion.

d. Separate posts of Chairperson & CEO :- The Company has appointed separate persons as Chairperson and Managing Director or CEO. Presently Mr. Suresh Chand Bansal is the Chairperson (Executive Chairman) of the Company and Mr. Mukesh Chand Bansal is the Managing Director and CEO of the Company.

e. The Internal Auditors reports directly to the Audit Committee.

DISCLOSURE WITH RESPECT TO DEMAT SUSPENSE ACCOUNT/ UNCLAIMED SUSPENSE ACCOUNT

As on 31st March, 2019, there are no outstanding shares of the Company lying in the demat suspense/ unclaimed suspense account.

DISCLOSURES OF THE COMPLIANCE WITH CORPORATE GOVERNANCE REQUIREMENTS SPECIFIED IN REGULATION 17 to 27 AND CLAUSES (b) TO (i) OF SUB – REGULATION (2) OF REGULATION 46 OF SEBI LODR REGULATIONS, 2015

The Company has complied with the requirements of aforesaid Regulations.

ANNEXURE TO THE DIRECTOR'S REPORT

Certification by Managing Director (CEO) and Chief Financial Officer (CFO) of the Company

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

Dear Sirs,

In terms of Regulations 17 (8) of SEBI (LODR), Regulation,2015, we, Mukesh Chand Bansal, Managing Director (CEO) and Mr. Manav Bansal, Wholetime Director & CFO, Certify that :

1. We have reviewed financial statements and the cash flow statements for the financial year 2018-19 and to our best of knowledge, belief and information –
   - i) These statements do not contain any materially untrue statement or omit any material fact or contain statement that might be misleading;
   - ii) These statements together present a true and fair view of the Company's affairs and are in compliance with existing accounting standards, applicable laws and regulations.
2. To the best of knowledge, belief and information, no transaction entered into by the Company during the financial year 2018-19 are fraudulent, illegal, or violative of the Company's Code of Conduct.
3. We accept responsibility for establishing and maintaining internal controls for financial reporting and that we have evaluated the effectiveness of the 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 internal controls which we are aware and we have taken and propose to take requisite steps to rectify the deficiencies, if any.
4. We have indicated to the Auditors and the Audit Committee :
   - i) significant changes in internal control over financial reporting during the financial year;
   - ii) significant changes in accounting policies during the year and that the same have been disclosed in the notes to the financial statements ; and
   - iii) that we have not come across any instances of significant fraud and the involvement therein of the management or an employee having significant role in the Company's internal control system over financial reporting.

	For Beekay Steel Industries Ltd.	**For Beekay Steel Industries Ltd.**
Place : Kolkata	Sd/-	Sd/-
Dated : 12th August, 2019	**Mukesh Chand Bansal**	**Manav Bansal**
	Managing Director	Wholetime Director & CFO
	(DIN: 00103098)	(DIN:00103024)

ANNEXURE TO THE DIRECTOR'S REPORT

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

We, Mukesh Chand Bansal, Managing Director and Mr. Manav Bansal, Wholetime Director & CFO of Beekay Steel Industries Limited declare that as of 31st March, 2019 all the Board Members and Senior Management Personnel have affirmed compliance with the Code of Conduct of the Company.

Place : Kolkata
Dated : 12th August, 2019

For Beekay Steel Industries Ltd.
Sd/-
Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

For Beekay Steel Industries Ltd.
Sd/-
Manav Bansal
Wholetime Director & CFO
(DIN:00103024)

ANNEXURE TO THE DIRECTOR'S REPORT

CERTIFICATE OF COMPLIANCE OF CORPORATE GOVERNANCE AS REQUIRED UNDER REGULATION 34(3) READ WITH SCHEDULE V OF SEBI (LISTING OBLIGATIONS & DISCLOSURE REQUIREMEMNTS) REGULATIONS, 2015

To the Members of
M/s. Beekay Steel Industries Ltd.

I have examined the Compliance of Corporate Governance by M/S. Beekay Steel Industries Limited for the financial year 2018-19, as stipulated in the applicable Regulations of SEBI (LODR) Regulations, 2015 and Listing Agreement entered into by the said Company with Stock Exchange.

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

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

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

Place: Kolkata
Dated: 12th August, 2019

Sd/-
(SANTOSH KUMAR TIBREWALLA)
Practising Company Secretary
Membership No. : 3811
Certificate of Practice No. : 3982.

Standalone Financial Statements

INDEPENDENT AUDITOR'S REPORT

To
The Members of
BEEKAY STEEL INDUSTRIES LIMITED.

Report on the Audit of the Standalone Ind AS Financial Statements

Opinion

We have audited the accompanying Standalone Ind AS Financial Statement of **BEEKAY STEEL INDUSTRIES LIMITED**, which comprise the Balance Sheet as at 31st March, 2019, the Statement of Profit and Loss(including other comprehensive income), the Statement of Changes in Equity, the Statement of Cash Flows for the year ended on that date, and a summary of the significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid Standalone financial statements give the information required by the Companies Act, 2013 (the "Act") in the manner so required and give a true and fair view in conformity with 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 Standalone state of affairs of the Company as at March 31, 2019, the Standalone profit, Standalone total comprehensive income, Standalone changes in equity and its Standalone cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit of the Standalone financial statements in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Act (SAs). Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Standalone Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India (ICAI) together with the independence requirements that are relevant to our audit of the Standalone financial statements under the provisions of the Act and the Rules made thereunder, 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 audit opinion on the Standalone financial statements.

Key Audit Matters

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

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

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

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

In connection with our audit of the Standalone financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the Standalone 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 for the Standalone Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these standalone financial statements that give a true and fair view of the financial position, financial performance, total comprehensive income, changes in equity and cash flows of the Company in accordance with the Ind AS 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 safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent;

and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the standalone financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error."

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

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

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

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

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

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

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

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by 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 ability of the Company to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the Standalone financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

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

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

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the Standalone financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by Section 143 (3) of the Act, based on our audit we report that:

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

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

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

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

    e) On the basis of the written representations received from the directors as on 31 March 2019 taken on record by the Board of Directors, none of the directors is disqualified as on 31 March 2019 from being appointed as a director in terms of Section 164 (2) of the Act.

    f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in 'Annexure A'. Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company's internal financial controls over financial reporting.

    g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended : In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Company to its directors during the year is in accordance with the provisions of section 197 of the Act.

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

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

        ii) The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts.

        iii) There has been no delay in transferring amounts, required to be transferred, to the Investor Education and Protection Fund by the Company.

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

For LIHALA & CO
Chartered Accountants
Firm's Registration Number. 315052E

Rajesh Lihala
(Partner)
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

Annexure - A to Independent Auditor's Report

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

1. We have audited the internal financial controls over financial reporting of **BEEKAY STEEL INDUSTRIES LIMITED** as of March 31, 2019 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

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

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

3. **Auditors' Responsibility**

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

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

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

6. **Meaning of Internal Financial Controls Over Financial Reporting**

   A Company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A Company's internal financial control over financial reporting includes those policies and procedures that:

   (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 authorisations of management and directors of the Company; and

   (iii) provide reasonable assurance regarding prevention or timely detection of unauthorised acquisition, use, or disposition of the Company's assets that could have a material effect on the financial statements.

7. Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

8. Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2019, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

For LIHALA & CO
Chartered Accountants
Firm's Registration Number. 315052E

Rajesh Lihala
(Partner)
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

Annexure - B to Independent Auditor's Report

The Annexure referred to in Independent Auditors' Report to the members of BEEKAY STEEL INDUSTRIES LIMITED on the Standalone financial statements for the year ended 31st March, 2019, we report that :

(i) a) The Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets.

b) The Company has a regular programme of physical verification of its fixed assets by which fixed assets are verified in a phased manner over a period of three years. In accordance with this program, certain fixed assets were verified during the year and no material discrepancies were noticed on such verification. In our opinion, this periodicity of physical verification is reasonable having regard to the size of the Company and the nature of its assets.

c) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the title deeds of immovable properties are held in the name of the Company.

(ii) The physical verification of inventory has been conducted at reasonable intervals by the management during the year. The discrepancies noticed on physical verification of inventory as compared to book records were not material and have been appropriately dealt with in the books of accounts.

(iii) There are Companies,firms, LLPs or other parties covered in the register to be maintained under section 189 of the Companies Act, 2013. However, the Company has not granted loan to such Companies, firms, LLPs or other parties.

(iv) In our opinion, and according to the information and explanations given to us, the Company has not granted any loans, investments, guarantees and security during the year that would attract provisions of Section 185 & 186 of the Act.

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

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

(vii) a) According to the information and explanations given to us and the records of the Company examined by us , in our opinion, the Company is generally regular in depositing undisputed statutory dues including Provident Fund, Employees' State Insurance, Income Tax, Service Tax, Goods and Service Tax, Value Added Tax, Customs Duty, Excise Duty, Cess and other material statutory dues, as applicable, with the appropriate authorities.

b) According to the information and explanations given to us, there were disputed amount payable in respect of Income Tax relating to F.Y. 2010-11 amounting ₹11,56,430/- and ₹2,67,322/- relating to F.Y 2013-14 which have remained outstanding as at 31st March, 2019 for a period of more than six months from the date they become payable. However no undisputed dues is payable in respect of wealth-tax, sales-tax, value added tax, service tax, customs duty and excise duty which have remained outstanding as at 31.03.2019 for a period of more than six months from the date they became payable.

c) According to the records of the Company, there are dues of sales tax, income tax, customs tax/wealth tax, value added tax, service tax, excise duty / cess which have not been deposited on account of dispute.

Nature of Dues	Period to which the matter pertains	Forum where disputes is pending	Amount Involved (₹)
Excise Duty	1998-1999	Hon'ble High Court, Kolkata	8,31,204
-- Do --	1997-1998	Customs,Excise & Service Tax Appeallate Tribunal, Kolkata.	10,67,07,795
-- Do --	2009-2013	Customs,Excise & Service Tax Appeallate Tribunal, Kolkata.	4,56,51,910
-- Do --	2015-2017	Commissioner of Central Excise(Appeals), Visakhaapatnam	10,91,158
-- Do --	2009-2014	Customs,Excise & Service Tax Appeallate Tribunal, Hyderabad.	89,78,682

Nature of Dues	Period to which the matter pertains	Forum where disputes is pending	Amount Involved (₹)
-- Do --	2012-2015	Customs,Excise & Service Tax Appeallate Tribunal, Hyderabad.	17,27,151
-- Do --	2012-2014	Customs,Excise & Service Tax Appeallate Tribunal, Chennai	8,81,095
Sales Tax	2010-2011	West Bengal Taxation Tribunal & Appellate Board	10,61,100
-- Do --	2013-2014	The Appellate Deputy Commissioner, Vijayawada	9,50,466
-- Do --	2013-2015	The Appellate Deputy Commissioner, Vijayawada	1,23,71,775
Income Tax	2011-2012	The Commissioner of Income Tax(Appeal-11), Kolkata	9,76,48,084
-- Do --	2014-2015	The Commissioner of Income Tax(Appeal-1), Kolkata	6,33,508
-- Do --	2015-2016	The Commissioner of Income Tax(Appeal-1), Kolkata	26,03,773

(viii) According to the records of the Company examined by us and the information and explanation given to us, the Company has not defaulted in repayment of loans or borrowings to any financial institution or bank or Government as at the balance sheet date.

(ix) In our opinion, and according to the information and explanations given to us, the term loans have been applied for the purposes for which they were obtained.

(x) During the course of our examination of the books and records of the Company, Carried out in accordance with the generally accepted auditing practices in India, and according to the information and explanations given to us, we have neither come across any instance of material fraud by the Company or on the Company by its officers or employees, noticed or reported during the year, nor have we been informed of any such cases by the Management.

(xi) The Company has paid/ provided for managerial remuneration in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule v to the Act.

(xii) As the Company is not a Nidhi Company and the Nidhi Rules, 2014 are not applicable to it. Accordingly, paragraph 3(xii) of the order are not applicable to the Company.

(xiii) The Company has entered into transactions with related parties in compliance with the provisions of sections 177 and 188 of the Act. The details of such related party transactions have been disclosed in the Standalone financial statements as required under Indian Accounting Standards (Ind AS) 24, Related Party Disclosures.

(xiv) The Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review. Accordingly, paragraph 3(xiv) of the order are not applicable to the Company.

(xv) The Company has not entered into any non cash transactions with its directors or persons connected with them. Accordingly, paragraph 3(xv) of the order are not applicable to the Company.

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

For LIHALA & CO
Chartered Accountants
Firm's Registration Number. 315052E

Rajesh Lihala
(Partner)
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

Standalone Balance Sheet as at 31 March 2019

(Amount in ₹)

	Note	As at 31 March, 2019	As at 31 March, 2018
ASSETS			
(1) Non-current assets			
(a) Property, plant and equipment	4A	2,07,91,06,334	1,87,11,29,006
(b) Capital work-in-progress	4B	23,41,50,046	25,34,63,074
(c) Financial assets			
(i) Investments	5	23,20,001	23,20,001
(ii) Other financial assets	6	1,46,18,229	1,39,24,000
(d) Other non-current assets	7	14,65,07,753	15,63,19,415
Total Non-current assets		2,47,67,02,363	2,29,71,55,496
(2) Current assets			
(a) Inventories	8	2,14,07,43,426	1,72,43,25,810
(b) Financial assets			
(i) Trade receivables	9	1,17,69,52,659	1,31,66,81,974
(ii) Cash and cash equivalents	10	2,76,87,997	1,89,70,222
(iii) Bank balances other than cash and cash equivalents	11	2,33,28,688	1,92,10,615
(iv) Other financial assets	12	65,14,436	56,78,407
(c) Other current assets	13	27,17,44,702	56,31,25,311
Total Current assets		3,64,69,71,908	3,64,79,92,339
TOTAL ASSETS		6,12,36,74,271	5,94,51,47,834
EQUITY AND LIABILITIES			
Equity			
(a) Equity share capital	14	19,09,09,270	19,09,09,270
(b) Other equity	15	3,77,38,44,078	2,81,34,88,579
Total Equity		3,96,47,53,348	3,00,43,97,849
Liabilities			
(1) Non-current liabilities			
(a) Financial liabilities			
(i) Borrowings	16 (i)	29,74,25,775	31,47,10,469
(b) Provisions	17 (i)	91,72,701	70,05,222
(c) Deferred tax liabilities (net)	18	33,30,27,444	32,46,78,951
(d) Other non-current liabilities	19	13,28,25,016	15,02,65,406
Total Non-current liabilities		77,24,50,936	79,66,60,048
(2) Current liabilities			
(a) Financial liabilities			
(i) Borrowings	16 (ii)	90,41,32,261	1,46,87,39,618
(ii) Trade payables	20		
Total outstanding dues of Micro Enterprises & small Enterprises		12,99,438	-
Total outstanding dues of Creditors other than Micro Enterprises & small Enterprises		35,99,22,645	36,15,15,829
(iii) Other financial liabilities	21	3,57,24,171	7,99,44,309
(b) Other current liabilities	22	7,54,94,169	21,95,54,095
(c) Provisions	17 (ii)	6,13,407	4,72,341
(d) Current Tax Liabilities (Net)	23	92,83,896	1,38,63,745
Total Current liabilities		1,38,64,69,987	2,14,40,89,937
TOTAL EQUITY AND LIABILITIES		6,12,36,74,271	5,94,51,47,834
Significant accounting policies	3		

The accompanying notes form an integral part of the standalone financial statements

As per our report of even date attached

For **LIHALA & CO**
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors
Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

Standalone Statement of Profit and Loss for the year ended 31 March 2019

(Amount in ₹)

		Note	Year ended 31 March, 2019	Year ended 31 March, 2018
I	Revenue from operations	24	9,60,37,14,908	9,92,38,74,847
II	Other income	25	6,88,88,528	10,04,59,389
III	Total income (I + II)		9,67,26,03,436	10,02,43,34,236
IV	Expenses			
	Cost of materials consumed	26	5,75,95,46,348	6,28,68,89,410
	Excise duty		-	14,15,32,414
	Purchase of stock-in-trade		28,07,40,671	27,44,07,300
	Changes in inventories of finished goods, stock-in-trade and work-in-progress	27	(15,75,93,527)	1,36,02,655
	Employee benefits expense	28	24,78,06,730	18,23,85,850
	Finance costs	29	15,77,44,576	18,49,65,423
	Depreciation and amortisation expense	4A	16,37,10,491	14,99,42,380
	Other expenses	30	1,71,90,74,627	1,69,05,52,225
	Total expenses (IV)		8,17,10,29,916	8,92,42,77,657
V	Profit/ (loss) before tax (III-IV)		1,50,15,73,520	1,10,00,56,579
VI	Tax expense:			
	Current tax		51,10,00,000	39,40,00,000
	Deferred tax		79,69,299	(18,86,669)
	For Earlier Years		-	-
VII	Profit / (loss) for the year (V-VI)		98,26,04,221	70,79,43,248
	Other comprehensive income			
	A. Items that will not be reclassified to profit or loss			
	(a) Remeasurements of defined benefit liability/ (asset)		10,85,144	7,08,714
	(b) Income taxes relating to items that will not be reclassified to profit or loss		(3,79,193)	(2,45,272)
	Net other comprehensive income not to be reclassified subsequently to profit or loss		7,05,951	4,63,442
	B. Items that will be reclassified to profit or loss		-	-
	Net other comprehensive income to be reclassified subsequently to profit or loss		-	-
VIII	Other comprehensive income		7,05,951	4,63,442
IX.	Total comprehensive income for the year (VII+VIII)		98,33,10,172	70,84,06,690
X.	Earnings per equity share			
	[Face value of equity share ₹10 each (previous year ₹10 each)]			
	- Basic		51.52	37.12
	- Diluted		51.52	37.12
Significant accounting policies		3		

The accompanying notes form an integral part of the standalone financial statements

As per our report of even date attached

For and on behalf of the Board of Directors

Sd/-

For **LIHALA & CO**
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

Cash Flow Statement for the year ended 31 March 2019

(Amount in ₹)

	Particulars	Year ended 31 March, 2019		Year ended 31 March, 2018	
		Amount (₹)	Amount (₹)	Amount (₹)	Amount (₹)
A.	**Cash flow from operating activities**		1,50,15,73,520		1,10,00,56,579
	Net Profit / (Loss) before extraordinary items and tax				
	Adjustments for:				
	Depreciation and amortisation	16,37,10,491		14,99,42,380	
	Gratuity & Leave Encashment	40,38,093		30,54,426	
	Interest Received	(78,53,703)		(1,02,25,752)	
	Sundry Balance W/Back	(9,36,408)		(1,06,275)	
	Foreign Currency Exchange Fluctuation Gain	(49,05,943)		(3,56,92,290)	
	(Profit)/Loss on sale of Fixed assets	36,40,087		8,82,193	
	Bad Debt & Sundry Balance Written Off	14,53,027		2,15,41,124	
	Finance costs	15,77,44,576		18,49,65,423	
			31,68,90,220		31,43,61,229
	Operating profit / (loss) before working capital changes		**1,81,84,63,740**		**1,41,44,17,808**
	Changes in working capital:				
	Adjustments for (increase) / decrease in operating assets:				
	Inventories	(41,64,17,616)		(16,84,85,649)	
	Trade receivables	13,97,29,315		(46,83,66,499)	
	Financial and Other Assets	29,55,43,940		(14,46,74,990)	
	Adjustments for increase / (decrease) in operating liabilities:				
	Trade payables	(2,93,746)		2,78,65,663	
	Borrowings	(56,46,07,357)		14,26,03,519	
	Financial and Other Liabilities	(21,26,77,610)		5,39,60,609	
	Provisions	23,08,545		17,46,462	
			(75,64,14,529)		(55,53,50,885)
	Cash generated from operations		**1,06,20,49,211**		**85,90,66,923**
	Net income tax (paid) / refunds		(51,55,84,446)		(37,81,36,088)
	Net cash flow from / (used in) operating activities (A)		**54,64,64,765**		**48,09,30,835**
B.	**Cash flow from investing activities**				
	Capital expenditure on fixed assets		(35,70,45,596)		(16,01,04,600)
	Interest Received		78,53,703		1,02,25,752
	Proceeds from sale of fixed assets		20,89,971		6,20,218
	Net cash flow from / (used in) investing activities (B)		**(34,71,01,922)**		**(14,92,58,630)**

Cash Flow Statement for the year ended 31 March 2019

(Amount in ₹)

Particulars		Year ended 31 March, 2019		Year ended 31 March, 2018	
		Amount (₹)	Amount (₹)	Amount (₹)	Amount (₹)
C.	**Cash flow from financing activities**				
	Repayment of Non Current borrowings	(1,03,27,538)		(18,19,39,138)	
	Dividend Paid	(2,23,13,097)		(2,23,13,097)	
	Unpaid Dividend Transferred to Investor Protection Fund	(2,59,857)		(1,51,052)	
	Finance cost	(15,77,44,576)		(18,49,65,423)	
	Net cash flow from / (used in) financing activities (C)		**(19,06,45,068)**		**(38,93,68,710)**
	Net increase / (decrease) in Cash and cash equivalents (A+B+C)		87,17,775		(5,76,96,505)
	Cash and cash equivalents at the beginning of the year		1,89,70,222		7,66,66,727
	Cash and cash equivalents at the end of the year		**2,76,87,997**		**1,89,70,223**

Notes:

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

The accompanying notes form an integral part of the standalone financial statements

As per our report of even date attached

For LIHALA & CO
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors

Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

Standalone Statement of Changes in Equity for the year ended 31 March 2019

A. Equity share capital

Particulars	Number	Amount
Balance as at 1st April 2018	1,90,72,052	19,07,20,520
Changes in equity share capital during 2018-19	-	-
Balance as at 31 March 2019	**1,90,72,052**	**19,07,20,520**

B. Other equity

Particulars	Reserves and surplus					Total
	Capital reserve	Share Premium	Capital Redemption Reserve	General Reserve	Retained earnings	
Balance as at 1st April 2018	3,01,42,208	32,88,46,550	3,00,00,000	48,34,33,983	1,94,10,65,838	2,81,34,88,579
Profit or Loss					98,26,04,221	98,26,04,221
Other comprehensive income (net of tax)					7,05,951	7,05,951
Dividend					(1,90,72,052)	(1,90,72,052)
Income tax on dividend paid					(38,82,621)	(38,82,621)
Other adjustments	-				-	-
Transfer from retained earnings						
Balance at 31 March 2019	**3,01,42,208**	**32,88,46,550**	**3,00,00,000**	**48,34,33,983**	**2,90,14,21,337**	**3,77,38,44,078**

The accompanying notes form an integral part of the standalone financial statements

As per our report of even date attached

For **LIHALA & CO**
Chartered Accountants
Firm's Registration Number. 315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors

Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

Notes to the Standalone Financial statements for the year ended 31 March 2019

1. Reporting entity

Beekay Steel Industries Limited (""the Company"") is a listed company incorporated in India on 28th March, 1981 having its registered office at 2/1A, Sarat Bose Road, Lansdowne Towers, 4 Floor, Kolkata-700020. The Company is principally engaged in the business of manufacturing of Hot Rolled Steel Sections, Bright Bars, Structural Items and TMT Bars.

The Companys' equity shares are listed on the BSE Limited(nation-wide trading terminal) under direct listing route. the trading of shares have started w.e.f, 25th March, 2015.

2. Significant Accounting Policies followed by the Company

a) Compliance with Ind AS

These financial statements are prepared in accordance with Indian Accounting Standards (Ind AS) under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair values, the provisions of the Companies Act, 2013 ("the Act") (to the extent notified) and guidelines issued by the Securities and Exchange Board of India (SEBI). The Ind AS are prescribed under section 133 of the Act read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 and relevant amendment rules issued thereafter.

The accounting policies are applied consistently to all the periods presented in the financial statements.

b) Functional and presentation currency

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

c) Basis of measurement

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

(i) Certain financial assets and financial liabilities measured at fair value;

(ii) Employee's defined benefit plan as per actuarial valuation.

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

d) Use of estimates and judgements

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

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

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

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

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

(ii) Fair value measurement of financial instruments:

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

(iii) Defined benefit plans:

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

(iv) Recognition and measurement of provisions and contingencies:

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

e) Measurement of fair values

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

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

The management regularly reviews significant unobservable inputs and valuation adjustments.

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

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

Level 2: inputs other than quoted prices included in Level 1 that are observable for the assets or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices). active markets for identical assets or liabilities.

Level 3: inputs for the assets or liability that are not based on observable market data(unobservable inputs).

When measuring the fair value of an asset or a liability, the Company uses observable market data as far as possible. If the inputs used to measure the fair value of an asset or a liability fall into different levels of the fair value hierarchy, then the fair value measurement is categorized in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement.

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

3. Statement of Significant accounting policies

a) Operating Cycle

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

b) Financial instruments

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

Notes to the Standalone Financial statements for the year ended 31 March 2019

i. Financial Assets

Initial recognition and measurement

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

Subsequent measurement

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

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

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

Financial assets at amortised cost

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

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

Financial assets at Fair value through other Comprehensive Income (FVTOCI)

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

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

Financial assets at Fair value through Profit & Loss (FVTPL)

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

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

Investment in Associates

Investment in Associates is shown at cost. Where the carrying amount of an investment in greater than its estimated recoverable amount, it is written down immediately to its recoverable amount and the difference is transferred to the Statement of Profit and Loss. On disposal of investment, the difference between the net disposal proceeds and the carrying amount is charged or credited to the Statement of Profit and Loss.

Other equity investments

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

Derecognition

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

ii. Financial liability

Initial recognition and measurement

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

Subsequent measurement

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

- Financial liabilities through profit or loss (FVTPL)
- Financial liabilities at amortised cost

Financial liabilities through FVTPL

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

Financial liabilities at amortised cost

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

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

Derecognition

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

iii. Offsetting of financial instruments

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

c) Property, Plant and Equipment

i. Recognition and measurement

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

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

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

Notes to the Standalone Financial statements for the year ended 31 March 2019

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

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

ii. Subsequent expenditure

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

iii. Depreciation and amortisation

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

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

Freehold land is not depreciated. Leasehold land (includes development cost) is amortised on a straight line basis over the period of respective lease, except land acquired on perpetual lease.

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

d) Intangible Assets

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

e) Inventories:

Inventories are valued at the lower of cost and net realisable value. Cost is computed on a weighted average basis. Cost of finished goods and work-in-progress include all costs of purchases, conversion costs and other costs incurred in bringing the inventories to their present location and condition. The net realisable value is the estimated selling price in the ordinary course of business less the estimated costs of completion and estimated costs necessary to make the sale.

f) Impairment

i. Impairment of financial instruments: financial assets

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

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

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

ii. Impairment of non-financial assets

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

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

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

g) Employee Benefits

i. Short-term employee benefits

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

ii. Defined contribution plans

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

iii. Defined benefit plans

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

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

h) Provisions (other than for employee benefits)

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

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

i) Revenue Recognition

The Company derives revenues primarily from sale of manufactured goods, traded goods and related services.

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

Revenue from the sale of goods and services are recognised when the significant risks and rewards of ownership have been transferred to the buyer. No revenue is recognised if there are significant uncertainties regarding recovery of the amount due, associated costs or the possible return of goods.

Other operating revenue-Export Incentives

Export Incentives under various schemes are accounted in the year of export.

Notes to the Standalone Financial statements for the year ended 31 March 2019

j) **Leases**

Leases of property, plant and equipment that transfer to the Company substantially all the risks and rewards of ownership are classified as finance leases. The leased assets are measured initially at an amount equal to the lower of their fair value and the present value of the minimum lease payments. The minimum lease payments are apportioned between finance charges and reduction of the lease liability so as to achieve a constant rate of interest on the remaining balance of the liability. Finance charges are recognised in the Statement of Profit and Loss.

Assets held under leases that do not transfer to the Company substantially all the risks and rewards of ownership (i.e. operating leases) are not recognised in the Company's Balance Sheet. Payments made under operating leases are recognized in the Statement of Profit or Loss on a straight-line basis over the term of the lease unless the payments to the lessor are structured to increase in line with general inflation.

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

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

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

l) **Segment reporting**

The Company is dealing in one segment only i.e. Rolling of Iron & Steel and hence separate segment is not given in accordance with Ind AS-108 "Operating Segments" notified pursuant to Companies (Accounting Standard) Rules, 2015.

m) **Income tax**

Income tax expense comprises of current and deferred tax. Current tax and deferred tax is recognized in the statement of profit or loss except to the extent that it relates to a business combination, or items recognized directly in equity or in OCI.

i. **Current tax**

Current tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities, based on tax rates and laws that are enacted or substantively enacted at the Balance sheet date.

ii. **Deferred tax**

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

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

n) **Borrowing costs**

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

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

o) **Earnings per Share**

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

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

p) Recent accounting pronouncements

Ind AS 116, Leases: On March 30, 2019, the Ministry of Corporate Affairs has notified Ind AS 116 Leases. Ind AS 116 will replace the existing leases standard, Ind AS 17, Leases and related interpretations. The standard sets out the principles for the recognition, measurement, presentation and disclosure of leases for both parties to a contract i.e. the lessee and the lessor.

The effective date for the adoption of Ind AS 116 is annual periods beginning on or after April 1, 2019.

Amendment to Ind AS 19, plan amendment, curtailment or settlement: On March 30, 2019, the Ministry of Corporate Affairs issued amendments to Ind AS 19, Employee Benefits, in connection with accounting for plan amendments, curtailments and settlements.

The amendments require an entity:

- To use updated assumptions to determine current service cost and net interest for the remainder of the period after a plan amendment, curtailment or settlement; and
- To recognize in profit or loss as part of past service cost, or a gain or loss on settlement, any reduction in a surplus, even if that surplus was not previously recognized because of the impact of the asset ceiling.

Effective date for application of this amendment is annual period beginning on or after April 1, 2019. The Company does not have any impact on accounts of this amendment.

Note: 4A Fixed Assets

Particulars	GROSS BLOCK				DEPRECIATION				NET BLOCK	
	As on 01.04.2018	Additions during the Year	Sold/ Discarded or Adjustments	As on 31.03.2019	Upto 01.04.2018	For the Year	Adjustment / Sold/ Discarded	As on 31.03.2019	As on 31.03.2019	As on 31.03.2018
Property, plant & equipment :-										
Land	14,48,08,253	88,942		14,48,97,195	-	-	-	-	14,48,97,195	14,48,08,253
Leasehold Land	73,37,847			73,37,847	3,10,144	2,59,856		5,70,000	67,67,847	70,27,703
Shed & Building	64,43,78,654	6,81,44,873		71,25,23,527	15,96,17,779	1,89,23,546		17,85,41,325	53,39,82,201	48,47,60,874
Flats	1,39,32,092		2,98,024	1,36,34,068	26,62,758	2,73,531	2,98,024	26,38,265	1,09,95,803	1,12,69,334
Leasehold Flats	5,54,810			5,54,810	1,40,278			1,40,278	4,14,532	4,14,532
Office Premises	3,05,02,147			3,05,02,147	54,18,233	4,72,581		58,90,814	2,46,11,333	2,50,83,914
Plant & Machineries	1,78,61,91,240	17,44,44,782	43,33,691	1,95,63,02,331	72,55,90,103	8,55,48,922	4,36,597	81,07,02,428	1,14,55,99,903	1,06,06,01,137
Electrical Installation	12,19,39,998	2,47,46,014		14,66,86,012	5,46,70,407	93,28,870		6,39,99,277	8,26,86,735	6,72,69,591
Laboratory Equipments	81,51,710			81,51,710	45,81,783			45,81,783	35,69,927	35,69,927
Rolls	47,08,83,268	8,25,92,882		55,34,76,150	43,49,15,548	4,03,11,422		47,52,26,970	7,82,49,180	3,59,67,720
Furniture & Fixtures	2,90,76,249	7,52,028		2,98,28,277	2,15,55,023	18,82,573		2,34,37,596	63,90,681	75,21,226
Computer	2,09,44,095	24,58,789		2,34,02,884	1,84,12,036	15,31,615		1,99,43,651	34,59,233	25,32,059
Office Equipments	61,90,370	52,546		62,42,916	47,07,434	1,68,830		48,76,264	13,66,652	14,82,936
Air Conditioner & Others	95,23,771	4,39,099		99,62,870	52,49,095	9,08,797		61,57,892	38,04,978	42,74,676
Motor Vehicles	3,67,90,237	2,26,38,670	28,70,760	5,65,58,147	2,22,45,109	41,62,151	21,59,250	2,42,48,010	3,23,10,137	1,45,45,128
Total - Fixed Assets	**3,33,12,04,740**	**37,63,58,625**	**75,02,475**	**3,70,00,60,890**	**1,46,00,75,734**	**16,37,72,693**	**28,93,871**	**1,62,09,54,557**	**2,07,91,06,334**	**1,87,11,29,006**
Previous Year										
Fixed Assets	**3,20,27,94,393**	**13,22,12,344**	**38,01,996**	**3,33,12,04,740**	**1,31,22,24,362**	**14,99,84,877**	**21,33,504**	**1,46,00,75,735**	**1,87,11,29,006**	-

(i) Certain property, plant and equipment are pledged against borrowings, the details relating to which has been described in Note 16 pertaining to borrowings.

Note: 4B Capital Work -in- Progress

Particulars	GROSS BLOCK				DEPRECIATION				NET BLOCK	
	As on 01.04.2018	Additions during the Year	Sold/ Discarded or Adjustments	As on 31.03.2019	Upto 01.04.2018	For the Year	Adjustment / Sold/ Discarded	As on 31.03.2019	As on 31.03.2019	As on 31.03.2018
Capital Work in Progress	25,34,63,074	24,21,37,567	26,14,50,596	23,41,50,045	-	-	-	-	23,41,50,046	25,34,63,074
Previous Year										
Capital Work In Progress	22,55,70,818	3,63,38,702	84,46,446	25,34,63,074	-		-	-	25,34,63,074	-

Notes to the Standalone Financial statements for the year ended 31 March 2019

Note 5. Non-Current Investments

(Amount in ₹)

	31 March 2019	31 March 2018
Investments in Equity Instruments		
In Associates (carrying amount determined using the equity method of accounting)		
Quoted:		
11,60,000 (31st March 2018: 11,60,000) Equity Shares ₹10/- each fully paid up in A K C Steel Industries Limited	23,20,000	23,20,000
In Others (at fair value through other comprehensive income)		
Quoted:		
800 (31st March 2018: 800) Equity Shares of ₹10/- each fully paid up in Super Forging & Steels Limited	1	1
	23,20,001	**23,20,001**
Aggregate book value of quoted investments	23,20,001	23,20,001
Aggregate amount of quoted investments at market value	23,20,001	23,20,00

Note 6. Other non-current financial asset

(Amount in ₹)

	31 March 2019	31 March 2018
Deposits with remaining maturity of more than 12 months*	1,46,18,229	1,39,24,000
	1,46,18,229	**1,39,24,000**

* Pledged with the banks against various credit facilities availed by the Company (Refer note 16).

Note 7. Other non-current assets

(Amount in ₹)

	31 March 2019	31 March 2018
(Unsecured, considered good)		
Capital advances	6,07,59,189	8,04,81,628
Advances other than capital advances		
- Security and other deposits	7,54,85,667	6,76,61,733
- Other advances (including advances with statutory authorities)	1,02,62,897	81,76,054
	14,65,07,753	**15,63,19,415**

Note 8. Inventories

(Valued at the lower of cost and net realisable value)

(Amount in ₹)

	31 March 2019	31 March 2018
Raw materials	1,18,05,87,355	93,84,04,719
Finished goods	72,04,77,552	61,71,02,040
Stock-in-trade (goods acquired for trading)	4,05,85,142	2,61,52,187
Scrap and cuttings	12,37,51,205	8,48,82,962
Stores and spares	7,53,42,172	5,77,83,902
	2,14,07,43,426	**1,72,43,25,810**

(i) The mode of valuation of inventories has been stated in Note 3(e).

(ii) Inventories have been pledged as security against certain bank borrowings of the Company as at 31 March 2019 (Refer note 16).

(iii) Cost of inventory recognised as an expense

Notes to the Standalone Financial statements for the year ended 31 March 2019

Note 9. Trade receivables

(Amount in ₹)

	31 March 2019	31 March 2018
Unsecured, Considered good	1,17,69,52,659	1,31,66,81,974
	1,17,69,52,659	**1,31,66,81,974**

Trade Receivables have been given as collateral towards borrowings (refer note 16).

Note 10. Cash and cash equivalents#

(Amount in ₹)

	31 March 2019	31 March 2018
Balances with banks		
- In cash credit and current accounts	87,04,031	50,38,098
- Deposit with original maturity of less than three months account	1,66,91,084	1,05,35,241
Cheques, drafts on hand	1,01,730	8,12,020
Cash on hand	21,91,152	25,84,863
	2,76,87,997	**1,89,70,222**

#Cash and cash equivalents (other than cash on hand) are pledged against borrowings, the details relating to which have been described in Note 16 pertaining to borrowings.

Note 11. Other bank balances *

(Amount in ₹)

	31 March 2019	31 March 2018
Earmarked balances (on unclaimed dividend account)	18,46,863	17,13,515
In deposit account**	2,14,81,825	1,74,97,100
	2,33,28,688	**1,92,10,615**

*Other Bank balances are pledged against borrowings, the details relating to which have been described in Note 16 pertaining to borrowings.

**Represents deposits with original maturity of more than 3 months having remaining maturity of less than 12 months from the Balance Sheet date.

Note 12. Other current financial assets

(Amount in ₹)

	31 March 2019	31 March 2018
Advances to employees	30,71,215	26,02,539
Interest accrued on deposits	34,43,221	30,75,868
	65,14,436	**56,78,407**

Note 13. Other current assets

(Amount in ₹)

	31 March 2019	31 March 2018
Advances other than capital advances		
- Advance to suppliers	14,76,83,268	13,45,41,790
- Export incentive receivable (including duty drawback)	6,93,446	1,14,09,118
- CENVAT receivable	-	93,93,686
- Other statutory advances	11,49,76,651	39,82,82,025
- Other advances (including prepaid expenses, other receivables etc.)	83,91,337	94,98,692
	27,17,44,702	**56,31,25,311**

Note 14. Equity share capital

(Amount in ₹)

	31 March 2019	31 March 2018
Authorised		
2,00,00,000 (March 31, 2018: 2,00,00,000) Equity Shares of ₹10/- each	20,00,00,000	20,00,00,000
3,00,000 (March 31, 2018: 3,00,000) 15% Non-Convertible Redeemable Preference Shares of ₹100 each of 100/- each	3,00,00,000	3,00,00,000
	23,00,00,000	**23,00,00,000**
Issued & subscribed		
1,93,71,652 (March 31, 2018: 1,93,71,652) Equity Shares of ₹10/- each	**19,09,09,270**	**19,09,09,270**
Paid up Capital		
1,90,72,052 (March 31, 2018 1,90,72,052) Equity Shares of ₹10/- each fully paid up	19,07,20,520	19,07,20,520
Add : Forfeited Shares	1,88,750	1,88,750
	19,09,09,270	**19,09,09,270**

A. Reconciliation of number of equity shares outstanding at the beginning and at the end of the period

	31 March 2019		31 March 2018	
	Number	Amount	Number	Amount
Balance as at the beginning of the year	1,90,72,052	19,07,20,520	1,90,72,052	19,07,20,520
Add: Issued during the year	-	-	-	-
Balance as at the end of the year	1,90,72,052	19,07,20,520	1,90,72,052	19,07,20,520

B. Rights, preferences and restrictions attaching to Equity Shares

The Company has equity shares having a par value of ₹10/- each. Each holder of equity shares is entitled to one vote per share and in the event of liquidation,the shareholders of Equity shares of the Company are eligible to receive the remaining assets of the Company after distribution of all preferential amounts in proportion to their shareholding.

The Company has authorised Preference Share Capital which are non convertible redeemable of 100/- each. Such Shareholders have right to receive fixed preferential dividend. However no preferential shares are outstanding on the date of Balance Sheet.

Notes to the Standalone Financial statements for the year ended 31 March 2019

C. Particulars of shareholders holding more than 5% shares of fully paid up equity shares

Name of the Shareholder	31 March 2019		31 March 2018	
	Number	% of total shares in the class	Number	% of total shares in the class
Jyotirmoy Trading Pvt. Ltd.	24,57,678	12.89%	24,57,678	12.89%
Concast Steels & Alloys Ltd.	21,29,754	11.17%	21,29,754	11.17%
Suresh Chand Bansal	20,13,854	10.56%	20,13,854	10.56%
B.L.Bansal	-		15,16,710	7.95%
Manav Bansal	12,58,196	6.60%	12,58,196	6.60%
Mukesh Chand Bansal	11,93,374	6.26%	11,93,374	6.26%
Century Vision Pvt. Ltd.	10,60,938	5.56%	10,60,938	5.56%
Vikas Bansal	9,53,998	5.00%	-	-

Note 15. Other equity

Components	Note	1 April 2018	Movement during the year	31 March 2019	1 April 2017	Movement during the year	31 March 2018
Capital reserve	a	3,01,42,208		3,01,42,208	3,01,72,342	(30,135)	3,01,42,208
Share premium	b	32,88,46,550		32,88,46,550	32,88,46,550		32,88,46,550
General reserve	d	48,34,33,983		48,34,33,983	48,34,33,983		48,34,33,983
Capital Redemption Reserve	e	3,00,00,000		3,00,00,000	3,00,00,000		3,00,00,000
Retained earnings	f	1,94,10,65,838	96,03,55,499	2,90,14,21,337	1,26,21,52,826	68,36,91,868	1,94,10,65,838
		2,81,34,88,579	96,03,55,499	3,77,38,44,078	2,13,46,05,701	68,36,61,733	2,81,34,88,579

The description, nature and purpose of each reserve within equity are as follows:

(a) **Capital Reserve:** Capital reserve is utilised in accordance with provisions of the Act

(b) **Securities Premium Account:** The amount received in excess of face value of the equity shares is recognised in Share Premium.

(c) **General Reserve:** The Company has transferred a potion of the net profit of the Company before declaring dividend to general reserve persuant to the earlier provisions of Companies Act 1956. Mandatory transfer to general reserve is not required under the Companies Act 2013.

(d) **Capital Redemption Reserve:** The Company has recognised Capital Redemption Reserve on redemption of Preference Shares from its retained earnings. The amount in Capital Redemption Reserve is equal to nominal amount of the Preference Shares redeemed.

(e) **Retained earnings:** It comprise of accumulated profit/ (loss) of the Company. The movement is on account of following

(i) ₹99,16,43,496 (31st March 2018: ₹70,66,16,406) was on account of profit/ (loss) incurred by the Company.

(iii) ₹2,29,54,673 (31st March 2018: 2,29,54,673) was on account of dividend distribution (inclusive of dividend distribution tax).

(iv) ₹ NIL (31st March 2018: 30,135) on account of depreciation on revaluation transferred to retained earnings.

Note 16. Borrowings

(Amount in ₹)

	31 March 2019	31 March 2018
16(i) Non-current borrowings		
Secured Term loans		
From banks		
- Bank of Baroda	27,74,494	-
- Yes Bank	56,70,803	-
- HDFC Bank	28,87,430	23,06,326
(A)	**1,13,32,727**	**23,06,326**
Unsecured Loans		
Bodies Corporate	28,60,93,048	31,24,04,143
(B)	**28,60,93,048**	**31,24,04,143**
(A + B)	**29,74,25,775**	**31,47,10,469**

Nature of Security and Terms of Payments for Long Term Borrowings

Nature of Security	Terms of Repayment
1. Term Loan from Bank of Baroda: Represents term loan amounting ₹27,74,494/- (31st March 2018 ₹ Nil) is secured on Vehicle.	(i) Repayable in 22 months from April 2020 to Jan 2022, Interest is payable at the rate of 8.90%
2. Term Loan from Yes Bank: Represents term loan amounting ₹56,70,803/- (31st March 2018 ₹ Nil) is secured on vehicles.	(i) Repayable in 24 months from April 2020 to March 2022, Interest is payable at the rate of 9.05% (ii) Repayable in 23 months from April 2020 to Feb 2022, Interest is payable at the rate of 9.05% (iii) Repayable in 22 months from April 2020 to Jan 2022, Interest is payable at the rate of 8.90%
3. Term Loan from HDFC Bank: Represents term loan amounting ₹28,87,430/- (31st March 2018 ₹23,06,326/-) is secured on vehicles.	(i) Repayable in 5 months from April 2020 to August 2020, Interest is payable at the rate of 8.50% (ii) Repayable in 9 months from April 2020 to Dec 2020, Interest is payable at the rate of 8.50% (iii) Repayable in 1 month in April 2020, Interest is payable at the rate of 8.90% (iv) Repayable in 20 months from April 2020 to Nov 2021, Interest is payable at the rate of 8.90%.

Notes to the Standalone Financial statements for the year ended 31 March 2019

Current Maturities of Non-Current Borrowings [disclosed under the head Other Financial Liabilities - Current (Refer note 21)]

(Amount in ₹)

	31 March 2019	31 March 2018
Punjab National Bank	-	3,08,73,948
HDFC Bank	14,09,220	20,51,825
Bank of Baroda	18,60,252	-
Yes Bank	36,87,684	-
	69,57,156	**3,29,25,773**
16(ii) Current borrowings		
Secured		
Working Capital Loans		
Allahabad bank	22,80,75,326	51,53,74,219
State Bank of India	49,84,18,308	41,43,17,733
Bank of Baroda	10,02,48,481	14,43,02,755
Punjab National Bank	4,84,80,126	18,79,06,793
Yes Bank	1,88,56,931	14,86,99,567
State Bank of India (IBD)	1,00,53,089	5,81,38,551
	90,41,32,261	**1,46,87,39,618**

Nature of security and other terms

Working Capital Loan are secured by first hypothecation on entire current assets of the Company including stocks, book debts and other Current Assets of all the units both present and future ranking pari-passu basis with working capital lending Banks under consortium and Personal guarantee of promoter directors and second charge on fixed assets (movable and immovable) of the Company.

Secured loan - terms of repayment

1. **Allahabad Bank:** Working capital loan amounting to ₹22,80,75,326 (31st March 2018: ₹51,53,74,219). Interest is payable at the rate of (MCLR+1.25%).
2. **State Bank of India:** Working capital loan amounting to ₹49,84,18,308 (31st March 2018: ₹41,43,17,733). Interest is payable at the rate of (MCLR+0.95%).
3. **Bank of Baroda:** Working capital amounting to ₹10,02,48,481 (31st March 2018: ₹14,43,02,755). Interest is payable at the rate of (MCLR+1.65%).
4. **Punjab National Bank:** Working capital amounting to ₹4,84,80,126 (31st March 2018: ₹18,79,06,793). Interest is payable at the rate of (MCLR+1.35%).
5. **Yes Bank:** Working capital amounting to ₹1,88,56,931 (31st March 2018: ₹14,86,99,567). Interest is payable at the rate of (MCLR+0.40%)
6. **State Bank of India (IBD):** Amounting to ₹1,00,53,089 (31st March 2018: ₹5,81,38,551).

Note 17. Provisions

(Amount in ₹)

	31 March 2019	31 March 2018
17(i) Non-Current		
Provisions for employee benefits		
- Provision for leave encashment	48,27,808	41,23,122
- Provision for gratuity (refer note 33)	43,44,893	28,82,100
	91,72,701	70,05,222
17(ii) Current		
Provisions for employee benefits		
Provision for Leave Encashment	6,13,407	4,72,341
	6,13,407	**4,72,341**

Note 18. Income and Deferred Taxes (net)

(Amount in ₹)

Deferred Tax		31 March 2019	31 March 2018
Deferred Tax Liabilities (net)			
Deferred tax liability		33,58,53,560	32,73,31,574
Less: Deferred tax asset		28,26,116	26,52,623
		33,30,27,444	**32,46,78,951**
Income taxes			
A. Amount recognised in profit or loss			
Current tax			
Current period		51,10,00,000	39,40,00,000
	A	51,10,00,000	39,40,00,000
Deferred tax			
Attributable to-			
Origination and reversal of temporary differences		79,69,299	(18,86,669)
	B	**79,69,299**	**(18,86,669)**
Tax expense reported in the Standalone Statement of Profit and Loss [(A)+(B)]		**51,89,69,299**	**39,21,13,331**
B. Income tax recognised in other comprehensive income			
Deferred tax			
On items that will not be reclassified to profit or loss			
- Remeasurements of defined benefit plans		(3,79,193)	(2,45,272)
Income tax expense reported in the Standalone Statement of Profit and Loss		**(3,79,193)**	**(2,45,272)**

Notes to the Standalone Financial statements for the year ended 31 March 2019

Note 18. Income and Deferred Taxes (net) (Contd.)

(Amount in ₹)

Deferred Tax	31 March 2019	31 March 2018
C. Reconciliation of effective tax rate for the year ended 31 March 2019		
Profit/(Loss) before tax (a)	1,50,15,73,520	1,10,00,56,579
Income tax rate as applicable (b)	34.944%	34.608%
Calculated taxes based on above, without any adjustments for deductions [(a) x (b)]	52,47,09,851	38,07,07,581
Permanent tax differences due to:		
Effect of expenses that are not deductible in determining taxable profit	25,04,310	16,58,564
	52,72,14,161	38,23,66,145
Tax effect of:		
Adjustments in prior year taxes	-	-
Tax allowances and concession	(4,99,191)	(4,55,091)
Others	(77,45,671)	1,02,02,277
	51,89,69,299	**39,21,13,331**

D. Recognised deferred tax assets and liabilities

	Balance as on 1 April 2018	(Charged) / credited to profit or loss	(Charged) / credited to OCI	Balance as on 31 March 2019
Property, plant and equipment	(32,72,54,430)	(85,99,130)	-	(33,58,53,560)
Provisions	25,87,835	6,17,474	(3,79,193)	28,26,116
Items allowed on payment basis	(12,357)	12,357	-	
	(32,46,78,952)	(79,69,299)	(3,79,193)	(33,30,27,444)

Note:

(a) The Company offsets tax assets and liabilities if and only if it has a legally enforceable right to set off current tax aseets and current tax liabilities and the deferred tax assets and deferred tax liabilities relate to income taxes levied by the same tax authority.

(b) During the year ended March 31, 2019 the Company has paid dividend to its shareholders. This has resulted in payment of Dividend Distribution Tax (DDT) to the taxation authorities. The Company believes that DDT represents additional payment to taxation authority on behalf of the shareholders. Hence, DDT paid is charged to equity.

Note 19. Other non-current liabilities

(Amount in ₹)

	31 March 2019	31 March 2018
Security and other deposits	13,28,25,016	15,02,65,406
	13,28,25,016	**15,02,65,406**

Note 20. Trade payables

(Amount in ₹)

		31 March 2019	31 March 2018
Dues to Micro And Small Enterprises (as per the intimation received from vendors)			
a.	Principal and interest amount remaining unpaid	12,99,438	-
b.	Interest due thereon remaining unpaid	-	-
c.	Interest paid by the Company in terms of Section 16 of the Micro, Small and Medium Enterprises Development Act, 2006, along with the amount of the payment made to the supplier beyond the appointed day	-	-
d.	Interest due and payable for the period of delay in making payment (which have been paid but beyond the appointed day during the period) but without adding interest specified under the Micro, Small and Medium Enterprises Act, 2006	-	-
e.	Interest accrued and remaining unpaid	-	-
f.	Interest remaining due and payable even in the succeeding years, until such date when the interest dues as above are actually paid to the small enterprises	-	-
	(A)	**12,99,438**	**-**

Disclosures of payables to vendors as defined under the Micro, Small and Medium Enterprise Development Act, 2006) is based on the information available with the Company regarding the status of registration of such vendors under the said Act, as per the intimation received from them on requests made by the Company. There are no overdue principal amounts/interest payable amounts for delayed payments to such vendors at the Balance Sheet date. There are no delays in payment made to such suppliers during the year or for any earlier years and accordingly there is no interest paid or outstanding interest in this regard in respect of payment made during the year or on balance brought forward from previous year.

Dues to others

		31 March 2019	31 March 2018
Trade payables			
- For goods		5,13,12,529	18,00,89,272
- For Stores		14,80,69,898	6,38,60,352
- For expenses		16,05,40,218	11,75,66,205
	(B)	35,99,22,645	36,15,15,829
	(A + B)	**36,12,22,083**	**36,15,15,829**

Trade payables are non interest bearing and are genereally settled with 30 to 90 days' payment terms.

Note 21. Other financial liabilities

(Amount in ₹)

	31 March 2019	31 March 2018
Current		
Current maturities of long-term debts (refer note 16)	-	3,08,73,948
Current maturities of finance lease obligations	69,57,156	20,51,825
Unpaid dividends	18,46,863	17,13,515
Payable for capital projects/ goods	-	2,44,49,726
Creditors for project expenditure	50,91,446	50,99,061
Cheques overdrawn	19,05,850	2,71,421
Interest accrued but not due	-	6,23,386
Others*	1,99,22,856	1,48,61,427
	3,57,24,171	**7,99,44,309**

*Others includes bonus payable to employees etc.

Note 22. Other current liabilities

(Amount in ₹)

	31 March 2019	31 March 2018
Advance received from customers	3,13,31,978	11,47,51,098
Statutory dues	4,41,62,191	10,48,02,997
	7,54,94,169	**21,95,54,095**

Notes to the Standalone Financial statements for the year ended 31 March 2019

Note 23. Current tax liabilities (Net)

(Amount in ₹)

	31 March 2019	31 March 2018
Current tax (net of payment)	92,83,896	1,38,63,745
	92,83,896	**1,38,63,745**

Note 24. Revenue from operations

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Sale of products & services		
Sale of products	7,68,25,33,102	8,27,74,72,551
Sale of services	1,38,25,73,938	1,15,86,39,882
Gross revenue from sale of products and services (including excise duty of ₹ NIL (P.Y. ₹14,15,32,414)		
Total (a)	**9,06,51,07,040**	**9,43,61,12,433**
Other operating revenues		
- Scrap and coal fines sales	51,38,53,876	43,51,15,260
- Export incentives	2,47,53,992	5,26,47,154
Total (b)	**53,86,07,868**	**48,77,62,414**
Total (a+b)	**9,60,37,14,908**	**9,92,38,74,847**

Note 25. Other income

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Interest income earned on financial assets that are not designated as FVTPL		
- Deposits with banks	78,53,703	1,02,25,752
Other non-operating income		
- Foreign currency exchange fluctuation gain	49,05,943	3,56,92,290
- Rent	47,61,817	43,83,291
- Sale of MEIS License	3,38,89,197	4,46,46,211
- Profit on sale of fixed asset	1,29,971	1,20,000
- Miscellaneous income *	1,73,47,897	53,91,845
	6,88,88,528	**10,04,59,389**

*Miscellaneous income includes balances and provisions written back, discount received, handling charges and miscellaneous receipts.

Note 26. Cost of materials consumed

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Inventory of raw materials at the beginning of the year (refer note 8)	93,84,04,719	68,26,13,189
Add: Purchases	6,00,17,28,984	6,54,26,80,940
	6,94,01,33,703	**7,22,52,94,129**
Less: Inventory of raw materials at the end of the year (refer note 8)	1,18,05,87,355	93,84,04,719
Cost of materials consumed	**5,75,95,46,348**	**6,28,68,89,410**

Notes to the Standalone Financial statements for the year ended 31 March 2019

Note 27. Change in inventories of finished goods and work-in-progress

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Inventories at the beginning of the year (refer note 8)		
Finished goods	61,71,02,040	65,36,24,810
Stock-in-Trade	2,61,52,187	4,23,27,662
Scrap, cuttings and coal fines	8,51,53,073	12,03,19,586
Less: Excise Duty	-	7,42,62,103
	72,84,07,300	**74,20,09,955**
Inventories at the end of the year (refer note 8)		
Finished goods	72,04,77,552	61,71,02,040
Stock-in-Trade	4,05,85,142	2,61,52,187
Scrap, cuttings and coal fines	12,49,38,133	8,51,53,073
	88,60,00,827	**72,84,07,300**
	(15,75,93,527)	**1,36,02,655**

Note 28. Employee benefits expense

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Salaries and wages (including managerial remuneration)	21,55,51,719	15,51,82,899
Contribution to provident and other funds (refer note 33)	1,75,29,154	1,22,95,712
Staff welfare expenses	1,47,25,857	1,49,07,239
	24,78,06,730	**18,23,85,850**

Note 29. Finance costs

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Interest expense:		
- on finance liabilities measured at amortized cost	12,11,05,550	13,67,83,690
- on finance lease	7,93,092	3,90,547
- others	2,73,59,937	3,52,04,660
Other borrowing costs	84,85,997	1,25,86,526
	15,77,44,576	**18,49,65,423**

Notes to the Standalone Financial statements for the year ended 31 March 2019

Note 30. Other expenses

(Amount in ₹)

		Year ended 31 March 2019	Year ended 31 March 2018
Manufacturing expenses:			
Rolling charges & material cutting charges		18,19,33,535	15,86,88,306
Stores and spare parts consumed		11,71,34,060	9,86,75,684
Furnace oil consumed		38,70,01,810	41,71,92,007
Oxygen and gas consumed		49,08,191	30,57,960
Coal consumed		22,41,74,584	11,38,02,806
Electricity charges		39,08,49,126	39,09,91,431
PGP operation charges		1,17,26,408	82,35,204
Processing charges		32,47,368	22,96,055
Repair and maintenance:			
- Plant and machinery and electrical		68,56,521	58,37,884
- Shed and building		38,33,348	28,94,913
Freight, carriage and octroi charges		10,80,28,591	16,31,67,950
Machinery hire charges		82,56,837	77,53,292
Testing, effluent and inspection charges		5,40,259	4,53,666
	A	**1,44,84,90,638**	**1,37,30,47,158**
Establishment expenses			
Electricity expenses		21,27,816	21,22,033
Insurance charges		33,55,279	40,11,626
Repair and maintenance-others		1,14,86,220	1,04,88,674
Rent charges paid		1,30,95,744	75,82,333
License, rates and taxes		70,10,299	55,68,693
Legal and professional charges		96,03,534	1,07,65,865
Security service charges		98,22,728	98,29,102
Bad debt written off		1,69,38,766	97,61,766
Computer maintenance expenses		10,77,708	8,55,879
Printing and stationary		13,44,736	16,59,796
Loss on sale of fixed assets		37,70,058	10,02,193
Travelling and conveyance expenses		1,15,64,634	78,92,178
Vehicle maintenance		54,68,734	49,92,301
Telephone and mobile expenses		30,18,792	27,25,028
Corporate social responsibility		1,27,79,639	88,08,630
Payment to Auditors:			
- Audit fees		5,70,000	5,70,000
- Tax audit		55,000	55,000
- Reimbursement of expenses		1,41,584	2,71,846
Miscellaneous expenses		1,89,27,459	2,34,64,413
	B	**13,21,58,730**	**11,24,27,356**
Selling and Distribution Expenses:			
Advertisement expenses		1,13,46,615	57,27,150
Commission on sales		1,27,38,484	43,85,649
Sales promotion expenses		72,27,392	41,29,531
Freight on export		5,09,12,009	11,79,28,100
Freight, carriage and octroi charges		4,71,63,579	6,65,73,050
Other selling and distribution expenses		90,37,180	63,34,231
	C	**13,84,25,259**	**20,50,77,711**
Total (A+B+C)		**1,71,90,74,627**	**1,69,05,52,225**

Note 31. Earnings/ (loss) per share (EPS)

The calculations of profit attributable to equity shareholders and weighted average number of equity shares outstanding for purposes of basic earnings per share calculation are as follows:

		Year ended 31 March 2019	Year ended 31 March 2018
(i)	**Profit/ (loss) attributable to equity shareholders (basic and diluted)**		
	Profit/ (loss) for the year, attributable to the equity holders	98,26,04,221	70,79,43,248
(ii)	**Weighted average number of equity shares (basic and diluted)**		
	At the beginning of the year	1,90,72,052	1,90,72,052
	Impact of new issue of equity shares	-	-
	Weighted average number of equity shares (basic and diluted) for the year	**1,90,72,052**	**1,90,72,052**
	Basic and diluted earnings/ (loss) per share [(i)/ (ii)]	51.52	37.12

Note 32. Contingent liability and commitments (Ind AS 37)

(to the extent not provided for)

		Year ended 31 March 2019	Year ended 31 March 2018
a)	**Claim against the Company not acknowledged as debt**		
	(i) Excise /Service Tax matters in dispute/under appeal	16,58,68,995	16,92,48,741
	(ii) Sales Tax/VAT matters in dispute/under appeal	1,43,83,341	1,52,28,808
	(iii) Income Tax matters in dispute/under appeal	10,08,85,365	10,08,85,365
b)	**Capital and other commitments**		
	(i) Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances)	78,96,789	1,89,07,780
c)	**Guarantee outstanding**		
	Bank guarantee issued on behalf of the Company to secure the financial assistance and business contract	43,50,39,000	33,92,11,000

Note 33. Assets and Liabilities relating to employee benefits (Ind AS 19)

	Year ended 31 March 2019	Year ended 31 March 2018
Statement of Assets and Liabilities for defined benefit obligation		
Net defined benefit asset - Gratuity Plan	1,39,40,269	1,41,87,206
Net defined benefit obligation - Gratuity Plan	(1,82,85,162)	(1,70,69,305)
Total employee benefit liabilities	**(43,44,893)**	**(28,82,099)**
Non-current	(43,44,893)	(28,82,099)
Current	-	-
Defined contribution		
Contribution to Defined Contribution Plan, recognized as expense for the period is as under:		
	31 March 2019	31 March 2`018
Employer's Contribution to Provident and Other Funds	**1,75,29,154**	**1,22,95,712**

Notes to the Standalone Financial statements for the year ended 31 March 2019

Defined benefits - Gratuity

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

The Company provides for gratuity from employees in India as per the Payment of Gratuity Act, 1972. Employees who are in continuous service for a period of 5 years are eligible for gratuity. The amount of gratuity payable on retirement/ termination is the employees last drawn basic salary per month computed proportionately for 15 days salary multiplied for the number of years of service. The gratuity plan is a funded plan and the Company makes contributions to recognised funds in India. The Company does not fully fund the liability and maintains a target level of funding to be maintained over a period of time based on estimation of expected gratuity payments.

These defined benefit plans expose the Company to actuarial risks, such as currency risk, interest risk and market (investment) risk.

The Company expects to pay ₹21,50,555 /- in contribution to its defined benefit plans during the year 2019-20

Inherent risk

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

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

Reconciliation of the net defined benefit (asset)/ liability:

			31 March 2019	31 March 2018
(i)	**Reconciliation of present value of defined benefit obligation**			
	(a)	Balance at the beginning of the year	1,70,69,305	1,48,98,079
	(b)	Current service cost	23,26,017	21,18,984
	(c)	Past service cost - plan amendments	-	5,06,394
	(d)	Interest cost	12,64,203	10,89,826
	(e)	Actuarial (gains)/ losses recognised in other comprehensive income		
		- financial assumptions	1,94,235	(3,69,872)
		- experience adjustment	(12,66,441)	(4,39,983)
	(g)	Benefits paid	(13,02,157)	(7,34,123)
	Balance at the end of the year		**1,82,85,162**	**1,70,69,305**
(ii)	**Reconciliation of present value of plan assets**			
	(a)	Balance at the beginning of the year	1,41,87,206	1,40,00,000
	(b)	Interest income	10,42,282	10,22,470
	(c)	Actual return on plan asset less interest on plan asset	12,938	(1,01,141)
	(d)	Contributions by the employer	-	-
	(e)	Benefits paid	(13,02,157)	(7,34,123)
	Balance at the end of the year		**1,39,40,269**	**1,41,87,206**
(iii)	**Net asset/ (liability) recognised in the Balance Sheet**			
	Present value of defined benefit obligation		(1,82,85,162)	(1,70,69,305)
	Fair value of plan assets		1,39,40,269	1,41,87,206
	Net defined benefit obligations in the Balance Sheet		**(43,44,893)**	**(28,82,099)**

Reconciliation of the net defined benefit (asset)/ liability: (Contd.)

		31 March 2019	31 March 2018
(iv)	**Expense recognised in Profit or Loss**		
	Current service cost	23,26,017	21,18,984
	Past service cost - plan amendments	-	5,06,394
	Interest cost	2,21,921	67,356
	Expected return on plan assets	-	-
	Amount charged to Profit or Loss	**25,47,938**	**26,92,734**
(v)	**Remeasurements recognised in Other Comprehensive Income**		
	(a) Actuarial loss/ (gain) arising on defined benefit obligation from	31 March 2019	31 March 2018
	- demographic assumptions	-	-
	- financial assumptions	1,94,235	(3,69,872)
	- experience adjustment	(12,66,441)	(4,39,983)
	(b) Actual return on plan asset less interest on plan asset	(12,938)	1,01,141
	Amount recognised in Other Comprehensive Income	**(10,85,144)**	**(7,08,714)**
(vi)	**Maturity profile of defined benefit obligation**		
	Within the next 12 months	20,87,552	22,79,737
	Between 1 and 5 years	48,53,074	42,48,973
	Between 5 and 10 years	1,08,99,175	97,00,663
	More than 10 years	73,84,000	16,49,57,982
(vi)	**Sensitivity analysis**		
	Defined benefit obligation on discount rate plus 100 basis points	17,94,181	16,60,239
	Defined benefit obligation on salary growth rate plus 100 basis points	21,43,329	19,90,161
	Defined benefit obligation on discount rate minus 100 basis points	21,51,801	19,95,977
	Defined benefit obligation on salary growth rate minus 100 basis points	18,19,143	16,84,681
(vii)	**Actuarial assumptions**		
	Principal actuarial assumptions at the reporting date (expressed as weighted averages)		
	Discount rate	7.60%	7.70%
	Expected rate of salary increase	7.00%	7.00%
	Retirement age (years)	58	58
	Attrition rate based on different age group of employees		
	- 20 to 25 years	0.50%	0.50%
	- 25 to 30 years	0.30%	0.30%
	- 30 to 35 years	0.20%	0.20%
	- 35 to 50 years	0.10%	0.10%
	- 50 to 55 years	0.20%	0.20%
	- 55 to 60 years	0.30%	0.30%

Assumptions regarding future mortality experience are set in accordance with the published rates under Indian Assured Lives Mortality (2006-08).

(viii)	**Weighted average duration of defined benefit obligation**	12 years	12 years

Notes to the Standalone Financial statements for the year ended 31 March 2019

Note 34. Related Party Disclosures under Ind AS 24

1. Relationship:-

(A) List of related parties where control exists

Particulars	Related Parties	Country of Incorporation
Associate	A K C Steel Industries Limited	India

(B) List of other related parties

Name of the related parties	Relationship
Mr. Suresh Chand Bansal, Executive Chairman	Key Management Personnel(KMP)
Mr. Mukesh Chand Bansal, Managing Director	Key Management Personnel(KMP)
Mr. Vikas Bansal, Executive Director	Key Management Personnel(KMP)
Mr. Manav Bansal, Whole time Director & CFO	Key Management Personnel(KMP)
Mr. Gautam Bansal, Whole time Director	Key Management Personnel(KMP)
Mrs. Indu Bansal	Relative of KMPs (wife of Mr. Suresh Chand Bansal)
Mrs. Aruna Bansal	Relative of KMPs (wife of Mr. Mukesh Chand Bansal)

(C) Other related parties over which Key Management Personnel to its relatives have its interest

Associate Company

B.P. Spring & Engineering Co (Pvt) Ltd

Century Vision Private Ltd

Emerald Suppliers Private Ltd

Tirumala Holdings Private Ltd

Beekay Associates Pvt Ltd

Metropolis Estates Pvt Ltd

Pleasant Holdings Pvt Ltd

Associate Enterprises

B.L.Bansal & Sons (HUF)

Thirupathy Bright Industries

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

Name of Related Party	Nature of Transactions	Amount (₹)	
		31 March 2019	31 March 2018
AKC Steel Industries Limited	Purchase of Goods	2,49,96,525	1,62,35,236
AKC Steel Industries Limited	Sale of Goods	3,22,794	65,22,471
Thirupathy Bright Industries	Purchase of Goods	38,60,747	-
Thirupathy Bright Industries	Sale of Goods	56,83,702	1,09,93,937
AKC Steel Industries Limited	Rent & Electricity	1,22,78,719	57,11,764
Emerald suppliers Private Limited	Rent, Electricity & Maintenance	3,56,196	1,60,901
Beekay Assocaites Pvt Ltd	Rent, Electricity & Maintenance	2,00,532	2,08,117
Metropolis Estates Pvt Ltd	Rent, Electricity & Maintenance	1,78,052	1,88,941
Pleasant Holdings Pvt Ltd	Rent, Electricity & Maintenance	2,80,289	3,02,256

Name of Related Party	Nature of Transactions	Amount (₹)	
		31 March 2019	31 March 2018
B.L.Bansal & Sons (HUF)	Rent, Electricity & Maintenance	36,000	36,000
Gautam Bansal	Rent, Electricity & Maintenance	4,66,774	3,98,526
Aruna Bansal	Rent, Electricity & Maintenance	4,02,000	3,72,000
Indu Bansal	Rent, Electricity & Maintenance	2,40,000	2,40,000
Mukesh Chand Bansal	Rent, Electricity & Maintenance	1,80,000	1,44,000
Manav Bansal	Rent, Electricity & Maintenance	1,80,000	1,44,000
Vikas Bansal	Rent, Electricity & Maintenance	1,62,000	1,32,000
AKC Steel Industries Limited	Machining Charges	1,02,09,518	69,39,546
Tirumala Holdings Private Limited	Interest on Unsecured Loan	-	2,219
Century Vision Private Limited	Interest on Unsecured Loan	12,84,862	10,19,841
Suresh Chand Bansal	Managerial Remuneration	4,11,70,000	1,40,02,000
Mukesh Chand Bansal	Managerial Remuneration	1,81,70,000	96,26,000
Vikas Bansal	Managerial Remuneration	1,74,50,000	90,50,000
Manav Bansal	Managerial Remuneration	1,18,50,000	70,70,000
Gautam Bansal	Managerial Remuneration	87,20,000	70,00,000

3. Balances with related parties referred in 1 above, in ordinary course of business:

Balance Outstanding at the end of the year:	Amount (₹)	
	31 March 2019	31 March 2018
Nature of Transactions		
Purchase of Goods		
AKC Steel Industries Limited (Dr. Balance)	1,97,10,257	4,63,66,160
Thirupathy Bright Industries(Dr Balance)	-	6,03,963
Sale of Goods		
AKC Steel Industries Limited (Dr. Balance)	-	10,71,471
Thirupathy Bright Industries(Dr Balance)	62,87,665	71,54,638
Rent, Electricity & Maintenance		
AKC Steel Industries Limited (Cr. Balance)	46,76,108	9,20,871
Beekay Associates Private Limited (Cr. Balance)	34,469	58,474
Pleasant Holdings Pvt Ltd (Cr. Balance)	36,798	96,630
Metropolis Estates Pvt Ltd (Cr. Balance)	40,166	70,980
Emerald Suppliers Private Limited(Cr. Balance)	83,049	1,60,921
B.L.Bansal & Sons(HUF)(Cr. Balance)	9,000	9,000
Gautam Bansal (Cr. Balance)	1,07,236	81,000
Mukesh Chand Bansal (Cr. Balance)	40,500	36,000
Manav Bansal(Cr. Balance)	40,500	36,000
Aruna Bansal (Cr. Balance)	54,000	54,000
Indu Bansal (Cr. Balance)	54,000	54,000

Notes to the Standalone Financial statements for the year ended 31 March 2019

Balance Outstanding at the end of the year:	Amount (₹)	
	31 March 2019	31 March 2018
Other Income(Rent & Electricity)		
B.P. Spring & Engg Co (Pvt) Limited(Dr. Balance)	72,101	79,35,825
Emerald Suppliers Private Limited(Dr. Balance)	1,00,000	1,00,000
Interest on unsecured loan		
Tirumala Holdings Private Limited(Cr. Balance)	-	1,997
Century Vision Private Limited(Cr. Balance)	11,56,375	-
Remuneration		
Suresh Chand Bansal(Cr. Balance)	2,10,08,181	6,75,647
Mukesh Chand Bansal(Cr. Balance)	75,96,781	1,95,485
Vikas Bansal(Cr. Balance)	74,57,172	1,83,786
Manav Bansal(Cr. Balance)	48,20,852	1,74,814
Gautam Bansal (Cr. Balance)	33,90,634	2,34,345

Compensation of Key Management Personnel of the Company

Key management personnel compensation comprised the following :

Nature of Transaction	Year ended 31 March 2019	Year ended 31 March 2018
Short-term employee benefits	9,73,60,000	4,67,48,000
Other long-term benefits (Refer Note below)	*	*
Total Compensation paid to key management personnel	**9,73,60,000**	**4,67,48,000**

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

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

Terms and conditions of transactions with related parties

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

Note 35: Accounting classifications and fair values (Ind AS 107)

35.1 Fair values vs carrying amounts

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

		Note No.	As at 31st March 2019		As at 31st March 2018	
			Carrying amount	Fair value Level 3	Carrying amount	Fair value Level 3
A.	**Financial assets:**					
a)	**Measured at amortised cost**					
	Trade receivables	9	1,17,69,52,659	-	1,31,66,81,974	-
	Cash and cash equivalents	10	2,76,87,997	-	1,89,70,222	-

		Note No.	As at 31st March 2019		As at 31st March 2018	
			Carrying amount	Fair value Level 3	Carrying amount	Fair value Level 3
	Bank balances other than cash and cash equivalents	11	2,33,28,688	-	1,92,10,615	-
	Other financial assets	6,12	2,11,32,665	-	1,96,02,407	-
b)	**Measured at fair value through profit or loss**					
	Investments	5	1	1	1	1
B.	**Financial liabilities:**					
a)	**Measured at amortised cost**					
	Borrowings	16	1,20,15,58,036	-	1,78,34,50,087	-
	Trade payables	20	36,12,22,083	-	36,15,15,829	-
	Other financial liabilities	21	3,57,24,171	-	7,99,44,309	-

Note 35.2 Fair value measurement

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

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

Level 1: The hierarchy uses quoted (adjusted) prices in active markets for identical assets or liabilities. The fair value of all bonds which are traded in the stock exchanges is valued using the closing price or dealer quotations as at the reporting date.

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

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

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

The fair value of the financial instruments is determined using net asset value at the respective reporting date

Note 35.3 Financial risk management

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

(i) Credit risk

(ii) Liquidity risk

(iii) Market risk

Risk management framework

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

The Company's activities expose it to a variety of financial risks, including market risk, credit risk and liquidity risk. The Company's primary risk management focus is to minimise potential adverse effects of market risk on its financial performance. The Company's exposure to credit risk is influenced mainly by the individual characteristic of each customer and the concentration of risk from the top few customers. The Company's risk management assessment and policies and processes are established to identify and analyse the risks faced by the Company,

Notes to the Standalone Financial statements for the year ended 31 March 2019

to set appropriate risk limits and controls, and to monitor such risks and compliance with the same. Risk assessment and management policies and processes are reviewed regularly to reflect changes in market conditions and the Company's activities.

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

(i) Credit risk

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

Trade receivable

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

Exposure to credit risks

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

Particulars	Year ended 31 March 2019		Year ended 31 March 2018	
	%	Amount	%	Amount
Revenue from top customer	11.44%	1,09,88,63,321	17.06%	1,69,26,81,532
Revenue from top five customers	44.02%	4,22,72,12,331	47.92%	4,75,59,87,871

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

(ii) Liquidity risk

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

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

Exposure to liquidity risk

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

31 March 2019	Less than 1 year	1-5 years	> 5 years	Total
Borrowings	90,41,32,261	29,74,25,775	-	1,20,15,58,036
Trade payables	36,12,22,083	-	-	36,12,22,083
Other financial liabilities	3,57,24,171	-	-	3,57,24,171

31 March 2018	Less than 1 year	1-5 years	> 5 years	Total
Borrowings	1,46,87,39,618	31,47,10,469		1,78,34,50,087
Trade payables	36,15,15,829	-	-	36,15,15,829
Other financial liabilities	7,99,44,309	-	-	7,99,44,309

(iii) Market risk

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

(a) Interest rate risk

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

Exposure to interest rate risk

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

Particulars	Year ended 31 March 2019	Year ended 31 March 2018
Fixed rate instruments		
Financial assets	5,27,91,138	4,19,56,341
Financial liabilities	(30,43,82,931)	(31,67,62,294)
	(25,15,91,793)	**(27,48,05,953)**
Variable rate instruments		
Financial assets	-	-
Financial liabilities	(89,71,75,105)	(1,46,66,87,793)
	(89,71,75,105)	**(1,46,66,87,793)**

Sensitivity analysis

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

Notes to the Standalone Financial statements for the year ended 31 March 2019

Cash flow sensitivity analysis for variable rate instruments

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

Particulars	Profit or loss		Equity, net of tax	
	Strengthening	Weakening	Strengthening	Weakening
31 March 2019				
Variable rate instruments	(89,71,751)	89,71,751	(58,36,662)	58,36,662
Cash flow sensitivity (net)	**(89,71,751)**	**89,71,751**	**(58,36,662)**	**58,36,662**
31 March 2018				
Variable rate instruments	(1,46,66,878)	1,46,66,878	(95,90,965)	95,90,965
Cash flow sensitivity (net)	**(1,46,66,878)**	**1,46,66,878**	**(95,90,965)**	**95,90,965**

(b) Equity price risk

The Company is not exposed to equity risks arising from equity investments. Equity investments are held for stratergic rather than trading purposes. The Company does not actively trade these investments.

(c) Currency risk

Foreign currency risk is the risk impact related to fair value or future cash flows of an exposure in foreign currency, which fluctuate due to changes in foreign exchange rates. The Company's exposure to the risk of changes in foreign exchange rates relates primarily to import of raw materials and spare parts, capital expenditure, exports of finished goods. The currency in which these transaction are primarily denominated as USD.

The Company evaluates exchange rate exposure arising from foreign currency transactions. The Company follows established risk management policies and standard operating procedures.

Exposure to currency risk

The Company's exposure to foreign currency are at the end of the reporting period are as follows:

Particulars	In original currency (USD)	In Rupees
31 March 2019		
Trade receivables	7,00,782	4,82,33,912
Net exposure in respect of recognised financial assets and liabilities	**7,00,782**	**4,82,33,912**
31 March 2018		
Trade receivables	2,53,490	1,62,65,130
Net exposure in respect of recognised financial assets and liabilities	2,53,490	1,62,65,130

Sensitivity analysis

A reasonably possible strengthening (weakening) of the USD and JPY against Indian rupee at 31 March would have affected the measurement of financial instruments denominated in a foreign currency and affected equity and profit or loss by the amount shown below. This analysis assumes that all other variables, in particular interest rates, remain constant and ignores any impact of forecast sales and purchases.

Particulars	Profit or loss		Equity, net of tax	
	Strengthening	Weakening	Strengthening	Weakening
31 March 2019				
USD (5% Movement)	**24,11,696**	**(24,11,696)**	**15,68,953**	**(15,68,953)**
31 March 2018				
USD (5% Movement)	8,13,257	(8,13,257)	5,31,805	(5,31,805)

Note 36. Capital management

The Company's policy is to maintain a strong capital base so as to maintain investor, creditor and market confidence and to sustain future development of the business. The management monitors the return on capital, as well as the level of dividends to equity shareholders.

The Company's objective when managing capital are to: (a) to maximise shareholders value and provide benefits to other stakeholders and (b) maintain an optimal capital structure to reduce the cost of capital.

For the purpose of the Company's capital management, capital includes issued equity share capital and other equity reserves attributable to the equity holders.

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

Particulars		31 March 2019	31 March 2018
Total debt (Bank and other borrowings)	A	1,20,15,58,036	1,81,43,24,035
Equity	B	3,96,47,53,348	3,00,43,97,849
Liquid investments including bank deposits	C	2,76,87,997	1,89,70,222
Debt to Equity (A / B)		0.30	0.60
Debt to Equity (net) [(A-C) / B]		0.30	0.60

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

Note 37. Leases: Company as lessee

The Company has entered into agreements in the nature of lease/leave and license agreement with different lessors/licensors for the purpose of establishment of office premises/residential accommodations etc. These are generally in the nature of operating lease/leave and license. Period of agreements are generally up to three years amd renewable at the option of the lessee.

Lease rentals charged to revenue (included under the head Other Expenses in Note 30) for right to use the following assets are:

Particulars	For the year ended 31 March	
	2019	2018
Office premises, residential flats, plant and equipment etc.	1,30,95,744	75,82,333

Note 38. During the Financial Year the Company have written off ₹1.54 Crores due to dis-embarkment of Bobbili Project of the Company because of non fulfilment of terms & conditions set by Andhra Pradesh Industrial Infrastructural Corporation Limited (APIIC).

Notes to the Standalone Financial statements for the year ended 31 March 2019

Note 39. Details of Corporate Social Responsibility (CSR) Expenditure:

(Amount in Lakhs)

Particulars	Year ended 31st March 2019	Year ended 31st March 2018
Amount required to be spent as per Section 135 of the Companies Act	129.66	72.55
Amount spent during the year on:		
(i) Construction/Acquisition of an assets	-	-
(ii) on purpose other than above(i)	128.36	92.07
Total	**128.36**	**92.07**

Note 40. Events occurred after the Balance Sheet date

The Board of Directors has recommended Equity Dividends of ₹2/- per Share (Previous year ₹1/-) for the financial year 2018-19

Note 41. The Financial statements were authorized for issue by the Directors on 29th May, 2019

The accompanying notes form an integral part of the standalone financial statements

As per our report of even date attached

For LIHALA & CO
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors

Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

Consolidated Financial Statements

Independent Auditor's Report

To
The Members of
BEEKAY STEEL INDUSTRIES LIMITED.

REPORT ON THE AUDIT OF THE CONSOLIDATED IND AS FINANCIAL STATEMENTS

Opinion

We have audited the accompanying Consolidated Ind AS Financial Statement of **BEEKAY STEEL INDUSTRIES LIMITED**, which comprise the Balance Sheet as at 31st March, 2019, the Statement of Profit and Loss(including other comprehensive income), the Statement of Changes in Equity, the Statement of Cash Flows for the year ended on that date, and a summary of the significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid Consolidated financial statements give the information required by the Companies Act, 2013 (the "Act") in the manner so required and give a true and fair view in conformity with 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 Consolidated state of affairs of the Company as at March 31, 2019, the Consolidated profit, Consolidated total comprehensive income, Consolidated changes in equity and its Consolidated cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit of the Consolidated financial statements in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Act (SAs). Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Consolidated Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India (ICAI) together with the independence requirements that are relevant to our audit of the Consolidated financial statements under the provisions of the Act and the Rules made thereunder, 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 audit opinion on the Consolidated financial statements.

Key Audit Matters

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

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

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

Our opinion on the Consolidated 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 Consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the Consolidated 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 for the Consolidated Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these Consolidated financial statements that give a true and fair view of the financial position, financial performance, total comprehensive income, changes in equity and cash flows of the Company in accordance with the Ind AS 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 safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the Consolidated financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the Consolidated financial statements, 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 responsible for overseeing the Company's financial reporting process.

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

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

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

- Identify and assess the risks of material misstatement of the Consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal financial controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company and its subsidiary companies which are companies incorporated in India, has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by 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 ability of the Company to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the Consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the Consolidated financial statements, including the disclosures, and whether the Consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements.

Materiality is the magnitude of misstatements in the Consolidated 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 Consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by Section 143 (3) of the Act, based on our audit we report that:

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

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

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

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

   e) On the basis of the written representations received from the directors as on 31 March 2019 taken on record by the Board of Directors, none of the directors is disqualified as on 31 March 2019 from being appointed as a director in terms of Section 164 (2) of the Act.

   f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in 'Annexure A'. Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company's internal financial controls over financial reporting.

   g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended : In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Company to its directors during the year is in accordance with the provisions of section 197 of the Act.

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

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

      ii) The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts.

      iii) There has been no delay in transferring amounts, required to be transferred, to the Investor Education and Protection Fund by the Company.

For LIHALA & CO
Chartered Accountants
Firm's Registration Number. 315052E

Rajesh Lihala
(Partner)
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

Annexure - A to Independent Auditor's Report

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

We have audited the internal financial controls over financial reporting of **BEEKAY STEEL INDUSTRIES LIMITED** as of March 31, 2019 in conjunction with our audit of the Consolidated financial statements of the Company for the year ended on that date.

2. Management's Responsibility for Internal Financial Controls

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

3. Auditors' Responsibility

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

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

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

4. Meaning of Internal Financial Controls Over Financial Reporting

A Company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A Company's internal financial control over financial reporting includes those policies and procedures that:

(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 authorisations of management and directors of the Company; and

(iii) provide reasonable assurance regarding prevention or timely detection of unauthorised acquisition, use, or disposition of the Company's assets that could have a material effect on the financial statements.

5. Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

6. Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2019, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

For LIHALA & CO
Chartered Accountants
Firm's Registration Number. 315052E

Rajesh Lihala
(Partner)
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

Consolidated Balance Sheet as at 31 March 2019

(Amount in ₹)

	Note	As at 31 March, 2019	As at 31 March, 2018
ASSETS			
(1) Non-current assets			
(a) Property, plant and equipment	4A	2,07,91,06,334	1,87,11,29,006
(b) Capital work-in-progress	4B	23,41,50,046	25,34,63,074
(c) Financial assets			
(i) Investments	5	1,54,32,181	70,98,857
(ii) Other financial assets	6	1,46,18,229	1,39,24,000
(d) Other non-current assets	7	14,65,07,753	15,63,19,415
Total Non-current assets		2,48,98,14,543	2,30,19,34,352
(2) Current assets			
(a) Inventories	8	2,14,07,43,426	1,72,43,25,810
(b) Financial assets			
(i) Trade receivables	9	1,17,69,52,659	1,31,66,81,974
(ii) Cash and cash equivalents	10	2,76,87,997	1,89,70,222
(iii) Bank balances other than cash and cash equivalents	11	2,33,28,688	1,92,10,615
(iv) Other financial assets	12	65,14,436	56,78,407
(c) Other current assets	13	27,17,44,702	56,31,25,311
Total Current assets		3,64,69,71,908	3,64,79,92,339
TOTAL ASSETS		6,13,67,86,451	5,94,99,26,690
EQUITY AND LIABILITIES			
Equity			
(a) Equity share capital	14	19,09,09,270	*19,09,09,270*
(b) Other equity	15	3,78,69,56,258	2,81,82,67,435
Total Equity		3,97,78,65,528	3,00,91,76,705
Liabilities			
(1) Non-current liabilities			
(a) Financial liabilities			
(i) Borrowings	16 (i)	29,74,25,775	31,47,10,469
(b) Provisions	17 (i)	91,72,701	70,05,222
(c) Deferred tax liabilities (net)	18	33,30,27,444	32,46,78,951
(d) Other non-current liabilities	19	13,28,25,016	15,02,65,406
Total Non-current liabilities		77,24,50,936	79,66,60,048
(2) Current liabilities			
(a) Financial liabilities			
(i) Borrowings	16 (ii)	90,41,32,261	1,46,87,39,618
(ii) Trade payables	20		
Total outstanding dues of Micro Enterprises & small Enterprises		12,99,438	-
Total outstanding dues of Creditors other than Micro Enterprises & small Enterprises		35,99,22,645	36,15,15,829
(iii) Other financial liabilities	21	3,57,24,171	7,99,44,309
(b) Other current liabilities	22	7,54,94,169	21,95,54,095
(c) Provisions	17 (ii)	6,13,407	4,72,341
(d) Current Tax Liabilities (Net)	23	92,83,896	1,38,63,745
Total Current liabilities		1,38,64,69,987	2,14,40,89,937
TOTAL EQUITY AND LIABILITIES		6,13,67,86,451	5,94,99,26,690
Significant accounting policies	3		

The accompanying notes form an integral part of the consolidated financial statements

As per our report of even date attached

For **LIHALA & CO**
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors
Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

BEEKAY
Inspired by Steel

Consolidated Statement of Profit and Loss for the year ended 31 March 2019

(Amount in ₹)

		Note	Year ended 31 March, 2019	Year ended 31 March, 2018
I	**Revenue from operations**	24	9,60,37,14,908	9,92,38,74,847
II	Other income	25	6,88,88,528	10,04,59,389
III	**Total income (I + II)**		**9,67,26,03,436**	**10,02,43,34,236**
IV	**Expenses**			
	Cost of materials consumed	26	5,75,95,46,348	6,28,68,89,410
	Excise duty		-	14,15,32,414
	Purchase of stock-in-trade		28,07,40,671	27,44,07,300
	Changes in inventories of finished goods, stock-in-trade and work-in-progress	27	(15,75,93,527)	1,36,02,655
	Employee benefits expense	28	24,78,06,730	18,23,85,850
	Finance costs	29	15,77,44,576	18,49,65,423
	Depreciation and amortisation expense	4A	16,37,10,491	14,99,42,380
	Other expenses	30	1,71,90,74,627	1,69,05,52,225
	Total expenses (IV)		**8,17,10,29,916**	**8,92,42,77,657**
V	**Profit/ (loss) before tax (III-IV)**		1,50,15,73,520	1,10,00,56,579
VI	**Tax expense:**			
	Current tax		51,10,00,000	39,40,00,000
	Deferred tax		79,69,299	(18,86,669)
VII	**Profit / (loss) for the year (V-VI)**		**98,26,04,221**	**70,79,43,248**
VIII	**Share of profit / (loss) from an associate**		83,33,324	(17,90,284)
IX	**Total Profit / (loss) for the year (VII + VIII)**		99,09,37,545	70,61,52,964
X	**Other comprehensive income**			
	A. Items that will not be reclassified to profit or loss			
	(a) Remeasurements of defined benefit liability/ (asset)		10,85,144	7,08,714
	(b) Income taxes relating to items that will not be reclassified to profit or loss		(3,79,193)	(2,45,272)
	Net other comprehensive		**7,05,951**	**4,63,442**
	B. Items that will be reclassified to profit or loss		-	-
	Net other comprehensive income to be reclassified subsequently to profit or loss		-	-
VIII	**Other comprehensive income**		**7,05,951**	**4,63,442**
IX.	**Total comprehensive income for the year (VII+VIII)**		**99,16,43,496**	**70,66,16,406**
X.	**Earnings per equity share**			
	[Face value of equity share ₹10 each (previous year ₹10 each)]			
	- Basic		51.96	37.03
	- Diluted		51.96	37.03
Significant accounting policies		3		

The accompanying notes form an integral part of the consolidated financial statements

As per our report of even date attached

For **LIHALA & CO**
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors
Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

Cash Flow Statement for the year ended 31 March 2019

(Amount in ₹)

	Particulars	Year ended 31 March, 2019		Year ended 31 March, 2018	
		Amount (₹)	Amount (₹)	Amount (₹)	Amount (₹)
A.	**Cash flow from operating activities**		1,50,99,06,844		1,09,82,66,295
	Net Profit / (Loss) after Share from Associate and before extraordinary items and tax				
	Adjustments for:				
	Depreciation and amortisation	16,37,10,491		14,99,42,380	
	Gratuity & Leave Encashment	40,38,093		30,54,426	
	Interest Received	(78,53,703)		(1,02,25,752)	
	Sundry Balance W/Back	(9,36,408)		(1,06,275)	
	Foreign Currency Exchange Fluctuation Gain	(49,05,943)		(3,56,92,290)	
	(Profit)/Loss on sale of Fixed assets	36,40,087		8,82,193	
	Bad Debt & Sundry Balance Written Off	14,53,027		2,15,41,124	
	Finance costs	15,77,44,576		18,49,65,423	
			31,68,90,220		31,43,61,229
	Operating profit / (loss) before working capital changes		**1,82,67,97,064**		**1,41,26,27,524**
	Changes in working capital:				
	Adjustments for (increase) / decrease in operating assets:				
	Inventories	(41,64,17,616)		(16,84,85,649)	
	Trade receivables	13,97,29,315		(46,83,66,499)	
	Financial and Other Assets	29,55,43,940		(14,46,74,990)	
	Adjustments for increase / (decrease) in operating liabilities:				
	Trade payables	(2,93,746)		2,78,65,663	
	Borrowings	(56,46,07,357)		14,26,03,519	
	Financial and Other Liabilities	(21,26,77,610)		5,39,60,609	
	Provisions	23,08,545		17,46,462	
			(75,64,14,529)		(55,53,50,885)
	Cash generated from operations		**1,07,03,82,535**		**85,72,76,639**
	Net income tax (paid) / refunds		(51,55,84,446)		(37,81,36,088)
	Net cash flow from / (used in) operating activities (A)		**55,47,98,089**		**47,91,40,551**
B.	**Cash flow from investing activities**				
	Capital expenditure on fixed assets		(35,70,45,596)		(16,01,04,600)
	Change in Value of Investment		(83,33,324)		17,90,284
	Interest Received		78,53,703		1,02,25,752
	Proceeds from sale of fixed assets		20,89,971		6,20,218
	Net cash flow from / (used in) investing activities (B)		**(35,54,35,246)**		**(14,74,68,346)**

Cash Flow Statement for the year ended 31 March 2019

(Amount in ₹)

	Particulars	Year ended 31 March, 2019		Year ended 31 March, 2018	
		Amount (₹)	Amount (₹)	Amount (₹)	Amount (₹)
C.	**Cash flow from financing activities**				
	Repayment of Non Current borrowings	(1,03,27,538)		(18,19,39,138)	
	Dividend Paid	(2,23,13,097)		(2,23,13,097)	
	Unpaid Dividend Transferred to Investor Protection Fund	(2,59,857)		(1,51,052)	
	Finance cost	(15,77,44,576)		(18,49,65,423)	
	Net cash flow from / (used in) financing activities (C)		**(19,06,45,068)**		**(38,93,68,710)**
	Net increase / (decrease) in Cash and cash equivalents (A+B+C)		87,17,775		(5,76,96,505)
	Cash and cash equivalents at the beginning of the year		1,89,70,222		7,66,66,727
	Cash and cash equivalents at the end of the year		**2,76,87,997**		**1,89,70,222**

Notes:

1. Statement of Cash Flows has been prepared under the indirect method as set out in Ind AS 7 specified under section 133 of the Companies Act, 2013.

2. Figures in brackets indicate cash outflows.

The accompanying notes form an integral part of the consolidated financial statements

As per our report of even date attached

For **LIHALA & CO**
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors

Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

Consildated Statement of Changes in Equity for the year ended 31 March 2019

A. Equity share capital

(Amount in ₹)

Particulars	Number	Amount
Balance as at 1st April 2018	1,90,72,052	19,07,20,520
Changes in equity share capital during 2018-19	-	-
Balance as at 31 March 2019	**1,90,72,052**	**19,07,20,520**

B. Other equity

Particulars	Reserves and surplus					Total
	Capital reserve	Share Premium	Capital Redemption Reserve	General Reserve	Retained earnings	
Balance as at 1st April 2018	3,01,42,208	32,88,46,550	3,00,00,000	48,34,33,983	1,94,58,44,694	2,81,82,67,435
Profit or Loss					99,09,37,545	99,09,37,545
Other comprehensive income (net of tax)					7,05,951	7,05,951
Dividend					(1,90,72,052)	(1,90,72,052)
Income tax on dividend paid					(38,82,621)	(38,82,621)
Balance at 31 March 2019	**3,01,42,208**	**32,88,46,550**	**3,00,00,000**	**48,34,33,983**	**2,91,45,33,517**	**3,78,69,56,258**

The accompanying notes form an integral part of the consolidated financial statements

As per our report of even date attached

For **LIHALA & CO**
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors

Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

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Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

Notes to the Consolidated Financial statements for the year ended 31 March 2019

1. Reporting entity

Beekay Steel Industries Limited ("the Company") is a listed company incorporated in India on 28th March, 1981 having its registered office at 2/1A, Sarat Bose Road, Lansdowne Towers, 4 Floor, Kolkata-700020. The Company is principally engaged in the business of manufacturing of Hot Rolled Steel Sections, Bright Bars, Structural Items and TMT Bars.

The Companys' equity shares are listed on the BSE Limited(nation-wide trading terminal) under direct listing route. the trading of shares have started w.e.f, 25th March , 2015..

2. Significant Accounting Policies followed by the Company

a) Compliance with Ind AS

These financial statements are prepared in accordance with Indian Accounting Standards (Ind AS) under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair values, the provisions of the Companies Act, 2013 ("the Act") (to the extent notified) and guidelines issued by the Securities and Exchange Board of India (SEBI). The Ind AS are prescribed under section 133 of the Act read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 and relevant amendment rules issued thereafter.

The accounting policies are applied consistently to all the periods presented in the financial statements.

b) Basis of consolidation

(i) Business combination

Business combinations are accounted for using Ind AS 103, Business Combinations. Ind AS 103 requires the identifiable intangible assets and contingent consideration to be fair valued in order to ascertain the net fair value of identifiable assets, liabilities and contingent liabilities of the acquiree. Significant estimates are required to be made in determining the value of contingent consideration and intangible assets.

(ii) Investment in associates

An associate is an entity over which the Group has significant influence. Significant influence is the power to participate in the financial and operating policy decisions of the investee but is not control or joint control over those policies.

The results and assets and liabilities of associates are incorporated in these consolidated financial statements using the equity method of accounting, except when the investment, or a portion thereof, is classified as held for sale, in which case it is accounted for in accordance with Ind AS 105 - Non-current Assets Held for Sale and Discontinued Operations. Under the equity method, an investment in an associate is initially recognised in the consolidated statement of financial position at cost and adjusted thereafter to recognise the Group's share of the profit or loss and other comprehensive income of the associate. When the Group's share of losses of an associate exceeds the Group's interest in that associate (which includes any long-term interests that, in substance, form part of the Group's net investment in the associate), the Group discontinues recognising its share of further losses. Additional losses are recognised only to the extent that the Group has incurred legal or constructive obligations or made payments on behalf of the associate.

An investment in an associate is accounted for using the equity method from the date on which the investee becomes an associate. On acquisition of the investment in an associate, any excess of the cost of the investment over the Group's share of the net fair value of the identifiable assets and liabilities of the investee is recognised as goodwill, which is included within the carrying amount of the investment. Any excess of the Group's share of the net fair value of the identifiable assets and liabilities over the cost of the investment, after reassessment, is recognised immediately in profit or loss in the period in which the investment is acquired.

After application of the equity method of accounting, the Group determines whether there is any objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the net investment in an associate and that event (or events) has an impact on the estimated future cash flows from the net investment that can be reliably estimated. If there exists such an objective evidence of impairment, then it is necessary to recognise impairment loss with respect to the Group's investment in an associate.

The Group discontinues the use of the equity method from the date when the investment ceases to be an associate, or when the investment is classified as held for sale. When a group entity transacts with an associate of the Group, profits and losses resulting from the transactions with the associate are recognised in the Group's consolidated financial statements only to the extent of interests in the associate that are not related to the Group.

c) Functional and presentation currency

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

d) Basis of measurement

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

(i) Certain financial assets and financial liabilities measured at fair value;

(ii) Employee's defined benefit plan as per actuarial valuation.

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

e) Use of estimates and judgements

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

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

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

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

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

(ii) Fair value measurement of financial instruments:

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

(iii) Defined benefit plans:

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

(iv) Recognition and measurement of provisions and contingencies:

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

f) **Measurement of fair values**

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

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

The management regularly reviews significant unobservable inputs and valuation adjustments.

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

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

Level 2: inputs other than quoted prices included in Level 1 that are observable for the assets or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices). active markets for identical assets or liabilities.

Level 3: inputs for the assets or liability that are not based on observable market data(unobservable inputs).

When measuring the fair value of an asset or a liability, the Company uses observable market data as far as possible. If the inputs used to measure the fair value of an asset or a liability fall into different levels of the fair value hierarchy, then the fair value measurement is categorized in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement.

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

3. Statement of Significant accounting policies

a) **Operating Cycle**

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

b) **Financial instruments**

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

i. **Financial Assets**

Initial recognition and measurement

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

Subsequent measurement

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

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

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

Financial assets at amortised cost

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

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

Financial assets at Fair value through other Comprehensive Income (FVTOCI)

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

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

Financial assets at Fair value through Profit & Loss (FVTPL)

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

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

Other equity investments

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

Derecognition

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

ii. Financial liability

Initial recognition and measurement

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

Subsequent measurement

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

- Financial liabilities through profit or loss (FVTPL)
- Financial liabilities at amortised cost

Financial liabilities through FVTPL

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

Financial liabilities at amortised cost

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

Notes to the Consolidated Financial statements for the year ended 31 March 2019

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

Derecognition

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

iii. Offsetting of financial instruments

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

c) Property, Plant and Equipment

i. Recognition and measurement

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

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

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

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

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

ii. Subsequent expenditure

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

iii. Depreciation and amortisation

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

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

Freehold land is not depreciated. Leasehold land (includes development cost) is amortised on a straight line basis over the period of respective lease, except land acquired on perpetual lease.

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

d) Intangible Assets

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

e) Inventories:

Inventories are valued at the lower of cost and net realisable value. Cost is computed on a weighted average basis. Cost of finished goods and work-in-progress include all costs of purchases, conversion costs and other costs incurred in bringing the inventories to their present location and condition. The net realisable value is the estimated selling price in the ordinary course of business less the estimated costs of completion and estimated costs necessary to make the sale.

f) Impairment

i. Impairment of financial instruments: financial assets

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

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

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

ii. Impairment of non-financial assets

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

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

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

g) Employee Benefits

i. Short-term employee benefits

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

ii. Defined contribution plans

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

Notes to the Consolidated Financial statements for the year ended 31 March 2019

iii. Defined benefit plans

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

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

h) Provisions (other than for employee benefits)

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

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

i) Revenue Recognition

The Company derives revenues primarily from sale of manufactured goods, traded goods and related services.

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

Revenue from the sale of goods and services are recognised when the significant risks and rewards of ownership have been transferred to the buyer. No revenue is recognised if there are significant uncertainties regarding recovery of the amount due, associated costs or the possible return of goods.

Other operating revenue-Export Incentives

Export Incentives under various schemes are accounted in the year of export.

j) Leases

Leases of property, plant and equipment that transfer to the Company substantially all the risks and rewards of ownership are classified as finance leases. The leased assets are measured initially at an amount equal to the lower of their fair value and the present value of the minimum lease payments. The minimum lease payments are apportioned between finance charges and reduction of the lease liability so as to achieve a constant rate of interest on the remaining balance of the liability. Finance charges are recognised in the Statement of Profit and Loss.

Assets held under leases that do not transfer to the Company substantially all the risks and rewards of ownership (i.e. operating leases) are not recognised in the Company's Balance Sheet. Payments made under operating leases are recognized in the Statement of Profit or Loss on a straight-line basis over the term of the lease unless the payments to the lessor are structured to increase in line with general inflation.

k) Recognition of dividend income, interest income or expense

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

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

l) Segment reporting

The Company is dealing in one segment only i.e. Rolling of Iron & Steel and hence separate segment is not given in accordance with Ind AS-108 "Operating Segments" notified pursuant to Companies (Accounting Standard) Rules, 2015.

m) Income tax

Income tax expense comprises of current and deferred tax. Current tax and deferred tax is recognized in the statement of profit or loss except to the extent that it relates to a business combination, or items recognized directly in equity or in OCI.

i. Current tax

Current tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities, based on tax rates and laws that are enacted or substantively enacted at the Balance sheet date.

ii. Deferred tax

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

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

n) Borrowing costs

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

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

o) Earnings per Share

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

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

p) Recent accounting pronouncements

Ind AS 116, Leases: On March 30, 2019, the Ministry of Corporate Affairs has notified Ind AS 116 Leases. Ind AS 116 will replace the existing leases standard, Ind AS 17, Leases and related interpretations. The standard sets out the principles for the recognition, measurement, presentation and disclosure of leases for both parties to a contract i.e. the lessee and the lessor.

The effective date for the adoption of Ind AS 116 is annual periods beginging on or after April 1, 2019.

Amendment to Ind AS 19, plan amendment, curtailment or settlement: On March 30, 2019, the Ministry of Corporate Affairs issued amendments to Ind AS 19, Employee Benefits, in connection with accounting for plan amendments, curtailments and settlements.

The amendments require an entity:

- To use updated assumptions to determine current service cost and net interest for the remainder of the period after a plan amendment, curtailment or settlement; and
- To recognize in profit or loss as part of past service cost, or a gain or loss on settlement, any reduction in a surplus, even if that surplus was not previously recognized because of the impact of the asset ceiling.

Effective date for application of this amendment is annual period beginning on or after April 1, 2019. The Company does not have any impact on accounts of this amendment.

Note: 4A Fixed Assets

Particulars	GROSS BLOCK				DEPRECIATION				NET BLOCK	
	As on 01.04.2018	Additions during the Year	Sold/ Discarded or Adjustments	As on 31.03.2019	Upto 01.04.2018	For the Year	Adjustment / Sold/ Discarded	As on 31.03.2019	As on 31.03.2019	As on 31.03.2018
Property, plant & equipment :-										
Land	14,48,08,253	88,942		14,48,97,195	-	-	-	-	14,48,97,195	14,48,08,253
Leasehold Land	73,37,847			73,37,847	3,10,144	2,59,856		5,70,000	67,67,847	70,27,703
Shed & Building	64,43,78,654	6,81,44,873		71,25,23,527	15,96,17,779	1,89,23,546		17,85,41,325	53,39,82,201	48,47,60,874
Flats	1,39,32,092		2,98,024	1,36,34,068	26,62,758	2,73,531	2,98,024	26,38,265	1,09,95,803	1,12,69,334
Leasehold Flats	5,54,810			5,54,810	1,40,278			1,40,278	4,14,532	4,14,532
Office Premises	3,05,02,147			3,05,02,147	54,18,233	4,72,581		58,90,814	2,46,11,333	2,50,83,914
Plant & Machineries	1,78,61,91,240	17,44,44,782	43,33,691	1,95,63,02,331	72,55,90,103	8,55,48,922	4,36,597	81,07,02,428	1,14,55,99,903	1,06,06,01,137
Electrical Installation	12,19,39,998	2,47,46,014		14,66,86,012	5,46,70,407	93,28,870		6,39,99,277	8,26,86,735	6,72,69,591
Laboratory Equipments	81,51,710			81,51,710	45,81,783			45,81,783	35,69,927	35,69,927
Rolls	47,08,83,268	8,25,92,882		55,34,76,150	43,49,15,548	4,03,11,422		47,52,26,970	7,82,49,180	3,59,67,720
Furniture & Fixtures	2,90,76,249	7,52,028		2,98,28,277	2,15,55,023	18,82,573		2,34,37,596	63,90,681	75,21,226
Computer	2,09,44,095	24,58,789		2,34,02,884	1,84,12,036	15,31,615		1,99,43,651	34,59,233	25,32,059
Office Equipments	61,90,370	52,546		62,42,916	47,07,434	1,68,830		48,76,264	13,66,652	14,82,936
Air Conditioner & Others	95,23,771	4,39,099		99,62,870	52,49,095	9,08,797		61,57,892	38,04,978	42,74,676
Motor Vehicles	3,67,90,237	2,26,38,670	28,70,760	5,65,58,147	2,22,45,109	41,62,151	21,59,250	2,42,48,010	3,23,10,137	1,45,45,128
Total - Fixed Assets	3,33,12,04,740	37,63,58,625	75,02,475	3,70,00,60,890	1,46,00,75,734	16,37,72,693	28,93,871	1,62,09,54,557	2,07,91,06,334	1,87,11,29,006
Previous Year										
Fixed Assets	3,20,27,94,393	13,22,12,344	38,01,996	3,33,12,04,740	1,31,22,24,362	14,99,84,877	21,33,504	1,46,00,75,735	1,87,11,29,006	-

(i) Certain property, plant and equipment are pledged against borrowings, the details relating to which has been described in Note 16 pertaining to borrowings.

Note: 4B Capital Work -in- Progress

Particulars	GROSS BLOCK				DEPRECIATION				NET BLOCK	
	As on 01.04.2018	Additions during the Year	Sold/ Discarded or Adjustments	As on 31.03.2019	Upto 01.04.2018	For the Year	Adjustment / Sold/ Discarded	As on 31.03.2019	As on 31.03.2019	As on 31.03.2018
Capital Work in Progress	25,34,63,074	24,21,37,567	26,14,50,596	23,41,50,045	-	-	-	-	23,41,50,046	25,34,63,074
Previous Year										
Capital Work In Progress	22,55,70,818	3,63,38,702	84,46,446	25,34,63,074	-		-	-	25,34,63,074	-

Note 5. Non-Current Investments

(Amount in ₹)

	31 March 2019	31 March 2018
Investments in Equity Instruments		
In Associates (carrying amount determined using the equity method of accounting)		
Quoted:		
11,60,000 (31st March 2018: 11,60,000) Equity Shares ₹10/- each fully paid up in A K C Steel Industries Limited	23,20,000	23,20,000
Add: Share of profit/ (loss)	1,31,12,180	47,78,856
	1,54,32,180	70,98,856
In Others (at fair value through other comprehensive income)		
Quoted:		
800 (31st March 2018: 800) Equity Shares of ₹10/- each fully paid up in Super Forging & Steels Limited	1	1
	1,54,32,181	**70,98,857**
Aggregate book value of quoted investments	**1,54,32,181**	**70,98,857**

Note 6. Other non-current financial asset

(Amount in ₹)

	31 March 2019	31 March 2018
Deposits with remaining maturity of more than 12 months*	1,46,18,229	1,39,24,000
	1,46,18,229	**1,39,24,000**

* Pledged with the banks against various credit facilities availed by the Company (Refer note 16).

Note 7. Other non-current assets

(Unsecured, considered good)

(Amount in ₹)

	31 March 2019	31 March 2018
Capital advances	6,07,59,189	8,04,81,628
Advances other than capital advances		
- Security and other deposits	7,54,85,667	6,76,61,733
- Other advances (including advances with statutory authorities)	1,02,62,897	81,76,054
	14,65,07,753	**15,63,19,415**

Note 8. Inventories

(Valued at the lower of cost and net realisable value)

(Amount in ₹)

	31 March 2019	31 March 2018
Raw materials	1,18,05,87,355	93,84,04,719
Finished goods	72,04,77,552	61,71,02,040
Stock-in-trade (goods acquired for trading)	4,05,85,142	2,61,52,187
Scrap and cuttings	12,37,51,205	8,48,82,962
Stores and spares	7,53,42,172	5,77,83,902
	2,14,07,43,426	**1,72,43,25,810**

(i) The mode of valuation of inventories has been stated in Note 3(e).

(ii) Inventories have been pledged as security against certain bank borrowings of the Company as at 31 March 2019 (Refer note 16).

(iii) Cost of inventory recognised as an expense

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 9. Trade receivables

(Amount in ₹)

	31 March 2019	31 March 2018
Unsecured, Considered good	1,17,69,52,659	1,31,66,81,974
	1,17,69,52,659	**1,31,66,81,974**

Trade Receivables have been given as collateral towards borrowings (refer note 16).

Note 10. Cash and cash equivalents#

(Amount in ₹)

	31 March 2019	31 March 2018
Balances with banks		
- In cash credit and current accounts	87,04,031	50,38,098
- Deposit with original maturity of less than three months account	1,66,91,084	1,05,35,241
Cheques, drafts on hand	1,01,730	8,12,020
Cash on hand	21,91,152	25,84,863
	2,76,87,997	**1,89,70,222**

#Cash and cash equivalents (other than cash on hand) are pledged against borrowings, the details relating to which have been described in Note 16 pertaining to borrowings.

Note 11. Other bank balances *

(Amount in ₹)

	31 March 2019	31 March 2018
Earmarked balances (on unclaimed dividend account)	18,46,863	17,13,515
In deposit account**	2,14,81,825	1,74,97,100
	2,33,28,688	**1,92,10,615**

*Other Bank balances are pledged against borrowings, the details relating to which have been described in Note 16 pertaining to borrowings.

**Represents deposits with original maturity of more than 3 months having remaining maturity of less than 12 months from the Balance Sheet date.

Note 12. Other current financial assets

(Amount in ₹)

	31 March 2019	31 March 2018
Advances to employees	30,71,215	26,02,539
Interest accrued on deposits	34,43,221	30,75,868
	65,14,436	**56,78,407**

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 13. Other current assets

(Amount in ₹)

	31 March 2019	31 March 2018
Advances other than capital advances		
- Advance to suppliers	14,76,83,268	13,45,41,790
- Export incentive receivable (including duty drawback)	6,93,446	1,14,09,118
- CENVAT receivable	-	93,93,686
- Other statutory advances	11,49,76,651	39,82,82,025
- Other advances (including prepaid expenses, other receivables etc.)	83,91,337	94,98,692
	27,17,44,702	**56,31,25,311**

Note 14. Equity share capital

(Amount in ₹)

	31 March 2019	31 March 2018
Authorised		
2,00,00,000 (March 31, 2018: 2,00,00,000) Equity Shares of ₹10/- each	20,00,00,000	20,00,00,000
3,00,000 (March 31, 2018: 3,00,000) 15% Non-Convertible Redeemable Preference Shares of ₹100 each of 100/- each	3,00,00,000	3,00,00,000
	23,00,00,000	**23,00,00,000**
Issued & subscribed		
1,93,71,652 (March 31, 2018: 1,93,71,652) Equity Shares of ₹10/- each	19,09,09,270	19,09,09,270
Paid up Capital		
1,90,72,052 (March 31, 2018 1,90,72,052) Equity Shares of ₹10/- each fully paod up	19,07,20,520	19,07,20,520
Add : Forfeited Shares	1,88,750	1,88,750
	19,09,09,270	**19,09,09,270**

A. Reconciliation of number of equity shares outstanding at the beginning and at the end of the period

	31 March 2019		31 March 2018	
	Number	Amount	Number	Amount
Balance as at the beginning of the year	1,90,72,052	19,07,20,520	1,90,72,052	19,07,20,520
Add: Issued during the year	-	-	-	-
Balance as at the end of the year	1,90,72,052	19,07,20,520	1,90,72,052	19,07,20,520

B. Rights, preferences and restrictions attaching to Equity Shares

The Company has equity shares having a par value of ₹10/- each. Each holder of equity shares is entitled to one vote per share and in the event of liquidation,the shareholders of Equity shares of the Company are eligible to receive the remaining assets of the Company after distribution of all preferential amounts in proportion to their shareholding.

The Company has authorised Preference Share Capital which are non convertible redeemable of 100/- each. Such Shareholders have right to receive fixed preferential dividend. However no preferential shares are outstanding on the date of Balance Sheet.

Notes to the Consolidated Financial statements for the year ended 31 March 2019

C. Particulars of shareholders holding more than 5% shares of fully paid up equity shares

Name of the Shareholder	31 March 2019		31 March 2018	
	Number	% of total shares in the class	Number	% of total shares in the class
Jyotirmoy Trading Pvt. Ltd.	24,57,678	12.89%	24,57,678	12.89%
Concast Steels & Alloys Ltd.	21,29,754	11.17%	21,29,754	11.17%
Suresh Chand Bansal	20,13,854	10.56%	20,13,854	10.56%
B.L.Bansal	-		15,16,710	7.95%
Manav Bansal	12,58,196	6.60%	12,58,196	6.60%
Mukesh Chand Bansal	11,93,374	6.26%	11,93,374	6.26%
Century Vision Pvt. Ltd.	10,60,938	5.56%	10,60,938	5.56%
Vikas Bansal	9,53,998	5.00%	-	-

Note 15. Other equity

Components	Note	1 April 2018	Movement during the year	31 March 2019	1 April 2017	Movement during the year	31 March 2018
Capital reserve	a	3,01,42,208		3,01,42,208	3,01,72,342	(30,135)	3,01,42,208
Share premium	b	32,88,46,550		32,88,46,550	32,88,46,550		32,88,46,550
General reserve	d	48,34,33,983		48,34,33,983	48,34,33,983		48,34,33,983
Capital Redemption Reserve	e	3,00,00,000		3,00,00,000	3,00,00,000		3,00,00,000
Retained earnings	f	1,94,58,44,694	96,86,88,823	2,91,45,33,517	1,26,21,52,826	68,36,91,868	1,94,58,44,694
		2,81,82,67,435	**96,86,88,823**	**3,78,69,56,258**	**2,13,46,05,701**	**68,36,61,733**	**2,81,82,67,435**

The description, nature and purpose of each reserve within equity are as follows:

(a) **Capital Reserve:** Capital reserve is utilised in accordance with provisions of the Act

(b) **Securities Premium Account:** The amount received in excess of face value of the equity shares is recognised in Share Premium.

(c) **General Reserve:** The Company has transferred a potion of the net profit of the Company before declaring dividend to general reserve persuant to the earlier provisions of Companies Act 1956. Mandatory transfer to general reserve is not required under the Companies Act 2013.

(d) **Capital Redemption Reserve:** The Company has recognised Capital Redemption Reserve on redemption of Preference Shares from its retained earnings. The amount in Capital Redemption Reserve is equal to nominal amount of the Preference Shares redeemed.

(e) **Retained earnings:** It comprise of accumulated profit/ (loss) of the Company. The movement is on account of following

(i) ₹99,16,43,496 (31st March 2018: ₹70,66,16,406) was on account of profit/ (loss) incurred by the Company.

(iii) ₹2,29,54,673 (31st March 2018: 2,29,54,673) was on account of dividend distribution (inclusive of dividend distribution tax).

(iv) ₹ NIL (31st March 2018: 30,135) on account of depreciation on revaluation transferred to retained earnings.

Note 16. Borrowings

(Amount in ₹)

	31 March 2019	31 March 2018
16(i) Non-current borrowings		
Secured Term loans		
From banks		
- Bank of Baroda	27,74,494	-
- Yes Bank	56,70,803	-
- HDFC Bank	28,87,430	23,06,326
(A)	**1,13,32,727**	**23,06,326**
Unsecured Loans		
Bodies Corporate	28,60,93,048	31,24,04,143
(B)	**28,60,93,048**	**31,24,04,143**
(A + B)	**29,74,25,775**	**31,47,10,469**

Nature of Security and Terms of Payments for Long Term Borrowings

Nature of Security	Terms of Repayment
1. Term Loan from Bank of Baroda: Represents term loan amounting ₹27,74,494/- (31st March 2018 ₹ Nil) is secured on Vehicle.	(i) Repayable in 22 months from April 2020 to Jan 2022, Interest is payable at the rate of 8.90%
2. Term Loan from Yes Bank: Represents term loan amounting ₹56,70,803/- (31st March 2018 ₹ Nil) is secured on vehicles.	(i) Repayable in 24 months from April 2020 to March 2022, Interest is payable at the rate of 9.05% (ii) Repayable in 23 months from April 2020 to Feb 2022, Interest is payable at the rate of 9.05% (iii) Repayable in 22 months from April 2020 to Jan 2022, Interest is payable at the rate of 8.90%
3. Term Loan from HDFC Bank: Represents term loan amounting ₹28,87,430/- (31st March 2018 ₹23,06,326/-) is secured on vehicles.	(i) Repayable in 5 months from April 2020 to August 2020, Interest is payable at the rate of 8.50% (ii) Repayable in 9 months from April 2020 to Dec 2020, Interest is payable at the rate of 8.50% (iii) Repayable in 1 month in April 2020, Interest is payable at the rate of 8.90% (iv) Repayable in 20 months from April 2020 to Nov 2021, Interest is payable at the rate of 8.90%.

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Current Maturities of Non-Current Borrowings [disclosed under the head Other Financial Liabilities - Current (Refer note 21)]

(Amount in ₹)

	31 March 2019	31 March 2018
Punjab National Bank	-	3,08,73,948
HDFC Bank	14,09,220	20,51,825
Bank of Baroda	18,60,252	-
Yes Bank	36,87,684	-
	69,57,156	**3,29,25,773**
16(ii) Current borrowings		
Secured		
Working Capital Loans		
Allahabad bank	22,80,75,326	51,53,74,219
State Bank of India	49,84,18,308	41,43,17,733
Bank of Baroda	10,02,48,481	14,43,02,755
Punjab National Bank	4,84,80,126	18,79,06,793
Yes Bank	1,88,56,931	14,86,99,567
State Bank of India (IBD)	1,00,53,089	5,81,38,551
	90,41,32,261	**1,46,87,39,618**

Nature of security and other terms

Working Capital Loan are secured by first hypothecation on entire current assets of the Company including stocks, book debts and other Current Assets of all the units both present and future ranking pari-passu basis with working capital lending Banks under consortium and Personal guarantee of promoter directors and second charge on fixed assets (movable and immovable) of the Company.

Secured loan - terms of repayment

1. **Allahabad Bank:** Working capital loan amounting to ₹22,80,75,326 (31st March 2018: ₹51,53,74,219). Interest is payable at the rate of (MCLR+1.25%).
2. **State Bank of India:** Working capital loan amounting to ₹49,84,18,308 (31st March 2018: ₹41,43,17,733). Interest is payable at the rate of (MCLR+0.95%).
3. **Bank of Baroda:** Working capital amounting to ₹10,02,48,481 (31st March 2018: ₹14,43,02,755). Interest is payable at the rate of (MCLR+1.65%).
4. **Punjab National Bank:** Working capital amounting to ₹4,84,80,126 (31st March 2018: ₹18,79,06,793). Interest is payable at the rate of (MCLR+1.35%).
5. **Yes Bank:** Working capital amounting to ₹1,88,56,931 (31st March 2018: ₹14,86,99,567). Interest is payable at the rate of (MCLR+0.40%)
6. **State Bank of India (IBD):** Amounting to ₹1,00,53,089 (31st March 2018: ₹5,81,38,551).

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 17. Provisions

(Amount in ₹)

	31 March 2019	31 March 2018
17(i) Non-Current		
Provisions for employee benefits		
- Provision for leave encashment	48,27,808	41,23,122
- Provision for gratuity (refer note 33)	43,44,893	28,82,100
	91,72,701	**70,05,222**
17(ii) Current		
Provisions for employee benefits		
Provision for Leave Encashment	6,13,407	4,72,341
	6,13,407	**4,72,341**

Note 18. Income and Deferred Taxes (net)

(Amount in ₹)

	31 March 2019	31 March 2018
Deferred Tax		
Deferred tax liability	33,58,53,560	32,73,31,574
Less: Deferred tax asset	28,26,116	26,52,623
	33,30,27,444	**32,46,78,951**
Income taxes		
A. Amount recognised in profit or loss		
Current tax		
Current period	51,10,00,000	39,40,00,000
A	51,10,00,000	39,40,00,000
Deferred tax		
Attributable to-		
Origination and reversal of temporary differences	79,69,299	(18,86,669)
B	**79,69,299**	**(18,86,669)**
Tax expense reported in the Consolidated Statement of Profit and Loss [(A)+(B)]	**51,89,69,299**	**39,21,13,331**
B. Income tax recognised in other comprehensive income		
Deferred tax		
On items that will not be reclassified to profit or loss		
- Remeasurements of defined benefit plans	(3,79,193)	(2,45,272)
Income tax expense reported in the standalone Statement of Profit and Loss	**(3,79,193)**	**(2,45,272)**

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 18. Income and Deferred Taxes (net) (Contd.)

(Amount in ₹)

	31 March 2019	31 March 2018
C. Reconciliation of effective tax rate for the year ended 31 March 2019		
Profit/(Loss) before tax (a)	1,50,15,73,520	1,10,00,56,579
Income tax rate as applicable (b)	34.944%	34.608%
Calculated taxes based on above, without any adjustments for deductions [(a) x (b)]	52,47,09,851	38,07,07,581
Permanent tax differences due to:		
Effect of expenses that are not deductible in determining taxable profit	25,04,310	16,58,564
	52,72,14,161	38,23,66,145
Tax effect of:		
Adjustments in prior year taxes	-	-
Tax allowances and concession	(4,99,191)	(4,55,091)
Others	(77,45,671)	1,02,02,277
	51,89,69,299	**39,21,13,331**

D. Recognised deferred tax assets and liabilities

	Balance as on 1 April 2018	(Charged) / credited to profit or loss	(Charged) / credited to OCI	Balance as on 31 March 2019
Property, plant and equipment	(32,72,54,430)	(85,99,130)	-	(33,58,53,560)
Provisions	25,87,835	6,17,474	(3,79,193)	28,26,116
Items allowed on payment basis	(12,357)	12,357	-	
	(32,46,78,952)	**(79,69,299)**	**(3,79,193)**	**(33,30,27,444)**

Note:

(a) The Company offsets tax assets and liabilities if and only if it has a legally enforceable right to set off current tax assets and current tax liabilities and the deferred tax assets and deferred tax liabilities relate to income taxes levied by the same tax authority.

(b) During the year ended March 31, 2019 the Company has paid dividend to its shareholders. This has resulted in payment of Dividend Distribution Tax (DDT) to the taxation authorities. The Company believes that DDT represents additional payment to taxation authority on behalf of the shareholders. Hence, DDT paid is charged to equity.

Note 19. Other non-current liabilities

(Amount in ₹)

	31 March 2019	31 March 2018
Security and other deposits	13,28,25,016	15,02,65,406
	13,28,25,016	**15,02,65,406**

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 20. Trade payables

(Amount in ₹)

	31 March 2019	31 March 2018
Dues to Micro And Small Enterprises (as per the intimation received from vendors)		
a. Principal and interest amount remaining unpaid	12,99,438	-
b. Interest due thereon remaining unpaid	-	-
c. Interest paid by the Company in terms of Section 16 of the Micro, Small and Medium Enterprises Development Act, 2006, along with the amount of the payment made to the supplier beyond the appointed day	-	-
d. Interest due and payable for the period of delay in making payment (which have been paid but beyond the appointed day during the period) but without adding interest specified under the Micro, Small and Medium Enterprises Act, 2006	-	-
e. Interest accrued and remaining unpaid	-	-
f. Interest remaining due and payable even in the succeeding years, until such date when the interest dues as above are actually paid to the small enterprises	-	-
(A)	**12,99,438**	-

Disclosures of payables to vendors as defined under the Micro, Small and Medium Enterprise Development Act, 2006) is based on the information available with the Company regarding the status of registration of such vendors under the said Act, as per the intimation received from them on requests made by the Company. There are no overdue principal amounts/interest payable amounts for delayed payments to such vendors at the Balance Sheet date. There are no delays in payment made to such suppliers during the year or for any earlier years and accordingly there is no interest paid or outstanding interest in this regard in respect of payment made during the year or on balance brought forward from previous year.

	31 March 2019	31 March 2018
Dues to others		
Trade payables		
- For goods	5,13,12,529	18,00,89,272
- For Stores	14,93,69,336	6,38,60,352
- For expenses	16,05,40,218	11,75,66,205
	35,99,22,645	36,15,15,829
	36,12,22,083	**36,15,15,829**

Trade payables are non interest bearing and are generally settled with 30 to 90 days' payment terms.

Note 21. Other financial liabilities

(Amount in ₹)

	31 March 2019	31 March 2018
Current		
Current maturities of long-term debts (refer note 16)	-	3,08,73,948
Current maturities of finance lease obligations	69,57,156	20,51,825
Unpaid dividends	18,46,863	17,13,515
Payable for capital projects/ goods	-	2,44,49,726
Creditors for project expenditure	50,91,446	50,99,061
Cheques overdrawn	19,05,850	2,71,421
Interest accrued but not due	-	6,23,386
Others*	1,99,22,856	1,48,61,427
*Others includes bonus payable to employees etc.	**3,57,24,171**	**7,99,44,309**

Note 22. Other current liabilities

(Amount in ₹)

	31 March 2019	31 March 2018
Advance received from customers	3,13,31,978	11,47,51,098
Statutory dues	4,41,62,191	10,48,02,997
	7,54,94,169	**21,95,54,095**

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 23. Current tax liabilities (Net)

(Amount in ₹)

	31 March 2019	31 March 2018
Current tax (net of payment)	92,83,896	1,38,63,745
	92,83,896	**1,38,63,745**

Note 24. Revenue from operations

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Sale of products & services		
Sale of products	7,68,25,33,102	8,27,74,72,551
Sale of services	1,38,25,73,938	1,15,86,39,882
Gross revenue from sale of products and services (including excise duty of ₹ NIL (P.Y. ₹14,15,32,414)		
Total (a)	**9,06,51,07,040**	**9,43,61,12,433**
Other operating revenues		
- Scrap and coal fines sales	51,38,53,876	43,51,15,260
- Export incentives	2,47,53,992	5,26,47,154
Total (b)	**53,86,07,868**	**48,77,62,414**
Total (a+b)	**9,60,37,14,908**	**9,92,38,74,847**

Note 25. Other income

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Interest income earned on financial assets that are not designated as FVTPL		
- Deposits with banks	78,53,703	1,02,25,752
Other non-operating income		
- Foreign currency exchange fluctuation gain	49,05,943	3,56,92,290
- Rent	47,61,817	43,83,291
- Sale of MEIS License	3,38,89,197	4,46,46,211
- Profit on sale of fixed asset	1,29,971	1,20,000
- Miscellaneous income *	1,73,47,897	53,91,845
	6,88,88,528	**10,04,59,389**

*Miscellaneous income includes balances and provisions written back, discount received , handling charges and miscellaneous receipts.

Note 26. Cost of materials consumed

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Inventory of raw materials at the beginning of the year (refer note 8)	93,84,04,719	68,26,13,189
Add: Purchases	6,00,17,28,984	6,54,26,80,940
	6,94,01,33,703	**7,22,52,94,129**
Less: Inventory of raw materials at the end of the year (refer note 8)	1,18,05,87,355	93,84,04,719
Cost of materials consumed	**5,75,95,46,348**	**6,28,68,89,410**

Note 27. Change in inventories of finished goods and work-in-progress

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Inventories at the beginning of the year (refer note 8)		
Finished goods	61,71,02,040	65,36,24,810
Stock-in-Trade	2,61,52,187	4,23,27,662
Scrap, cuttings and coal fines	8,51,53,073	12,03,19,586
Less: Excise Duty	-	7,42,62,103
	72,84,07,300	**74,20,09,955**
Inventories at the end of the year (refer note 8)		
Finished goods	72,04,77,552	61,71,02,040
Stock-in-Trade	4,05,85,142	2,61,52,187
Scrap, cuttings and coal fines	12,49,38,133	8,51,53,073
	88,60,00,827	**72,84,07,300**
	(15,75,93,527)	**1,36,02,655**

Note 28. Employee benefits expense

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Salaries and wages (including managerial remuneration)	21,55,51,719	15,51,82,899
Contribution to provident and other funds (refer note 32)	1,75,29,154	1,22,95,712
Staff welfare expenses	1,47,25,857	1,49,07,239
	24,78,06,730	**18,23,85,850**

Note 29. Finance costs

(Amount in ₹)

	Year ended 31 March 2019	Year ended 31 March 2018
Interest expense:		
- on finance libilities measured at amortized cost	12,11,05,550	13,67,83,690
- on finance lease	7,93,092	3,90,547
- others	2,73,59,937	3,52,04,660
Other borrowing costs	84,85,997	1,25,86,526
	15,77,44,576	**18,49,65,423**

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 30. Other expenses

(Amount in ₹)

		Year ended 31 March 2019	Year ended 31 March 2018
Manufacturing expenses:			
Rolling charges & material cutting charges		18,19,33,535	15,86,88,306
Stores and spare parts consumed		11,71,34,060	9,86,75,684
Furnace oil consumed		38,70,01,810	41,71,92,007
Oxygen and gas consumed		49,08,191	30,57,960
Coal consumed		22,41,74,584	11,38,02,806
Electricity charges		39,08,49,126	39,09,91,431
PGP operation charges		1,17,26,408	82,35,204
Processing charges		32,47,368	22,96,055
Repair and maintenance:			
- Plant and machinery and electrical		68,56,521	58,37,884
- Shed and building		38,33,348	28,94,913
Freight, carriage and octroi charges		10,80,28,591	16,31,67,950
Machinery hire charges		82,56,837	77,53,292
Testing, effluent and inspection charges		5,40,259	4,53,666
	A	**1,44,84,90,638**	**1,37,30,47,158**
Establishment expenses			
Electricity expenses		21,27,816	21,22,033
Insurance charges		33,55,279	40,11,626
Repair and maintenance-others		1,14,86,220	1,04,88,674
Rent charges paid		1,30,95,744	75,82,333
License, rates and taxes		70,10,299	55,68,693
Legal and professional charges		96,03,534	1,07,65,865
Security service charges		98,22,728	98,29,102
Bad debt written off		1,69,38,766	97,61,766
Computer maintenance expenses		10,77,708	8,55,879
Printing and stationary		13,44,736	16,59,796
Loss on sale of fixed assets		37,70,058	10,02,193
Travelling and conveyance expenses		1,15,64,634	78,92,178
Vehicle maintenance		54,68,734	49,92,301
Telephone and mobile expenses		30,18,792	27,25,028
Corporate social responsibility		1,27,79,639	88,08,630
Payment to Auditors:			
- Audit fees		5,70,000	5,70,000
- Tax audit		55,000	55,000
- Reimbursement of expenses		1,41,584	2,71,846
Miscellaneous expenses		1,89,27,459	2,34,64,413
	B	**13,21,58,730**	**11,24,27,356**
Selling and Distribution Expenses:			
Advertisement expenses		1,13,46,615	57,27,150
Commission on sales		1,27,38,484	43,85,649
Sales promotion expenses		72,27,392	41,29,531
Freight on export		5,09,12,009	11,79,28,100
Freight, carriage and octroi charges		4,71,63,579	6,65,73,050
Other selling and distribution expenses		90,37,180	63,34,231
	C	**13,84,25,259**	**20,50,77,711**
Total (A+B+C)		**1,71,90,74,627**	**1,69,05,52,225**

Note 31. Earnings/ (loss) per share (EPS)

The calculations of profit attributable to equity shareholders and weighted average number of equity shares outstanding for purposes of basic earnings per share calculation are as follows:

		Year ended 31 March 2019	Year ended 31 March 2018
(i)	**Profit/ (loss) attributable to equity shareholders (basic and diluted)**		
	Profit/ (loss) for the year, attributable to the equity holders	99,09,37,545	70,61,52,964
(ii)	**Weighted average number of equity shares (basic and diluted)**		
	At the beginning of the year	1,90,72,052	1,90,72,052
	Impact of new issue of equity shares	-	-
	Weighted average number of equity shares (basic and diluted) for the year	**1,90,72,052**	**1,90,72,052**
	Basic and diluted earnings/ (loss) per share [(i)/ (ii)]	**51.96**	**37.03**

Note 32. Contingent liability and commitments (Ind AS 37)

(to the extent not provided for)

			Year ended 31 March 2019	Year ended 31 March 2018
a)	**Claim against the Company not acknowledged as debt**			
	(i)	Excise /Service Tax matters in dispute/under appeal	16,58,68,995	16,92,48,741
	(ii)	Sales Tax/VAT matters in dispute/under appeal	1,43,83,341	1,52,28,808
	(iii)	Income Tax matters in dispute/under appeal	10,08,85,365	10,08,85,365
b)	**Capital and other commitments**			
	(i)	Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances)	78,96,789	1,89,07,780
c)	**Guarantee outstanding**			
	Bank guarantee issued on behalf of the Company to secure the financial assistance and business contract		43,50,39,000	33,92,11,000

Note 33. Assets and Liabilities relating to employee benefits (Ind AS 19)

	Year ended 31 March 2019	Year ended 31 March 2018
Statement of Assets and Liabilities for defined benefit obligation		
Net defined benefit asset - Gratuity Plan	1,39,40,269	1,41,87,206
Net defined benefit obligation - Gratuity Plan	(1,82,85,162)	(1,70,69,305)
Total employee benefit liabilities	**(43,44,893)**	**(28,82,099)**
Non-current	(43,44,893)	(28,82,099)
Current	-	-
Defined contribution		
Contribution to Defined Contribution Plan, recognized as expense for the period is as under:		
	31 March 2019	31 March 2018
Employer's Contribution to Provident and Other Funds	**1,75,29,154**	**1,22,95,712**

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Defined benefits - Gratuity

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

The Company provides for gratuity from employees in India as per the Payment of Gratuity Act, 1972. Employees who are in continuous service for a period of 5 years are eligible for gratuity. The amount of gratuity payable on retirement/ termination is the employees last drawn basic salary per month computed proportionately for 15 days salary multiplied for the number of years of service. The gratuity plan is a funded plan and the Company makes contributions to recognised funds in India. The Company does not fully fund the liability and maintains a target level of funding to be maintained over a period of time based on estimation of expected gratuity payments.

These defined benefit plans expose the Company to actuarial risks, such as currency risk, interest risk and market (investment) risk.

The Company expects to pay ₹21,50,555 /- in contribution to its defined benefit plans during the year 2019-20

Inherent risk

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

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

Reconciliation of the net defined benefit (asset)/ liability:

			31 March 2019	31 March 2018
(i)	**Reconciliation of present value of defined benefit obligation**			
	(a)	Balance at the beginning of the year	1,70,69,305	1,48,98,079
	(b)	Current service cost	23,26,017	21,18,984
	(c)	Past service cost - plan amendments	-	5,06,394
	(d)	Interest cost	12,64,203	10,89,826
	(e)	Actuarial (gains)/ losses recognised in other comprehensive income		
		- financial assumptions	1,94,235	(3,69,872)
		- experience adjustment	(12,66,441)	(4,39,983)
	(g)	Benefits paid	(13,02,157)	(7,34,123)
	Balance at the end of the year		**1,82,85,162**	**1,70,69,305**
(ii)	**Reconciliation of present value of plan assets**			
	(a)	Balance at the beginning of the year	1,41,87,206	1,40,00,000
	(b)	Interest income	10,42,282	10,22,470
	(c)	Actual return on plan asset less interest on plan asset	12,938	(1,01,141)
	(d)	Contributions by the employer	-	-
	(e)	Benefits paid	(13,02,157)	(7,34,123)
	Balance at the end of the year		**1,39,40,269**	**1,41,87,206**
(iii)	**Net asset/ (liability) recognised in the Balance Sheet**			
	Present value of defined benefit obligation		(1,82,85,162)	(1,70,69,305)
	Fair value of plan assets		1,39,40,269	1,41,87,206
	Net defined benefit obligations in the Balance Sheet		**(43,44,893)**	**(28,82,099)**

Reconciliation of the net defined benefit (asset)/ liability: (Contd.)

	31 March 2019	31 March 2018
(iv) Expense recognised in Profit or Loss		
Current service cost	23,26,017	21,18,984
Past service cost - plan amendments	-	5,06,394
Interest cost	2,21,921	67,356
Expected return on plan assets	-	-
Amount charged to Profit or Loss	**25,47,938**	**26,92,734**
(v) Remeasurements recognised in Other Comprehensive Income		
(a) Actuarial loss/ (gain) arising on defined benefit obligation from		
- demographic assumptions	-	-
- financial assumptions	1,94,235	(3,69,872)
- experience adjustment	(12,66,441)	(4,39,983)
(b) Actual return on plan asset less interest on plan asset	(12,938)	1,01,141
Amount recognised in Other Comprehensive Income	**(10,85,144)**	**(7,08,714)**
(vi) Maturity profile of defined benefit obligation		
Within the next 12 months	20,87,552	22,79,737
Between 1 and 5 years	48,53,074	42,48,973
Between 5 and 10 years	1,08,99,175	97,00,663
More than 10 years	73,84,000	16,49,57,982
(vi) Sensitivity analysis		
Defined benefit obligation on discount rate plus 100 basis points	17,94,181	16,60,239
Defined benefit obligation on salary growth rate plus 100 basis points	21,43,329	19,90,161
Defined benefit obligation on discount rate minus 100 basis points	21,51,801	19,95,977
Defined benefit obligation on salary growth rate minus 100 basis points	18,19,143	16,84,681
(vii) Actuarial assumptions		
Principal actuarial assumptions at the reporting date (expressed as weighted averages)		
Discount rate	7.60%	7.70%
Expected rate of salary increase	7.00%	7.00%
Retirement age (years)	58	58
Attrition rate based on different age group of employees		
- 20 to 25 years	0.50%	0.50%
- 25 to 30 years	0.30%	0.30%
- 30 to 35 years	0.20%	0.20%
- 35 to 50 years	0.10%	0.10%
- 50 to 55 years	0.20%	0.20%
- 55 to 60 years	0.30%	0.30%

Assumptions regarding future mortality experience are set in accordance with the published rates under Indian Assured Lives Mortality (2006-08).

(viii) Weighted average duration of defined benefit obligation	12 years	12 years

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 34. Related Party Disclosures under Ind AS 24

1. Relationship:-

(A) List of related parties where control exists

Particulars	Related Parties	Country of Incorporation
Associate	A K C Steel Industries Limited	India

(B) List of other related parties

Name of the related parties	Relationship
Mr. Suresh Chand Bansal, Executive Chairman	Key Management Personnel(KMP)
Mr. Mukesh Chand Bansal, Managing Director	Key Management Personnel(KMP)
Mr. Vikas Bansal, Executive Director	Key Management Personnel(KMP)
Mr. Manav Bansal, Whole time Director & CFO	Key Management Personnel(KMP)
Mr. Gautam Bansal, Whole time Director	Key Management Personnel(KMP)
Mrs. Indu Bansal	Relative of KMPs (wife of Mr. Suresh Chand Bansal)
Mrs. Aruna Bansal	Relative of KMPs (wife of Mr. Mukesh Chand Bansal)

(C) Other related parties over which Key Management Personnel to its relatives have its interest

Associate Company

B.P.Spring & Engineering Co (Pvt) Ltd

Century Vision Private Ltd

Emerald Suppliers Private Ltd

Tirumala Holdings Private Ltd

Beekay Associates Pvt Ltd

Metropolis Estates Pvt Ltd

Pleasant Holdings Pvt Ltd

Associate Enterprises

B.L.Bansal & Sons (HUF)

Thirupathy Bright Industries

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

Name of Related Party	Nature of Transactions	Amount (₹)	
		31 March 2019	31 March 2018
AKC Steel Industries Limited	Purchase of Goods	2,49,96,525	1,62,35,236
AKC Steel Industries Limited	Sale of Goods	3,22,794	65,22,471
Thirupathy Bright Industries	Purchase of Goods	38,60,747	-
Thirupathy Bright Industries	Sale of Goods	56,83,702	1,09,93,937
AKC Steel Industries Limited	Rent & Electricity	1,22,78,719	57,11,764
Emerald suppliers Private Limited	Rent, Electricity & Maintenance	3,56,196	1,60,901
Beekay Assocaites Pvt Ltd	Rent, Electricity & Maintenance	2,00,532	2,08,117
Metropolis Estates Pvt Ltd	Rent, Electricity & Maintenance	1,78,052	1,88,941
Pleasant Holdings Pvt Ltd	Rent, Electricity & Maintenance	2,80,289	3,02,256
B.L.Bansal & Sons (HUF)	Rent, Electricity & Maintenance	36,000	36,000
Gautam Bansal	Rent, Electricity & Maintenance	4,66,774	3,98,526

Name of Related Party	Nature of Transactions	Amount (₹)	
		31 March 2019	31 March 2018
Aruna Bansal	Rent, Electricity & Maintenance	4,02,000	3,72,000
Indu Bansal	Rent, Electricity & Maintenance	2,40,000	2,40,000
Mukesh Chand Bansal	Rent, Electricity & Maintenance	1,80,000	1,44,000
Manav Bansal	Rent, Electricity & Maintenance	1,80,000	1,44,000
Vikas Bansal	Rent, Electricity & Maintenance	1,62,000	1,32,000
AKC Steel Industries Limited	Machining Charges	1,02,09,518	69,39,546
Tirumala Holdings Private Limited	Interest on Unsecured Loan	-	2,219
Century Vision Private Limited	Interest on Unsecured Loan	12,84,862	10,19,841
Suresh Chand Bansal	Managerial Remuneration	4,11,70,000	1,40,02,000
Mukesh Chand Bansal	Managerial Remuneration	1,81,70,000	96,26,000
Vikas Bansal	Managerial Remuneration	1,74,50,000	90,50,000
Manav Bansal	Managerial Remuneration	1,18,50,000	70,70,000
Gautam Bansal	Managerial Remuneration	87,20,000	70,00,000

3. Balances with related parties referred in 1 above, in ordinary course of business:

Balance Outstanding at the end of the year:	Amount (₹)	
	31 March 2019	31 March 2018
Nature of Transactions		
Purchase of Goods		
AKC Steel Industries Limited (Dr. Balance)	1,97,10,257	4,63,66,160
Thirupathy Bright Industries(Dr Balance)	-	6,03,963
Sale of Goods		
AKC Steel Industries Limited (Dr. Balance)	-	10,71,471
Thirupathy Bright Industries(Dr Balance)	62,87,665	71,54,638
Rent, Electricity & Maintenance		
AKC Steel Industries Limited (Cr. Balance)	46,76,108	9,20,871
Beekay Associates Private Limited (Cr. Balance)	34,469	58,474
Pleasant Holdings Pvt Ltd (Cr. Balance)	36,798	96,630
Metropolis Estates Pvt Ltd (Cr. Balance)	40,166	70,980
Emerald Suppliers Private Limited(Cr. Balance)	83,049	1,60,921
B.L.Bansal & Sons(HUF)(Cr. Balance)	9,000	9,000
Gautam Bansal (Cr. Balance)	1,07,236	81,000
Mukesh Chand Bansal (Cr. Balance)	40,500	36,000
Manav Bansal(Cr. Balance)	40,500	36,000
Aruna Bansal (Cr. Balance)	54,000	54,000
Indu Bansal (Cr. Balance)	54,000	54,000

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Balance Outstanding at the end of the year:	Amount (₹)	
	31 March 2019	31 March 2018
Other Income(Rent & Electricity)		
B.P. Spring & Engg Co (Pvt) Limited (Dr. Balance)	72,101	79,35,825
Emerald Suppliers Private Limited (Dr. Balance)	1,00,000	1,00,000
Interest on unsecured loan		
Tirumala Holdings Private Limited(Cr. Balance)	-	1,997
Century Vision Private Limited(Cr. Balance)	11,56,375	-
Remuneration		
Suresh Chand Bansal(Cr. Balance)	2,10,08,181	6,75,647
Mukesh Chand Bansal(Cr. Balance)	75,96,781	1,95,485
Vikas Bansal(Cr. Balance)	74,57,172	1,83,786
Manav Bansal(Cr. Balance)	48,20,852	1,74,814
Gautam Bansal (Cr. Balance)	33,90,634	2,34,345

Compensation of Key Management Personnel of the Company

Key management personnel compensation comprised the following :

Nature of Transaction	Year ended 31 March 2019	Year ended 31 March 2018
Short-term employee benefits	9,73,60,000	4,67,48,000
Other long-term benefits (Refer Note below)	*	*
Total Compensation paid to key management personnel	**9,73,60,000**	**4,67,48,000**

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

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

Terms and conditions of transactions with related parties

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

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 35: Accounting classifications and fair values (Ind AS 107)

35.1 Fair values vs carrying amounts

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

		Note No.	As at 31st March 2019		As at 31st March 2018	
			Carrying amount	Fair value Level 3	Carrying amount	Fair value Level 3
A.	**Financial assets:**					
a)	**Measured at amortised cost**					
	Trade receivables	9	1,17,69,52,659	-	1,31,66,81,974	-
	Cash and cash equivalents	10	2,76,87,997	-	1,89,70,222	-
	Bank balances other than cash and cash equivalents	11	2,33,28,688	-	1,92,10,615	-
	Other financial assets	6,12	2,11,32,665	-	1,96,02,407	-
b)	**Measured at fair value through profit or loss**					
	Investments	5	1	1	1	1
B.	**Financial liabilities:**					
a)	**Measured at amortised cost**					
	Borrowings	16	1,20,15,58,036	-	1,78,34,50,087	-
	Trade payables	20	36,12,22,083	-	36,15,15,829	-
	Other financial liabilities	21	3,57,24,171	-	7,99,44,309	-

Note 35.2 Fair value measurement

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

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

Level 1: The hierarchy uses quoted (adjusted) prices in active markets for identical assets or liabilities. The fair value of all bonds which are traded in the stock exchanges is valued using the closing price or dealer quotations as at the reporting date.

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

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

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

The fair value of the financial instruments is determined using net asset value at the respective reporting date

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 35.3 Financial risk management

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

(i) Credit risk

(ii) Liquidity risk

(iii) Market risk

Risk management framework

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

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

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

(i) Credit risk

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

Trade receivable

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

Exposure to credit risks

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

Particulars	Year ended 31 March 2019		Year ended 31 March 2018	
	%	Amount	%	Amount
Revenue from top customer	11.44%	1,09,88,63,321	17.06%	1,69,26,81,532
Revenue from top five customers	44.02%	4,22,72,12,331	47.92%	4,75,59,87,871

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

(ii) Liquidity risk

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

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

Exposure to liquidity risk

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

31 March 2019	Less than 1 year	1-5 years	> 5 years	Total
Borrowings	90,41,32,261	29,74,25,775	-	1,20,15,58,036
Trade payables	36,12,22,083	-	-	36,12,22,083
Other financial liabilities	3,57,24,171	-	-	3,57,24,171

31 March 2018	Less than 1 year	1-5 years	> 5 years	Total
Borrowings	1,46,87,39,618	31,47,10,469		1,78,34,50,087
Trade payables	36,15,15,829	-	-	36,15,15,829
Other financial liabilities	7,99,44,309	-	-	7,99,44,309

(iii) Market risk

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

(a) Interest rate risk

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

Exposure to interest rate risk

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

Particulars	Year ended 31 March 2019	Year ended 31 March 2018
Fixed rate instruments		
Financial assets	5,27,91,138	4,19,56,341
Financial liabilities	(30,43,82,931)	(31,67,62,294)
	(25,15,91,793)	**(27,48,05,953)**
Variable rate instruments		
Financial assets	-	-
Financial liabilities	(89,71,75,105)	(1,46,66,87,793)
	(89,71,75,105)	**(1,46,66,87,793)**

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Sensitivity analysis

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

Cash flow sensitivity analysis for variable rate instruments

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

Particulars	Profit or loss		Equity, net of tax	
	Strengthening	Weakening	Strengthening	Weakening
31 March 2019				
Variable rate instruments	(89,71,751)	89,71,751	(58,36,662)	58,36,662
Cash flow sensitivity (net)	**(89,71,751)**	**89,71,751**	**(58,36,662)**	**58,36,662**
31 March 2018				
Variable rate instruments	(1,46,66,878)	1,46,66,878	(95,90,965)	95,90,965
Cash flow sensitivity (net)	**(1,46,66,878)**	**1,46,66,878**	**(95,90,965)**	**95,90,965**

(b) Equity price risk

The Company is not exposed to equity risks arising from equity investments. Equity investments are held for stratergic rather than trading purposes. The Company does not actively trade these investments.

(c) Currency risk

Foreign currency risk is the risk impact related to fair value or future cash flows of an exposure in foreign currency, which fluctuate due to changes in foreign exchange rates. The Company's exposure to the risk of changes in foreign exchange rates relates primarily to import of raw materials and spare parts, capital expenditure, exports of finished goods. The currency in which these transaction are primarily denominated as USD.

The Company evaluates exchange rate exposure arising from foreign currency transactions. The Company follows established risk management policies and standard operating procedures.

Exposure to currency risk

The Company's exposure to foreign currency are at the end of the reporting period are as follows:

Particulars	In original currency (USD)	In Rupees
31 March 2019		
Trade receivables	7,00,782	4,82,33,912
Net exposure in respect of recognised financial assets and liabilities	**7,00,782**	**4,82,33,912**
31 March 2018		
Trade receivables	2,53,490	1,62,65,130
Net exposure in respect of recognised financial assets and liabilities	**2,53,490**	**1,62,65,130**

Sensitivity analysis

A reasonably possible strengthening (weakening) of the USD and JPY against Indian rupee at 31 March would have affected the measurement of financial instruments denominated in a foreign currency and affected equity and profit or loss by the amount shown below. This analysis assumes that all other variables, in particular interest rates , remain constant and ignores any impact of forecast sales and purchases.

Particulars	Profit or loss		Equity, net of tax	
	Strengthening	Weakening	Strengthening	Weakening
31 March 2019				
USD (5% Movement)	**24,11,696**	**(24,11,696)**	**15,68,953**	**(15,68,953)**
31 March 2018				
USD (5% Movement)	8,13,257	(8,13,257)	5,31,805	(5,31,805)

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 36. Capital management

The Company's policy is to maintain a strong capital base so as to maintain investor, creditor and market confidence and to sustain furture development of the business. The management monitors the return on capital, as well as the level of dividends to equity shareholders.

The Company's objective when managing capital are to: (a) to maximise shareholders value and provide benefits to other stakeholders and (b) maintain an optimal capital structure to reduce the cost of capital.

For the purpose of the Company's capital management, capital includes issued equity share capital and other equity reserves attributable to the equity holders.

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

Particulars		31 March 2019	31 March 2018
Total debt (Bank and other borrowings)	A	1,20,15,58,036	1,81,43,24,035
Equity	B	3,97,78,65,528	3,00,91,76,705
Liquid investments including bank deposits	C	2,76,87,997	1,89,70,222
Debt to Equity (A / B)		0.30	0.60
Debt to Equity (net) [(A-C) / B]		0.30	0.60

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

Note 37. Leases: Company as lessee

The Company has entered into agreements in the nature of lease/leave and license agreement with different lessors/licensors for the purpose of establishment of office premises/residential accommodations etc. These are generally in the nature of operating lease/leave and license. Period of agreements are generally up to three years amd renewable at the option of the lessee.

Lease rentals charged to revenue (included under the head Other Expenses in Note 30) for right to use the following assets are:

Particulars	For the year ended 31 March	
	2019	2018
Office premises, residential flats, plant and equipment etc.	1,30,95,744	75,82,333

Note 38. During the Financial Year the Company have written off ₹1.54 Crores due to dis-embarkment of Bobbili Project of the Company because of non fulfilment of terms & conditions set by Andhra Pradesh Industrial Infrastructural Corporation Limited (APIIC).

Notes to the Consolidated Financial statements for the year ended 31 March 2019

Note 39. Details of Corporate Social Responsibility (CSR) Expenditure:

(Amount in Lakhs)

Particulars	Year ended 31st March 2019	Year ended 31st March 2018
Amount required to be spent as per Section 135 of the Companies Act	129.66	72.55
Amount spent during the year on:		
(i) Construction/Acquisition of an assets	-	-
(ii) on purpose other than above(i)	128.36	92.07
Total	**128.36**	**92.07**

Note 40. Events occurred after the Balance Sheet date

The Board of Directors has recommended Equity Dividends of ₹2/- per Share (Previous year ₹1/-) for the financial year 2018-19

Note 41. The Financial statements were authorized for issue by the Directors on 29th May, 2019

The accompanying notes form an integral part of the consolidated financial statements

As per our report of even date attached

For **LIHALA & CO**
Chartered Accountants
Firm's Registration Number.315052E

Rajesh Lihala
Partner
Membership No. 052138

Place: 11, Crooked Lane, Kolkata - 700 069
Date: 29th May 2019

For and on behalf of the Board of Directors

Sd/-

Suresh Chand Bansal
Executive Chairman
(DIN: 00103134)

Mukesh Chand Bansal
Managing Director
(DIN: 00103098)

Manav Bansal
Wholetime Director & CFO
(DIN: 00103024)

Rabindra Kumar Sahoo
Company Secretary

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