



RAMA STEEL TUBES LTD.

Manufacturers & Exporters : ERW Steel Tubes (Black & Galvanised)

CIN : L27201DL1974PLC007114 | AN ISO 9001 : 2015 CO.

Regd. Office : B-5, 3rd Floor, Main Road, Ghazipur, New Delhi (India) - 110096

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Date: September 7, 2021

The Manager – Listing National Stock Exchange of India Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai – 400 051 Symbol: RAMASTEEL	Department of Corporate Services BSE Limited, Corporate Relationship Dept., P. J. Towers, Dalal Street, Mumbai - 400 001. Script Code: 539309
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Dear Sir,

Sub: Submission of Annual Report for the financial year 2020-21

Pursuant to Regulation 34(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Report for the financial year 2020-21 along with Notice of the 47th Annual General Meeting of the Company to be held on Thursday, September 30, 2021 at 12:30 p.m. through Video Conferencing (VC)/ Other Audio Visual Means (OAVM).

The Secretarial Audit Reports of material unlisted subsidiary is also attached.

You are requested to take the same on your records.

Thanking you,

Yours faithfully,

For Rama Steel Tubes Limited

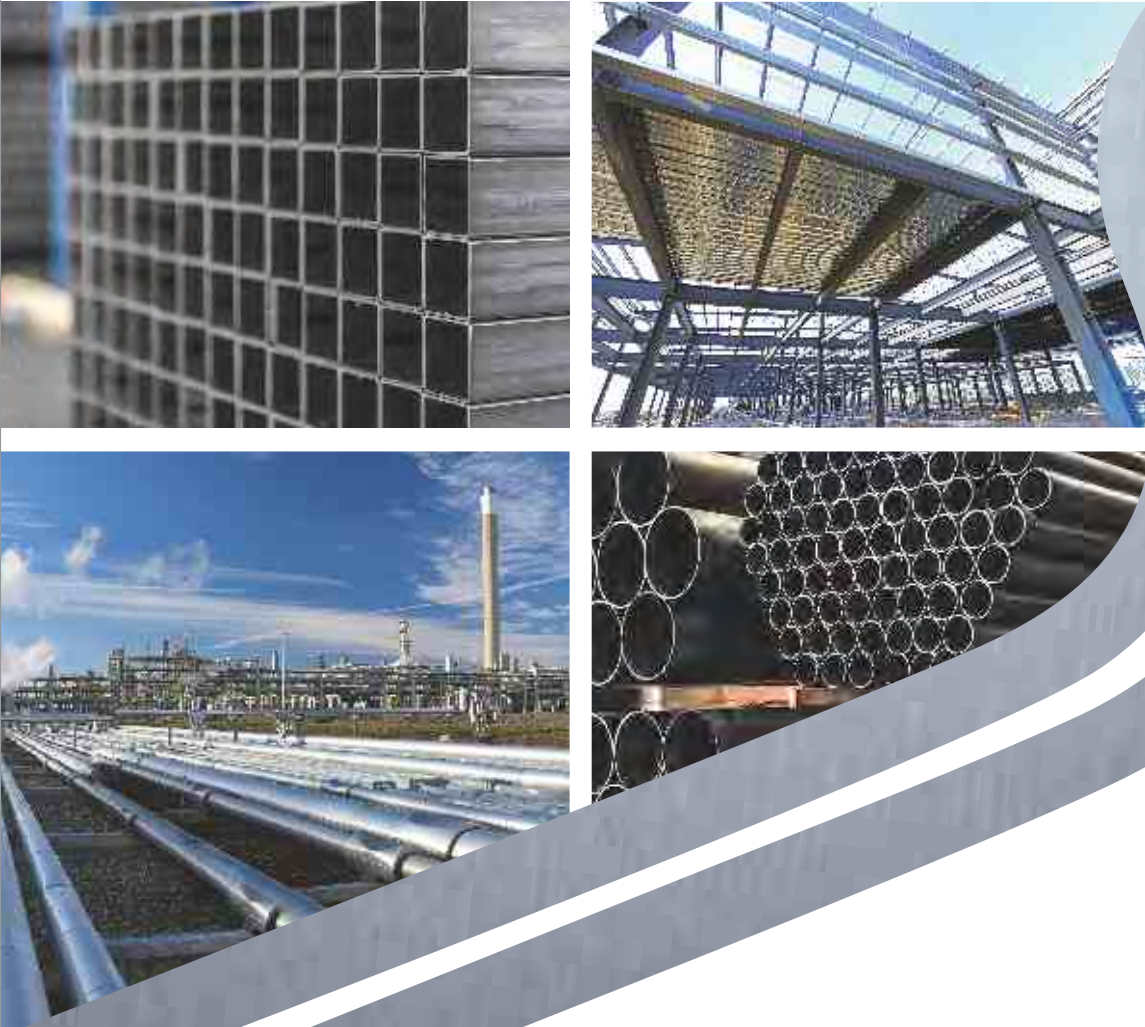
K. Datta

Kapil Datta
Company Secretary & Compliance Officer
Email Id: investors@ramasteel.com



Encl.: As above

EMBRACING CHANGE WITH **NEWNESS**



RAMA
BUILD WITH TRUST

Rama Steel Tubes Limited
Annual Report 2020-21



Scan this QR code
to view our digital
annual report

Caution regarding forward looking statements

Certain statements in this annual report concerning our future growth prospects are forward-looking statements, which involve a number of risks, and uncertainties that could cause actual results to differ materially from those in such forward-looking statements. We have tried wherever possible to identify such statements by using words such as 'anticipate', 'estimate', 'expect', 'project', 'intend', 'plan', 'believe' and words of similar substance in connection with any discussion of future performance. We cannot guarantee that these forward-looking statements will be realized, although we believe we have been prudent in 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, our 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.

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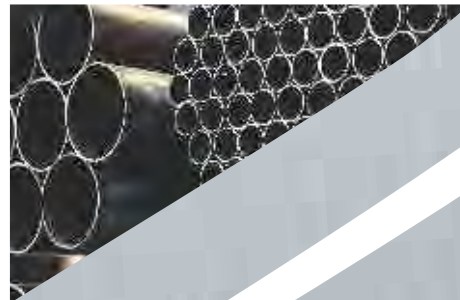
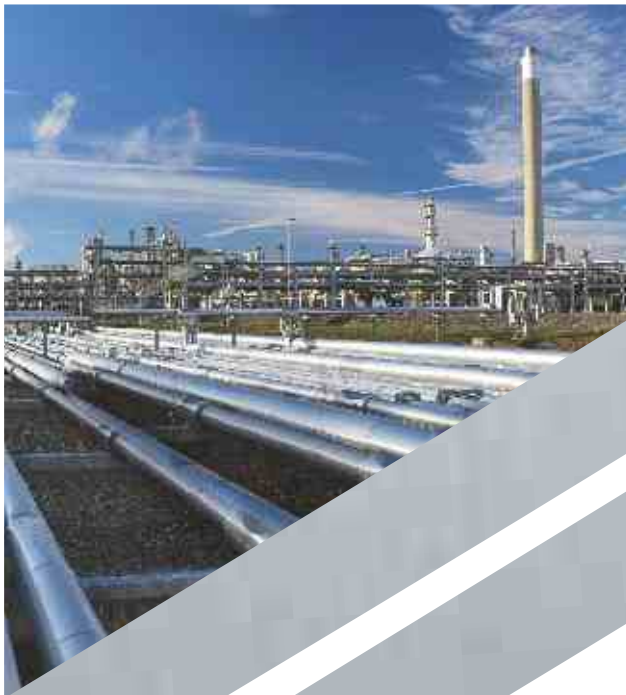
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Embracing Change with **NEWNESS**





“Change is the only constant” and FY20 and FY21 have truly proved it right. With the onset of global pandemic COVID-19 and resultant alteration of realities of the world as we know, has put many question marks and many-many more answers which were never known before.

At Rama Steel, we are embracing the change and embracing it with newness and new vigour. We have taken this as mission to overcome these challenges, bounce back with agility and prepare ourselves for the opportunities and challenges of future and ready a Rama Steel for tomorrow.

During FY21, while we were going through one of human history's worst challenge in form of COVID-19, we were focused on strengthening and improving what is internal to us. We continued with our relentless pursuit of making ourselves, tougher, bolder, sharper across critical functions.

We executed on-going capacity expansion plans at Khopoli & Anantpur, besides announcing future expansion plans. We decided to set up first ever manufacturing facility in East of India at Raipur. We continued with plant upgradation at Sahibabad facility. We broadened our market touchpoints in India and overseas. We were on track to build a professional, experienced and dynamic leadership team and leveraged their presence during the year. The result of our efforts started showing positive results when we posted a turnaround performance in FY21 compared to FY20.

With our actions across functions and facets, we are 'embracing change with newness'.



Embracing Change with **NEW IDENTITY**

Amid all the challenges in the aftermath of COVID-19 pandemic, at Rama Steel we continued relentlessly to execute what is in our control and what forms our core.

During FY21, single biggest change in the Company's history since inception was the unveiling of our new brand identity. We brought out a new brand identity for the Company and rolled out across communication channels and platforms to get our stakeholders familiar with. The objective behind adopting a new identity was to look contemporary while our actions are already in line with prevailing times. Rama Steel has a rich legacy of more than three decades and seen the organization evolve throughout and the organization realized the need to adopt this new brand identity. As a dynamic organization, Rama Steel Tubes is evolving and expanding fast. We are covering more geographies in India and overseas; we are adding more products & more capacities; we are expanding our talent pool; and we are supporting all our present and future aims and actions with this new Brand Identity.





With new identity, our **BRAND PROMISE** remains the same viz.:

1. To emerge as a leading manufacturer in steel tube industry on the strengths of our quality and strength.
2. To serve the satisfaction of our customers by producing products that are symbols of durable excellence.
3. To add every possible value in the service in pursuit of a strong and long term bonds with our customers.
4. To sustain our position as one of India's valuable enterprise through highest standards of quality, creating greater value for India's economy and our stakeholders.

Expanding the newness **WIDER, DEEPER**

As we adopted the new Brand Identity for our business at the Corporate and Parent brand level, we have taken forward this change deeper and wider to our offerings for a dynamic market. Taking forward the newness of new brand identity, we have taken a futuristic approach to bring our various industry specific products under this new branding. Here we bring to you our new product brand identities:



Embracing Change with **NEW CAPABILITIES**

In a challenging FY2020-21, we continued to strengthen our core and add more muscle to our manufacturing capabilities. We took our opportunity to widen and deepen our manufacturing infrastructure by way of executing the on-going plans and initiating new projects to add more capacities and to upgrade the existing infrastructure.

Present Capacities and Products

SAHIBABAD, UTTAR PRADESH:

Capacities: 60,000 MTPA Products:
ERW Black Steel Pipes and Tubes,
ERW Galvanized Steel Pipes and
Tubes, Scaffolding Pipes and Tubes,
Swaged/ Light Poles, Structural Steel
Products, Hollow Sections



KHOPOLI, MAHARASHTRA:

Capacities: 1,32,000 MTPA Products:
ERW Black Steel Pipes and Tubes,
ERW Pre galvanized Steel Pipes and
Tubes, Scaffolding Pipes and Tubes,
Structural Steel Products, Hollow
Sections



LAPAKSHI, ANDHRA PRADESH:

Capacities: 72,000 MTPA Products:
ERW Black Steel Pipes and Tubes,
ERW Pre galvanized Steel Pipes and
Tubes, Scaffolding Pipes and Tubes,
Structural Steel Products, Hollow
Sections





On-going & Future Capacities and Products

In-line with our vision for much enhanced capacities and equally better utilization for future growth, we have strategized to synergistically grow our infrastructure across locations in terms of manufacturing as well as sales. In line with this, not only we are increasing the capacities but are also modernizing/ upgrading existing facilities.

SAHIBABAD, UTTAR PRADESH:

- A complete plant modernization and upgradation is in full swing at our first manufacturing footprint – Sahibabad. Upgradation process will strengthen its technical capabilities, improve efficiency and cost optimisation. To be complete by December, 2021



LAPAKSHI, ANDHRA PRADESH:

- Backward integration plan underway in the form of
 - a. New Cold-rolling mill and
 - b. Strip hot-dip Galvanising Plants to produce the additional value added products which will increase tonnage and profit margins

Global Division

In-line with our vision to grow business contribution of the Global Division, we are taking definitive steps to fulfil our vision. With a land acquisition in Nigeria, Africa, we are all set to have our first manufacturing footprint outside India.

Embracing Change with **NEW REACH**

Rama Steel Tubes Limited has been a name synonymous with Quality Products, On-time Delivery and Customer Satisfaction. On the basis of these fundamentals. Over the years of its operations, the Company has built a strong clientele with the help of a very strong market reach.

A strong market network has always been a strength of Rama Steel Tubes Limited which we built on the quality of our products, impeccable relations with dealer network, keeping customer satisfaction as foremost and delivering on our delivery timelines.

During FY21, Rama Steel progressed towards further entrenching its Indian and global market reach with definitive actions on ground. These corporate developments will take our products much farther and deeper in newer hotspots of growth in the earmarked markets. During FY21, the Company decided to set up a new manufacturing setup in Raipur, India to have a regional manufacturing support in East India for the desired market reach in Eastern India. The existing manufacturing facilities at Sahibabad (UP), Khopoli (Maharashtra) and Lepakshi (Andhra Pradesh) are already put up for capacity expansions, product additions and plant upgradation to back our expansion in market reach.

India Marketing Network

300+ Dealers & Distributors across India

17+ States & UTs Served

- Delhi-NCR • Jammu & Kashmir
- Uttarakhand • Uttar Pradesh
- Himachal Pradesh • Punjab • Rajasthan
- Bihar • Odisha • Madhya Pradesh
- Haryana • West Bengal • Assam
- Karnataka • Arunachal Pradesh
- Maharashtra • Gujarat

Expanding Eastern India manufacturing footprint for much wider & efficient coverage of Eastern India markets.



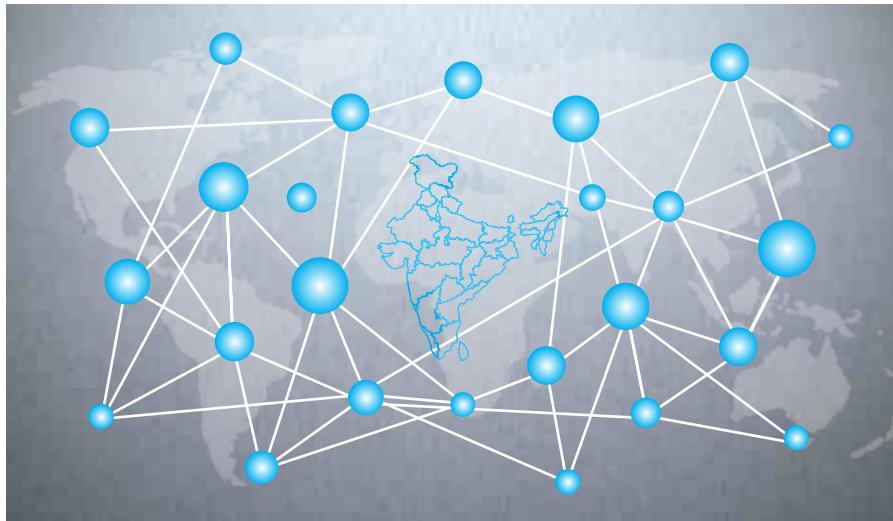
During FY21, the Company further expanded its market network in India and overseas.

Global Marketing Network

18 Countries with a footprint

South Africa, United Arab Emirates (U.A.E.) United Kingdom (U.K.), Europe, Sri Lanka, Ethiopia, Kenya, Uganda, Kuwait Republic of Congo, Yemen, Guyana, Germany, USA, South Africa, Zambia, Malta

Setting up manufacturing facility in Africa region to better cater to Africa and Middle East markets.



Embracing Change with **NEW ACUMEN**

Changing times, challenging environment, aspirations to grow and commitment to succeed – we believe that one thing that binds and makes all these facets work synergistically is knowledge and intellect. We believe that growth fosters where talent is nurtured and with right talent pool, with right mindset and a focused vision can lead organizations to newer heights. Acquiring, nurturing and retaining right talent has been our strengths and we have many a valued team members who have contributed their years to the success of the organization.

Now, as we move on an altogether different growth trajectory in line with our aims and ambitions to grow faster, wider and steadier, we are leveraging possibly the best asset of businesses – talent and human power. We believe that next level of our growth will need next level of energy in form of young talent and new acumen in form of a diverse and capable leadership team.

Over the previous two years including FY21, we have inducted highly experienced, successful and dynamic leadership team members across functions. The key departments that have seen this crucial change include Chief Executive Office, Chief Operations Office, Commercial, Sales & Marketing and Govt. Sales. The new leadership team does not only foster our growth plans and future of Rama Steel Tubes, they also contribute to our vision of making Rama Steel Tubes an organization driven by professionals.

The impact of this new acumen is well visible in our efforts, results, strategies and execution. We saw a significant turnaround in our performance for FY21 post the adverse effects of COVID1-19 hitting the entire industry from end of FY20 and through FY21 as well. The capacity expansions, plant upgradations, product extensions and market expansions; all these and more are the outcome of a teamwork between a visionary promoter management and an impeccable leadership team.

TOTAL EMPLOYEES: 250+



At Rama Steel Tubes, we have always strived for not only on acquiring and retaining good talent, we have strong practices in place to nurture the human capital with learning & development. We impart trainings & skill upgradation for technical, inter-personal, functional and productivity related aspects of human resources.



Financial PERFORMANCE

₹ In Lakhs

Particulars	2019	2020	2021
Total Revenue	50,678.66	35,645.96	47,657.35
EBIDTA	1,907.87	1,232.15	2,446.16
EBIT	1,876.52	1,174.45	2,240.42
PBT	939.34	211.31	1,470.65
PAT	837.18	42.64	1,237.81
Sale Volume (in M.T.)	102,116.392	80,249.955	92,334.211
EPS ₹	5.09	0.49	7.21
Net Worth	8,700.94	8,782.82	9,994.45

Ratio in %

EBIDTA%	3.76%	3.46%	5.13%
PBT%	1.85%	0.55%	3.09%
PAT%	1.65%	0.12%	2.60%
ROI/ROCE	17.23%	10.84%	17.09%
ROE	10.65%	0.49%	14.14%
Sales Value Growth	31.02%	-29.66%	33.70%
Sales Volume Growth	21.60%	-21.41%	15.06%

Quarterly Performance FY 2020-21

₹ In Lakhs

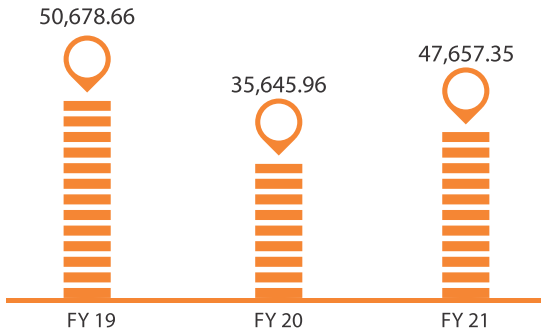
Particulars	Q1FY21	Q2FY21	Q3FY21	Q4FY21
Total Revenue	4,817.54	13,010.71	15,461.44	14,367.70
EBIDTA	63.00	632.54	672.65	1,218.03
PBT	-213.22	334.25	365.86	983.38
PAT	-192.30	345.48	301.10	783.21

Ratio in %

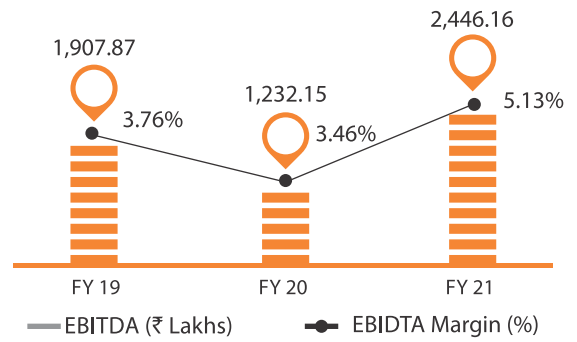
EBIDTA %	1.31%	4.86%	4.35%	8.48%
PBT%	-4.43%	2.57%	2.37%	6.84%
PAT%	-3.99%	2.66%	1.95%	5.45%



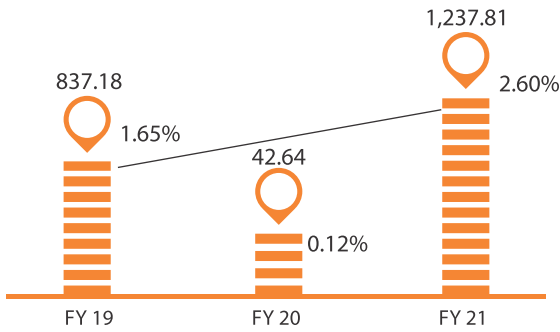
Total Revenue (₹ Lakhs)



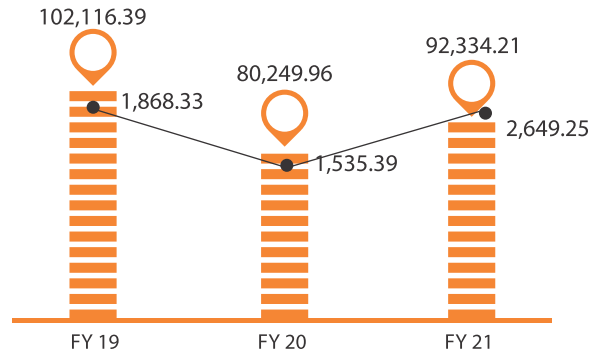
EBIDTA (₹ Lakhs) & EBIDTA Margin (%)



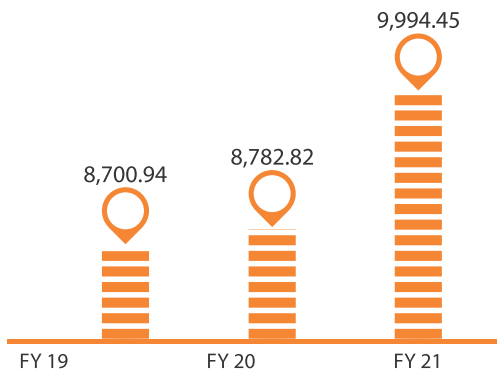
PAT (₹ Lakhs) & PAT Margin (%)



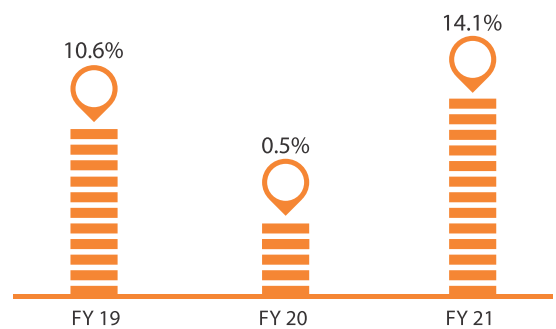
Sales Volume (MT) & EBIDTA Per Tonne (₹)



Net Worth (₹ Lakhs)



ROE (%)



From the desk of **CHAIRMAN** & Managing Director

Dear Shareholders,



It is my privilege to present to you the Annual Report of Rama Steel Tubes Ltd. for the financial year 2020-21. While this was a year of extreme economic challenges for the world due to COVID-19 pandemic, our Company continued to play on its strengths and posted a robust financial performance. FY21 proved to be promising year as our Company has emerged stronger backed by diversified products, manufacturing efficiency and superior project execution skills. We continued to strengthen our focus on customer experience, technological investments, capacity expansion and widening our products offerings - all of which plays vital roles to sustain our position as one of the leading player in steel tubes and pipe industry in India.

Economy Overview

The unprecedented COVID-19 pandemic has had a significant impact on lives, livelihoods, and the business globally. IMF expects the world economy to contract by 3.2% in 2020 and the growth is expected to rebound by 6.0% in 2021. During the first few months of the pandemic, operational challenges mounted due to restricted movement and disrupted supply chain. After significant GDP contraction in the first quarter of FY21, Indian economy witnessed a gradual recovery and aggregate demand has picked up in the second half of FY21 with easing relaxations, favourable policies and increased government spending. As the economy

continues to combat the second wave of COVID-19 pandemic, the government allowed economic activities to continue with partial lockdowns and limited restrictions set by respective states. However, the fast pace of vaccination provides hope in containing the future waves of COVID-19.

Industry Developments

Aided by favourable policy support, large stimulus packages, improving consumer sentiment and fast recovery in China, the pandemic effect on global steel industry was benign, witnessing only minor contraction of 0.2% in global steel demand in 2020. Over the past decade, Indian steel industry has responded well to the increase in domestic steel demand leading to significant capacity addition in the Indian markets. According to the World Steel Association (WSA), steel demand in India is expected to rebound by 19.8% in 2021, after it had declined 13.7% in 2020 due to COVID-19 induced lockdown.

The Government's focus on Atmanirbhar Bharat initiative and strong impetus on infrastructure and development will stimulate the demand for steel pipes and tubes. As the country is slowly moving towards a gas-based economy, the success of 'One Nation, One Gas Grid' mission majorly depends on the infrastructural development of the natural gas pipeline. Under 'Jal Jeevan Mission' initiative, the



Government will provide piped water across India's rural areas. Moreover, growing impetus on the energy sector through ambitious capacity addition programme presents huge opportunity for domestic steel pipes and tubes industry.

Performance Review

At RSTL, we are one of the leading player in Indian steel tubes and pipes industry with a strong legacy of more than 45+ years. In addition to manufacturing and supplying our products, we provide unmatched value proposition to our customers by offering end-to-end projects execution solutions. Over the years, we have emerged as a trusted brand globally with strong recognition of our brand 'TTT Rama'.

Our Company is constantly improving processes and fortifying existing systems to deliver superior quality products and meet the evolving needs of our vast clientele. At present, we are undergoing mill upgradation at Sahibabad plant, Uttar Pradesh with latest technology, which will help in improving efficiency and expanding the product portfolio. During the year under review, we have completed capacity expansion at Khopoli, Maharashtra while at Anantapur, Andhra Pradesh it was halted for some time due to resurgence of COVID-19 induced restrictions. Post completion of capacity enhancement initiatives at Anantapur in FY22, total capacity of the Company will increase from 2,28,000 MTPA to 2,64,000 MTPA. The added capacities will help us strengthen our share in the domestic and global markets.

We are perfectly poised to capitalize on emerging opportunities as our niche products ERW Black Pipes and Galvanised Steel Pipes find use in sectors like water pipelines, agriculture, irrigation, deep tube wells, fencing tubes etc having huge growth potential. Being a pioneer in the industry, we are also a preferred partner due to strong relationship with our suppliers and reputed customers globally. Moreover, we are also initiating our new brand entity in order to align with the existing market situation.

Our best-in-class manufacturing units are located strategically in close proximity to raw materials sources, that encourage efficiency and enhance productivity. With the continuous investment in R&D activities and advanced technology, we are able to align our production facilities with specific grade, size and thickness. This allows us to leverage our capacities and make the most of the opportunities in rising sectors across the globe.

After establishing ourselves as one of the leading player in the country, we are all geared to expand our operations globally. During the year under review, we have acquired land for setting up a manufacturing unit in Nigeria. The export sales accounted for 18% of total sales value in FY21. Our Company aims to further strengthen its global footprints by providing more value added products.

On the back of our agile and resilient business model, ability to effectively implement strategies and

relentless commitment, we were able post robust performance in FY21. This achievement comes at a time when the world faces unprecedented challenges due to the outbreak of COVID-19. The consolidated revenue from operations increased significantly by 33.34% to ₹ 470.43 crore in FY21. EBITDA increased by 98.53 % YoY to ₹ 24.46 crore. Profit after tax increased tremendously to ₹ 12.38 crore in FY21 as against ₹ 0.43 crore in FY20. During the year under review, our Company managed to reduce debt and sustained strong cash generation.

Future Focus

Moving ahead, we are excited about the future. At RSTL, we are attractively placed in the industry with our solid fundamentals and brand reputation. As our Company continues to scale its operations, the customer-centric attitude and the zeal to outperform enables us to deliver impressive growth year after year. With rich experience, diverse products portfolio, strong clientele, we are well positioned to take advantage of the industry opportunities and contribute to nation's thirst for power and steel to build its infrastructure. Going forward, we aspire to strengthen our technological expertise, expand our manufacturing capacities and capabilities and create a stronger presence in newer as well as existing territories. Our capacity expansion plans, firm balance sheet and upcoming new brand entity will drive further growth and consolidate our market position.

Our Company believes that the key to outstanding business result is an excellent talent pool. We will continue to focus on building highly professional and experienced leadership team and attracts the best talent to provide a significant differentiation to our products and processes.

Our exciting journey of growth and holistic value creation will continue with the support and guidance of our customers, employees, shareholders, suppliers, bankers, government and the Board of Directors.

I would like to take this opportunity to thank all our people who have been tirelessly working to ensure that we continue to serve the people of this country through this extremely challenging year. Most importantly, I would like to thank you, our shareholders, for your overwhelming trust, support, and confidence in RSTL.

Sincerely,

Naresh Kumar Bansal

Chairman & Managing Director

About RAMA STEEL Tubes Limited

One of India's leading and trusted name in the steel tubes and pipes industry, we are Rama Steel Tubes Ltd (RSTL). We manufacture and market highest quality steel tubes, pipes and square sections products. We add value to steel and contribute in nation building. With a rich legacy of more than 45 years, we are standing contemporary to present day market needs and are on a growth path irrespective of the challenges that are at our hand. Headquartered in Delhi, we are multi-location manufacturing infrastructures besides a wide sales network across India. We have a strong presence outside India as well.

Our VISION-MISSION

1. To emerge as a leading manufacturer in steel tube industry on the strengths of our quality and strength.
2. To serve the satisfaction of our customers by producing products that are symbols of durable excellence.
3. To add every possible value in the service in pursuit of a strong and long term bonds with our customers.
4. To sustain our position as one of India's valuable enterprise through highest standards of quality, creating greater value for India's economy and our stakeholders.

Key NUMBERS

14%
Revenue
CAGR (5 Years)

15%
PAT CAGR
(5 Years)

300+ SKUs

300+
Partners in India
Sales Network

₹400+ Cr.
Worth projects
executed
(Last 5 Years)

**2,64,000
MT**
Total Installed
Capacity



Our Manufacturing **INFRASTRUCTURE**

Over the years Rama Steel Tubes Ltd has built a manufacturing infrastructure that has strategic locations across India's North, South and West regions. With presentation utilization of 60%, our plants boast of 2,64,000 MTPA capacities. Here is more about these impeccable assets of ours:

UTTAR PRADESH

Sahibabad, Uttar Pradesh
Capacity: **60,000 MTPA**
Markets Served: Delhi-NCR and entire northern India

MAHARASHTRA

Khopoli, Maharashtra
Capacity: **132,000 MTPA**
Markets Served: Maharashtra, Gujarat, Madhya Pradesh

ANDHRA PRADESH

Anantpur, Andhra Pradesh
Capacity: **72,000 MTPA**
Markets Served: Andhra Pradesh & Tamil Nadu, Kerala, Karnataka, Goa, Telangana

Marquee Clients

OIL AND GAS: SAIL, GAIL, RIL, Gujrat Gas etc.

TELECOM: Airtel, BSNL, etc.

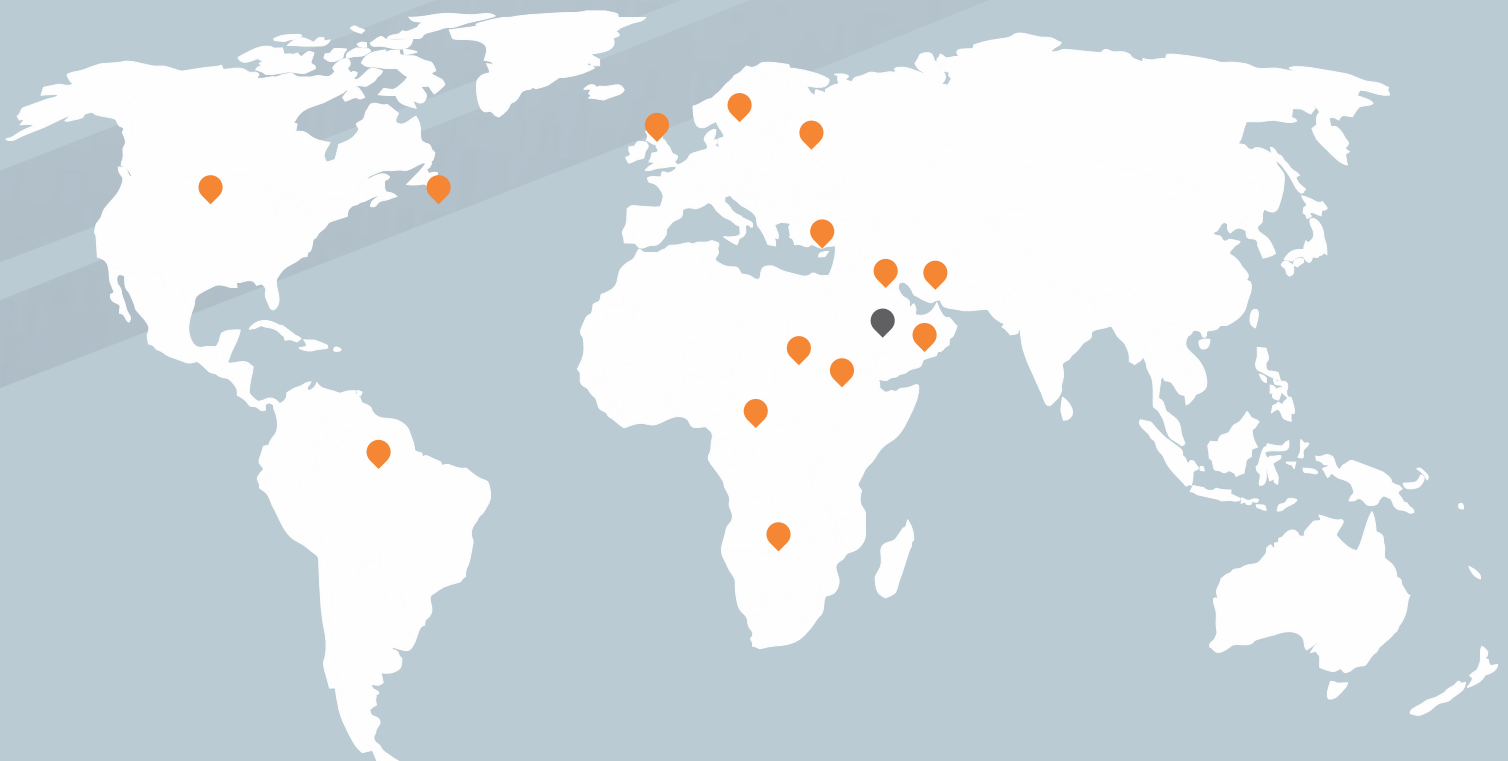
INFRASTRUCTURE: L&T, GMR, DLF, TATA, LARSEN & TOUBRO, ADANI etc.

POWER: NTPC, BSES, UPCL, PVVNL, DVVNL, HPSEBL etc

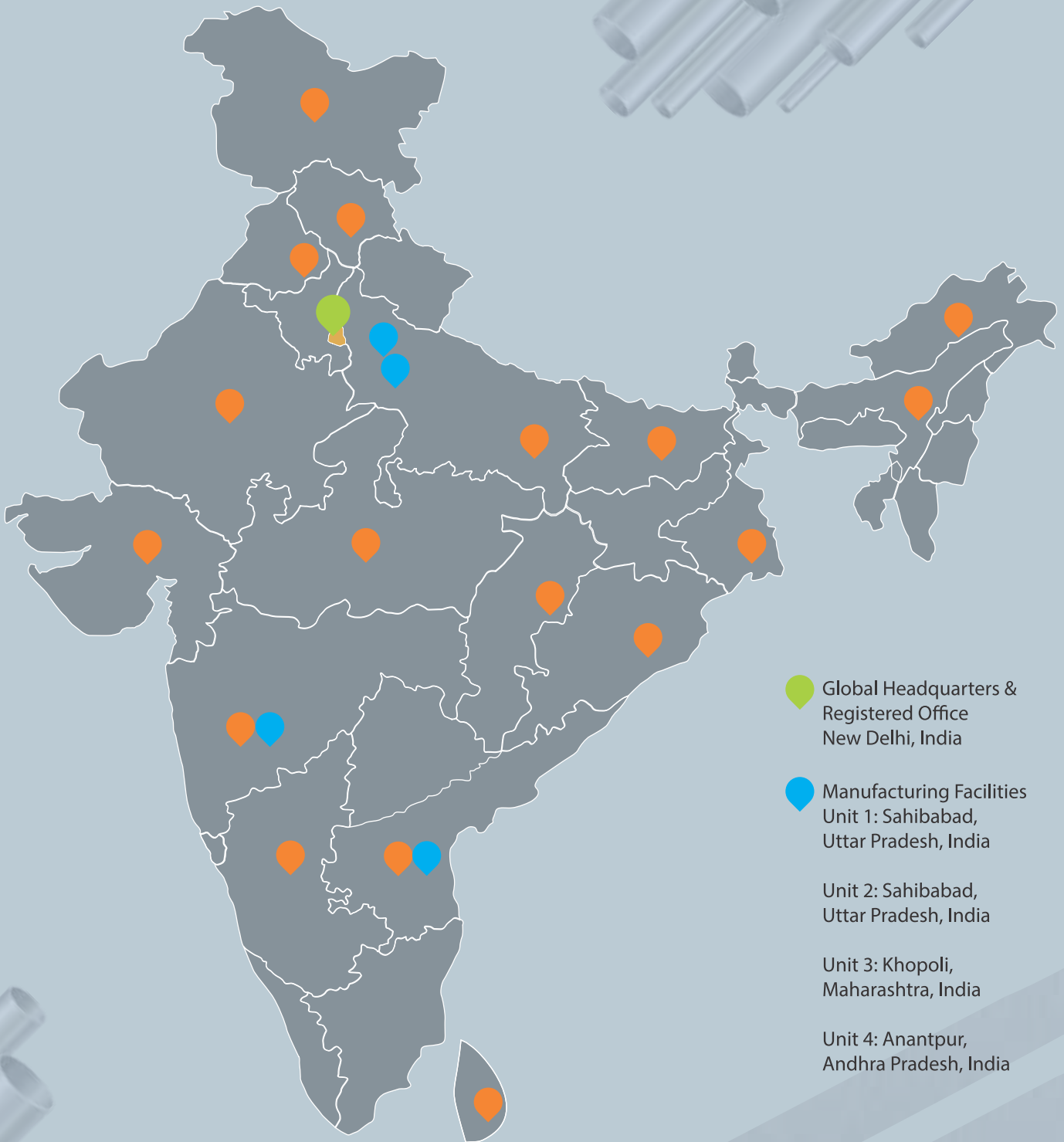
AUTOMOBILE: Ashok Leyland, Tata Motors, etc.



Our PRESENCE



-  **Market Reach**
300+ Cities in India,
17+ States & UT
South Africa | United Arab Emirates (U.A.E.)
United Kingdom (U.K.) | Europe | Sri Lanka | Ethiopia | Kenya
Uganda | Kuwait Republic of Congo | Yemen | Guyana | Germany
USA | Zambia | Malta etc.
-  **Foreign Subsidiary**
RST International Trading FZE (U.A.E.)

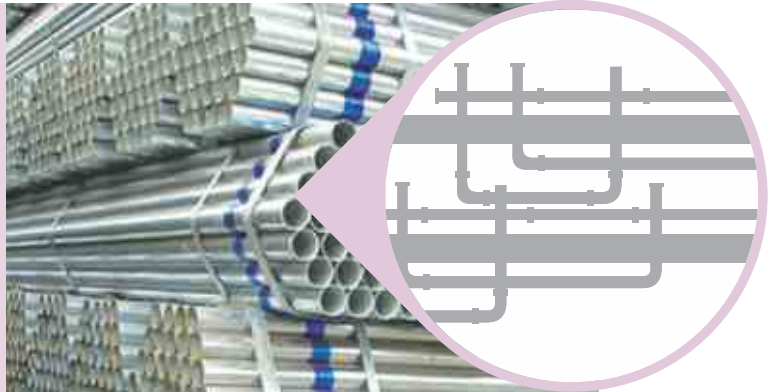


- Global Headquarters & Registered Office
New Delhi, India
- Manufacturing Facilities
 - Unit 1: Sahibabad, Uttar Pradesh, India
 - Unit 2: Sahibabad, Uttar Pradesh, India
 - Unit 3: Khopoli, Maharashtra, India
 - Unit 4: Anantpur, Andhra Pradesh, India

Our PRODUCTS

ERW Galvanized Steel Pipes and Tubes.

Widely Used For: Water Pipelines, Tube Wells, Gas and Oil Pipelines, Cross Country Pipelines



ERW Black Steel Pipes and Tubes.

Widely Used For: Road Barriers, Temporary Fencing, Steel gates and windows, Horse Riding Fences, Parking Lots, Steel Buildings, Industrial Gates



Scaffolding Pipes and Tubes

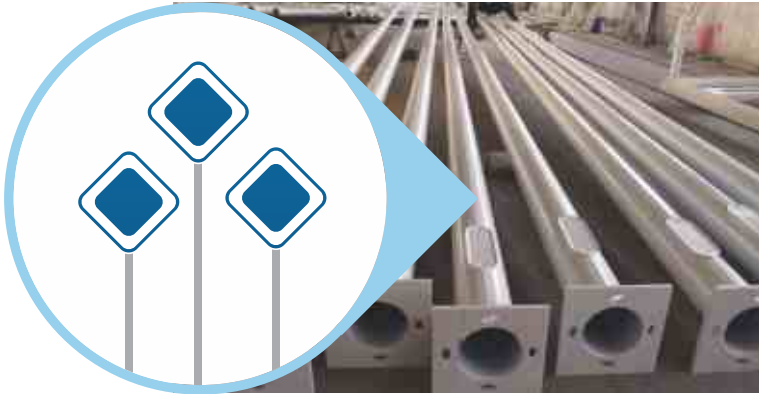
Widely Used For: Handrails, Piling, Sign Poles, Bumpers, Bracings, Towers, Support, Rollers, Casing





Our diversified product portfolio helps us deliver on nation's need for infrastructure development. Our product applications are found in various industries, including automobiles, infrastructure, real estate and furniture.

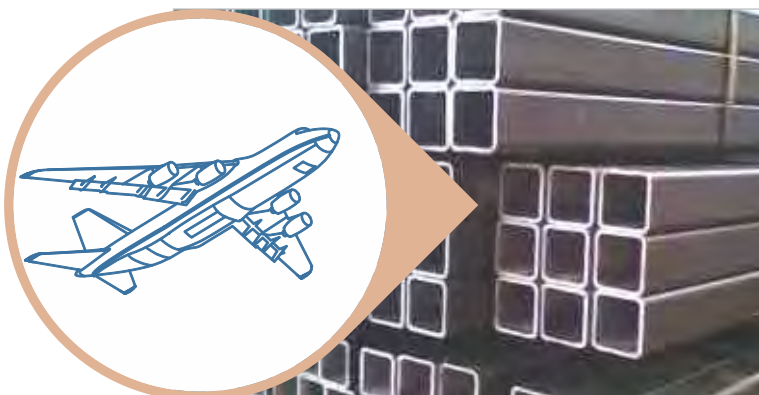
Following, is how and where we contribute to nation building with our products.



Swaged Poles
Widely Used For:
Traffic and
Street Light Poles



Structural Steel Products
Widely Used For: Hollow
Sections for Real Estate,
Automobiles




Hollow Sections
Widely Used For: Furniture,
Automobiles, Chassis,
Pallets, Staircases,
Hydraulic Platforms,
Columns, Trolleys

Our PROJECTS

With end-to-end project execution capabilities and track record, we truly fulfil our mission to add value to our customer deliveries. Beyond just making products available, we execute projects for our customers and have a revered list of big names on our clientele roster.



 **BSES Rajdhani Power Limited (BSES)**
Project-Earthing Electrodes
Products Used-GI Pipes



 **Gujarat Gas Limited**
Project-Gas distribution
Products Used-Pipes




 **Uttarakhand Power Corporation Ltd. (UPCL)**
Project-Rural Electrification
Products Used-Steel Pipes & Steel Poles




 **Power Projects**
Project-J&K Rural electrification
Products Used- Steel Pipes & Poles




 **Purvanchal Vidyut Vitran Nigam Limited**
Project-Kumbh Mela Electrification
Products Used- Steel Tubular Poles




 **Dakshinanchal Vidut Vitran Nigam Limited**
Project-Village & Highway Electrification
Products Used- Steel Tubular Poles




 **Paschimanchal Vidyut Vitran Nigam Ltd.**
Project-Village & Highway Electrification
Products Used- Steel Tubular Poles




 **UP & Utrakhand Peyjal Nigam**
Project-Water distribution
Products Used-GI Pipes




 **BSES Yamuna Power Limited**
Project-Earthing Electrodes
Products Used-GI Pipes & Pole



 **Madhyanchal Vidyut Vitran Nigam Limited**
Project-Village & Highway Electrification
Products Used- Steel Tubular Poles



 **Miner & Irigation Department UP**
Project-Water distribution
Products Used-MS Pipes



 **Noida Power Corporation Limited**
Project-Electification in Noida
Products Used-Earthing electrodes & Steel Tubular Poles



 **HPCL Bhatinda & Manglore Refinery Project**
Project-Refinery Project
Products Used-Pipes



 **Himachal Pradesh State Electricity Board Ltd.**
Project-Village & Highway Electrification
Products Used-Steel Tubular Poles



 **Jal Shakti Department Shimla**
Project-Water distribution
Products Used-GI Pipes

Board of **DIRECTORS**



Naresh Kumar Bansal,
Chairman & Managing Director

Mr. Naresh has More than 40 years of experience in manufacturing industry of “Steel Tubes” with dynamic vision and sharp business acumen. He is well versed with the technical aspects of manufacturing of steel tubes. Mr Bansal handles the strategic planning and identification of new growth drivers for the Company



Richi Bansal
Executive Director & CEO

With over 16 Years of Experience, Mr. Richi is responsible for the administrative aspect; and marketing and finance function of the Company along with formulation of Business Development.



Vinod Pal Singh Rawat
Executive Director

He, aged 39, is a Commerce Graduate. He has over 16 years of experience in steel pipe industry. He has been associated with our group from last 5 years as Commercial Manager (Taxation). He has vast experience in matters related to Indirect Taxation. He has served as the Manager (Taxation) in Spark Electrodes Private Limited. He was also associated with our group from 2009 to 2014. He has successfully handled Indirect Taxation matters of the Company.



Bharat Bhushan Sahny
Independent Director

A law graduate with a vision to reach the top, he has been showing his business acumen for the past more than 40 years. His dynamic vision and sharp mindedness have brought Rama Steel Tubes Limited to its current market position. His industry knowledge and business essence remain unparalleled. It can be rightfully said that he is the backbone of the company.



Jai Prakash Gupta
Independent Director

Mr. Jai Prakash Gupta has done Diploma in Mechanical Engineering. He has over 30 years of experience in steel pipe industry. He has rich experience of 30 years in Jindal Pipes Limited. His suggestions and guidance has helped in improving production process, achieving production targets, minimizing breakdowns and product rejections.



Anju Gupta
Independent Director

A first-generation entrepreneur, her dynamic problem-solving approach has helped us in achieving greater fetes. With her hard-work and passion towards her work, she sets the right example for everyone at Rama Steel Tubes Limited. She joined Rama Steel Tubes Limited in January 2017 as an Independent Director in the Board of Directors of the Company.

Management TEAM

Rakesh Chaturvedi

President- Commercial

Mr. Rakesh Chaturvedi has more than 40 years of progressive experience in steel industry and his deep experience and impressive accomplishments across his career, including most recently thirteen years as Executive Vice President (Domestic Marketing) and worked 13 years for Bhushan Steel Limited. His abilities as an innovative and impactful leader will bring to building on RSTL's story in ways that connect and inspire a wide range of areas.

He began his carrier as Sales Officer with Ajanta Tubes Limited in 1980. In 1988, he joined Bhushan Steel & Strips Limited as Assistant Manager (Marketing) and grew to the level of General Manager (Marketing). After working for 12 years in Bhushan Steel & Strips, he joined Vardhan Industries Limited as Vice President of the Company. Since it was a new entrant in the field of Galvanized Steel, he developed a solid network for the company's product in the shortest possible time and established the product in the very competitive market. In 2005, he joined Bhushan Steel Limited as Executive Vice President (Domestic Marketing) and worked 13 years for Bhushan Steel Limited.

Mr. Chaturvedi holds a Diploma in Marketing Management from Bhartiya Vidhya Bhawan. He has earned his Masters in Political Science from Meerut University and is a Graduate in Economics and Political Science from University of Delhi



Rajeev Kohli

Chief Executive Officer (CEO)

Mr. Rajeev Kohli has more than 25 years of senior management experience, including a decade of strategic development and plan execution at national level in the steel and tube industry, most recently as CEO of the Apollo Metalex Private Limited for 3 years, he also held position of Director in Apollo Tricoat Tubes Limited.

Mr. Kohli will lead to a significant reshaping of RSTL's international footprint, the expansion of the product portfolio across multiple new segments and a wide-ranging reset of the domestic and international strategy.

Mr. Kohli has a Bachelor of Engineering (Computer Science) from Bangalore University.



Keshav Sharan Sharma

Chief Operating Officer (COO)

A Mechanical engineer, Keshav has 40 years of professional experience in the steel industry and has been associated with the company since 2014. He has worked with companies like Bhushan Power and Steel Limited, Bhushan Steel Limited, Bharat Berg Limited, Khandewal Tubes Limited, Surya Roshni Limited, Jain Tubes Limited, Quality Steel Tubes Limited, Abul Khir Limited Bangladesh etc at the senior management position. He is actively involved in all strategic decisions within the group and has been assigned with the responsibility to handle the overseas operations as well as export sales & marketing functions.



**Rajeev Kumar Agarwal**

Chief Financial Officer (CFO)

A qualified Chartered Accountant & Company Secretary, Rajeev has a proven track record and extensive experience of over 13 years of exemplary career, out of which he has devoted 9 years exclusively to the Steel Industry. He has worked He has been associated with Rama Steel Tubes Limited for the last 3 years and in the day-to-day operations of the company, he leads an efficient team and budget planning, funds management, treasury, and taxation matters.

**Vineet Goel**

Vice President –Sales & Marketing

Mr. Vineet Goel brings more than two decades of experience in marketing and will bring leadership, knowledge and proven know-how to our transformation plan, he will be very instrumental and contribute to the deployment of business strategies in collaboration with the sales team.

He has always been an experienced manager with skills in direct sales as well as cross-functional teams, efficiently managing a product life cycle, justifying new product development. He joined Bhushan Power & Steel Limited in 1998 as Manager, Marketing, and then in 2018 was lastly promoted as Vice President, Marketing and continued in the same position. His expertise in marketing of Tubes such as MS ERW Black and Galvanised Steel Tubes, Hollow Sections (MS Black and Galvanised) and Pre Galvanised-Round and Hollow Section Tubes.

Mr. Goel is a Management Post Graduate in Marketing from IGNOU, Delhi and holds a Bachelor in Mechanical Engineering from Punjab University.

**Kapil Datta**

Company Secretary

Kapil is a qualified Company Secretary and associated with Rama Steel Tubes Limited with more than 7 years and handles all the duties related to the Company's Secretarial work along with ensuring fulfillment of various compliances.

**Alok Aggarwal**

General Manager-Govt-Sales & Marketing

Alok is graduate and diploma in sales & marketing having robust experience of more than 33 years in Steel Industry. He handles the sales and marketing functions efficiently with his rich experience.

Corporate INFORMATION

BOARD OF DIRECTORS

Mr. Naresh Kumar Bansal
Chairman & Managing Director

Mr. Richi Bansal
Executive Director

Mr. Vinod Pal Singh Rawat
Executive Director

Mr. Bharat Bhushan Sahny
Non-Executive Independent Director

Mr. Charat Sharma
Non-Executive Independent Director

Mrs. Anju Gupta
Non-Executive Independent Director

CHIEF FINANCIAL OFFICER
Mr. Rajeev Kumar Agarwal, FCA

**COMPANY SECRETARY &
COMPLIANCE OFFICER**
Mr. Kapil Datta

STATUTORY AUDITORS
M/s Alok Mittal & Associates,
New Delhi

SECRETARIAL AUDITORS
M/s Arun Kumar Gupta & Associates,
New Delhi

COST AUDITORS
M/s Subodh Kumar & Co. New Delhi

REGISTERED OFFICE

B-5, 3rd Floor, Main Road, Ghazipur,
New Delhi-110066

Tel. No. +91 11-43446600

Website: www.ramasteel.com

CIN : L27201DL1974PLC007114

Work

RAMA STEEL TUBES LTD.

Sahibabad (UP)
B-21, B-25/1 and B-5, Site No.4,
Industrial Area, Sahibabad,
Uttar Pradesh-201010

Raigad (Maharashtra)

151, Village Umbare Tal. Khalapur,
Khopoli, Pali Road,
Distt. Raigad, Maharashtra-410203

LEPAKSHI TUBES PVT.LTD.

Survey No-398, Nayanapalli Road,
Village Kallur, Lepakshi Mandal,
Distt. Anantpur, Andhra Pradesh-515331

REGISTRAR AND SHARE TRANSFER AGENT TO THE COMPANY

Big Share Services Private Limited
302, Kushal Bazar, 32-33, Nehru Place,
New Delhi-110019.

Telephone No.: 011-42425004

Email Id: bssdelhi@bigshareonline.com

BANKERS

Axis bank Limited
HDFC Bank Limited
Canara Bank
ICICI Bank



Business RESPONSIBILITY

Caring, Sharing, Growing.

We believe that when we care, share and grow that is when a larger impact of every penny of growth comes back into business eco-system including macro environment including society and environment. We follow the culture of being a Responsible Corporate Citizen and actively contribute not only to organization's sustainable growth but to all possible contribution of our immediate social ambit and natural environment.

We have devised detailed and result-oriented CSR policies at the strategic level and continuously contribute to the well-being of the people, society and environment immediately surrounding our locations of operations. We believe that if we grow inclusively, we'll be able to grow better and sustainably.

Focus areas of Business Responsibility measures at Rama Steel Tubes Limited:



COVID-19: Impact, After-effects and Response

COVID-19 Impact:

FY2020-21 was the year where the real impact of COVID-19 was felt right from lockdowns to halt on economic activities to restrictions post first wave and then finally onset of the deadly second wave from March 2021 onwards. This period has seen industries and sectors across the globe getting impacted badly besides loss of lives and livelihood.

As per WHO, as on 3rd September, 2021 there were:

- 218,946,836 confirmed cases
- 4,539,723 deaths
- 5,289,724,918 vaccine doses administered

As per IMF's World Economic Outlook estimates:

- Global Economy contracted by 3.2% in Calendar Year 2020
- Global Economy is expected to rebound to 6.0% growth in Calendar Year 2021
- Global Economy is likely to resume to 4.9% growth in 2022

As per National Statistics Office (NSO), MOSPI, Govt. of India, the Indian Economy:

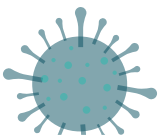
- Expected to have de-grown by 7.3% in FY21
- Expected to rebound to 9.5% growth in FY22

As per World Steel Association (WSA)

- There was minor contraction in Global Steel Demand in 2020
- While China saw 9.1% growth in steel demand, the rest of world (excluding China) witnessed 10% contraction in 2020

As per Ministry of Steel and CARE Ratings

- India's Crude Steel Production fell by 5.9% in FY21
- India's Finished Steel Production fell by 7.3% in FY21
- Positively, Steel Exports from India were higher by 29.1%





COVID-19: Business Impact, Response, Outlook.

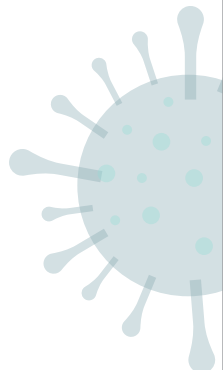
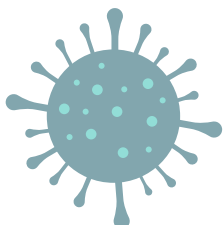
At Rama Steel Tube, we have been able to weather this storm well in FY21. Though there were visible dents on the business due to overall impact on the industry, we were able to put up a performance better than FY20 and have avoided any major adverse impact on our business.

As a truly progressive organization, Rama Steel continued to pursue strategic development across capacity expansion, product extension, plant upgradation, talent acquisition and widening our market reach. All this had added upto much better financial performance for FY21 compared to FY20 and has only strengthened our financial position.

There are apprehensions about the likely second wave of COVID-19 to impact the business. The Company expects the domestic demand to bounce back post monsoon, due to expected uptake in infrastructure and construction sectors. While COVID-19 posed considerable challenges for the business but on the back of strong foundation and right strategic direction, the Company is able to see a much larger opportunity landscape going forward.

During FY21, Rama Steel Tubes:

- Posted 33% growth in consolidated revenues and 98.5% growth in consolidated EBIDTA
- Continued the capacity expansion and plant upgradation post uplifting of COVID-19 related lockdowns
- Pursued market reach expansion in India as well as globally
- Ensured safeguard of its employees, staff and management while continuing operations



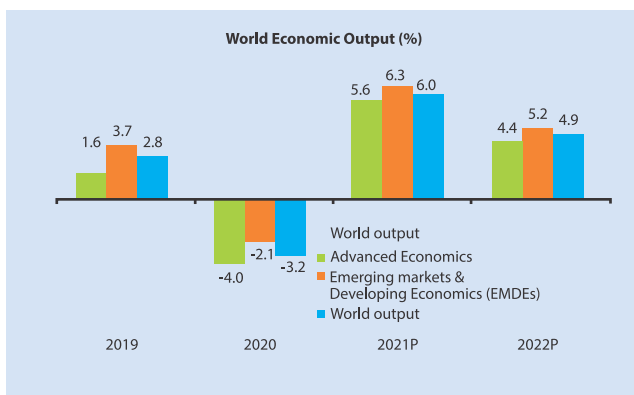
Management **DISCUSSION** and Analysis

GLOBAL ECONOMY

2020 was an unprecedented year that saw huge demand destruction, instability and uncertainties due to the COVID-19 pandemic. However, sizable and swift fiscal, monetary and regulatory responses by most Governments helped prevent worse outcomes and led to a stronger than expected economic recovery in the second half of 2020. According to International Monetary Fund (IMF), the global economy is expected to contract by 3.2% in 2020.

The global economy is now experiencing a fast recovery with growth likely to approach 6.0% in 2021 and continue at 4.9% in 2022. The strength of recovery will remain uneven depending on the severity of the pandemic in each country, the effectiveness of policy stimulus and access to vaccination. China, India and Turkey have progressed above pre-pandemic levels driven by strong fiscal measures and a recovery in manufacturing and construction. The substantial fiscal support announced in 2021, notably in United States and Japan, together with unlocking of Next Generation EU funds, will help lift economic activity among advanced economies. However, new mutants of the COVID-19 virus, second/third waves of infections, re-imposition of lockdowns in many countries and uneven access to vaccines across world continue to weigh on the outlook.

World Economies: Performance at a Glance

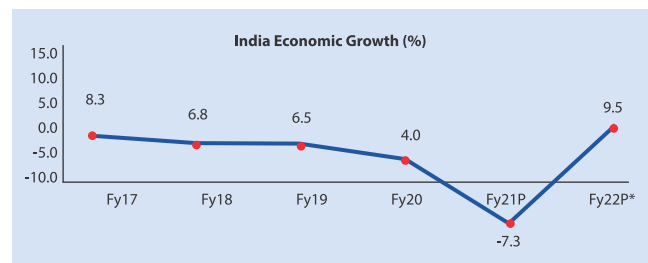


INDIAN ECONOMY

The Indian economy declined sharply during first half of FY21 as the country witnessed a complete standstill of activities due to the forced lockdown starting March 2020. This was followed by encouraging government and central

bank interventions at rapid intervals and assignment of the medical fraternity for vaccine development, which holds the potential to bring stability. The revival in second half of FY21 was supported by continued normalization of economic activities, robust growth in the agriculture sector and restoration of manufacturing, construction, banking and real estate activities. Rapid rollout of vaccines coupled with Government's efforts on stimulating growth improved consumer sentiments.

According to provisional estimates by National Statistical Office (NSO), Indian GDP is estimated to contract by 7.3% in FY21 as compared to growth of 4.0% in FY20.



Source: National Statistics Office; FY21 Provisional Estimates dated 31st May, 2021

* RBI Monetary Policy June 2021

The trajectory of the pandemic still remains unpredictable to a very large extent, with country already witnessing a second wave of COVID-19 since March 2021. The lockdown imposed during the second wave was regional in nature and less restrictive. The Indian economy is projected to grow by 9.5% in FY22 as per RBI. The pace of vaccination will play a very critical role to avoid severe waves of infection in future. However, with better awareness and understanding of the virus, mass vaccination drives and preparedness to work with restricted mobility, businesses and households alike saw a relatively better economic momentum this time. Further, on the positive side, improvement in external demand should support India's export sector, while normal monsoon may revive rural demand faster, although increasing COVID-19 spread to rural areas poses downside risks.

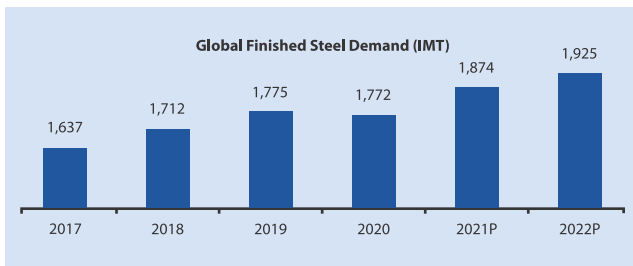
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INDUSTRY OVERVIEW

GLOBAL STEEL INDUSTRY

Despite the influence of the COVID-19 pandemic and its different regional impacts, the global steel industry was fortunate to end 2020 with only a minor contraction in finished steel demand. This was due to the robust recovery in China with steel demand growth pegged at 9.1% in 2020, while the rest of the world (excluding China) steel demand contracted by 10%. According to the World Steel Association (WSA), the global steel demand is expected to increase by around 5.8% to 1,874 Million Tonnes (MT) in 2021 and further by around 2.7% to reach 1,924.6 MT in 2022.

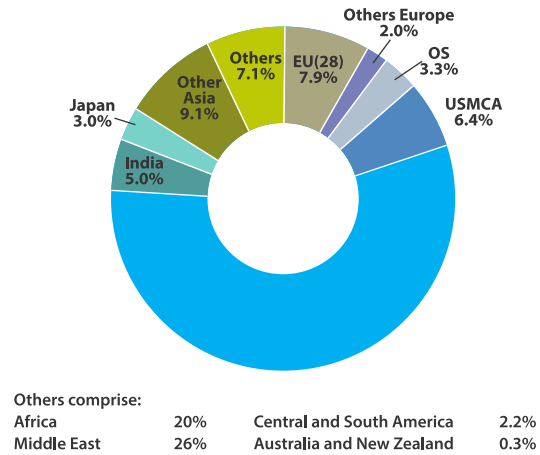


Source: World Steel Association - Short Range Outlook Report April 2021; MT-Million Tonnes

China's economy saw an accelerating rebound from the lockdown in late February 2020 due to successful control of the virus, government stimulus, and strong exports. Regardless of the initial disruptions, all steel using sectors in China posted positive growth in 2020 with the construction sector, in particular, recorded growth of 8.5% YoY supported by infrastructure investment. Due to this strong activity coupled with some inventory accumulations, China reported growth of 9.1% in 2020 for apparent consumption of finished steel products. As most

steel-using sectors are expected to show moderate growth, China's steel demand is expected to grow by 3.0% in 2021, but decelerate to 1.0% growth in 2022.

Region-wise Finished Steel Demand in 2020 – 1,772 MT



Source: World Steel Association - Short Range Outlook Report April 2021

Developing economies excluding China suffered more from the pandemic as compared to the developed economies, due to inadequate medical capacity, a collapse in tourism and commodity prices, and insufficient fiscal support. Steel demand in the developing economies excluding China declined by 7.8% in 2020. Benefitting from the global economic recovery and with renewed government infrastructure initiatives, steel demand in the developing economies is expected to show a relatively quick rebound in 2021 and 2022, with growth of 10.2% and 5.2% respectively.

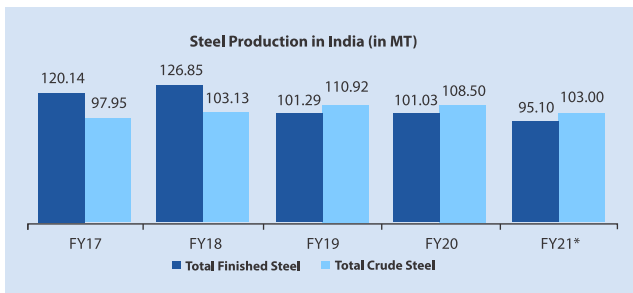
The structural changes in a post-pandemic world will bring about paradigm shifts in steel demand shape. The steel industry will see exciting opportunities from rapid developments through digitalisation and automation, infrastructure initiatives, reorganisation of urban centres, and energy transformation. However, the industry remains subject to various risks such as reduction in government stimulus programmes, renewed waves of COVID-19, new mutants of virus, slow vaccination etc. Mainland China has also started enforcing emissions restrictions tightening global steel supply, which may lead to increase in steel prices.

INDIAN STEEL INDUSTRY

The steel sector plays a vital role in Indian economy contributing over 2% to India's GDP and employs over

500,000 people directly and 2.50 million indirectly. Indian Steel Industry is structurally fragmented marked by presence of few major integrated players and numerous small and mid-sized players. India is the 2nd largest global Crude Steel producer in 2020.

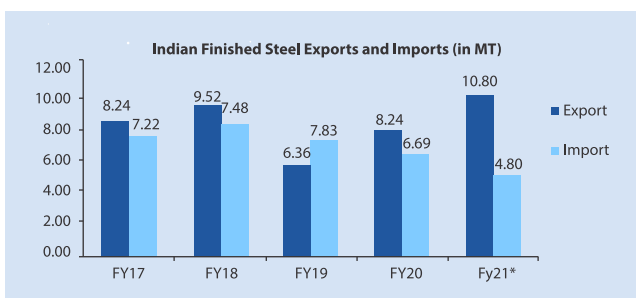
India's production of crude steel fell by 5.9% to 103 million tonnes and finished steel fell by 7.3% to 95.1 million tonnes in FY21 as the COVID-19 pandemic hampered production mainly in Q1FY21. However, the domestic steel industry made a quick recovery in the second half of FY21 riding on the back of higher international steel demand and revival in domestic demand. By Q2FY21 domestic crude steel production reached 96% of pre-Covid levels and by Q3FY21 production was 7.5% higher on YoY basis. In Q4FY21, crude steel production increased by 7.4% as manufacturers ramp up output on account of higher seasonal demand. Consumption of finished steel fell by 6.7% YoY in FY21.



Source: Ministry of Steel, *CARE Ratings

Trade scenario in FY21

During FY21, export of finished steel from India was higher by 29.1% at 10.8 MT as compared to export during FY20, mainly driven by China. Share of export to Italy rose to 22% in March 2021 from 12% in March 2020. Share of export to Spain and Hong Kong rose to 5% and 10%, respectively from just under 1% in March 2020. India was net exporter of finished steel during FY21 with net trade surplus of 6 million tonnes. Import of finished steel stood at 4.8 MT, which was lower by 29.8% over the previous year.



Source: Ministry of Steel, *CARE Ratings

Besides being the 2nd largest global Crude Steel producer in 2020, India has also made a mark globally in the production of Sponge Iron/Direct Reduced Iron (DRI). India is also a leading producer of Sponge Iron with a host of coal-based units, located in the mineral-rich states of the country. Over the years, the coal-based route has emerged as a key contributor and accounted for 82% of total sponge iron production in the country in 2020. India has been the world's largest sponge iron producer every year since 2003.

Outlook

According to CARE Ratings India's crude steel production is expected to reach 112-114 million tonnes in FY22, which would be a growth of 8%-9% YoY. Steel demand in FY22 will be supported by economic recovery, government spending and enhanced liquidity. The Union Budget for 2021-2022 aimed at infrastructure creation and manufacturing to propel the economy and had a sharp 34.5% YoY increase in allocation for capex at 5.54 lakh crore. Therefore, enhanced outlays for key sectors like defence services, railways, roads, transport and highways would provide impetus to steel consumption, which is expected to grow by 10%-12% in FY22 to cross 100 MT for the first time ever.

An increase in steel prices is expected to continue in FY22. Stimulus package unveiled by various countries will keep demand for steel high in the international market. Absence of China from the world export market and higher import of steel from China is one of the major factor keeping steel prices elevated. Continued higher demand from China on the back of stimulus package and the country's desire to bring down production levels in 2021 to reduce Co2 levels will be an important factor that will strengthen steel prices. Demand-supply imbalance in the global market will also continue to present export opportunities to domestic players.

Source: CARE Ratings

GOVERNMENT INITIATIVES

The government has taken various measures to ensure healthy growth of the steel industry in India. The 'Make in India' will provide impetus to the growth in steel demand. The Government's focus on improving infrastructure, smart cities mission, affordable housing,



dedicated freight & high-speed rail corridors, expansion in electricity generating capacity especially using solar energy is expected to create significant demand for steel in the country. Few other initiatives include the following:

- **National Steel Policy 2017:** National Steel Policy (NSP) formulated by the Ministry of enshrines the long term vision of the government to give impetus to the steel sector. The policy envisages to create a technologically advanced and globally competitive steel industry that promotes self-sufficiency in steel production as well as economic growth. The policy projects crude steel capacity of 300 million tonnes (MT), crude steel production of 255 MT, finished steel production of 230 MT and a robust finished steel per capita consumption of 160 Kgs by FY31, as against the current consumption of 74 Kg. To achieve this target, the ministry of steel has released a draft policy in December 2019 for the promotion of Greenfield steel plants in India to the tune of 25-30 MT capacity by FY25.
- **Setting up value addition focused steel clusters:** In September 2020, the Ministry of Steel prepared a draft framework policy for facilitating and establishing greenfield steel clusters, along with development and expansion of the existing steel clusters. This will further increase employment opportunities within the sector. This move would also support in evolving of MSMEs in the steel sector and motivate them to produce more value-added products.
- **FDI:** 100% FDI through the automatic route allowed in the Indian steel sector.
- **Increase in Export Duty:** The government hiked the export duty on iron ore to 50% ad valorem on all varieties of iron ore (except pellets) to ensure supply to domestic steel industry.

Steel Scrap Recycling Policy: The Government introduced Steel Scrap Recycling Policy aimed to reduce import, conserve resources and save energy.

- **Research and Development (R&D) Promotion:**
 - The Ministry of Steel has established a task force to identify the need for technology development and R&D. The Ministry has issued necessary direction to the steel companies to frame a strategy for taking up more R&D projects by spending at least 1% of their sales turnover to facilitate technological innovations in the steel sector.
 - In January 2021, the Ministry of Steel, signed a Memorandum of Cooperation with the Ministry of Economy, Trade and Industry, Government of Japan,

to boost the steel sector through joint activities under the framework of India–Japan Steel Dialogue.

- **Steel producing Companies** are attempting coal gasification and gas-based direct-reduced iron (DRI) production. Other alternative technologies such as Hismelt, Finex and ITmk3 being adopted to produce hot metal
 - o **Production-linked Incentive (PLI) Scheme:** In November 2020, Union Cabinet approved the production-linked incentive (PLI) scheme in 10 key sectors (including electronics and white goods) to boost India's manufacturing capabilities and exports and promote the 'Atmanirbhar Bharat' initiative. India is a net exporter of finished steel and has the potential to become a frontrunner in certain grades of steel. A PLI scheme in specialty steel will help in enhancing manufacturing capabilities for value-added steel which will lead to an increase in total exports.
 - o **Duty drawback benefit:** In October 2020, Directorate General of Foreign Trade announced that steel manufacturers in the country can avail duty drawback benefits on steel supplied through their service centres, distributors, dealers and stockyards

Source: IBEF, PIB

GLOBAL STEEL TUBES & PIPES INDUSTRY

Steel tubes and steel pipes are among the most commonly used components in a wide range of industrial sectors, such as construction, mining, oil & gas, and manufacturing industries. The global steel tubes & pipes market was valued at USD 142.4 billion in 2019 and is expected to grow at a compound annual growth rate (CAGR) of 6.2% from 2020 to 2027 to reach USD 231.1 billion by 2027. The oil & gas application segment which accounted for 51% in 2019, is anticipated to remain the dominant application segment over the forecast period. However, with the emergence of the global pandemic steel pipes is the oil & gas industry faced its worst crisis ever with oil prices plummeting to USD 21.04 per barrel during COVID-19 first wave. Although the oil prices have regained a level above USD 60 per barrel from February 2021 because of a production cut to protect margins, the demand is slowly regaining normalcy. To match the increasing

global demand for oil, the oil sector is now witnessing revival in capex to garner the required supply growth which brings in several global opportunities to pipe manufacturers. As the governments across the world refocus on infrastructure projects such as water and sewage systems and oil and gas pipeline networks, the demand for steel tubes and pipes are expected to **rebound**.

Since the past few years, Electric Resistance Welded (ERW) pipes & tubes are gaining prominence in the market owing to their low prices and modest performance. Modern welding technologies, such as high-frequency welding, that are being increasingly integrated into the process of manufacturing ERW pipes & tubes act as a crucial factor supporting the segment growth.

Impact of Covid-19 in Steel Pipes and Tubes Market

Due to the COVID-19 pandemic, the demand for steel pipes plunged as the construction activities halted with the rising number of infections. However, as the first wave retracted, the governments responded with hefty spending on infrastructure to boost the economies. With the onset of second wave, curtailment measures like lockdowns and curfews once again took the centre stage resulting in supply chain disruptions, labour shortages, financial losses, and temporary adverse impact on investments. Consequently, according to CARE Ratings, global steel tubes & pipes industry recorded a slump of 10.60% implying destruction of 7.3 million tonnes in consumption. Recovery in oil prices and a parallel improvement in spending on exploration and production activities is expected to brighten the medium-term outlook for oil pipeline-related infrastructure projects.

Source: <https://www.grandviewresearch.com/industry-analysis/steel-pipes-tubes-market>

CARE Ratings

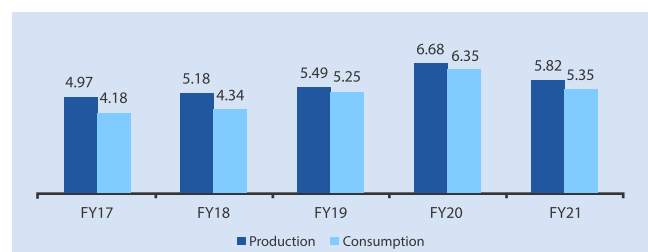
INDIAN STEEL TUBES & PIPES INDUSTRY

India's steel tubes and pipes industry is presently valued at nearly ₹ 60,000 crore, accounting for

around 8% of the global steel tubes & pipes industry. The production of steel tubes and pipes has grown at a CAGR of 7.69% from 4.97 million tonnes in FY17 to 6.68 million tonnes in FY20. The growth is mainly attributable to incremental demand emanating from growth in domestic water infrastructure mainly driven by Jal Jeevan Mission, oil exploration, construction, infrastructure, and expansion of gas pipelines such as national gas grid and city gas distribution. As a result, the consumption growth outpaced the production growth and expanded with a CAGR of 11.03% over the period FY17 to FY20.

The COVID-19 pandemic deeply affected the steel tube and pipe industry during first half of FY21. Both supply and demand were impacted due to the closure of cross-country borders and stringent nationwide lockdown. With unlocking of the economy and resumption of construction activities, the industry witnessed a V-shaped recovery in the second half of FY21. Steel consumption and demand for steel tubes and pipes are expected to improve in FY22 driven by water transportation, oil and gas, firefighting, construction, and infrastructure segments, among others.

Indian Steel Tubes & Pipes – Production and Consumption Trend (in MT)

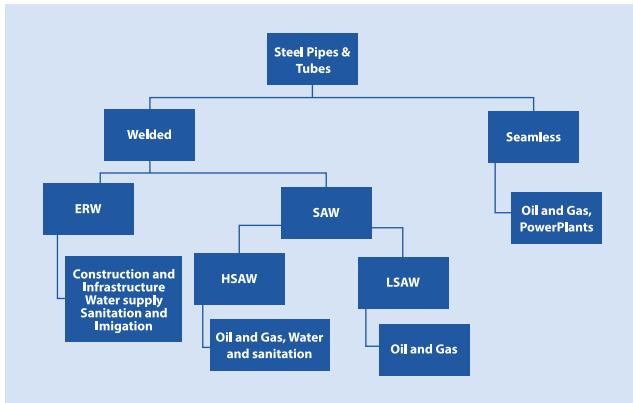


Source: CARE Ratings

Steel pipe and tube industry structure

Based on the manufacturing method, the industry is largely split between Electric Resistance Welded (ERW) and submerged arc welded (SAW) and seamless together referred as S&S segment. Within welded pipes, electric resistance weld (ERW) pipes

and tubes are mostly used in construction, water and oil & gas transportation, and automotive components. ERW tubes that are used in construction are known as structural steel tubes.



The decreasing share of unorganized and small players and increasing dominance of larger players is expected to result in better pricing power and margins for the larger players especially in ERW segment which has been the most fragmented segment historically, while other segments such as SAW, ductile and seamless pipes segments are traditionally dominated by few large players.

Major growth drivers for Steel Tubes and Pipes Industry

The prospects for steel tubes and pipes industry are expected to improve on the back of revival of infrastructure projects and investment sentiment. The major growth drivers include:

- The increase of government spending on infrastructure projects, affordable housing, smart city development shall boost the demand for steel pipes and tubes. National Infrastructure Pipeline (NIP) has a capex outlay plan of about ₹ 111 trn (US\$1.6trn) over FY21-25
- The Government's emphasis on projects like increasing the share of gas in energy mix, improved focus on domestic water segment, allocation in 'Nal se Jal' scheme etc. will further boost the demand growth of steel tubes and pipes.
- In the natural gas sector, the Prime Minister has already announced the target of 'One nation, one gas grid' in which the natural gas grid is expected to expand by 17,000 Km taking the total length of pipelines to 34,500 Km by 2025. Efforts to move towards a gas-based economy along with the impetus on implementation of city gas distribution networks is going to be a major driver for the demand in the steel pipe sector.

India is expected to become a preferred location for global manufacturing in the medium and long term led by initiatives such as Make in India, vocal for local, performance-linked incentives schemes and China plus one strategy being adopted by consumption-driven economies across the globe.

The major Government initiatives that are supposed to augment the demand for steel tubes and pipes are highlighted below:

Housing for All by 2022

- 100 Smart Cities
- 24x7 Electricity - DDUGJY (Deen Dayal Upadhyaya Gram JyotiYojana) / Saubhagya Yojna
- National Highway Development Programme - Bharatmala programme
- Port connectivity through the Sagarmala programme
- Renewable Energy Target 100 GW
- PM Krishi Sanchar Yojna
- Swachh Bharat Abhiyan
- Access to at-least basic sanitation
- Network of water transmission pipelines to link rivers, canals and other water bodies across the country
- Infrastructure to improve the utilization of Ganga – Brahmaputra – Meghana river basin
- AMRUT scheme launched to enhance sewage treatment capacities

COMPANY OVERVIEW

Rama Steel Tubes Limited (hereafter referred as "RSTL" / "the Company") is one of the leading player in the Indian steel tubes and pipes industry. Incorporated in 1974 by late Shri. Harbans Lal Bansal, RSTL is currently managed by his son Mr. Naresh Kumar Bansal and grandson Mr. Richi Bansal. The Company is primarily engaged in the manufacturing and trading of Steel Tubes & Pipes & Galvanised Iron Pipes in India as well as in the world. With more than four decades of legacy, the Company markets its product under the brand name "TTT Rama" and has established strong brand recognition across the world. RSTL has established its global presence in the export market in the UK, Middle East, Africa and South America. The strategically located state-of-the-art manufacturing

facilities in the North, South and West India provides a competitive edge to the Company in the respective market regions.

Robust Product Portfolio: RSTL offers a diversified mix of products, which has helped it fortify its market share and position itself as the leading pipe solutions provider. The Company provides customised products and continuously working on innovating new products as per market dynamics and evolving customer needs.

RSTL's niche product includes ERW (electric resistance weld) Black Pipes and Galvanised Steel Pipes. The products manufactured by the Company find use in various industries, including automobiles, infrastructure, irrigation and real estate. The major products of the Company include:

- **Steel Tubes and Pipes:** The major products manufacture by Company in this segment are ERW galvanised tubes and pipes, ERW Black steel tubes and pipes, scaffolding tubes and pipes, pre-grooved pipes, swaged poles etc. Its MS ERW black pipes vary from 15mm to 200mm in diameter and conform to IS: 1239, IS:1161, IS:3589, IS:3601, & IS:4270. The Company's G.I. Pipes range from 15mm to 150mm NB in light, medium and heavy sizes. The major application areas include water pipelines, agriculture and irrigation, deep tube wells & casing pipes, fencing tubes, gas pipe lines and cross country pipelines.
- **Telecommunication Transmission Tower & Substation Structure:** Over the years, RSTL has built up expertise in designing and maintenance of significantly customisable high & light towers products like Legged Square Lattice Steel Towers, Three Legged Tubular Steel Tower etc. The Company's other application areas include Radar Towers and Railway Electrification Structure.
- **Structural Steel Products:** It include Square / Rectangular Tubes & Pipes with hollow sections and is primarily used in furniture industries, hand railings, cranes, material storage racks, pallets, staircases, cabins, bus stands, milk booths, truck & bus body members trusses, trolleys, columns and purlins etc.

Coils and Sheets: The Company also manufactures and trades various cold rolled coils/sheets, galvanised plain coils/sheets, galvanised corrugated sheets, colour coated coils/sheets.

BUSINESS STRENGTHS

Niche player with market leadership: Over the years, RSTL has established itself as one of niche and leading player

in Indian steel tubes and pipes industry. The extensive experience of the promoters

- and the Company's long track record of operations provide the necessary technical expertise, brand recognition and long standing relationships with various stakeholders for its business.

- **Strategically located manufacturing units:** RSTL has four strategically located state-of-the-art manufacturing facilities spread across North, South and West India. Two manufacturing facilities are located at Sahibabad, Uttar Pradesh with installed capacity of 60,000 Metric tonne per annum (MTPA), one in Khopoli, Maharashtra with installed capacity of 132,000 MTPA and one Anantapur, Andhra Pradesh with installed capacity of 36,000 MTPA. The Company has total consolidated installed capacity of 2,28,000 MTPA as on March 31, 2021. RSTL derives locational advantage of its manufacturing facilities owing to close proximity to ports and commercial markets. In FY21, capacity utilization stood at 52 % with 77830.21 MTPA as against 70149.15MTPA in the previous year.

- **Gaining International footprints:** Underpinned by solid foundation, rich experience, and diversified product portfolio, the Company has established its strong hold in global market with presence across more than 17 counties especially in the UAE & Africa regions. RSTL's products are exported across the world, mainly in the countries like United Kingdom, UAE, Sri Lanka, Ethiopia, Kenya, Uganda, Somalia, Ghana, Sudan, Kuwait, Republic of Congo, Yemen, Guyana, Germany, USA, South Africa, Zambia and Malta etc. RSTL keeps close watch on global developments with an aim to cater to global requirements to the maximum extent possible. The Company is in the process to set up manufacturing unit in Nigeria and has acquired land for the same during FY21.

- **Diversified Customer Base:** RSTL offers an end-to-end integrated solution to its customers, wherein the Company executes the whole project for clients. Over the years the, RSTL has been able to build a reputation as a trustworthy player and has developed diversified and marquee customer base. Some of the leading clients includes BSES Rajdhani Power Limited (BSES), Gujarat Gas Limited, J&K Rural electrification, Purvanchal Vidyut Vitran Nigam Limited, UP & Utrakhnad Peyjal Nigam, HPCL Bhatinda & Manglore Refinery Project.

Leveraging Technology: The Company has a policy of technology absorption and makes continuous efforts to bring Innovation in all spheres of its activities. The



Company emphasises to serve its customers with superior quality products and increase efficiency by leveraging its advanced technology to modernize production. To take the lead & full fill the market demand, RSTL has installed a modern high speed Tube Mill based on latest technology of world leader M/s Kusakabe of Japan.

BUSINESS STRATEGIES

- **On-going Capacity Expansion:** RSTL has made requisite capacity expansions from time to time to build the best-in-class manufacturing facilities. In order to manufacture products of different dimensions and specifications, the Company is doing capacity expansion at Anantapur, Andhra Pradesh. As a result, Anantapur, Andhra Pradesh plant capacity will increase from 36,000 MTPA to 72,000 MTPA. Hence, the total capacity of the Company will increase from 2,28,000 MTPA to 2,64,000 MTPA leading to efficiencies from larger scale of operations. The Company is also undergoing total upgradation of old machines with new technology at Sahibabad, Uttar Pradesh plant which is expected to complete by Q3FY21.

The Company will continue to leverage through product development capabilities to launch niche items that address high-demand applications, this will begin by backward integration capacity of 50,000 tonnes per year going upto 200,000 tonnes of total capacity by end of FY24. RSTL will roll out a cold rolling mill and the Strip Galvanising plants to produce the additional value added products at Anantapur Plant, Andhra Pradesh

- **Strengthening operations in South India:** The Anantapur facility in Andhra Pradesh under its subsidiary, Lepakshi Tubes Pvt Ltd. has recorded 30% production growth during FY21. The Company is planning to set up another line of production in this facility for product size upto 8-inch diameter to cater the diversified demand in the southern regions. The on-going expansion at the Lepakshi plant was halted temporarily due to re-emergence of COVID-19 led lockdown. However, the same is expected to complete by end of FY22.

- **Enhancing marketing and distribution:** The Company has established an efficient distribution channel of authorized dealers spread over North, South and West India. As on March 31, 2021, the Company has outreach in most of the cities in India through a dealer network of 300+ touch-points. The Company focuses on further expanding its distribution reach has strengthened senior level marketing team during the year under review.

As a part of the marketing initiative, the Company has

taken major initiative to adopt and launch their new brand identity. RSTL has adopted new logo, creating new website, which is under development and circulating some of the digital media posts. This will help the Company to align with existing market & industry scenario and would be more appropriate for current and future communication with stakeholders.

- **Growing capabilities for Solar Energy sector and Government Schemes:** RSTL, has a wide variety of products to suite the varied needs of nation's infrastructure Like Roads, Buildings Construction, Urban Transportation, Water Supply, and Electricity Transmission & Distribution. The Company is eyeing to venture in products for solar energy projects as the under-going and planned capacity expansion in solar energy will generate huge demand for steel pipes. In order to expand further, RSTL focuses on business growth opportunities from government schemes such as housing for all, affordable housing, smart cities, national highway development programme, Swachh Baharat mission, NAL Se JAL, Jal Shakti Scheme, RGGVY (Rajiv Gandhi Grameen Vidyutikaran Yojana), DDUGJY (Deen Dayal Upadhyaya Gram Jyoti Yojana) etc.

- **Safeguarding future energy requirements:** Post the success of 750 KW solar power plant in Khopoli Unit, the Company is looking to set up solar power plant of 1 MW each at Andhra Pradesh and Uttar Pradesh in order to optimise its power costs.

- **Heading towards professional driven Company:** The Company has been hiring senior management professionals across various functions to drive the next level of growth and synergies. During FY21 the Company has recruited quality resources at top positions in the field of marketing, strategy planning, plant operations etc.

FINANCIAL OVERVIEW

Consolidated Financial Highlights

Financial Snapshot (₹ crore)			
Year	Fy20	Fy21	YoY Change
Net Revenue from operations	352.81	470.43	33.34%
Other Income	3.65	3.35	-8.33%
Total Income	356.46	476.57	33.70%
EBIDTA	12.3	224.46	98.54%
Depreciation	2.90	3.46	19.31%
Interest	9.63	7.70	-20.08%
PBT (after share of net profits of investments in associates and joint Ventures)	2.11	14.71	597.16%
Profit After Tax (PAT)	0.43	12.38	2779.07%

Despite significant challenges posed during FY21 due to COVID-19 pandemic and subsequent lockdowns and restrictions, RSTL has shown robust performance in FY21 in terms of sales volume, revenues and profits. Total consolidated revenue from operations increased significantly by 33.34% to ₹ 470.43 crore in FY21 as against ₹ 352.81 crore in FY20. The EBITDA (earnings before interest, depreciation and tax) increased by 98.54% YoY and stood at ₹ 24.46 crore in FY21 as compared to ₹ 12.32 crore in FY20. Interest expense reduced by 20.08% from ₹ 9.63 crore in FY20 to ₹ 7.70 crore in FY21. The profit before tax (PBT) after including share of associates and joint ventures stood at ₹ 14.71 crore in FY21 as compared to ₹ 2.11 crore recorded in FY20. The PAT increased tremendously to ₹ 12.38 crore in FY21 as against ₹ 0.43 crore in FY20. EPS for FY21 was ₹ 7.21 as against ₹ 0.49 in FY20.

Details of Key Consolidated Financial Ratios that registered more than 25% change during FY21

Ratios	FY20	FY21	YoY Change
Debtors Turnover (x)	5.17	7.56	46.42%
Inventory Turnover (x)	6.70	7.42	10.72%
Interest Coverage Ratio (x)	0.98	2.73	178.57%
Current Ratio (x)	1.74	1.68	-3.45 %
Debt Equity Ratio (x)	0.95	0.85	-10.53%
Operating Profit Margin (%)	2.64%	4.41%	67.05%
Net Profit Margin (%)	0.23%	2.54%	1379.78%
Return on Networth – RoNW (x)	0.94%	13.80%	1379.78%

- The Company's debtor turnover ratio increased to 7.56x in FY21 from 5.17x in FY20 mainly due to increase in net sales and decline in average debtors.
- At the end of March 31, 2021, the Company's net worth stood at ₹ 99.94 crore as compared to ₹ 87.83 crore as on March 31, 2020. The total debt increased from ₹ 83.17 crore in FY20 to ₹ 85.44 crore in FY21 however increase in net margin due to better price realisation and sale of product mix resulting in a lower debt/equity ratio of 0.85 as compared to last year's ratio of 0.95. The cash and cash equivalents stood at ₹ 22.17 crore for FY21 as against ₹ 13.11 crore recorded in FY20. Optimisation and efficient utilisation of fund has led to decline in interest expense thereby improving interest coverage ratio in FY21.
- Operating profit increased two-fold times from ₹ 9.42 crore in FY20 to ₹ 21.00 crore in FY21. As a result, there was significant increase in operating profit margin.
- The significant growth of PAT resulted in improving net profit margin and return on Networth.

COVID-19 IMPACT

The management has evaluated the possible impact of COVID-19 pandemic on the business operations and the financial position of the Company and no material adverse impact has been found. Despite the challenging business environment, RSTL continue to maintain a high quality of operations, capacity expansion, widening its market reach and a robust financial position.

The second wave of COVID-19 may impact the Company in terms of lower demand. However, domestic demand is likely to bounce back post the end of the monsoon, which would largely drive by the infrastructure and construction sector and mass vaccination programme. Though, COVID-19 has impacted the normal course of business but the Company is well-positioned to make most of the opportunities when the situation normalises. The management will continue to monitor any material changes to its COVID-19 impact assessment, resulting from the future economic conditions and future uncertainty, if any.

OUTLOOK

India is expected to become a preferred location for global manufacturing in medium and long term, which shall further make the Company more competitive considering its strong brand presence, PAN India operations, diversified product portfolio and extensive dealer network mainly in rural and semi-urban areas. In addition, on-going capacity expansion to add new product range coupled with long standing relationships with customers and suppliers will further help RSTL to achieve higher growth going forward. Moreover, with various initiatives in the end-user segments, supportive Government policies, strong industry position and capacities, the Company anticipates continuous order inflow and sustainable growth in the future.

CORPORATE SOCIAL RESPONSIBILITY

RSTL aims to actively contribute to the social and economic development for evolving a sustainable society. The Company has Corporate Social Responsibility ("CSR") Policy in place, which articulates positive contribution towards economic, environmental and social well-being of communities through its CSR activities. RSTL intends to create the Company's image as a reliable, credible, responsible business partner by making a positive difference in the society, where the Company operates its business. The CSR Committee is in place, to formulate and recommend CSR Policy to the Board. The Committee monitors in areas such as waste management, sanitation activities, providing skill development and vocation based



education, working for the upliftment of the lives of under privileged and women & youth empowerment. It also contributes towards certain areas like Environmental sustainability, Disaster Relief and National Missions projects. During the year under review, the Company has spent ₹19.95 lakhs towards the CSR expenses on women empowerment and skill development.

RISKS AND MITIGATION STRATEGIES

- **Economic Risk:** Any slowdown in economy will impact the steel demand from end user segments like oil and gas, construction, capital goods, consumer durables, automobiles etc. Further, any delay in revival of planned industrial capex due to macro-economic factors for instance COVID-19, would impact the growth of the Company.

- **Mitigation strategy:** The Company has well diversified and balanced product portfolio with multiple end user sectors and strong hold in international markets. In addition, the Company's strong brands positioning helps reduce exposure to business cycles. RSTL has resilient business model and proactive strategies in the face of changing economic scenario. This is reflected in FY21 as the Company's revenue and profitability increased significantly despite COVID-19 challenges.

- **Supply Demand Risk:** Overcapacity and oversupply of steel globally may lead to higher imports in India at cheaper rate resulting into fall in steel prices.

Mitigation Strategy: RSTL has established itself as a pioneer in the industry with an expansive reach across the world, diverse customer profile, proven expertise, long standing customer relationship and focus on constant upgradation of facilities. The Company establish and maintains optimal production capacity based on a realistic steel demand outlook and market forces.

- **Competition Risk:** The Company might receive stiff competition from its peers in terms of new market entrants with better technology or change in marketing strategy by the competitors.

Mitigation Strategy: RSTL manufactures the best quality product with latest advanced technology and rich expertise ensuring value addition for its customers. Over the years the Company has established strong brand equity and continuously working on upgrading marketing strategies. The Company focuses on efficient and cost effective manufacturing operations. As one of the leading players, the Company strives to meet evolving needs and satisfies customer demands by constantly adding capacities and capabilities in its strategically located manufacturing facilities.

- **Input Risk:** The Company is exposed to volatility in the price of raw materials, which forms significant part of the overall cost. Any disruption in availability or sharp increase in raw material prices will erode margin.

Mitigation Strategy: The Company continuously monitors the price movements and undertakes the necessary strategy or adopts remedial measures to offset this risk. The risk of supply chain is alleviated to some extent by geographical and vendor diversification of critical raw material requirements. The Company has placed clear terms for long term contracts of raw material with suppliers. Moreover, inventories are maintained in buffer and RSTL adjust its inventory levels based on the demand supply scenario.

- **Regulatory Risk:** The Company operates in a highly regulated and competitive environment across multiple geographies. Increased regulatory oversight and adverse changes to regulations in key markets could adversely impact the Company's business of operations.

Mitigation Strategy: The Company constantly monitors the changing regulatory scenario and undertakes necessary changes as per the requirement. As a responsible organisation, the Company continuously invests in training as well as automated systems ensuring compliances to all applicable guidelines and regulatory norms.

- **Foreign Exchange Risk:** The Company is exposed to currency risks as the import of raw materials, and the export of finished products across the international geographies as well as several miscellaneous payments involve dealings in foreign currency. Any adverse movement in currencies might affect the Company's revenue and profitability.

- **Mitigation Strategy:** The Company has in place well-defined Foreign Exchange (FX) risk management system, which regularly monitors the currency fluctuations and optimises the risk using various hedging activities. In addition, the Company hedge its foreign currency exposure by using various derivative financial instruments, such as forward contracts.

ENVIRONMENT, HEALTH AND SAFETY (EHS)

RSTL places utmost importance on health and safety of its employees and the environment it operates within. It is ensured that employees are adequately trained to execute their responsibilities with precautions and all the possible measures are undertaken to keep the environment safe and hygienic. The Company has dedicated teams to maintain occupational safety at manufacturing units and ensure that all rules and norms relating to EHS

are followed. . Through clear communication and transparency, it tries to ensure a zero-hazard work environment. EHS management includes increased integration with other software systems such as ERP to better streamline it in order to achieve overall sustainability management. The Company's policies and procedures related to EHS are regularly reviewed and updated to ensure that they meet industry standards.

QUALITY

RSTL's objective is to deliver value to its customers and other stakeholders with its high-quality products by leveraging its robust Quality Management System. The Company constantly put efforts to ensure that all its products are of superior quality and comply with applicable standards. RSTL has in place the checks and quality testing systems from the procurement of raw material to the products manufacturing and distribution. The Company's manufacturing facilities are highly automated and centrally controlled to manufacture the best quality product with latest technology and rich expertise. Total Quality Control (TQC) is carried out through the whole process of production and the configurations of operation are being stringently respected. Also the Company has also put in place comprehensive systems and procedural quality standards, which are being strictly observed and safety protocols are being thoroughly enforced.

INTERNAL CONTROL SYSTEMS

RSTL has put in place a strong internal control mechanism to safeguard all its assets and ensure operational excellence. The mechanism also meticulously records all transaction details and ensures regulatory compliance. The internal control framework is commensurate with the nature of the business, size, scale and complexity of its operations. The Company has proper and adequate systems of internal financial controls, which ensure that transactions are authorized, recorded and reported correctly. Regular internal audits and checks ensure that responsibilities are executed effectively. Audit committee is responsible for implementation and maintenance of adequate internal financial controls to ensure the orderly and efficient conduct of its business. The Audit committee review important issues and material weakness raised by the internal and statutory auditors on a periodic basis. Timely and adequate measures are undertaken ensuring that the risk is mitigated appropriately with necessary rectifications.

HUMAN RESOURCES

RSTL believes that employees are the pillars for the success of the organisation. The Company takes pride in acknowledging the performance of its human resource, which has always responded with deep commitment to achieve business growth and market leadership. The top management acts as the governing force in ensuring a progressive work culture. The Company believes in reinforcing the key thrust areas i.e. being the employer of choice, building an inclusive culture, building a strong talent pipeline and building capabilities in the organisation.

The HR development framework ensure employees' career progression and greater connect with the Company. This framework rides on multiple programs and opportunities for individual training, skill up-gradation, congenial atmosphere for employee-management relationship and equal opportunities. The Company continued to build on the diversity and inclusion agenda through building leadership capability and respectful work environment for the teams. The leadership development frameworks are focused on the core capabilities, which are essential for strong and effective leadership. As of March 31, 2021 the Company had a workforce of 250+ peoples.

CAUTIONARY STATEMENT

This Statement contains forward-looking statements about the business, financial performance, skills and prospects of the Company. Statements about the plans, intentions, expectations, beliefs, estimates, predictions or similar expressions for future are forward-looking statements. Forward-looking statements should be viewed in the context of many risk issues and event that could cause actual performance to be different from that contemplated in the Directors' Report and Management Discussions and Analysis Report, including but not limited to, the impact of changes in oil, steel prices worldwide, technological obsolescence and domestic, economic and political conditions. Actual results could differ materially from those expressed or implied. Important factors that could make a difference to the Company's operations include economic conditions affecting demand/supply and price conditions in the domestic and overseas markets in which the Company operates, changes in the Government regulations, tax laws and other statutes and incidental factors. The Company disclaims any duty to update the information given in the aforesaid reports.

STATUTORY REPORTS

DIRECTORS' REPORT

To the Members,

The Directors submit annual report of the Rama Steel Tubes Limited (the "Company" or "RAMA") along with the audited financial statements for the financial year ended March 31, 2021.

FINANCIAL RESULTS

Particulars	Standalone		Consolidated	
	2020-21	2019-20	2020-21	2019-20
Revenue from Operations	32571.00	29,176.13	47,043.45	35,280.90
Other Income	312.47	472.34	613.89	365.06
Total Revenue	32,883.47	29,648.47	47,657.34	35,645.96
EBIDTA	1413.81	1064.95	2446.16	1232.15
Finance Costs	610.22	807.06	769.78	963.14
Depreciation and Amortisation Expenses	265.74	221.78	346.17	290.09
Share of profits from Associates and JVs	140.44	232.39	140.44	232.9
Net Profit before Tax	678.29	268.50	1470.65	211.31
Tax Expenses	140.47	131.23	232.83	168.67
Net Profit after Tax	537.82	137.28	1237.81	42.64
Other Comprehensive Income	6.56	(-) 0.84	(-) 26.17	39.24
Total Comprehensive Income	544.38	136.44	1211.64	81.88
Earning per equity share (Face Value of ₹ 5 each)				
Basic	3.24	0.81	7.21	0.49
Diluted	3.24	0.81	7.21	0.49

COMPANY'S PERFORMANCE

The business performance of the company during the financial year 2020-21 was very strong, exhibited stellar performance amidst a dampening environment globally. The Company was able to perform through its operational excellence, better price realization, higher efficiency, effective cost management practices and well executed strategies.

During FY 2020-21, your company achieved Consolidated Revenue from operations of ₹ 47043.45 Lakhs compared to ₹35280.90 in FY20, registering a growth of 32% over the last year.

Earnings before Interest, Depreciation and Taxes (EBIDTA) stood at ₹2446.16 Lakhs in FY 2020-21 compared to ₹1232.15 Lakhs in FY 2019-20. Compared to the previous fiscal, EBIDTA enhanced by 98.53%.

Consolidated profit before tax (PBT) in FY 2020-21 was ₹1470.65 Lakhs compared to ₹211.31 Lakhs in last FY 20, reflecting an increase of 595.97%.

Consolidated profit after tax (PAT) for the year under review was ₹1237.81 Lakhs against ₹42.64 Lakhs in FY 2020-21, an increase of 2803 % over the last fiscal year.

BUSINESS IMPACT OF COVID-19

In the first quarter of the financial year 2020-21, the COVID-19 pandemic had an adverse impact across regional and global economies and financial markets. Most governments reacted by instituting lockdowns, business shutdowns, quarantines and restriction on travel. Businesses also implemented safety measures to reduce the risk of transmission. Such action led to disruption of economic activity, leading to many economies



encountering a deep slump. However, end of lockdowns and resumption of economic activity from second quarter onwards, consumption picked up.

The company did face some operational disruptions in the beginning of FY 2020-21, which impacted the business. However, it was agile enough to work on a mitigation plan to overcome the challenges and combat the impact of the economic slowdown induced by the pandemic. It made all possible efforts to ramp up capacity utilisation and resume near-normal run rates by the end of the first quarter of FY 2020-21. In second quarter, the Company focused on increasing sales volumes to offset the loss of sales volumes of first quarter.

As long term plan, the company also identified key focuses areas to ensure seamless business continuity. One such area is digitalisation, which it will continue to leverage by undertaking digital initiatives, using digital tools to access markets, and digital platforms to ensure operational excellence. It will also reduce its cost base and maintain continuity of its supply chains. Most importantly, it will remain committed to its environmental, social and governance goals.

DIVIDEND

The Board does not recommend any dividend for the year under review.

ADOPTION OF INDIAN ACCOUNTING STANDARDS (IND AS)

The Company has adopted Indian Accounting Standards (Ind AS). Accordingly, the standalone financial statements of the Company and the consolidated financial statements of the Company with its subsidiary for the financial year ended March 31, 2021, have been prepared in accordance with Ind AS as prescribed under section 133 of the Companies Act, 2013 (the "Act"), read with the relevant rules made there under and other accounting principles generally accepted in India.

EQUITY SHARE CAPITAL

The issued, subscribed and paid-up equity share capital of the Company is ₹8,39,70,000 divided into 1,67,94,000 Equity shares of ₹5/- each.

MANAGEMENT'S DISCUSSION AND ANALYSIS REPORT

Management's Discussion and Analysis Report for the year under review, is presented in a separate section forming part of this Annual Report.

SUBSIDIARIES, JOINT VENTURES AND ASSOCIATES

The Company has 2 Direct subsidiaries and 1 Indirect subsidiary and 1 JV as on March 31, 2021. Pursuant to Section 129 of the Companies Act, 2013 a statement in prescribed Form AOC-1, relating to subsidiaries and joint venture for the year ended on March 31, 2021 has been attached with the consolidated financial statements of the Company for the financial year ended March 31, 2021. In accordance with provisions of Section 136 of the Companies Act, 2013 the standalone and consolidated financial statements of the company, along with relevant document and separate audited accounts in respect of the subsidiaries, are available on the website of the company. The company will provide the annual accounts of the subsidiaries and related detailed information to the shareholders of the Company on specific request made to it in this regard by the shareholders.

The policy for determining material subsidiaries as approved may be accessed on the Company's Website: <http://www.ramasteel.com/app/webroot/img/uploads/files/93/POLICY%20FOR%20DETERMINING%20MATERIAL%20SUBSIDIARY.pdf>

Lepakshi Tubes Private Limited, a wholly owned subsidiary of Rama Steel Tubes Limited is the material subsidiary of the Company as per Listing regulations.

The provisions of Regulation 24(1) of the Listing Regulations, appointment of one of the Independent Directors of the Company on the Board of material subsidiaries are not applicable to Lepakshi Tubes Private Limited.

The Company is in compliance with Regulation 24A of the Listing Regulations. The Company's unlisted material subsidiary Lepakshi Tubes Private Limited undergo Secretarial Audit. Copy of Secretarial Audit Report of is available on the website of the Company. The Secretarial Audit report of Lepakshi Tubes Private Limited does not contain any qualification, reservation or adverse remark or disclaimer.

SECRETARIAL STANDARDS

The Company has followed applicable Secretarial Standards, i.e. SS-1 and SS-2, relating to 'Meetings of the Board of Directors' and 'General Meetings' respectively.

PUBLIC DEPOSITS

Your Company has not accepted any deposits within the meaning of Section 73 of the Companies Act, 2013 and the Companies (Acceptance of Deposits) Rules, 2014. Accordingly, there are no unclaimed or unpaid deposits lying with the Company for the year under review.

DIRECTORS AND KEY MANAGERIAL PERSONNEL

Mr. Charat Sharma was appointed as Additional Director (Non-executive Independent Director) by the Board of Directors of the Company w.e.f. November 17, 2019 has resigned from Board of Directors of the company due to personal reason w.e.f. September 4, 2020.

Mr. Jai Prakash Gupta was appointed as Additional Director (Non-executive Independent Director) by the Board of Directors of the Company w.e.f. September 4, 2020 who holds office up to the ensuing Annual General Meeting.

Mr. Vinod Pal Singh Rawat was appointed as Additional Director (Executive Director) by the Board of Directors of the Company w.e.f. July 8, 2021 who holds office up to the ensuing Annual General Meeting.

As per the provisions of the Companies Act 2013 and the Articles of Association of the Company, Mr. Richi Bansal, Director of the Company will be retiring by rotation at the ensuing AGM and being eligible has offered himself for re-appointment.

The details pursuant to Regulation 36(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 relating to appointment and re-appointment of directors at the AGM are provided in the Notice to the members.

Key Managerial Personnel:

The Key Managerial Personnel (KMP) in the Company as per Section 2(51) and 203 of the Companies Act, 2013 are as follows:

*Mr. Naresh Kumar Bansal, Managing Director

*Mr. Rajeev Kumar Aggarwal, Chief Financial Officer

*Mr. Kapil Datta, Company Secretary

DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to Section 134(5) of the Companies Act, 2013, the Board of Directors, to the best of their knowledge and ability, confirm that:

- a) that in the preparation of the annual accounts, the applicable accounting standards have been followed and there has been no material departure;
- b) that the selected accounting policies were applied consistently. Reasonable and prudent judgments and estimates were made so as to give a true and fair view of the state of affairs of the Company as at March 31, 2021 and of the loss of the Company for the year ended on that date;
- c) the directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;
- d) that the annual accounts have been prepared on a going concern basis;
- e) the directors had laid down internal financial controls to be followed by the Company and such internal financial control are adequate and were operating effectively; and
- f) the directors had devised proper systems to ensure compliance with the provisions of all applicable laws and such systems are adequate and were operating effectively.

POLICY ON DIRECTORS' APPOINTMENT AND REMUNERATION AND OTHER DETAILS

The current policy is to have an appropriate mix of executive and independent directors to maintain the independence



of the Board, and separate its functions of governance and management. As on March 31, 2021, the Board consist of 6 members, three of whom are executive and three are independent directors. The Board periodically evaluates the need for change in its composition and size.

The policy of the Company on directors' appointment and remuneration, including criteria for determining qualifications, positive attributes, independence of a director and other matters provided under Sub-section (3) of Section 178 of the Companies Act, 2013, adopted by the Board. We affirm that the remuneration paid to the directors is as per the terms laid out in the nomination and remuneration policy of the Company.

DECLARATION BY INDEPENDENT DIRECTOR(S)

All the Independent Directors have submitted their disclosures to the Board that they fulfill all the requirements as stipulated in Section 149 (6) of the Companies Act, 2013 so as to qualify themselves to be appointed as Independent Directors under the provisions of the Companies Act, 2013 and the relevant rules.

CORPORATE GOVERNANCE REPORT

The Company is committed to maintain the highest standards of corporate governance and adhere to the corporate governance requirements set out by SEBI. The Company has also implemented several best corporate governance practices as prevalent globally. The report on Corporate Governance as stipulated under the Listing Regulations forms an integral part of this Report. The requisite certificate from the Auditors of the Company confirming compliance with the conditions of corporate governance is attached to the report on Corporate Governance.

ANNUAL RETURN

In accordance with provisions of Section 134(3)(a) of the Companies Act, 2013, the annual return as required under Section 92 of the Act for the financial year 2020-21, is available on the Company's website at www.ramasteel.com.

NUMBER OF MEETINGS OF THE BOARD

Eight meetings of the board were held during the year.

For details of the meetings of the board, please refer to the corporate governance report, which forms part of this report.

CONTRACTS AND ARRANGEMENT WITH RELATED PARTIES

All contracts / arrangements / transactions entered by the Company during the financial year with related parties were in the ordinary course of business and on an arm's length basis. During the year, the Company had not entered into any contract / arrangement / transaction with related parties which could be considered material in accordance with the policy of the Company on materiality of related party transactions.

Your Directors draw attention of the members to Note 48 to the Standalone financial statement which sets out related party disclosures. The particulars of contracts and arrangements entered into by the company with related parties referred to in Section 188 in Form AOC-2 is attached herewith as Annexure- I.

AUDITORS AND AUDITORS' REPORT

Statutory Auditors

As per provisions of Section 139 of the Companies Act, 2013, the Company has appointed M/s Alok Mittal & Associates, Chartered Accountants (Firm Registration No. 005717N) as Statutory Auditors for a period of 5 (five) years in the AGM of the Company held on 29th September 2018.

The requirement to place the matter relating to appointment of auditors for ratification by Members at every AGM has been done away by the Companies (Amendment) Act, 2017 with effect from May 7, 2018. Accordingly, no resolution is being proposed for ratification of appointment of statutory auditor at the ensuing AGM.

The Auditor's Report to the shareholders on the standalone and consolidated financial statement for the year ended March 31, 2021 does not contain any qualification, observation or adverse comment.

Secretarial Auditors

Pursuant to the provision of Section 204 of the Act, read with Rule 9 of the Companies (Appointment and Remunerartion of Managerial Personnel) Rules, 2014 the

Board of Directors had appointed M/s Arun Kumar Gupta & Associates (CP No. 5086), Company Secretaries, to conduct Secretarial Audit for the financial year ended March 31, 2021. The Secretarial Audit Report for the financial year ended March 31, 2021 is annexed herewith marked as Annexure - II to this Report. The Secretarial Audit Report does not contain any qualification, reservation or adverse remark.

Pursuant to Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, the Company has obtained annual secretarial compliance report from M/s Arun Kumar Gupta & Associates (CP No. 5086), Company Secretaries, and same will be submitted to the stock exchange within the prescribed time limits. The Annual Secretarial Compliance Report does not contain any remarks or observations.

Cost Auditors

Pursuant to the provision of Section 148(3) of the Act, the Board of Directors had appointed M/s. Subodh Kumar & Co., Cost Accountants, for conducting the audit of cost records of the Company for Steel pipe Segment for the financial year ended March 31, 2021. The audit is in progress and report will be filed with the Ministry of Corporate Affairs within the prescribed period.

The cost records as specified by the Central Government under sub-section (1) of Section 148 of the Act as required by the Company are maintained by the Company.

Details in respect of frauds reported by Auditors other than those which are reportable to the Central Government

The Statutory Auditors, Cost Auditors or Secretarial Auditors of the Company have not reported any frauds to the Audit Committee or to the Board of Directors under Section 143(12) of the Companies Act, 2013, including rules made thereunder.

LOANS, GUARANTEES AND INVESTMENTS

The particulars of loans, guarantees and investments given under Section 186 of the Companies Act, 2013 have been disclosed in the financial statements.

CORPORATE SOCIAL RESPONSIBILITY

We at RAMA aim to create economic value and to actively contribute toward the development of a sustainable society by taking up projects for the common good through responsible business practices and good governance. In line with the requirement of Section 135 of the Companies Act 2013 your Company having a Corporate Social Responsibility Committee. The details of Committee and the terms of reference are provided in corporate governance report. The CSR Policy of the Company is available on its website at the link: <http://ramasteel.com/cms/policy-and-code-of-conduct>.

During the year the Company has spent ₹19.95 Lakhs on CSR activities for the financial year 2020-21 as annexed herewith Annexure- III to this Report.

Aforesaid CSR money paid to Konfyans Charitable Public Trust for purpose of women empowerment and social development.

INTERNAL FINANCIAL CONTROL

The Board has adopted the policies and procedures for ensuring the orderly and efficient conduct of its business, including adherence to the 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 disclosures.

VIGIL MECHANISM AND WHISTLE BLOWER POLICY

Fraud-free and corruption free work culture has been the core of the Company's functioning. In view of the potential risk of fraud and corruption due to rapid growth and geographical spread of operations, the company has put even greater emphasis to address the risk.

To meet this objective, a Whistle Blower Policy has been laid down. The same policy is approved by the Board was uploaded on the Company's website (www.ramasteel.com).

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

The Company has zero tolerance for sexual harassment at workplace and has adopted a policy on prevention,



prohibition and redressal of sexual harassment at workplace in line with the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed there under. No complaint has been received for sexual harassment of women at work place by the Company during the financial year 2020-21.

BOARD EVALUATION

The Board of Directors has carried out an annual evaluation of its own performance, Board committees and individual directors pursuant to the provisions of the Companies Act, 2013 and Corporate Governance requirements as prescribed by SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

PARTICULARS OF EMPLOYEES RELATED DISCLOSURES

- a. Disclosures pertaining to remuneration and other details as required under Section 197(12) of the Act read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 are given below :
- i. The ratio of the remuneration of each director to the median remuneration of the employees of the Company for the financial year:

Non-executive directors	Ratio to median remuneration
Mr. Bharat Bhushan Sahny	N.A.
Mr. Charat Sharma (upto 04.09.2021)	N.A.
Mr. Jai Prakash Gupta (w.e.f. 04.09.2021)	N.A.
Mrs. Anju Gupta	N.A.

Executive directors	Ratio to median remuneration
Mr. Naresh Kumar Bansal	21.00
Mr. Richi Bansal	19.00
Mr. Surender Kumar Sharma	1.00

- ii. The percentage increase in remuneration of each director, chief executive officer, chief financial officer, company secretary in the financial year:

Directors, Chief Financial Officer and Company Secretary	% increase in remuneration in the financial year
Mr. Bharat Bhushan Sahny	N.A.
Mr. Charat Sharma (upto 04.09.2021)	N.A.
Mr. Jai Prakash Gupta (w.e.f. 04.09.2021)	N.A.
Mrs. Anju Gupta	N.A.
Mr. Naresh Kumar Bansal, Managing Director	NIL
Mr. Richi Bansal, Executive Director	NIL
Mr. Rajeev Kumar Agarwal, Chief Financial Officer	NIL
Mr. Kapil Datta, Company Secretary	NIL

- b. The percentage increase in median remuneration of employees in the financial year: NIL
- c. The number of permanent employees on the rolls of Company : 85
- d. Variations in the market capitalisation of the Company, price earning ratio as at the closing date of the current financial year and previous financial year : N.A.
- e. Percentage increase over decrease in the market quotations of the shares of the Company in comparison to the rate at which the Company came out with the last public offer: N.A.
- f. Average percentile increase already made in the salaries of employees other than the managerial personnel in the last financial year and its comparison with the percentile increase in the managerial remuneration and justification thereof and point out if there are any exceptional circumstances for increase in the managerial remuneration:

The average annual increase was NIL

Increase in the managerial remuneration for the year was NIL

- g. The Company affirms that the remuneration is as per remuneration policy of the Company.

In terms of the provisions of Section 197(12) of the Act read with Rules 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, there is no such employee drawing remuneration in excess of the limits set out in the said rules and are required to be disclosed.

Further, particulars of employees pursuant to Rule 5(2) & 5(3) of the above rules form part of this report. However in terms of provisions of section 136 of the said Act, the report and accounts are being sent to all the members of the Company and others entitled thereto, excluding the said particulars of employees. Any member interested in obtaining such particulars may write to the Company Secretary at investors@ramasteel.com. The said information is available for inspection at the Registered Office of the Company during working days of the Company upto the date of the ensuing AGM.

CONSERVATION OF ENERGY, RESEARCH AND DEVELOPMENT, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTGO

A) CONSERVATION OF ENERGY :

- a) The Company has always been particular to conservation of energy on continuous basis by closely monitoring energy consuming equipment involving use of energy generating diesel set and power purchased from Electricity Board e.g. size of the Equipments is optimum to save energy. The low-efficient Machinery and Equipments are identified and replaced.
- b) Keeping in view the nature of the manufacturing process no additional investment is proposed and hence further consumption of energy is ruled out in the near future.
- c) No specific studies regarding impact of the above measures of (a) and (b) have been carried out and the cost impact of energy cost and energy saving

measures on cost of production of goods is not material, as it forms a very low percentage vis-a vis the cost of Company's product.

- d) Total energy consumption and energy consumption per unit of production is given as per Form-A.

B) TECHNOLOGY ABSORPTION, ADOPTION AND INNOVATION :

I. RESEARCH AND DEVELOPMENT (R&D)

- i. Specific area in which R & D carried out by the Company :

There is no specific area in which the Company has carried the R & D. However, the Company is continuously making efforts for improvements in its production process for better productivity and cost efficiency.

- ii. Future plan of action

The Company plans to monitor continuously the plant efficiency thus reducing the shortage and reducing the cost of production.

- iii. Expenditure on R & D

The company did not incur any Expenditure on R & D.

II. TECHNOLOGICAL, ABSORPTION, ADAPTATION & INNOVATION :

- i. Efforts made towards Technology Absorption:

For the goods manufactured by the Company there is a simple process of ERW manufacturing technique and the Company has already adopted the same and no innovations have been carried by the company, as there is no other available alternative that would ensure further cost efficiency.

- ii. Particulars relating to imported technology :

The Company has not imported any technology and the plant is working with completely Indigenous Technical know-how.

**C) FOREIGN EXCHANGE EARNING AND OUTGO :**

(₹ In Lacs)

		Current year	Previous year
a)	Total Foreign Exchange Earning	5645.78	4700.41
b)	Total Foreign Exchange Outgo	3567.06	3010.26

FORM 'A'**POWER AND FUEL CONSUMPTION**

	Current Year	Previous Year
1. Electricity		
(a) Purchased Unit	2910254	3666641
Total amount (in ₹)	2,19,88,311	2,26,95,286
Rate/unit	7.56	6.19
(b) Own generation		
Through Diesel Generator Unit	79049	114990
Unit per Litre of Diesel Oil	4.73	4.78
Total Amount (in ₹)	12,48,133	15,73,659
Cost/Unit	15.73	13.69
2. Furnace Oil Quantity(litres)	195150	140560
Total Amount (in ₹)	69,37,350	59,64,800
Average Rate ₹/litre	35.55	42.44

CONSUMPTION PER UNIT OF PRODUCTION

NAME OF PRODUCT	UNIT	ELECTRICITY (UNIT)		FURNACE OIL/GAS (LITRE/SQ. CUBIC MTR)	
		CURRENT YEAR	PREVIOUS YEAR	CURRENT YEAR	PREVIOUS YEAR
Black Steel Tubes/Pipes	Per Ton	54.35	60.96	--	--
Galvd. Steel Tubes/Pipes	Per Ton	52.91	59.11	14.43	12.66

ACKNOWLEDGEMENT

The Directors acknowledge the contributions made by the employees towards the success and growth of the company. Your Directors also take this opportunity to express sincere thanks to the Government Authorities, Financial Institutions and the Bankers for their co-operation and assistance to the Company. The Directors would also like to acknowledge the continued support of the Company's shareholders in all its endeavors.

For and on behalf of Board of Directors

Sd/-

(Naresh Kumar Bansal)

Chairman & Managing Director

Place: New Delhi

Date: August 14, 2021

Form No. AOC-2

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

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

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

None: During the Reporting Period, all the transactions not at arm's length basis.

a.	Name(s) of the related party and nature of relationship	Not Applicable
b.	Nature of contracts/arrangements/transactions	Not Applicable
c.	Duration of the contracts / arrangements/transactions	Not Applicable
d.	Salient terms of the contracts or arrangements or transactions including the value, if any	Not Applicable
e.	Justification for entering into such contracts or arrangements or transactions	Not Applicable
f.	Date(s) of approval by the Board	Not Applicable
g.	Amount paid as advances, if any	Not Applicable
h.	Date on which the special resolution was passed in general meeting as required under first proviso to section 188	Not Applicable

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

None: During the Reporting Period, there was no material* Contracts or Arrangement.

a.	Name(s) of the related party and nature of relationship	Not Applicable
b.	Nature of contracts/arrangements/transactions	Not Applicable
c.	Duration of the contracts / arrangements/transactions	Not Applicable
d.	Salient terms of the contracts or arrangements or transactions	Not Applicable
e.	Date(s) of approval by the Board, if any	Not Applicable
f.	Amount paid as advances, if any	Not Applicable

For and on behalf of Board of Directors

Sd/-

(Naresh Kumar Bansal)

Chairman & Managing Director

Place: New Delhi

Date: August 14, 2021



Form No. MR-3
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021

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

To,
 The Members,
RAMA STEEL TUBES LIMITED
B-5, 3rd Floor, Main Road, Ghazipur
New Delhi 110096

We have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Rama Steel Tubes Limited** (hereinafter called the Company). Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on our verification of the **Rama Steel Tubes Limited** 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, we hereby report that in our opinion, the company has, during the audit period covering the financial year ended on **31st March, 2021** complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by **Rama Steel Tubes Limited** for the financial year ended on 31st March, 2021 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made there under;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made there under 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'):-
 - a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the Company during the Audit Period)**
 - d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulation, 2014; **(Not applicable to the Company during the Audit Period)**
 - e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the Audit Period)**
 - f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
 - g) The Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment) Regulations, 2016; **(Not applicable to the Company during the Audit Period) and**
 - h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the Audit Period)**

(vi) Having regard to the compliance system prevailing in the Company and on examination of the relevant documents and records in pursuance thereof, on test-check basis, the Company has complied with the following laws applicable specifically to the Company:

- The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- The Factories Act, 1948
- The Payment of Wages Act, 1936
- The Minimum Wages Act, 1948
- Employees Provident Fund And Misc. Provisions Act, 1952
- Employees State Insurance Act, 1948
- The Payment of Bonus Act, 1965
- The Environment (Protection) Act, 1986
- Income Tax Act 1961, Wealth Tax Act, Goods and Services Tax Act, 2016 and rules made thereof.
- Negotiable Instrument Act, 1881
- Maternity Benefits Act 1961
- Payment of Gratuity Act, 1972
- The Industrial Disputes Act, 1947
- The Child Labour (Regulation and Abolition) Act, 1970
- The Weekly Holidays Act, 1942
- Water (Prevention & Control of Pollution) Act 1974 and rules thereunder
- Air (Prevention & Control of Pollution) Act 1981 and rules thereunder

We 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 SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015, (erstwhile Listing Agreement) entered into by the Company with Bombay Stock Exchange Limited and National Stock Exchange of India Limited.

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

We further report that

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

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

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

We further report that there are adequate systems and processes in the company commensurate with the size and operations of the company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

We further report that during the audit period the Company obtained consent of shareholders by way of Special resolution in its Annual General meeting in respect of following matter:

- (i) Re-appointment of Mr. Naresh Kumar Bansal (DIN: 00119213) as Managing Director of the Company.
- (ii) Ratification of approval of remuneration to Mr. Naresh Kumar Bansal (DIN: 00119213), Managing Director in terms of regulation 17(6)(e) of SEBI Amended Listing Regulations.
- (iii) Ratification of approval of remuneration to Mr. Richi Bansal (DIN: 00119206), Executive Director in terms of regulation 17(6)(e) of SEBI Amended Listing Regulations.

For **ARUN KUMAR GUPTA & ASSOCIATES**
COMPANY SECRETARIES
Sd/-
(ARUN KUMAR GUPTA)
FCS: 5551
CP: 5086
UDIN: F005551C000787200

Place: Delhi
Date: August 14, 2021



ANNEXURE TO THE SECRETARIAL AUDIT REPORT

In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished and representations made to us by the Company, its officers and agents, we report that the Company has, during the financial year under review, complied with the provisions of the Acts, the Rules made there under and the Memorandum and Articles of Association of the Company with regard to:-

1. Maintenance of various statutory registers and documents and making necessary entries therein;
2. Contracts, Common Seal, Registered Office and Publication of name of the Company;
3. Forms, Returns, Documents and resolutions required to be filed with the Registrar of Companies, Regional Director, Central Government, Company Law Board and such other authorities;
4. Service of documents by the Company on its Members, Directors, Auditors and Registrar of Companies;
5. Constitution of the Board, Audit Committee, Nomination and Remuneration Committee and Corporate Social Responsibility Committee;
6. Appointment, Re-appointment, Retirement of Directors including Whole Time Directors and payment of remuneration.
7. Disclosure of Interest and Concerns in Contracts and Arrangements, Shareholdings and Directorships in other Companies and interest in other entities by Directors and Key Managerial Personnel;
8. Disclosures requirements in respect of their eligibility for appointment, declaration of their independence, compliance with the code of conduct for Directors of Rama Steel Tubes Limited;
9. Related party transactions which were in the ordinary course of business and at arm's length basis and were placed before the Audit Committee for their review/ approval as and when required;
10. Formulation and adopting Nomination and Remuneration Policy;
11. Appointment and remuneration of Statutory Auditors;
12. Notice of the meetings of the Board and Committees thereof;
13. Minutes of the meeting of the Board and Committees thereof;
14. Notice convening Annual General Meeting held on November 20, 2020 and holding of the meeting on that date;
15. Minutes of General Meeting;
16. Approval of the Members, Board of Directors, Committees of Directors and Government Authorities wherever required;
17. Form of the Balance Sheet as at March 31, 2020 as prescribed under part I of schedule III of the Companies Act, 2013 and requirements as to Profit & Loss Account for the year ended on that date as per Part II of the said schedule;
18. Report of the Board of Directors for the financial year ended March 31, 2020;
19. Transfer of Equity and Preference Shares and issue and delivery of share certificates;
20. Borrowings and registration of charges;
21. Investment of Company's funds and inter-corporate loans and investments.

**ANNUAL REPORT ON CORPORATE SOCIAL RESPONSIBILITY (CSR) ACTIVITIES
(PURSUANT TO SECTION 135 OF THE COMPANIES ACT, 2013) FOR THE FINANCIAL YEAR 2020-21**

1. A brief outline of the Company's CSR policy, including overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programmes

Terms of reference of the CSR Committee:

- To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013;
- To recommend the amount of expenditure to be incurred on the activities referred to in clause (a) in a financial year;
- To monitor the Corporate Social Responsibility Policy of the company from time to time.
- Any other matter/thing as may be considered expedient by the members in furtherance of and to comply with the CSR Policy of the Company.

The Corporate Social Responsibility Policy of the Company is available on the website of the Company. The Web link for the same is: <http://ramasteel.com/cms/policy-and-code-of-conduct>.

- Average Net Profit of the Company for the last Three Financial Year: ₹ 997.27 lakhs
- Prescribed CSR Expenditure (Two percent of the Average Net Profit as in item 2): ₹ 19.95 lakhs
- Details of the amount spent for the financial year: ₹ 19.95 Lakhs
- Composition of CSR Committee

Name of the Director	Status	Nature of Directorship
Ms. Anju Gupta	Chairman	Non-Executive Independent Director
Mr. Bharat Bhushan Sahny	Member	Non-Executive Independent Director
Mr. Naresh Kumar Bansal	Member	Managing Director
Mr. Richi Bansal	Member	Director

Manner in which the amount spent during the financial year is detailed below:

1	2	3	4	5	6	7	8
S. No	CSR project or activity identified	Sector in which the Project is covered	Projects or programs (1) Local area or other (2) Specify the State and district where projects or programs was undertaken	Amount outlay (budget) project or programs wise (in Rs.)	Amount spent on the projects or programs Sub - heads: (1) Direct expenditure on projects or programs (2) Overheads (in Rs.)	Cumulative expenditure upto the reporting period	Amount spent : Direct or through implementing agency
1	Women Empowerment & Social Development	Promoting Gender Equality and Empowering Women (The project is covered under schedule VII(iii) of the Companies Act, 2013)	South Extension Part II, New Delhi	19,95,000	19,95,000	88,24,000	Implementing Agency
2	Women Education	Promoting Gender Equality and Empowering Women (The project is covered under schedule VII(iii) of the Companies Act, 2013)	GT Karnal Road, Industrial Area, Aajadpur, Delhi	-	-	2,00,000	Implementing Agency

- In case the Company failed to spent Two Percent of the average Net Profit of Last three financial Years or any part thereof, the company shall provide the reason for not spending the Amount in its Board Report: Please refer Directors' Report
- Responsibility Statement : The implementation and monitoring of CSR Policy, is in compliance with CSR objectives and Policy of the Company.

Sd/-
Anju Gupta
Chairman of CSR Committee

Sd/-
Naresh Kumar Bansal
Member of CSR Committee

Sd/-
Bharat Bhushan Sahny
Member of CSR Committee



CORPORATE GOVERNANCE REPORT

1. COMPANY'S PHILOSOPHY ON CORPORATE GOVERNANCE

At Rama Steel Tubes Limited ("RAMA"), Corporate Governance is all about maintaining a valuable relationship and trust with all stakeholders. We believe that it is imperative for us to manage our business affairs in the most fair and transparent manner with a firm commitment to our values. For us, corporate governance is an ethically driven business process that is committed to values aimed at enhancing an organization's brand and reputation. Our corporate governance framework is a reflection of our culture, our policies, our relationship with stakeholders and our commitment to values. Accordingly, we always seek to ensure that our performance is driven by integrity. This is vital to gain and retain the trust of our stakeholders.

Our corporate governance framework ensures effective engagement with our stakeholders and helps us evolve with changing times.

The Company is in compliance with the requirements stipulated under regulation 17 to 27 read with Schedule V and clause (b) to (i) of sub-regulation (2) of the regulation 46 of SEBI Listing Regulations, as applicable, with regard to corporate governance.

Our corporate governance framework ensures that we make timely disclosures and share accurate information regarding our financials and performance, as well as the leadership and governance of the Company.

We believe, Corporate Governance is not just a destination, but a journey to constantly improve sustainable value creation. It is an upward-moving target that we collectively strive towards achieving.

Board Leadership

As on March 31, 2021, Rama's Board consists of 6 members, 3 out of which are Independent Directors (including one woman director). At RAMA, it is our belief that an enlightened Board consciously creates a culture of leadership to provide a long-term vision and policy approach to improve the quality of governance.

The Board's actions and decisions are aligned with the Company's best interests. It is committed to the goal of sustainably elevating the Company's value creation. The Company has defined guidelines and an established framework for the meetings of the Board and Board Committees. These guidelines seek to systematise the decision-making process at the meeting of the Board and Board Committees in an informed and efficient manner.

The Board critically evaluates the Company's strategic direction, management policies and their effectiveness. The agenda for the Board reviews include strategic review from each of the Board committees, a detailed analysis and review of annual strategic and operating plans and capital allocation and budgets. Additionally, the Board reviews related party transactions, possible risks and risk mitigation measures, financial reports from the CFO and business reports from each of the sector heads. Frequent and detailed interaction sets the agenda and provides the strategic roadmap for the Company's future growth.

Role of Company Secretary in Overall Governance Process

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 primarily responsible 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.

2. BOARD OF DIRECTORS

Board composition and category of Directors

The Company's policy is to maintain optimum combination of Executive and Non-Executive Directors.

The composition of the Board and category of Directors are as follows:

Category	Name of Directors
Executive Directors	Mr. Naresh Kumar Bansal
	-Chairman and Managing Director
	Mr. Richi Bansal
	Mr. Surender Kumar Sharma (upto 19.04.2021)
	Mr. Vinod Pal Singh Rawat (w.e.f. 08.07.2021)
Independent Directors	Mr. Bharat Bhushan Sahny
	Mr. Charat Sharma (upto 04.09.2020)
	Mr. Jai Prakash Gupta (w.e.f. 04.09.2020)
	Mrs. Anju Gupta

Mr. Richi Bansal is the son of Mr. Naresh Kumar Bansal. None of the other directors are related to any other director on the Board.

MEETINGS OF THE BOARD OF DIRECTORS AND COMMITTEES OF BOARD

Number of Board meetings held with dates

Eight Board meetings were held during the year, as against the minimum requirement of four meetings.

The details of Board meetings are given below:

Date	Board Strwnth	No. of Directors Present
29-Jun-20	6	6
12-Aug-20	6	6
04-Sep-20	6	6
05-Oct-20	6	6
11-Nov-20	6	6
27-Jan-21	6	6
12-Feb-21	6	6
29-Mar-21	6	6

ATTENDANCE OF DIRECTORS AT BOARD MEETINGS, LAST ANNUAL GENERAL MEETING (AGM) AND NUMBER OF OTHER DIRECTORSHIPS AND CHAIRMANSHIPS / MEMBERSHIPS OF COMMITTEES OF EACH DIRECTOR IN VARIOUS COMPANIES:

Name of the Director	Attendance at the Board meetings during 2020-21	Attendance at the AGM during 2020-21	No. of Other Directorship(s) on 31-03-2021	No. of Membership(s)/ Chairmanship of Committees in other Companies as on 31-03-2021
Naresh Kumar Bansal	8	YES	4	0
Richi Bansal	8	YES	3	0
Bharat Bhushan Sahny	8	YES	2	1
Surender Kumar Sharma	8	YES	1	0
Anju Gupta	8	YES	0	0
Charat Sharma (upto 04.09.2020)	3	N.A.	3	0
Jai Prakash Gupta (w.e.f. 04.09.2020)	5	YES	0	0



3. AUDIT COMMITTEE

Our audit committee ('the committee') comprised four Directors as on March 31, 2021:

Bharat Bhushan Sahny - Chairman of the Committee	Independent Director
Charat Sharma (upto 04.09.2020)	Independent Director
Jai Prakash Gupta (w.e.f. 04.09.2020)	Independent Director
Anju Gupta	Independent Director
Naresh Kumar Bansal	Executive Director

The Committee's composition meets with requirements of Section 177 of the Companies Act, 2013 and Regulation 18 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015. Members of the Audit Committee possess financial / accounting expertise / exposure.

Mr. Charat Sharma was appointed as Director (Non-executive Independent Director) by the Board of Directors of company with effect from November 17, 2019. Board has also appointed Mr. Sharma as Member of Audit Committee with effect from November 17, 2019. Due to personal reasons, Mr. Charat Sharma resigned from Board of Directors of the company and as Member of Audit Committee. Mr. Jai Prakash Gupta was appointed as Director of the company and Member of the Audit Committee with effect from September 4, 2020.

Role of the Audit Committee:

- Overseeing the Company's financial reporting process and the disclosure of its financial information to ensure that the financial statements are correct, sufficient and credible.
- Reviewing the utilization of loans and/ or advances from/investment by the Company in the subsidiary exceeding ₹100 Crores or 10% of the asset size of the subsidiary, whichever is lower including existing loans / advances / investments
- Recommending to the Board, the appointment, re-appointment and, if required, the replacement or removal of the statutory auditor and the fixation of audit fees.
- Approval of payment to statutory auditors for any other services rendered by the statutory auditors.
- Reviewing, with the management, the annual financial statements before submission to the board for approval, with particular reference to:
 - Matters required being included in the Directors 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.
 - Changes, if any, in accounting policies and practices and reasons for the same.
 - Major accounting entries involving estimates based on the exercise of judgment by management.
 - Significant adjustments made in the financial statements arising out of audit findings.
 - Compliance with listing and other legal requirements relating to financial statements.
 - Disclosure of any related party transactions.
 - Qualifications in the draft audit report.
- Reviewing, with the management, the half yearly and annual financial statements before submission to the board for approval.
- 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.
- Reviewing, with the management, performance of statutory and internal auditors, adequacy of the internal control systems.
- 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.

- Discussion with internal auditors on any significant findings and follow up there on.
- 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.
- 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.
- To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of nonpayment of declared dividends) and creditors.
- To review the functioning of the Whistle Blower mechanism, in case the same is existing.
- 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 & background, etc. of the candidate.
- To overview the Vigil Mechanism of the Company and took appropriate actions in case of repeated frivolous complaints against any Director or Employee.

Powers of the Audit Committee:

- Investigating any activity within its terms of reference;
- Seeking information from any employee;
- Obtaining outside legal or other professional advice; and
- Securing attendance of outsiders with relevant expertise, if it considers necessary.

4. NOMINATION AND REMUNERATION COMMITTEE

Our Nomination and Remuneration Committee ('the committee') comprised three Directors as on March 31, 2021:

Charat Sharma - Chairman of the Committee (upto 04.09.2021)	Independent Director
Jai Prakash Gupta - Chairman of the Committee (w.e.f. 04.09.2021)	Independent Director
Bharat Bhushan Sahny	Independent Director
Anju Gupta	Independent Director

The Committee's composition meets with requirements of Section 178(1) of the Companies Act, 2013 and Regulation 19 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015.

Mr. Charat Sharma was appointed as Director (Non-executive Independent Director) by the Board of Directors of company with effect from November 17, 2019. Board has also appointed Mr. Sharma as Chairman of Nomination and Remuneration Committee with effect from November 17, 2019. Due to personal reasons, Mr. Charat Sharma resigned from Board of Directors of the company and as Chariman of Nomination and Remuneration Committee. Mr. Jai Prakash Gupta was appointed as Director of the Company and Chairman of the Nomination and Remuneration Committee with effect from September 4, 2020.

The terms of reference of the Nomination and Remuneration Committee include the following:

- To recommend to the Board, the remuneration packages of the Company's Managing/Joint Managing/ Deputy Managing/Whole time / Executive Directors, including all elements of remuneration package (i.e. salary, benefits, bonuses, perquisites, commission, incentives, stock options, pension, retirement benefits, details of fixed component and performance linked incentives along with the performance criteria, service contracts, notice period, severance fees etc.);

To be authorized at its duly constituted meeting to determine on behalf of the Board of Directors and on behalf of the shareholders with agreed terms of reference, the Company's policy on specific remuneration packages for Company's Managing/ Joint Managing/ Deputy Managing/ Whole time/ Executive Directors, including pension rights and any compensation payment.



5. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

Our Corporate Social Responsibility Committee ('the committee') comprised four directors as on March 31, 2021:

Anju Gupta (Chairman of the Committee)	Independent Director
Bharat Bhushan Sahny	Independent Director
Naresh Kumar Bansal	Executive Director
Richi Bansal	Executive Director

The Role of CSR Committee is as under:

- Formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the Company in compliance with the Companies Act, 2013 and rules thereunder.
- Recommend the amount of expenditure to be incurred on the activities as above, and
- Monitor the CSR Policy of the Company from time to time.

The Company has formulated a CSR Policy in line with Schedule VII of the Companies Act, 2013.

6. STAKEHOLDERS' RELATIONSHIP COMMITTEE

The committee has the mandate to review and redress shareholder grievances. Our stakeholders' relationship committee ('the committee') comprised Four Directors as on March 31, 2021

Charat Sharma – Chairman of the Committee (upto 04.09.2020)	Independent Director
Jai Prakash Gupta – Chairman of the Committee (w.e.f. 04.09.2020)	Independent Director
Bharat Bhushan Sahny	Independent Director
Anju Gupta	Independent Director
Richi Bansal	Executive Director

Mr. Charat Sharma was appointed as Director (Non-executive Independent Director) by the Board of

Directors of company with effect from November 17, 2019. Board has also appointed Mr. Sharma as Chairman of Stakeholders' Relationship Committee with effect from November 17, 2019. Due to personal reasons, Mr. Charat Sharma resigned from Board of Directors of the company and as Chariman of Stakeholders' Relationship Committee. Mr. Jai Prakash Gupta was appointed as Director of the Company and Chairman of the Stakeholders' Relationship Committee with effect from September 4, 2020.

The Stakeholder Relationships Committee shall oversee all matters pertaining to investors of our Company. The terms of reference of the Stakeholder Relationships Committee include the following:

- Redressal of shareholders'/investors' complaints;
- Reviewing on a periodic basis the Approval of transfer or transmission of shares, debentures or any other securities made by the Registrar and Share Transfer Agent;
- Issue of duplicate certificates and new certificates on split/consolidation/renewal;
- Non-receipt of declared dividends, balance sheets of the Company; and
- Carrying out any other function as prescribed under the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The Committee has periodic interaction with the representatives of the Registrar and Transfer Agent of the Company.

Details of Shareholders'/ Investors' Complaints

Mr. Kapil Datta, Company Secretary, is the Compliance Officer for resolution of Shareholders'/Investors' complaints. During the financial year ended 31st March 2021, No complaint was received from the shareholder during the year 2020-21 and as on 31st March 2021, no shareholder complaint is pending.

Meetings of Board Committees held during the year and Directors' attendance

Board Committees	Audit Committee	Stakeholders' Relationship Committee	Nomination and Remuneration Committee	Corporate Social Responsibility Committee
Meeting Held	4	1	2	1
Directors' Attendance				
Naresh Kumar Bansal	4	N.A.	N.A.	1
Richi Bansal	N.A.	1	N.A.	1
Bharat Bhushan Sahny	4	1	2	1
Charat Sharma (upto 04.09.2020)	2	-	1	N.A.
Anju Gupta	4	1	2	1
Jai Prakash Gupta (w.e.f. 04.09.2020)	2	1	1	N.A.

7. OTHER COMMITTEES
a) Finance Committee

The Board of Directors of the Company constituted Finance committee for delegating power of the Board of the Company in respect of matters relating to banking/finance operations. Our Finance committee ('the committee') comprised two Directors as on March 31, 2021:

Naresh Kumar Bansal	Executive Director
Richi Bansal	Executive Director

The Finance Committee shall oversee all matters pertaining to finance and banking operations. The terms of reference of the Finance Committee include the following:

- Forecast monthly, quarterly and annual results;
- Approve or reject budgets;
- Evaluate and decide on investments;
- Allocate resources and manage cash flows;
- Consult board members about funding options; and
- Recommend cost-reducing solutions.

8. DETAILS OF REMUNERATION OF EXECUTIVE DIRECTORS FOR THE FINANCIAL YEAR ENDED 31ST MARCH 2021

(₹ in Lakhs)

Name of the Director	Salary	Bonus	Perquisites	Contribution to PF	Pension	Total
Naresh Kumar Bansal	45.61	-	0.40	-	-	46.01
Richi Bansal	39.91	-	0.40	-	-	40.31
Surender Kumar Sharma	3.20	-	-	0.17	-	3.37



Details of Remuneration of Non-Executive Directors for the financial year ended 31st March 2021:

(₹ in Lakhs)

Name of the Director	Sitting Fees	Total
Bharat Bhushan Sahny	0.40	0.40
Charat Sharma (upto 04.09.2020)	0.20	0.20
Anju Gupta	0.35	0.35
Jai Prakash Gupta (w.e.f. 04.09.2020)	0.20	0.20

9. FRAMEWORK FOR MONITORING SUBSIDIARY COMPANIES

Lepakshi Tubes Private Limited, a wholly owned subsidiary of Rama Steel Tubes Limited is material subsidiary of Rama Steel Tubes Limited. The provisions of Regulation 24(1) of the Listing Regulations, appointment of one of the Independent Directors of the Company on the Board of material subsidiaries are not applicable to Lepakshi Tubes Private Limited.

The Company is in compliance with Regulation 24A of the Listing Regulations. The Company's unlisted material subsidiary Lepakshi Tubes Private Limited undergo Secretarial Audit. Copy of Secretarial Audit Report of is available on the website of the Company.

The Company has formulated a policy for determining material subsidiary as required under Regulation 16 of the listing Regulations and the same is disclosed on the Company's Website.

10. GENERAL BODY MEETINGS

Annual General Meeting

Details of last three Annual General Meetings and summary of Special Resolutions passed therein as under:

Financial year ended	Date and Time	Venue	Special Resolution Passed
March 31, 2018	September 29, 2018 11.30 a.m.	Aura Grand Residency, 439, Jagriti Enclave, Near Karkardooma Metro Station, Delhi-110092	None
March 31, 2019	September 30, 2019 11.30 a.m.	JP Hotel & Resorts, 6B, Patparganj, I.P. Extension, NH-24, Behind CNG Petrol Pump, Delhi- 110 092	<ul style="list-style-type: none"> Ratification of continuation of Sh. Bharat Bhushan Sahny (DIN: 00014334) as Non-Executive Independent Director of the Company Re-Appointment of Sh. Bharat Bhushan Sahny (DIN: 00014334) as Non-Executive Independent Director of the Company

The Secretarial Audit report of Lepakshi Tubes Private Limited does not contain any qualification, reservation or adverse remark or disclaimer.

The minutes of the Board meetings of the unlisted subsidiary company(ies) are placed at the Board meeting of the Company. A statement of all significant transactions and arrangements entered into by the unlisted subsidiary companies, if any, are also placed at the Board meeting of the Company.

The Company monitors performance of subsidiary companies, inter alia, by the following means:

- Financial statements, in particular investments made by subsidiary companies, are reviewed quarterly by the Company's Audit Committee.
- Minutes of Board meetings of subsidiary companies are placed before the Company's Board regularly.
- A statement containing all significant transactions and arrangements entered into by subsidiary companies is placed before the Company's Board.
- Presentations are made to the Company's Board on business performance by the senior management on major subsidiaries of the Company.

Financial year ended	Date and Time	Venue	Special Resolution Passed
March 31, 2020	November 20, 2020 12.30 p.m.	Through Video Conferencing ("VC") / Other Audio Visual Means ("OAVM")	<ul style="list-style-type: none"> Re-appointment of Mr. Naresh Kumar Bansal as a Managing Director of the Company Ratification of approval of remuneration to Mr. Naresh Kumar Bansal (DIN: 00119213), Managing Director in terms of regulation 17(6)(e) of SEBI Amended Listing Regulations Ratification of approval of remuneration to Mr. Richi Bansal (DIN: 00119206), Executive Director in terms of regulation 17(6)(e) of SEBI Amended Listing Regulations

Extra-ordinary General Meeting

No Extra-ordinary General Meeting of the members of the RAMA was held during the year 2020-21.

POSTAL BALLOT

No resolution was passed through postal ballot during last 3 financial years ended on March 31, 2019, March 31, 2020 and March 31, 2021.

11. MEANS OF COMMUNICATION

Timely disclosure of consistent, comparable, relevant and reliable information on corporate financial performance is at the core of good governance towards this end:

a. Quarterly/Half Yearly/Nine Monthly/ Annual Results:

The Quarterly, Half Yearly, Nine Monthly and Annual Results of the Company are intimated to the Stock Exchanges immediately after they are approved by the Board.

b. Publication of Quarterly/ Half Yearly/Nine Monthly/ Annual Results:

The quarterly/half yearly/nine monthly/annual financial results are normally published in Financial Express (English Newspaper) and Jansatta (Hindi Newspaper) etc. and are promptly furnished to the Stock Exchanges.

c. Website:

The results are displayed on the Company's

website "www.ramasteel.com". The Company's website (www.ramasteel.com) contains a separate dedicated section "Investor Relations".

d. News releases, presentations:

Official news releases and official media releases are sent to Stock Exchanges and are also available on the website of the Company.

e. Annual Report:

The Annual Report containing, inter alia, Audited Financial Statement, Audited Consolidated Financial Statement, Board's Report, Auditors' Report and other important information is circulated to the members and others entitled thereto. The Management Discussion and Analysis Report forms part of the Annual Report. The Annual Report is also available on the website of the Company.

f. NSE Electronic Application Processing System (NEAPS):

NEAPS is a web-based application designed by NSE for corporates. All periodical and other compliance filings are filed electronically on NEAPS.

g. BSE Listing Centre (Listing Centre):

BSE's Listing Centre is a web-based application designed for corporates. All periodical and other compliance filings are filed electronically on the Listing Centre.



12. GENERAL SHAREHOLDER INFORMATION

i.	Annual General Meeting		
	Date	:	As mentioned in the Notice of the 47 th AGM
	Time	:	
	Venue	:	
ii.	Financial Calendar	:	
iii.	Date of book closure / record date	:	As mentioned in the Notice of the 47 th AGM
iv.	Dividend Payment Date	:	During the year 2020-21, dividend was not declared.
v.	Listing on stock exchanges	:	National Stock Exchange of India Limited (NSE)- Exchange Plaza, Bandra – Kurla Complex, Bandra(E), Mumbai – 400 051 BSE Limited – Floor 25, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001
	Listing fees as applicable have been paid.	:	Annual Listing fees for the financial year 2020-21 have been duly paid to all the above Stock Exchange
vi.	Stock Code(EQUITY SHARES) ISIN	:	NSE Limited – RAMASTEEL BSE Limited – 539309 INE23OR01027
vii.	Market Price Data	:	Refer Table – I
viii.	Registered office	:	B-5, 3rd Floor, Main Road, Ghazipur, New Delhi – 110096
ix.	Registrar & transfer agent:		
	Name & address		Bigshare Services Private Limited 302, Kushal Bazar 32-33, Nehru Place, New Delhi-110019
	Telephone	:	011-42425004
	Email	:	bssdelhi@bigshareonline.com
x.	Share transfer system	:	99.77% of the equity shares of the Company are in electronic form. Transfers of these shares are done through the depositories with no involvement of the Company. As regards transfer of shares held in physical form the transfer documents can be lodged with Bigshare Services Private Limited at the above mentioned addresses. As per SEBI Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018, the Registrar and Share Transfer Agent of the Company has sent letters to the Shareholders to record their KYC details. Shareholders are requested to update these details at the earliest.
xi.	Distribution of Shareholding	:	Refer Table – II & Table – III
xii.	Dematerialization of shares and liquidity	:	Refer Table – IV
xiii.	Outstanding GDRs/ADRs/ Warrants or any other convertible instrument, conversion date and likely impact on equity	:	None
xiv.	Commodity price risk or foreign exchange risk and hedging activities	:	Please refer to Management Discussion and Analysis Report for the same.
xv.	Plant Locations	:	<ul style="list-style-type: none"> • B-21, Site No. 4, Industrial Estate, Sahibabad, Uttar Pradesh. • B-5, Site No. 4, Industrial Estate, Sahibabad, Uttar Pradesh. • 151, Village Umbare, Taluka Khalapur, Khopoli, Pali Road, Dist. Raigad, Maharashtra.

xvi.	Credit Ratings	:	The Company has received following credit ratings from Brickwork Ratings India Private Limited: On 17.08.2020				
			<table border="1"> <tr> <td>FUND BASED/LONG TERM</td> <td>BWR BBB- Stable</td> </tr> <tr> <td>NON-FUND BASED / SHORT TERM</td> <td>BWR A3)</td> </tr> </table>	FUND BASED/LONG TERM	BWR BBB- Stable	NON-FUND BASED / SHORT TERM	BWR A3)
FUND BASED/LONG TERM	BWR BBB- Stable						
NON-FUND BASED / SHORT TERM	BWR A3)						
xvii.	Fees paid to the statutory auditor and all entities in the network firm/network entity of which the	:	During the financial year ended March 31, 2021, the Company has paid total fees for various services including statutory audit, amounting to ₹2.21 lakh, including taxes to statutory auditor, namely M/s Alok Mittal & Associates, Chartered Accountants. Further, no fees other than above was paid by any of the subsidiaries or by the Company to any entity in the network firm/network entity of the statutory auditor is a part.				
xviii.	Details of utilization of funds raised through preferential allotment	:	Not Applicable				

TABLE - I

Market Price Data: The shares of the Company are listed at NSE and BSE. Monthly High and Low at both the Stock Exchanges for the year 2020-21 is given:

(Amount in ₹)

Month	BSE			NSE		
	High	Low	Volume (No. of Shares)	High	Low	Volume (No. of Shares)
Apr-20	27.2	19.75	8682	31.3	18.6	115360
May-20	25.85	22.5	828	29.8	23.5	67242
Jun-20	36.15	24.9	4300	35.9	26.5	225738
Jul-20	35.75	25.3	4222	36.25	25.65	135165
Aug - 20	43.3	26.65	22043	44.5	25.4	280485
Sep - 20	41.8	34.15	17034	43.45	34.25	229261
Oct - 20	45.4	39.45	4106	44.85	39.2	66486
Nov - 20	49.8	39.55	23199	49.9	39.3	153784
Dec - 20	50.5	41.3	31967	52	43.5	204724
Jan - 21	86.4	43.1	67334	84.9	45.5	760820
Feb - 21	87.1	68.5	22159	86.75	67.65	459320
Mar - 21	78.8	66.6	29317	77	66.25	416973



TABLE - II

Chart A: Rama's Share Performance versus Nifty:

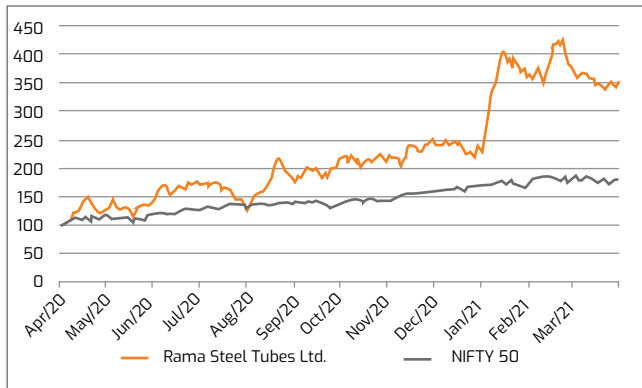
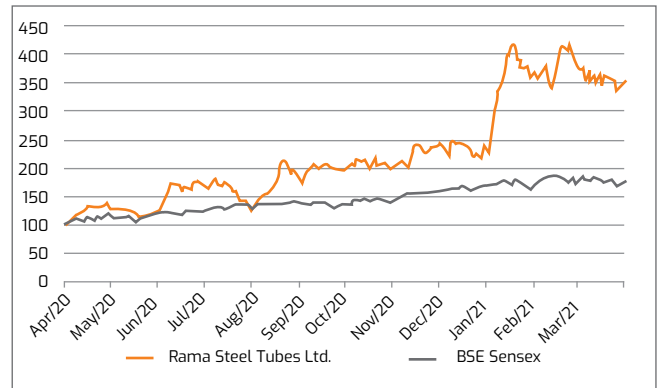


Chart B: Rama's Share Performance versus BSE Sensex:



Distribution of Equity Shareholding as on March 31, 2021

Category (Shares)	Number of Shareholders	% to Total Shareholders	No. of Shares	% of Total Shares
1-500	2872	82.67	292475	1.74
501-1000	233	6.70	189182	1.13
1001-2000	117	3.37	176839	1.05
2001-3000	70	2.02	183856	1.09
3001-4000	17	0.49	63211	0.38
4001-5000	31	0.89	147015	0.88
5001-10000	64	1.84	466431	2.78
10001 and above	70	2.02	15274991	90.95
G. TOTAL	3474	100.00	16794000	100.00

TABLE - IV

DEMATERIALISATION OF EQUITY SHARES AS ON MARCH 31, 2021

Mode of Holding	No. of Shares	Percentage (%)
NSDL	64,11,194	38.18
CDSL	1,03,43,805	61.59
Physical	39,001	0.23
TOTAL	1,67,94,000	100.00

13. OTHER DISCLOSURES

a) Related Party transactions

The Company has formulated a Policy on materiality of Related Party Transactions and on dealing with Related Party Transactions, in accordance with relevant provisions of Companies Act, 2013 and Listing Regulations.

The Policy is available on the website of the Company at <http://ramasteel.com/cms/policy-and-code-of-conduct>

- b) Disclosure of Non-Compliance: There has been no instance of non-compliance by the Company on any matter related to Capital Markets since the inception of the Company and hence no penalties have been imposed.
- c) Vigil Mechanism/Whistle Blower Policy: The Company has adopted a whistle blower policy and has established the necessary vigil mechanism for employees and directors to report concerns about unethical behaviour. No person has been denied

access to the chairman of the audit committee. The said policy has been also put up on the website of the Company at <http://ramasteel.com/cms/policy-and-code-of-conduct>

- d) The Company has complied with all the mandatory requirements of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Regarding compliance with non-mandatory requirements, the following is the status:

- i. Shareholders' Rights - Half-yearly declaration of financial performance of the Company are not currently sent to each of the household of shareholders but are published in terms of Regulation 47(3) of Listing regulations in newspapers and also sent to the Stock Exchange. Besides, all Quarterly/Half-yearly/ Annual financial results are published on the Company's Website.
- ii. Audit Qualification - The financial statements of the Company are unqualified.
- iii. Separate post of Chairperson and Managing Director/Chief Executive Officer – Currently the post of Chairperson and Managing Director is held by Sh. Naresh Kumar Bansal.

iv. Reporting of Internal Auditor: The internal auditor of the Company, directly reports to the audit committee on functional matters.

- e) Web link for policy for determining 'material' subsidiaries: <http://ramasteel.com/cms/policy-and-code-of-conduct>
- f) Web link for policy on dealing with related party transactions: <http://ramasteel.com/cms/policy-and-code-of-conduct>
- g) Disclosure of commodity price risks and commodity hedging activities: The Company has not entered into any commodity hedging activities.

14. The Company complied with all the requirement of corporate governance report said out in the schedule V of SEBI (LODR) Regulations, 2015.

15. The corporate governance report shall also disclose the extent to which the discretionary requirements as specified in Part E of Schedule II have been adopted: Disclosed in 10(d) of this report.

16. The 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 shall be made in the section on corporate governance of the annual report. – All requirements mentioned are complied.



CERTIFICATE ON COMPLIANCE WITH CODE OF CONDUCT

I hereby confirm that the Company has obtained from all the members of the Board and Management Personnel, affirmation that they have complied with the Code of Conduct for the financial year 2020-21

Sd/-
(Naresh Kumar Bansal)
Chairman & Managing Director

Place: New Delhi
Date: August 14, 2021

CEO / CFO CERTIFICATION

To,
The Board of Directors
Rama Steel Tubes Limited

We have reviewed financial statements and the cash flow statements of Rama Steel Tubes Limited for the year ended 31st March, 2021 and to the best of our knowledge and belief:

- a) these statements do not contain any materially untrue statement or omit any material fact or contain statements that might be misleading;
- b) 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.

There are, to the best of our knowledge and belief, no transactions entered into by the Company during the year which are fraudulent, illegal or violative of the Company's Code of Conduct.

We accept responsibility for establishing and maintaining internal controls for financial reporting and we have evaluated the effectiveness of Company's internal control systems pertaining to financial reporting. We have not come across any reportable deficiencies in the design or operation of such internal controls.

We have indicated to the Auditors and the Audit Committee:

- a) that there are no significant changes in internal control over financial reporting during the year;
- b) that there are no significant changes in accounting policies during the year; and
- c) that there are no instances of significant fraud of which we have become aware.

Sd/-
Rajeev Kumar Agarwal
Chief Financial Officer

Sd/-
Naresh Kumar Bansal
Chairman & Managing Director

Place: New Delhi
Date: August 14, 2021

CERTIFICATE ON CORPORATE GOVERNANCE

To
The Members,
Rama Steel Tubes Limited
B-5, 3rd Floor, Main Road, Ghazipur,
New Delhi 110 096

We have examined the compliance of conditions of Corporate Governance by RAMA STEEL TUBES LIMITED for the year ended 31st March, 2021, as stipulated in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

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

In our opinion and to the best of our information and according to the explanations given to us, we certify that the Company has complied with the conditions of Corporate Governance as stipulated in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We 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.

For ARUN KUMAR GUPTA & ASSOCIATES
COMPANY SECRETARIES
Sd/-
(ARUN KUMAR GUPTA)
FCS: 5551
CP: 5086
UDIN: F005551C000787178

Place: Delhi
Date: 14.08.2021



CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS

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

To
 The Members,
 Rama Steel Tubes Limited
 B-5, 3rd Floor, Main Road, Ghazipur,
 New Delhi 110096

I have examined the relevant registers, records, forms, returns and disclosures received from the Directors of **Rama Steel Tubes Limited** having CIN L27201DL1974PLC007114 and having registered office at B-5, 3rd Floor, Main Road, Ghazipur, New Delhi 110096 (hereinafter referred to as 'the Company'), produced before me by the Company for the purpose of issuing this Certificate, in accordance with Regulation 34(3) read with Schedule V Para-C Sub clause 10(i) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In my opinion and to the best of my information and according to the verifications (including Directors Identification Number (DIN) status at the portal www.mca.gov.in) as considered necessary and explanations furnished to me by the Company & its officers, I hereby certify that none of the Directors on the Board of the Company as stated below for the Financial Year ending on 31st March, 2021 has been debarred or disqualified from being appointed or continuing as Director of companies by the Securities and Exchange Board of India, Ministry of Corporate Affairs, Reserve Bank of India or any such other Statutory Authority.

SR. NO.	NAME OF DIRECTOR	DIN	DATE OF APPOINTMENT IN COMPANY
1.	Mr. Bharat Bhushan Sahny	00014334	18/11/2014
2.	Mr. Richi Bansal	00119206	01/05/2007
3.	Mr. Naresh Kumar Bansal	00119213	26/02/1974
4.	Mr. Jai Prakash Gupta	02727514	04/09/2020
5.	Mr. Surender Kumar Sharma	03594435	04/05/2016
6.	Ms. Anju Gupta	06958607	25/01/2017

For ARUN KUMAR GUPTA & ASSOCIATES
 COMPANY SECRETARIES

Sd/-
(ARUN KUMAR GUPTA)

FCS: 5551

CP: 5086

UDIN: F005551C000787145

Place: Delhi
 Date: 14.08.2021

**STANDALONE
FINANCIAL
STATEMENTS**



INDEPENDENT AUDITOR'S REPORT

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

Opinion

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

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2021, and profits, changes in equity and its cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies Act, 2013. Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Standalone Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together

with the ethical requirements that are relevant to our audit of the standalone financial statements under the provisions of the Companies Act, 2013 and the Rules thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on the standalone financial statements.

Emphasis of Matter

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

Key Audit Matters

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

Key Audit Matter	Auditor's Response
<p>1. Related Party Transactions'</p> <p>The Company has entered into several transactions with related parties during the year 2020-21. We identified related party transactions as a key audit matter because of risks with respect to completeness of disclosures made in the standalone financial statements including recoverability thereof; compliance with statutory regulations governing relate party relationships such as the Companies Act, 2013 and SEBI Regulations and the judgement involved in assessing whether transactions with related parties are undertaken at arms' length.</p> <p>Refer Note 48 to the standalone financial statements.</p>	<p>Our audit procedures on related party transactions included:</p> <ul style="list-style-type: none"> Assessed the key controls to identify and disclose related party relationships and transactions in accordance with the relevant accounting standard. Assessed compliances with the listing regulations and the regulations under Companies Act, 2013 including checking of approvals/scrutiny as specified in Sections 177 and 188 of the Companies Act, 2013 with respect to the related party transactions. Considered the adequacy and appropriateness of the disclosures in the standalone financial statements, including recoverability thereof, relating to the related party transactions.

	<ul style="list-style-type: none"> Inspected relevant ledgers, agreements and other information that may indicate the existence of related party relationships or transactions. Further, we also tested completeness of related parties with reference to the various registers maintained by the company statutorily. On a sample basis, tested Company's assessment of related party transactions for arms' length pricing.
<p>2. Provisions and contingent liabilities in relation to tax positions</p> <p>Company has received outstanding demands and show cause notices from various tax authorities.</p> <p>The Management have made judgements relating to the likelihood of an obligation arising and whether there is a need to recognize a provision or disclose a contingent liability. We therefore focused on this area as a result of uncertainty and potential material impact.</p> <p>Refer Note 41 to the standalone financial statements.</p>	<p>We have involved our tax experts to gain an understanding of the current status of the tax cases and monitored changes in the disputes by reading external opinions received by the company if any, where relevant to establish that the tax provisions had been appropriately adjusted to reflect the latest external developments.</p> <p>For Legal, regulatory and tax matters our procedures included the following:</p> <ul style="list-style-type: none"> ▶ Testing key controls surrounding litigation, regulatory and tax procedures. ▶ Performing substantive procedures on the underlying calculations supporting the provisions recorded. ▶ Where relevant, reading external legal opinions obtained by the management ▶ Discussing open matters with the litigation, regulator, general counsel and tax teams ▶ Assessing management's conclusions through understanding precedents set in similar cases. <p>Based on the evidence obtained, while noting the inherent uncertainty with such legal, regulatory and tax matters, we determined the level of provisioning and disclosure of contingent liabilities as at March 31,2021 to be appropriate.</p>

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

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

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

In connection with our audit of the standalone financial statements, our responsibility is to read the other

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

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

Management's Responsibility for the Standalone Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these



standalone financial statements that give a true and fair view of the financial position, financial performance, changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the accounting Standards specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate implementation and maintenance of accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the standalone financial statement that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

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

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

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

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

- Identify and assess the risks of material misstatement of the standalone financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal financial controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the standalone financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the company to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the standalone financial statements, including the disclosures, and whether the standalone financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- (c) Materiality is the magnitude of misstatements in the standalone financial statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonable knowledgeable user of the standalone financial statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the standalone financial statements.
- (d) We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.
- (e) We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.
- (f) From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the standalone financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report

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

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditor's Report) Order, 2016 ("the Order"), issued by the Central Government of India in terms of sub-section (11) of section 143 of the Companies Act, 2013, we give in "Annexure A" a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.
2. As required by Section 143(3) of the Act, we report that:
 - a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
 - b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
 - c) The Balance Sheet, the Statement of Profit and Loss including other comprehensive income, Statement of Changes in Equity and the statement of Cash Flow dealt with by this Report are in agreement with the books of account.
 - d) In our opinion, the aforesaid standalone financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.
 - e) On the basis of the written representations received from the directors as on 31st March, 2021 taken on record by the Board of Directors, none of the directors is disqualified as on 31st March, 2021 from being appointed as a director in terms of Section 164 (2) of the Act.



- f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B".
- g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended:
 - ii. The Company is not required to make any provision, as required under the applicable law or accounting standards, for material foreseeable losses on long-term contracts including derivative contracts.
 - iii. The Company is not required to transfer any amount to the Investor Education and Protection Fund.

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.

For **Alok Mittal & Associates**

Chartered Accountants

ICAI Firm Registration Number: 005717N

Alok Kumar Mittal

Partner

Membership Number: 071205

Place: New Delhi

Date: June 18, 2021

UDIN: 21071205AAAARC2557

ANNEXURE 'A' TO THE INDEPENDENT AUDITOR'S REPORT

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

- i. (a) The company is maintaining proper records showing full particulars including quantitative details and situation of fixed assets. Companies Act, 2013 in respect of the loans and investments made, and guarantees and security provided by it.
- (b) The company has a program of verification to cover all the items of fixed assets in a phased manner which, in our opinion, is reasonable having regard to the size of the Company and the nature of its assets. Pursuant to the programme, certain fixed assets have been physically verified by the management during the year and no material discrepancies were noticed on such physical verification. v. The Company has not accepted any deposits from the public within the meaning of Sections 73, 74, 75 and 76 of the Act and the Rules framed there under to the extent notified.
- (c) The title deeds of immovable properties, as disclosed in Note 3 & Note 4 on fixed assets to the standalone financial statements, are held in the name of the Company. vi. Pursuant to the rules made by the Central Government of India, the company is required to maintain cost records as specified under Section 148(1) of the Act in respect of its products. We have broadly reviewed the same, and are of the opinion that, prima facie, the prescribed accounts and records have been made and maintained. We have not made a detailed examination of the records with a view to determine whether they are accurate or complete.
- ii. According to the information available to us that physical verification of inventory has been conducted at reasonable intervals by the management and no material discrepancies is noticed on physical verification between the physical stocks and the book records. vii. (a) The Company has generally been regular in depositing undisputed statutory dues, including Provident Fund, Employees' State Insurance, Income-tax, Sales Tax, Service Tax, Goods and Service Tax, Customs Duty, Excise Duty, Value Added Tax, cess and other material statutory dues applicable to it to the appropriate authorities.
- iii. The Company has not granted any loans, secured or unsecured, to companies, firms, Limited Liability Partnerships or other parties covered in the register maintained under Section 189 of the Act. Therefore, the provisions of Clause 3(iii), (iii)(a), (iii)(b) and (iii)(c) of the said Order are not applicable to the Company. (b) There were no undisputed amounts payable in respect of Provident Fund, Employees' State Insurance, Income-tax, Sales Tax, Service Tax, Customs Duty, Excise Duty, Value Added Tax, Goods and Service Tax, cess and other material statutory dues in arrears as at March 31, 2021 for a period of more than six months from the date they became payable.
- iv. In our opinion, and according to the information and explanations given to us, the Company has complied with the provisions of Section 185 and 186 of the (c) The particulars of dues of Entry Tax as at March 31, 2021 which have not been deposited on account of dispute, are as follows:

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



- viii. According to the records of the Company examined by us and the information and explanation given to us, the company has not defaulted in repayment of loans or borrowings to any bank. Further, the company has not obtained any loan or borrowing from government or financial institution.
- ix. In our opinion and according to the information and explanations given to us, the Company has not raised any moneys by way of initial public offer or further public offer (including debt instruments). In our opinion and according to the information and explanations given to us, money raised by way of term loans have been applied by the company during the year for the purposes for which they were raised.
- x. During the course of our examination of the books and records of the Company, carried out in accordance with the generally accepted auditing practices in India, and according to the information and explanations given to us, we have neither come across any instance of material fraud by the Company or on the Company by its officers or employees, noticed or reported during the year, nor have we been informed of any such case by the Management. The Company has not given any guarantee for loans taken by others from bank or financial institutions.
- xi. The Company has paid/ provided for managerial remuneration during the year in accordance with the provisions of Section 197 read with Schedule V to the Act.
- xii. As the Company is not a Nidhi Company and the Nidhi Rules, 2014 are not applicable to it, the provisions of Clause 3(xii) of the Order are not applicable to the Company.
- xiii. The Company has entered into transactions with related parties in compliance with the provisions of Section 177 and 198 of the Act. The details of such

related party transactions have been disclosed in the Standalone Financial Statements as required under Indian Accounting Standard (Ind AS) 24, Related Party Disclosures specified under Section 133 of the Act, read with Rule 4 of the Companies (Indian Accounting Standards) Rules, 2015 (as amended).

- xiv. During the year, the Company has not made any preferential allotment or private placement of shares or fully or partly paid convertible debentures and hence reporting under clause 3 (xvi) of the order is not applicable to the company.
- xv. The Company has not entered into any non-cash transactions with its Directors or persons connected with him. Accordingly, the provisions of Clause 3(xv) of the Order are not applicable to the Company.
- xvi. The Company is not required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934. Accordingly, the provisions of Clause 3(xvi) of the Order are not applicable to the Company.

For **Alok Mittal & Associates**

Chartered Accountants

ICAI Firm Registration Number: 005717N

Alok Kumar Mittal

Partner

Membership Number: 071205

Place: New Delhi

Date: June 18, 2021

UDIN: 21071205AAAARC2557

ANNEXURE "B" TO THE INDEPENDENT AUDITOR'S REPORT

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

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

We have audited the internal financial controls over financial reporting of RAMA STEEL TUBES LIMITED ("the Company") as of March 31, 2021 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

Opinion

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

Management's Responsibility for Internal Financial Controls

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

Auditor's Responsibility

Our responsibility is to express an opinion on the internal financial controls over financial reporting of the Company

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

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

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

Meaning of Internal Financial Controls Over Financial Reporting

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

- (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the



transactions and dispositions of the assets of the company;

- (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and
- (3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Limitations of Internal Financial Controls Over Financial Reporting

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting

to future periods are subject to the risk that the internal financial control over financial reporting may be come in adequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

For **Alok Mittal & Associates**

Chartered Accountants

ICAI Firm Registration Number: 005717N

Alok Kumar Mittal

Partner

Membership Number: 071205

Place: New Delhi

Date: June 18, 2021

UDIN: 21071205AAAARC2557

STANDALONE BALANCE SHEET AS AT MARCH 31, 2021

(₹ in Lakhs)

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

As per our attached report of even date

For Alok Mittal & Associates

Chartered Accountants
Firm Reg. No. 005717N

Sd/-

Alok Kumar Mittal

Partner

Membership No. 071205

Place : Delhi

Date : June 18, 2021

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For and On Behalf of the Board

Sd/-

Naresh Kumar Bansal

(Managing Director)

DIN: 00119213

Sd/-

Rajeev Kumar Agarwal

(Chief Financial Officer)

Sd/-

Richi Bansal

(Director)

DIN: 00119206

Sd/-

Kapil Datta

(Company Secretary)



STANDALONE STATEMENT OF PROFIT OR LOSS

FOR THE YEAR ENDED MARCH 31, 2021

(₹ in Lakhs)

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

As per our attached report of even date

For Alok Mittal & Associates

Chartered Accountants
Firm Reg. No. 005717N

Sd/-

Alok Kumar Mittal

Partner

Membership No. 071205

Place : Delhi

Date : June 18, 2021

For and On Behalf of the Board

Sd/-

Naresh Kumar Bansal

(Managing Director)

DIN: 00119213

Sd/-

Rajeev Kumar Agarwal

(Chief Financial Officer)

Sd/-

Richi Bansal

(Director)

DIN: 00119206

Sd/-

Kapil Datta

(Company Secretary)

STANDALONE STATEMENT OF CASH FLOWS

FOR THE YEAR ENDED MARCH 31, 2021

(₹ in Lakhs)

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



(₹ in Lakhs)

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

Notes:

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

2 Figures in Bracket indicate cash outflow

See accompanying notes to the Standalone financial statements

As per our attached report of even date

For Alok Mittal & Associates

Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

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

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Kapil Datta
(Company Secretary)

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

a. Equity share capital

(₹ in Lakhs)

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

b. Other equity

(₹ in Lakhs)

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

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

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

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

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

As per our attached report of even date

For Alok Mittal & Associates

Chartered Accountants
Firm Reg. No. 005717N

Sd/-

Alok Kumar Mittal

Partner

Membership No. 071205

Place : Delhi

Date : June 18, 2021

For and On Behalf of the Board

Sd/-

Naresh Kumar Bansal

(Managing Director)

DIN: 00119213

Sd/-

Rajeev Kumar Agarwal

(Chief Financial Officer)

Sd/-

Richi Bansal

(Director)

DIN: 00119206

Sd/-

Kapil Datta

(Company Secretary)



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

1. Corporate Information

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

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

2.1 Basis of Preparation of financial Statements

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

2.2 Statement of compliance

The financial statements have been prepared in accordance with Indian Accounting Standard (Ind AS) notified under the Companies (Indian Accounting

Standards) Rules, 2015 read with Section 133 of the Companies Act, 2013.

2.3 Use of estimates

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

3. Significant Accounting Policies

3.1 Basis of Measurement

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

3.2 Investment in Joint Venture

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

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

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

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

Upon loss of significant influence over the joint venture, the Group measures and recognises any

retained investment at its fair value. Any difference between the carrying amount of the joint venture upon loss of significant and the fair value of the retained investment and proceeds from disposal is recognised in the Standalone Statement of Profit & Loss.

3.3 Property, Plant and Equipment (PPE)

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



3.4 Depreciation and Amortisation

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

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

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

- ii Property, plant and equipment (PPE) which are added/ disposed- of during the year, depreciation is provided on pro-rata basis from (up- to) the date on which the PPE is available for use (disposed-of).
- iii Assets residual values and useful lives are reviewed at each financial year end considering the physical condition of the assets and benchmarking analysis or whenever there are indicators for review of residual value and useful life adjusted prospectively, if appropriate. Freehold land is not depreciated. Lease hold land is amortised over the period of lease.
- iv Free-hold land are not subject to amortisation.

3.5 Impairment of non-financial assets

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

3.6 Cash and cash equivalents

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

3.7 Inventories

Inventories are carried in the balance sheet as follows:

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

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

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

Purchased Goods in transit Valued at cost.

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

3.8 Employee benefits

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

a) Defined contribution plan

- (I) Provident Fund: Contribution to the provident fund with the government at pre-determined rates is a defined contribution scheme and is charged to the statement of Profit and Loss. There are no other obligations other than contribution to PF Schemes
- (II) National pension scheme : Contribution to national pension scheme with the at predetermined rates is a defined contribution scheme and is charged to the statement of Profit and Loss when employees have rendered services entitling them to such benefit

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

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

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



3.9 Foreign currency reinstatement and translation

Initial Recognition:

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

Measurement of Foreign currency Items at reporting date:

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

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

3.10 Leases

As a lessee The Company's lease asset classes primarily consist of leases for land. The Company assesses whether a contract contains a lease, at inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company assesses whether: (i) the contract involves the use of an identified asset (ii) the Company has substantially all of the economic benefits from use of the asset through the period of the lease and (iii) the Company has the right to direct the use of the asset. At the date of commencement of the lease, the Company recognizes a right-of-use asset ("ROU") and a corresponding lease liability for all lease arrangements in which it is a lessee, except for

leases with a term of twelve months or less (short-term leases) and low value leases. For these short-term and low value leases, the Company recognizes the lease payments as an operating expense on a straight-line basis over the term of the lease.

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

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

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

3.11 Financial instruments

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

Subsequent measurement:

- i Financial assets carried at amortised cost:** A financial asset is subsequently measured at amortised cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.
- ii Financial assets carried at fair value through other comprehensive income:** A financial asset is subsequently measured at fair value through other comprehensive income if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.
- iii Financial assets at fair value through profit or loss:** A financial asset which is not classified in any of (i) & (ii) above categories are subsequently fair valued through profit or loss.
- v Financial Liabilities:** Financial liabilities are subsequently carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

De-recognition

The company de-recognises of financial assets when the contractual rights to receive cash flows from the financial asset expire or transfer the financial asset and transfer qualifies for de-recognition under IND AS 109. A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires. The difference between the carrying amount of

a financial liability that has been extinguished is recognised in profit or loss as other income.

Offsetting of financial instruments

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

3.12 Derivative financial instruments

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

3.13 Borrowing costs

- a) Borrowing costs that are attributable to the acquisition, construction, or production of a qualifying asset are capitalised as a part of the cost of such asset till such time the asset is ready for its intended use or sale. A qualifying asset is an asset that necessarily requires a substantial period of time to get ready for its intended use or sale.
- b) All other borrowing costs are recognised as expense in the period in which they are incurred.

3.14 Taxation

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



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

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

3.15 Revenue recognition and other income

- a) Revenue from the sale of goods and services are measured at the fair value of the consideration received or receivable, net of returns and allowances, trade discounts, rebates and incentives etc. Sales exclude Goods and Service Tax.
- b) Revenue from the sale of goods is recognised, when all the significant risks and rewards of ownership of the goods have passed to the buyer, the amount of revenue can be measured reliably and no significant uncertainty exists regarding the amount of Consideration that will be derived from the sales of goods.

- c) Revenue from Services is recognised as per terms of the contract with customers based on stage of completion when the outcome of the transaction involving rendering of services can be estimated reliably.
- d) Export benefits are accounted for in the year of exports based on eligibility and when there is no uncertainty in receiving the same and there is reasonable assurance that the Company will comply with the conditions attached to them.
- e) Other Income Interest income is recognised on a time proportion basis taking into account the amount outstanding and the rate applicable.

3.16 Government grants / Assistance

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

3.17 Dividend Distribution

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

3.18 Fair Value measurement

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

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

value disclosures, the Company has determined classes of assets & liabilities on the basis of the nature, characteristics and the risks of the asset or liability and the level of the fair value hierarchy as explained above.

3.19 Earnings per share

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

3.20 Provisions

- a) **Provisions** Provisions (excluding employee benefits) are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. If the effect of the time value of money is material, provisions are discounted using equivalent period government securities interest rate. Unwinding of the discount is recognised in the Statement of Profit and Loss as a finance cost. Provisions are reviewed at each balance sheet date and are adjusted to reflect the current best estimate.
- b) **Contingencies** Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain



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

3.21 Research and development costs

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

- a) The technical feasibility of completing the intangible asset so that the asset will be available for use or sale.
- b) Its intention to complete and its ability and intention to use or sell the asset
- c) How the asset will generate future economic benefits
- d) The availability of resources to complete the asset
- e) The ability to measure reliably the expenditure during development

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

4. Critical accounting estimates, assumptions and judgements

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

- a) **Property, plant and equipment - Useful lives of assets** The Company reviews the useful life of assets at the end of each reporting period. This reassessment may result in change in depreciation expenses in future periods.
- b) **Warranties** The Company generally offers Warranties for its consumer products and the liability towards warranty related costs are recognized in the year of sales or service provided to the customers. Management ascertain and measure the liability for warranty claims based on historical experience and trend. The assumptions made in relation to current year are consistent of those are in prior years.
- c) **Provision and Contingencies** A provision is recognised when the Company has a present obligation as a result of past events and it is probable that an outflow of resources will be required to settle the obligation in respect of which a reliable estimate can be made. Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made. Contingent liabilities are disclosed in the notes. Contingent assets are not recognised in the financial statements.

NOTE 3 : PROPERTY, PLANT AND EQUIPMENT

(₹ in Lakhs)

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

NOTE 4 : INVESTMENT PROPERTIES

(₹ in Lakhs)

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

**NOTE 5 : INTANGIBLE ASSETS**

(₹ in Lakhs)

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

NOTE 6 : RIGHT OF USE ASSETS

(₹ in Lakhs)

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

NOTE 7 : INVESTMENT IN SUBSIDIARIES, ASSOCIATES AND JOINT VENTURES

(₹ in Lakhs)

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

Details of Joint Ventures

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

The amounts recognised in the balance sheet are as follows:

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

NOTE 8 : INVESTMENTS

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

NOTE 9 : OTHER FINANCIAL ASSETS (NON-CURRENT)

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

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

NOTE 10 : OTHER NON-CURRENT ASSETS

(₹ in Lakhs)		
Particulars	As at March 31, 2021	As at March 31, 2020
Unsecured, considered good:		
Capital Advances	-	66.28
Total	-	66.28

**NOTE 11 : INVENTORIES**

(₹ in Lakhs)

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

NOTE 12(a) : TRADE RECEIVABLES

(₹ in Lakhs)

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

NOTE 12(b) : CASH AND CASH EQUIVALENTS

(₹ in Lakhs)

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

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

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

(₹ in Lakhs)

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

NOTE 13 : OTHER CURRENT ASSETS

(₹ in Lakhs)

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

NOTE 14 : SHARE CAPITAL:

(₹ in Lakhs)

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

B. RECONCILIATION OF NUMBER OF SHARES

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

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

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

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

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

NOTE 15 : OTHER EQUITY

(₹ in Lakhs)

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

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

**NOTE 16 : BORROWINGS**

(₹ in Lakhs)

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

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

- First Term loan against property (LAP) from bank outstanding amounting ₹402.97 Lakhs as at 31.03.2021 are payable in 110 monthly installments commencing from August 2014 to September 2023, carrying a floating interest rate linked with MCLR of bank (1 year MCLR : 8.35% plus 0.95 % p.a.) with periodical interest reset.
- Second topup term loan against property (LAP) from bank outstanding amounting ₹ 119.62 Lakhs as at 31.03.2021 are payable in 121 monthly installments commencing from May 2017 to May 2027, carrying a floating interest rate linked with MCLR of bank (1 year MCLR: 8.35% plus 1.40 % p.a.) with periodical interest reset.
- Third topup term loan against property (LAP) from bank outstanding amounting ₹214.95 Lakhs as at 31.03.2021 are payable in 120 monthly installments commencing from Nov 2018 to Oct 2028, carrying a floating interest rate linked with MCLR of bank (1 year MCLR: 7.40% plus 0.95 % p.a.) with periodical interest reset.
- Term loan for plant expansion from bank outstanding amounting ₹ 531.96 Lakhs as at 31.03.2021 are payable in 26 equal monthly installments of ₹ 20 Lakhs each commencing from July 2021 to September 2023 and last 1 installment of ₹ 13 Lakhs with rate of interest 10% p.a. at year end.
- First Vehicle term loan from bank outstanding amounting ₹ 15.80 Lakhs as at 31.03.2021 are payable in 60 monthly installments commencing from March 2017 to Feb 2022 with rate of interest 9.75% p.a. at year end.
- Second Vehicle term loan from bank outstanding amounting ₹9.64 Lakhs as at 31.03.2021 are payable in 60 monthly installments commencing from October 2019 to Sept 2024 with rate of interest 9.05% p.a

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

NOTE 17 : OTHER FINANCIAL LIABILITIES (NON CURRENT)

(₹ in Lakhs)

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

NOTE 18 : PROVISIONS (NON CURRENT)

(₹ in Lakhs)

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

NOTE 19 : DEFERRED TAX ASSETS/LIABILITIES(NET)

(₹ in Lakhs)

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

NOTE 20(a) : BORROWINGS (CURRENT)

(₹ in Lakhs)

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

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

**NOTE 20(b) : TRADE PAYABLES**

(₹ in Lakhs)

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

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

(₹ in Lakhs)

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

NOTE 21 : PROVISIONS (CURRENT)

(₹ in Lakhs)

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

NOTE 22 : OTHER CURRENT LIABILITIES

(₹ in Lakhs)

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

NOTE 23 : CURRENT TAX LIABILITIES (NET)

(₹ in Lakhs)

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

NOTE 24 : REVENUE FROM OPERATIONS

(₹ in Lakhs)

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

NOTE 25 : OTHER INCOME

(₹ in Lakhs)

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

NOTE 26 : COST OF MATERIALS CONSUMED

(₹ in Lakhs)

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

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

(₹ in Lakhs)

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

NOTE 28 : EMPLOYEE BENEFIT EXPENSES

(₹ in Lakhs)

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

NOTE 29 : FINANCE COST

(₹ in Lakhs)

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

NOTE 30 : DEPRECIATION AND AMORTISATION

(₹ in Lakhs)

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

NOTE 31: OTHER EXPENSES

(₹ in Lakhs)

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

NOTE 32 : TAX EXPENSE

(₹ in Lakhs)

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



33. FINANCIAL RISK MANAGEMENT

Financial Risk Factors

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

i) Market Risk

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

ii) Credit Risk

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

iii) Liquidity Risk

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

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

Market Risk

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

(a) Foreign exchange risk and sensitivity

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

(₹ in Lakhs)

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

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

Particulars of forward contracts taken during the year are given below

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

Summary of exchange difference accounted in Statement of Profit & Loss

(₹ in Lakhs)

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

(b) Interest rate risk and sensitivity

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

Interest rate

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

(₹ in Lakhs)

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

(c) Commodity price risk and sensitivity

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

Credit Risk

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



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

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

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

Liquidity Risk

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

Maturity profile of financial liabilities

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

(₹ in Lakhs)

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

(₹ in Lakhs)

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

Capital Risk Management

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

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

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

(₹ in Lakhs)

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

34. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES

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

(₹ in Lakhs)

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

Fair Value Hierarchy

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

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

1. Level 1: Quoted prices/ NAV for Identical instruments in an active market.
2. Level 2: Directly or indirectly observable market inputs, other than level 1 inputs; and



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

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

Fair Value Technique

- 1) The carrying amounts of trade receivables, trade payables and cash and cash equivalents are considered to be the same as their fair values due to their short term nature.
- 2) The fair value of security deposit given was calculated based on cash flows discounted using the current lending rate. They are classified as a level 2 fair values in the fair value hierarchy due to the inclusion of unobservable inputs including counterparty credit risk.
- 3) For financial assets and liabilities that are measured at fair value, the carrying amounts are equal to the fair values.

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

Assets/ Liabilities measured at fair value (Accounted)

(₹ in Lakhs)

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

(₹ in Lakhs)

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

(₹ in Lakhs)

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

(₹ in Lakhs)

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

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

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

(a) Assets/ Liabilities measured at Fair value

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

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

35. SEGMENT REPORTING

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

36. INCOME TAX EXPENSES

(₹ in Lakhs)

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

Effective Tax Reconciliation

(₹ in Lakhs)

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



37. DEFERRED TAX

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

(₹ in Lakhs)

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

Component of tax accounted in OCI

(₹ in Lakhs)

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

38. RETIREMENT BENEFIT OBLIGATION

I. Expenses recognised for Defined Contribution plan

(₹ in Lakhs)

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

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

II. Movement in Defined benefit obligation

(₹ in Lakhs)

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

III. Movement in Plan Assets-Gratuity

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

IV. Recognised in Profit & Loss

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

V. Recognised in other comprehensive income

Particulars	(₹ in Lakhs)	
	Employee Benefit Expenses	
Remeasurement-Actuarial (loss)/gain	1.11	
For the year ended March 31, 2020	1.11	
Remeasurement-Actuarial (loss)/ gain	(8.76)	
For the year ended March 31, 2021	(8.76)	



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

(₹ in Lakhs)

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

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

VII. Sensitivity Analysis:-

For the year ended March 31, 2021

(₹ in Lakhs)

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

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

For the year ended March 31, 2020

(₹ in Lakhs)

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

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

VIII. History of experience adjustments is as follows:

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

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

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

IX. Statement of Employee benefit provision

Particulars	(₹ in Lakhs)	
	Year ended March 31, 2021	Year ended March 31, 2020
Gratuity	74.76	73.01
Compensated absences	10.89	8.15
Other employee benefits	-	-
Total	85.65	81.16

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

For the year ended March 31, 2021

Particulars	(₹ in Lakhs)	
	Gratuity	Compensated absence
Current Provision	29.09	4.13
Non Current Provision	45.67	6.76
Total Provision	74.76	10.89

For the year ended March 31, 2020

Particulars	(₹ in Lakhs)	
	Gratuity	Compensated absence
Current Provision	26.58	2.96
Non Current Provision	46.43	5.19
Total Provision	73.01	8.15



XI. Employee benefits expenses

(₹ in Lakhs)

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

(Figures in no.)

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

OCI presentation of defined benefit plan

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

Presentation in Statement of Profit and Loss and Balance Sheet

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

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

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

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

39. OTHER DISCLOSURES

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

(₹ in Lakhs)

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

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

- b) The company has not proposed any dividend to its shareholders during the year.
- c) The Company has not given any loan or given any guarantee with respect to the parties covered under section 186 (4) of the Companies Act, 2013.
- d) Certain balances of trade receivables, loan and advances, trade payable and other liabilities are subject to confirmation and / or reconciliation.

40. EXPENDITURE INCURRED ON CORPORATE SOCIAL RESPONSIBILITY:

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

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

41. CONTINGENT LIABILITIES NOT PROVIDED FOR IN RESPECT OF:

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



42. There are no amounts due and outstanding to be credited to Investor Education and Protection Fund as at March, 2021.
43. Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances) is ₹ NIL (Previous Year ₹ NIL).
44. Exceptional item consists of Loss (Net) of ₹ NIL (Previous year Loss (Net) of ₹ NIL on the provision of employees benefits pertaining to previous years.
45. Based on the intimation received from supplier regarding their status under the Micro, Small and Medium Enterprises Development Act, 2006, the required disclosure is given below:-

(₹ in Lakhs)

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

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

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

(₹ in Lakhs)

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

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

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

Included in the Financial Statements as

(₹ in Lakhs)

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

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

(₹ in Lakhs)

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

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

(₹ in Lakhs)

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

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

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

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

48. RELATED PARTY TRANSACTIONS

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



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

List of related parties

1. A. Key Management Personnel

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

B. Non-executive and Independent Directors

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

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

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

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

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

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

(₹ in Lakhs)

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



(₹ in Lakhs)

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

Compensation of Key Management Personnel of the Company

(₹ in Lakhs)

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

- *A. Short-term benefits comprises the expenses recorded under the head employee benefit expenses (eg. Salary and wages, contribution to provident and other funds and staff welfare expenses).
- B. The liability for gratuity and compensated absences are provided on actuarial basis for the Company as a whole, amounts accrued pertaining to key managerial personnel are not included above.
- C. The remuneration of directors and key executives is determined by the remuneration committee having regard to the performance of individuals and market trends.
5. Balance at the end of the year

(₹ in Lakhs)

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

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

49. EARNING PER SHARE (EPS)

(₹ in Lakhs)

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

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

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

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



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

- 52.** The Company has evaluated the impact of COVID pandemic on the operations of the Company, revenue, inventories, investments, property, plant & equipment, current borrowings and trade payables. The management has considered the possible effects, if any, on the carrying amounts of these assets and liabilities up to the date of approval of these results. As per the management's current assessment, no significant impact on carrying amounts of inventories, tangible assets, trade receivables, investments and other financial assets is expected, and management continue to monitor changes in future economic conditions. The company values its inventory of finished goods at lower of cost and Net realisable value. The Net realisable value of all the inventories of the company is higher than their cost based on subsequent sales taken place till date and their present market prices. Hence there is no impairment risk in the inventory.
- 53.** Previous year figures have been regrouped/ rearranged, wherever considered necessary to conform to current year's classification.
- 54.** Notes 1 to 52 are annexed to and form an integral part of financial statements.

As per our attached report of even date

For Alok Mittal & Associates

Chartered Accountants
Firm Reg. No. 005717N

Sd/-

Alok Kumar Mittal

Partner

Membership No. 071205

Place : Delhi

Date : June 18, 2021

For and On Behalf of the Board

Sd/-

Naresh Kumar Bansal

(Managing Director)

DIN: 00119213

Sd/-

Rajeev Kumar Agarwal

(Chief Financial Officer)

Sd/-

Richi Bansal

(Director)

DIN: 00119206

Sd/-

Kapil Datta

(Company Secretary)

**CONSOLIDATED
FINANCIAL
STATEMENTS**



INDEPENDENT AUDITOR'S REPORT

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

Opinion

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

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid consolidated financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Group as at March 31, 2021, and profits, changes in equity and its cash flows for the year ended on that date.

Basis for Opinion

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

issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the consolidated financial statements under the provisions of the Companies Act, 2013 and the Rules thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on the consolidated financial statements.

Emphasis of Matter

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

Key Audit Matters

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

Key Audit Matter	Auditor's Response
<p>1. Related Party Transactions</p> <p>The Company has entered into several transactions with related parties during the year 2020-21. We identified related party transactions as a key audit matter because of risks with respect to completeness of disclosures made in the consolidated financial statements including recoverability thereof; compliance with statutory regulations governing relate party relationships such as the Companies Act, 2013 and SEBI Regulations and the judgement involved in assessing whether transactions with related parties are undertaken at arms' length.</p> <p>Refer Note 48 to the consolidated financial statements.</p>	<p>Our audit procedures on related party transactions included:</p> <ul style="list-style-type: none"> Assessed the key controls to identify and disclose related party relationships and transactions in accordance with the relevant accounting standard. Assessed compliances with the listing regulations and the regulations under Companies Act, 2013 including checking of approvals/scrutiny as specified in Sections 177 and 188 of the Companies Act, 2013 with respect to the related party transactions. Considered the adequacy and appropriateness of the disclosures in the consolidated financial statements, including recoverability thereof, relating to the related party transactions.

	<ul style="list-style-type: none"> • Inspected relevant ledgers, agreements and other information that may indicate the existence of related party relationships or transactions. Further, we also tested completeness of related parties with reference to the various registers maintained by the company statutorily. • On a sample basis, tested Company's assessment of related party transactions for arms' length pricing.
<p>2. Provisions and contingent liabilities in relation to tax positions</p> <p>Company has received outstanding demands and show cause notices from various tax authorities.</p> <p>The Management have made judgements relating to the likelihood of an obligation arising and whether there is a need to recognize a provision or disclose a contingent liability. We therefore focused on this area as a result of uncertainty and potential material impact.</p> <p>Refer Note 41 to the consolidated financial statements.</p>	<p>We have involved our tax experts to gain an understanding of the current status of the tax cases and monitored changes in the disputes by reading external opinions received by the company if any, where relevant to establish that the tax provisions had been appropriately adjusted to reflect the latest external developments.</p> <p>For Legal, regulatory and tax matters our procedures included the following:</p> <ul style="list-style-type: none"> ▶ Testing key controls surrounding litigation, regulatory and tax procedures. ▶ Performing substantive procedures on the underlying calculations supporting the provisions recorded. ▶ Where relevant, reading external legal opinions obtained by the management ▶ Discussing open matters with the litigation, regulator, general counsel and tax teams ▶ Assessing management's conclusions through understanding precedents set in similar cases. <p>Based on the evidence obtained, while noting the inherent uncertainty with such legal, regulatory and tax matters, we determined the level of provisioning and disclosure of contingent liabilities as at March 31,2021 to be appropriate.</p>

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

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

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

In connection with our audit of the consolidated

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

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

Management's Responsibility for the Consolidated Financial Statements

The Holding Company's management and Board of



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

The respective management and Board of Directors of the companies included in the group are responsible for maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of each company and for preventing and detecting frauds and other irregularities; selection and application of appropriate implementation and maintenance of accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the consolidated financial statement that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, the respective Board of Directors of the companies included in the Group are responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate or to cease operations, or has no realistic alternative but to do so. The respective Board of Directors of the companies included in the Group are also responsible for overseeing the Group's financial reporting process.

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

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an

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

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

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

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

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

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

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

We communicate with those charged with governance of the Holding Company and such other entities included in the consolidated financial statements of which we are the independent auditors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including

any significant deficiencies in internal control that we identify during our audit.

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

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

Other Matters

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

Report on Other Legal and Regulatory Requirements

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



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

- a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit of the aforesaid Consolidated Financial Statements.
- b) In our opinion, proper books of account as required by law relating to preparation of the aforesaid consolidated financial statements have been kept so far as it appears from our examination of those books, returns and the reports of the other auditor.
- c) The Consolidated Balance Sheet, the Consolidated Statement of Profit and Loss (including other consolidated comprehensive income), Consolidated Statement of Changes in Equity and the consolidated statement of Cash Flow dealt with by this Report are in agreement with the relevant books of account maintained for the purpose of preparation of the consolidated financial statements.
- d) In our opinion, the aforesaid consolidated financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.
- e) On the basis of the written representations received from the directors of the Holding Company as on 31 March 2021 taken on record by the Board of Directors of the Holding Company and the reports of the statutory auditors of its subsidiary companies, none of the directors of the Group companies are disqualified as on 31 March 2021 from being appointed as a director in terms of section 164(2) of the Act.
- f) With respect to the adequacy of the internal financial controls over financial reporting of the Group and the operating effectiveness of such controls, refer to our separate Report in "Annexure A".

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

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

- h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:
 - i. The Group has disclosed the impact of pending litigations on its financial position in its consolidated financial statements.
 - ii. The Group is not required to make any provision, as required under the applicable law or accounting standards, for material foreseeable losses on long-term contracts including derivative contracts.
 - iii. The Group is not required to transfer any amount to the Investor Education and Protection Fund.

For **Alok Mittal & Associates**

Chartered Accountants

ICAI Firm Registration Number: 005717N

Alok Kumar Mittal

Partner

Membership Number: 071205

Place: New Delhi

Date: June 18, 2021

UDIN: 21071205AAAAUJ9802

ANNEXURE "A" TO THE INDEPENDENT AUDITOR'S REPORT

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

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

Opinion

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

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

Management's Responsibility for Internal Financial Controls

The respective company's management and board of directors are responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the respective company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India. These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and

efficient conduct of its business, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditor's Responsibility

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

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

We believe that the audit evidence we have obtained and the audit evidence obtained by the auditor of the subsidiaries (which are incorporated in India) and associates, in terms of their report referred to in other matters paragraph



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

Meaning of Internal Financial Controls Over Financial Reporting

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

- (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;
- (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and
- (3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Limitations of Internal Financial Controls Over Financial Reporting

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

For **Alok Mittal & Associates**

Chartered Accountants

ICAI Firm Registration Number: 005717N

Alok Kumar Mittal

Partner

Membership Number: 071205

Place: New Delhi

Date: June 18, 2021

UDIN: 21071205AAAAUJ9802

CONSOLIDATED BALANCE SHEET AS AT MARCH 31, 2021

(₹ in Lakhs)

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

See accompanying notes to the Consolidated financial statements

As per our attached report of even date

For Alok Mittal & Associates

Chartered Accountants

Firm Reg. No. 005717N

Sd/-

Alok Kumar Mittal

Partner

Membership No. 071205

For and On Behalf of the Board

Sd/-

Naresh Kumar Bansal

(Managing Director)

DIN: 00119213

Sd/-

Rajeev Kumar Agarwal

(Chief Financial Officer)

Sd/-

Richi Bansal

(Director)

DIN: 00119206

Sd/-

Kapil Datta

(Company Secretary)

Place : Delhi

Date : June 18, 2021



CONSOLIDATED STATEMENT OF PROFIT OR LOSS

FOR THE YEAR ENDED MARCH 31, 2021

(₹ in Lakhs)

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

See accompanying notes to the Consolidated financial statements

As per our attached report of even date

For Alok Mittal & AssociatesChartered Accountants
Firm Reg. No. 005717N

Sd/-

Alok Kumar Mittal

Partner

Membership No. 071205

Place : Delhi

Date : June 18, 2021

For and On Behalf of the Board

Sd/-

Naresh Kumar Bansal

(Managing Director)

DIN: 00119213

Sd/-

Rajeev Kumar Agarwal

(Chief Financial Officer)

Sd/-

Richi Bansal

(Director)

DIN: 00119206

Sd/-

Kapil Datta

(Company Secretary)

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

(₹ in Lakhs)

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



(₹ in Lakhs)

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

Notes:

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

See accompanying notes to the Standalone financial statements

As per our attached report of even date

For Alok Mittal & AssociatesChartered Accountants
Firm Reg. No. 005717N

Sd/-

Alok Kumar Mittal

Partner

Membership No. 071205

Place : Delhi

Date : June 18, 2021

For and On Behalf of the Board

Sd/-

Naresh Kumar Bansal

(Managing Director)

DIN: 00119213

Sd/-

Rajeev Kumar Agarwal

(Chief Financial Officer)

Sd/-

Richi Bansal

(Director)

DIN: 00119206

Sd/-

Kapil Datta

(Company Secretary)

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

a. Equity share capital

(₹ in Lakhs)

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

b. Other equity

(₹ in Lakhs)

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

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

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

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

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

For Alok Mittal & Associates

Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

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

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Kapil Datta
(Company Secretary)



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

1. Corporate Information

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

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

2.1 Basis of Preparation of financial Statements

These financial statements are prepared in accordance with Indian Accounting Standards (Ind AS) under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair values, the provisions of the Companies Act, 2013 ('the Act') (to the extent notified) and guidelines issued by the Securities and Exchange Board of India (SEBI). The Ind AS are prescribed under Section 133 of the Act read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 and Companies (Indian Accounting Standards) Amendment Rules, 2016. Accounting policies have

been consistently applied except where a newly-issued accounting standard is initially adopted or a revision to an existing accounting standard requires a change in the accounting policy hitherto in use.

2.2 Statement of compliance

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

2.3 Use of estimates

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

3. Significant Accounting Policies

3.1 Basis of Measurement

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

3.2 Basis of Consolidation

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

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

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

- a) The Contractual arrangement with the other vote holders of the investee;
- b) The rights arising from other contractual arrangements;

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

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

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

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

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



Subsidiary:

- a) Combine like items of assets, liabilities, equity, income, expenses and cash flows of the parent with those of its subsidiaries. For this purpose, income and expenses of the subsidiary are based on the amounts of the assets and liabilities recognised in the consolidated financial statements at the acquisition date;
- b) Offset (eliminate) the carrying amount of the parent's investment in each subsidiary and the parent's portion of equity of each subsidiary. Business combinations policy explains how to account for any related goodwill and
- c) Eliminate in full intragroup assets and liability, equity, income, expenses and cash flows relating to transactions between entities of the group (profits or losses resulting from intragroup transactions that are recognised in assets, such as inventory and fixed assets, are eliminated in full). Ind AS 12 "Income Taxes" applies to temporary differences that arise from the elimination of profits and losses resulting from intragroup transactions.

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

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

- Derecognises the assets (including goodwill) and liabilities of the subsidiary;
- Derecognises the carrying amount of any non-controlling interests;
- Derecognises the cumulative translation differences recorded in equity;
- Recognises the fair value of the consideration received;

- Recognises the fair value of any investment retained;
- Recognises any surplus or deficit in Consolidated Statement of Profit and Loss;
- Reclassifies the parent's share of components previously recognised in OCI to profit or loss or retained earnings, as appropriate, as would be required if the Group had directly disposed of the related assets or liabilities.

Associates / Joint Venture:

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

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

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

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

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

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

3.3 Property, Plant and Equipment (PPE)

Property, plant and equipment are stated at cost, net of accumulated depreciation and accumulated impairment losses, if any. Cost comprises of the purchase price (net of GST credits / duty credits wherever applicable) and all direct costs attributable to bringing the asset to its working condition for intended use and includes the borrowing costs for qualifying assets and the initial estimate of restoration cost if the recognition criteria is met. All other repair and maintenance costs are recognised in the statement of profit and loss as incurred. Software and licences which are integral part of the PPE are capitalised along with respective PPE. An item of property, plant & equipment is de-recognised upon disposal or when no future economic benefits are expected from its use or disposal. The gain or loss arising on the disposal or retirement of an item of property, plant and equipment is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognised in the Statement of Profit and Loss on the date of disposal or retirement. Capital work-in-progress includes cost of property, plant and equipment under installation / under development as at the balance sheet date. Advances paid towards the acquisition of property, plant and equipment outstanding at each balance of profit and loss if there has been a change in the

estimates used to determine the recoverable amount. The carrying amount of the asset is increased to its revised recoverable amount, provided that this amount does not exceed the carrying amount that would have been determined (net of any accumulated amortization or depreciation) had no impairment loss been recognised for the asset in prior years. A reversal of impairment loss is recognised immediately in Statement of Profit and Loss.

3.4 Depreciation and Amortisation

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

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

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

- ii Property, plant and equipment (PPE) which are added/ disposed- of during the year, depreciation is provided on pro-rata basis from (up- to) the date on which the PPE is available for use (disposed-of).
- iii Assets residual values and useful lives are reviewed at each financial year end considering



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

- iv Free-hold land are not subject to amortisation.

3.5 Impairment of non-financial assets

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

3.6 Cash and cash equivalents

Cash and cash equivalents includes cash on hand and at bank, deposits held at call with banks, other short-term highly liquid investments with original maturities of three months or less that are readily convertible to a known amount of cash and are

subject to an insignificant risk of changes in value and are held for the purpose of meeting short-term cash commitments. The cash flow statement has been prepared under the indirect method as set out in Indian Accounting Standard (IND AS) 7 statement of cash flows.

3.7 Inventories

Inventories are carried in the balance sheet as follows:

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

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

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

Purchased Goods in transit Valued at cost.

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

3.8 Employee benefits

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

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

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

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

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

d) Other Short-term employee benefits: All employee benefits payable wholly within twelve months rendering services are classified as short term employee benefits. Benefits such as salaries, wages, short-term compensated

absences, performance incentives etc.and the expected cost of bonus, ex-gratia are recognised during the period in which the employee renders related service.

3.9 Foreign currency reinstatement and translation

Initial Recognition:

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

Measurement of Foreign currency Items at reporting date:

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

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

Translation of Financial Statements of Foreign entities:

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



Consolidated Statement of Profit and Loss.

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

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

3.10 Leases

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

Certain lease arrangements includes the options to

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

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

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

3.11 Financial instruments

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

Subsequent measurement:

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

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

- ii Financial assets carried at fair value through other comprehensive income:** A financial asset is subsequently measured at fair value through other comprehensive income if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.
- iii Financial assets at fair value through profit or loss:** A financial asset which is not classified in any of (i) & (ii) above categories are subsequently fair valued through profit or loss.
- iv Financial Liabilities:** Financial liabilities are subsequently carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

De-recognition

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

Offsetting of financial instruments

Financial assets and financial liabilities are offset and the net amount is reported in the balance sheet if there is a currently enforceable legal right to offset

the recognised amounts and there is an intention to settle on a net basis, to realise the assets and settle the liabilities simultaneously.

3.12 Derivative financial instruments

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

3.13 Borrowing costs

- a) Borrowing costs that are attributable to the acquisition, construction, or production of a qualifying asset are capitalised as a part of the cost of such asset till such time the asset is ready for its intended use or sale. A qualifying asset is an asset that necessarily requires a substantial period of time to get ready for its intended use or sale.
- b) All other borrowing costs are recognised as expense in the period in which they are incurred.

3.14 Taxation

- i Income tax expense represents the sum of current tax and deferred tax. Tax is recognised in the Statement of Profit and Loss, except to the extent that it relates to items recognised directly in equity or other comprehensive income.
- ii Current tax provision is computed on Income calculated after considering allowances and exemptions under the provisions of the applicable Income Tax Laws.
- iii Provision for current income taxes and advance taxes paid are presented in the balance sheet after offsetting them on an assessment year basis.



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

3.15 Revenue recognition and other income

- a) Revenue from the sale of goods and services are measured at the fair value of the consideration received or receivable, net of returns and allowances, trade discounts, rebates and incentives etc. Sales exclude Goods and Service Tax.
- b) Revenue from the sale of goods is recognised, when all the significant risks and rewards of ownership of the goods have passed to the buyer, the amount of revenue can be measured reliably and no significant uncertainty exists regarding the amount of Consideration that will be derived from the sales of goods.
- c) Revenue from Services is recognised as per terms of the contract with customers based on stage of completion when the outcome of the transaction involving rendering of services can be estimated reliably.
- d) Export benefits are accounted for in the year of exports based on eligibility and when there is no uncertainty in receiving the same and there

- is reasonable assurance that the Company will comply with the conditions attached to them.
- e) Other Income Interest income is recognised on a time proportion basis taking into account the amount outstanding and the rate applicable.

3.16 Government grants / Assistance

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

3.17 Dividend Distribution

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

3.18 Fair Value measurement

The Company measures financial instruments at fair value at each balance sheet date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either: In the principal market for the asset or liability, or In the absence of a principal market, in the most advantageous market for the asset or liability The principal or the most advantageous market must be accessible by the Company. The fair value of an asset ora liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest. A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits

by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use. The Company uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs. All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

Level 1: Quoted (unadjusted) prices in active markets for identical assets and liabilities

Level 2: Other techniques for which all inputs which have a significant effect on the recorded fair value are observable either directly or indirectly

Level 3: Techniques which use inputs that have a significant effect on the recorded fair value that are not based on observable market data. For assets and liabilities that are recognised in the financial statements on a recurring basis, the Company determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period. For the purpose of fair value disclosures, the Company has determined classes of assets & liabilities on the basis of the nature, characteristics and the risks of the asset or liability and the level of the fair value hierarchy as explained above.

3.19 Earnings per share

Basic earnings per equity share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares outstanding during the year. Diluted earnings per equity share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares considered for deriving

basic earnings per equity share and also the weighted average number of equity shares that could have been issued upon conversion of all dilutive potential equity shares.

3.20 Provisions

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

b) Contingencies Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made. Information on contingent liability is disclosed in the Notes to the Financial Statements. Contingent assets are not recognised. However, when the realisation of income is virtually certain, then the related asset is no longer a contingent asset, but it is recognised as an asset.

3.21 Research and development costs

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



Company can demonstrate:

- a) The technical feasibility of completing the intangible asset so that the asset will be available for use or sale.
- b) Its intention to complete and its ability and intention to use or sell the asset
- c) How the asset will generate future economic benefits
- d) The availability of resources to complete the asset
- e) The ability to measure reliably the expenditure during development

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

4. Critical accounting estimates, assumptions and judgements

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

- a) **Property, plant and equipment - Useful lives of assets** The Company reviews the useful life of assets at the end of each reporting period. This reassessment may result in change in depreciation expenses in future periods.
- b) **Warranties** The Company generally offers Warranties for its consumer products and the liability towards warranty related costs are recognized in the year of sales or service provided to the customers. Management ascertain and measure the liability for warranty claims based on historical experience and trend. The assumptions made in relation to current year are consistent of those are in prior years.
- c) **Provision and Contingencies** A provision is recognised when the Company has a present obligation as a result of past events and it is probable that an outflow of resources will be required to settle the obligation in respect of which a reliable estimate can be made. Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made. Contingent liabilities are disclosed in the notes. Contingent assets are not recognised in the financial statements.

NOTE 3 : PROPERTY, PLANT AND EQUIPMENT

(₹ in Lakhs)

Particulars	Freehold Land	Buildings	Furniture and Fixtures	Plant & Equipment	Office Equipment	Elect. Fitting & Installation	Computers - Hardware	Vehicle	Capital Work-in Progress	Total
Year ended 31 March, 2021										
Gross Carrying Amount										
Gross Carrying Cost as of April 1, 2020	478.47	820.24	59.20	2,918.22	36.80	35.72	11.55	89.35	678.97	5,128.52
Additions during the year	-	641.61	0.62	663.31	2.06	0.06	5.00	52.70	1,026.28	2,391.65
Diposals during the year	-	-	-	15.55	-	-	-	0.83	1,272.38	1,288.76
Closing Gross carrying amount	478.47	1,461.86	59.82	3,565.98	38.86	35.78	16.55	141.22	432.87	6,231.41
Accumulated Depreciation										
As at April 1, 2020	-	97.03	12.83	717.82	15.13	15.90	7.02	32.75	-	898.47
Depreciation charged during the year	-	33.60	9.57	236.27	5.86	3.34	1.07	22.59	-	312.30
Disposals during the year	-	-	-	10.28	-	-	-	0.41	-	10.70
Closing accumulated depreciation	-	130.64	22.40	943.80	20.98	19.25	8.09	54.93	-	1,200.08
Net carrying value as on March 31, 2021	478.47	1,331.22	37.42	2,622.17	17.88	16.54	8.47	86.29	432.87	5,031.33

NOTE 4 : INVESTMENT PROPERTIES

(₹ in Lakhs)

Particulars	Freehold Land	Buildings	Plant and Equipments	Furniture and Fixtures	Office Equipments	Elect. Fitting & Installation	Total
Year ended 31 March, 2021							
Gross Carrying Amount							
Gross Carrying Cost as of April 1, 2020	95.06	295.59	16.79	6.05	6.96	15.05	435.49
Additions during the year	-	36.00	-	-	-	-	36.00
Diposals during the year	-	-	-	-	-	-	-
Closing Gross carrying amount	95.06	331.59	16.79	6.05	6.96	15.05	471.49
Accumulated Depreciation							
As at April 1, 2020	-	49.39	4.56	3.64	5.11	9.29	71.98
Depreciation charged during the year	-	10.96	1.27	0.91	-	2.24	15.38
Disposals during the year	-	-	-	-	-	-	-
Closing accumulated depreciation	-	60.35	5.82	4.55	5.11	11.53	87.36
Net carrying value as on March 31, 2021	95.06	271.24	10.97	1.50	1.85	3.52	384.13

**NOTE 5 : INTANGIBLE ASSETS**

(₹ in Lakhs)

Particulars	Computer Software	Total
Year ended March 31, 2021		
Gross Carrying Amount		
Deemed Cost as of April 1, 2020	15.55	15.55
Additions during the year	1.50	1.50
Diposals during the year	-	-
Closing Gross carrying amount	17.05	17.05
Accumulated Depreciation		
Opening	13.33	13.33
Depreciation charge during the year	0.59	0.59
Disposals during the year	-	-
Closing accumulated depreciation	13.92	13.92
Net carrying value as on March 31, 2021	3.14	3.14

NOTE 6 : RIGHT OF USE ASSETS

(₹ in Lakhs)

Particulars	Land	Commercial Vehicles	Total
Balance as at April 1, 2020	65.24	96.75	162.00
Depreciation/Amortisation	1.59	16.02	17.61
Net carrying value as on March 31, 2021	63.65	80.74	144.39

NOTE 7 : INVESTMENT IN SUBSIDIARIES, ASSOCIATES AND JOINT VENTURES

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Investment in Joint Venture		
M/s Pir Panchal Construction Pvt. Ltd. Joint Venture	825.56	685.13
	825.56	685.13

Details of Joint Ventures

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

The amounts recognised in the balance sheet are as follows:

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

NOTE 8 : INVESTMENTS

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

NOTE 9 : OTHER FINANCIAL ASSETS (NON-CURRENT)

Particulars	(₹ in Lakhs)	
	As at March 31, 2021	Asat March 31, 2020
Security Deposits	104.57	100.36
Loans to Others	655.24	593.80
Bank Deposits with maturity period more than 12 months*	452.87	128.90
Total	1,212.68	823.07

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

NOTE 10 : OTHER NON-CURRENT ASSETS

Particulars	(₹ in Lakhs)	
	As at March 31, 2021	Asat March 31, 2020
Unsecured, considered good:		
Capital Advances	-	66.28
Unamortized Expenses	41.52	44.75
Total	41.52	111.03

NOTE 11 : INVENTORIES

Particulars	(₹ in Lakhs)	
	As at March 31, 2021	Asat March 31, 2020
Raw Materials	3,121.76	1,469.63
(Including material in-transit ₹544.52 Lakhs/- (As at 31st March, 2020 : ₹ NIL/-)		
Finished Goods	2,704.91	3,191.94
Work-in-progress	1,405.64	656.06
Scrap Material	21.45	37.22
Stores, spares and consumable	32.31	39.06
Total	7,286.07	5,393.90

**NOTE 12(a) : TRADE RECEIVABLES**

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Unsecured:		
Considered Good	5,225.58	7,214.99
Total	5,225.58	7,214.99

NOTE 12(b) : CASH AND CASH EQUIVALENTS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Balances with banks		
-Current Accounts	1,987.23	711.07
-In Fixed deposit accounts with original maturity of less than 3 months*	211.48	585.95
Cash in Hand	8.97	14.63
Total	2,207.68	1,311.65

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

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

(₹ in Lakhs)

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

NOTE 13 : OTHER CURRENT ASSETS

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Advances other than capital advances		
Advance to suppliers and others	282.60	2,021.10
Balance with Government Authorities	1,411.54	867.35
Prepaid Expenses	64.56	23.41
Other Receivables	612.11	519.81
Total	2,370.81	3,431.67

NOTE 14 : SHARE CAPITAL:

(₹ in Lakhs)

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

B. RECONCILIATION OF NUMBER OF SHARES

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

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

Name of Shareholder	As at March 31, 2021		As at March 31, 2020	
	Numbers of Shares held	% of holding	Numbers of Shares held	% of holding
Naresh Kumar Bansal	6,389,848	38.05	6,212,578	36.99
Richi Bansal	1,469,287	8.75	1,469,287	8.75
Nikhil Naresh Bansal	1,355,998	8.07	1,355,998	8.07
Tarun Dhir-Arun Enterprises (a Partnership Firm)	1,209,821	7.20	1,209,821	7.20

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

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

NOTE 15: OTHER EQUITY

Particulars	(₹ in Lakhs)	
	As at March 31, 2021	As at March 31, 2020
Securities Premium Account	2,176.20	2,176.20
General Reserve	1,277.28	1,277.28
Retained Earnings	5,452.47	4,208.04
Foreign Currency Translation Reserve	23.10	55.90
Capital Reserve	225.70	225.70
Total	9,154.75	7,943.12

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

NOTE 16: BORROWINGS

Particulars	(₹ in Lakhs)	
	As at March 31, 2021	As at March 31, 2020
Secured		
Term Loans from banks#	2,951.82	1,910.39
Less: Current Maturities transferred to Other financial liabilities	(359.20)	(342.02)
	2,592.62	1,568.37
Unsecured Loans		
Loan from Directors	343.58	187.06
Loans and Advances from Related Parties	61.51	59.94
	405.09	247.00
Total	2,997.71	1,815.37



Term loan against property (LAP) from banks is secured by way of mortgage of plot No 131, sector-44, Gurgaon & hypothecation of fixed assets of the Company and extension of charge by way of hypothecation of current assets of the Company. Another term loan from bank is secured by way of mortgage of land & building & hypothecation of fixed assets of the Company (movable & immovable) belonging to the unit set up at Anantpur District, Andhra Pradesh, present and future belonging to the company and extension of first charge by way of hypothecation of entire current assets of the company, present and future and guaranteed by personal guarantee by Mr. Naresh Kumar Bansal and Mr. Richi Bansal, Directors of the Company. Further secured by way of corporate guarantee by holding company-Rama Steel Tubes Limited. Another Term loan for plant expansion is secured by way of hypothecation of plant and machinery purchased from proposed term loan and factory land and Building at Survey No.155,H.No. 4A, Village Umbare, Taluka Khalapur, District Raigad-410203, Maharashtra. Vehicles loan is secured by way of hypothecation of said vehicle.

Term loan from banks outstanding amounting ₹ 517.88 Lakhs as at 31.03.2021 carrying interest @ Repo Rate + 4.80% p.a i.e.9.20 p.a.This balance loan is repayable in 60 monthly installments of ₹ 13.21 Lakhs till March 31, 2024 and last installment of ₹2.69 Lakhs to be paid in April 2024.

- First Term loan against property (LAP) from bank outstanding amounting ₹402.97 Lakhs as at 31.03.2021 are payable in 110 monthly installments commencing from August 2014 to September 2023, carrying a floating interest rate linked with MCLR of bank (1 year MCLR : 8.35% plus 0.95 % p.a.) with periodical interest reset.
- Second topup term loan against property (LAP) from bank outstanding amounting ₹ 119.62 Lakhs as at 31.03.2021 are payable in 121 monthly installments commencing from May 2017 to May 2027, carrying a floating interest rate linked with MCLR of bank (1 year MCLR: 8.35% plus 1.40 % p.a.) with periodical interest reset.
- Third topup term loan against property (LAP) from bank outstanding amounting ₹214.95 Lakhs as at 31.03.2021 are payable in 120 monthly installments commencing from Nov 2018 to Oct 2028, carrying a floating interest rate linked with MCLR of bank (1 year MCLR: 7.40% plus 0.95 % p.a.) with periodical interest reset.
- Term loan for plant expansion from bank outstanding amounting ₹531.96 Lakhs as at 31.03.2021 are payable in 26 equal monthly installments of ₹ 20 Lakhs each commencing from July 2021 to September 2023 and last 1 installment of ₹ 13 Lakhs with rate of interest 10% p.a. at year end.
- First Vehicle term loan from bank outstanding amounting ₹ 15.80 Lakhs as at 31.03.2021 are payable in 60 monthly installments commencing from March 2017 to Feb 2022 with rate of interest 9.75% p.a. at year end.
- Second Vehicle term loan from bank outstanding amounting ₹ 9.64 Lakhs as at 31.03.2021 are payable in 60 monthly installments commencing from October 2019 to Sept 2024 with rate of interest 9.05% p.a

Truck Loan outstanding amounting ₹ 15.20 Lakhs as on 31.03.2021 from Bank carrying a interest rate i.e. 9.50% p.a. repayable in 47 monthly installment of ₹ 0.65 Lakhs till March 01,2023 is secured by hypothecation of vehicle.

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

NOTE 17 : OTHER FINANCIAL LIABILITIES (NON CURRENT)

(₹ in Lakhs)

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

NOTE 18 : PROVISIONS (NON CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Gratuity	48.40	48.36
Compensated Absences	7.36	5.56
Total	55.76	53.92

NOTE 19 : DEFERRED TAX ASSETS/LIABILITIES(NET)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Deferred Tax Assets		
Provision for Gratuity and Compensated Absences	22.50	21.05
Unabsorbed Depreciation/ carried forward losses	212.34	167.45
	234.84	188.50
Deferred Tax Liabilities		
Depreciation	273.37	275.49
	273.37	275.49
Deferred Tax Assets(Net)	-	-
Deferred Tax Liabilities(Net)	38.53	87.00

NOTE 20(a) : BORROWINGS (CURRENT)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Secured		
Loans Repayable on demand from Banks*	5,187.36	6,159.31
Unsecured		
Other Loans from Banks	-	-
Total	5,187.36	6,159.31

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

NOTE 20(b) : TRADE PAYABLES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Total outstanding dues to Micro, Small and medium Enterprises (Refer Note No-45)	49.60	-
Total outstanding dues to other than Micro, Small and medium Enterprises	4,980.12	5,926.28
Total	5,029.72	5,926.29

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

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Current Maturities of term loans transferred from long term borrowings	359.20	342.02
Total	359.20	342.02

**NOTE 21 : PROVISIONS (CURRENT)**

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Gratuity	29.10	26.58
Compensated Absences	4.54	3.37
Total	33.64	29.95

NOTE 22 : OTHER CURRENT LIABILITIES

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Advance from Customers and Others	619.48	310.43
Statutory Levies	33.12	23.78
Employee Benefits Payable	51.21	51.41
Expenses Payable	108.32	67.65
Total	812.13	453.27

NOTE 23 : CURRENT TAX LIABILITIES (NET)

(₹ in Lakhs)

Particulars	As at March 31, 2021	Asat March 31, 2020
Provision for Taxation	307.22	18.99
Less: Advance Tax	(85.00)	(10.00)
Total	222.22	8.99

NOTE 24 : REVENUE FROM OPERATIONS

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Sale of Products		
Finished Goods		
Within India	27,717.82	26,457.52
Outside India	2,555.83	1,206.80
Traded Goods	16,479.90	7,227.73
Total Gross Sales	46,753.55	34,892.05
Other Operating Revenue		
Scrap Sale	213.11	352.27
Job Work Income	8.64	8.81
Export Incentives	68.15	27.77
Total	289.90	388.85
Total Revenue from Operations	47,043.45	35,280.90

NOTE 25 : OTHER INCOME

Particulars	(₹ in Lakhs)	
	Year Ended March 31, 2021	Year Ended March 31, 2020
Interest Income from financial assets measured at amortised cost		
- on fixed deposits with bank	135.97	139.58
Liabilities no longer required written back	1.73	0.60
Net Gain on disposal of property, plant and equipment and investment property	(0.17)	-
Foreign Exchange Gain(net)	354.36	42.27
Rental Income	89.85	180.50
Miscellaneous Income	32.15	2.10
Total	613.89	365.06

NOTE 26 : COST OF MATERIALS CONSUMED

Particulars	(₹ in Lakhs)	
	Year Ended March 31, 2021	Year Ended March 31, 2020
Raw Materials		
Opening Stock	1,469.63	3,064.48
Add: Purchase	44,536.91	31,535.95
Less: Closing Stock	(2,577.24)	(1,469.63)
Less: Cost of Raw Material cleared as such	(14,692.78)	(7,128.74)
Total	28,736.52	26,002.06

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

Particulars	(₹ in Lakhs)	
	Year Ended March 31, 2021	Year Ended March 31, 2020
Opening Stock		
Finished Goods	1,127.34	658.37
WIP	613.13	551.00
Scrap Material	80.15	12.40
Traded Goods	1,999.54	-
Total (A)	3,820.16	1,221.77
Closing Stock		
Finished Goods	1,392.56	1,127.34
WIP	1,405.64	656.06
Scrap Material	21.45	37.22
Traded Goods	1,310.48	132.07
Total (B)	4,130.13	1,952.69
Total (A-B)	(309.97)	(730.93)

**NOTE 28 : EMPLOYEE BENEFIT EXPENSES**

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Salaries, Wages, Bonus etc.	685.15	654.21
Contribution to Provident and Other Funds	12.44	18.45
Staff Welfare Expenses	18.77	7.30
Gratuity	2.66	13.94
Compensated Absences	3.00	2.71
Total	722.02	696.61

NOTE 29 : FINANCE COST

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Interest Expense on :	709.33	953.07
Other Expenses	60.45	10.07
Total	769.78	963.14

NOTE 30 : DEPRECIATION AND AMORTISATION

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Depreciation	312.59	258.16
Depreciation on investment property	15.38	14.53
Amortisation of intangible assets	0.59	1.12
Right of Use Assets Amortisation	17.61	16.29
Total	346.17	290.09

NOTE 31 : OTHER EXPENSES

(₹ in Lakhs)

Particulars	Year Ended March 31, 2021	Year Ended March 31, 2020
Job Work Charges	14.68	7.89
Power & Fuel Expenses	288.60	311.05
Repair & Maintenance :-		
Building	11.67	23.47
Plant & Machinery	33.39	22.98
Rent (Including Lease Rent)	70.91	43.33
Printing & Stationery	4.13	5.99
Postage & Telephone	11.03	24.17

Vehicle Running Expenses	9.30	9.96
Fees & Taxes	30.40	22.86
Travelling Expenses:		
Directors	2.59	6.02
Others	46.52	31.91
Legal & Professional Charges	169.38	35.28
Donation	-	0.11
Corporate social responsibility expenses (Refer Note 40)	19.95	25.50
Miscellaneous Expenses	31.76	18.70
Auditor's Remuneration	4.27	2.50
Insurance	7.89	13.92
Key-man Insurance	19.39	15.69
Office Expenses	32.82	20.83
Commission	18.29	43.12
Freight Outward	226.57	277.74
Business Promotion	22.23	29.38
Bad Debt	9.03	1.75
Other Selling Expenses	24.70	86.52
Stores and Spares	260.34	236.64
Total	1,369.84	1,317.32

NOTE 32 : TAX EXPENSE

Particulars	(₹ in Lakhs)	
	Year Ended March 31, 2021	Year Ended March 31, 2020
Current Tax		
Current Tax on profits for the year	287.93	18.99
Adjustment for current tax of prior periods	-	0.48
Total current tax expense	287.93	19.47
Deferred Tax		
Decrease/(increase) in deferred tax assets	-	-
(Decrease)/increase in deferred tax liabilities	(55.09)	149.20
Total deferred tax expense/(benefit)	(55.09)	149.20
Total Tax Expense	232.83	168.67

33. FINANCIAL RISK MANAGEMENT

Financial Risk Factors

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



i) Market Risk

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

ii) Credit Risk

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

iii) Liquidity Risk

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

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

Market Risk

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

(a) Foreign exchange risk and sensitivity

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

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

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

Particulars of forward contracts taken during the year are given below

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

Summary of exchange difference accounted in Statement of Profit & Loss

Particulars	(₹ in Lakhs)	
	Year Ended March 31, 2021	Year Ended March 31, 2020
Net foreign exchange (gain)/ losses shown under Other Income	354.36	42.27
Net foreign exchange (gain)/ losses shown under OCI	(32.80)	40.24
Total	321.56	82.51

(b) Interest rate risk and sensitivity

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

Interest rate

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

Particulars	Total Borrowings	Floating rate borrowings	Fixed rate borrowings	(₹ in Lakhs)
				Weighted average interest rate
INR	8,544.27	8,113.74	75.61	9.25%
Total as at 31 March, 2021	8,544.27	8,113.74	75.61	9.25%
INR	8,316.70	8,026.14	92.15	9.75%
Total as at 31 March, 2020	8,316.70	8,026.14	92.15	9.75%

(c) Commodity price risk and sensitivity

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

Credit Risk

The Company is exposed to credit risk from its operating activities (primarily trade receivables). Credit risk arises from the possibility that counter party may not be able to settle their obligations as agreed. To manage this, the Company periodically assesses the financial reliability of customers, taking into account the financial condition, current economic trends, and analysis of historical bad debts and ageing of accounts receivable. Individual risk limits are set accordingly. The Company considers the probability of default upon initial recognition of assets and whether there has been a significant increase in credit risk on an ongoing basis through each reporting period. To assess whether there is a significant increase in credit risk, the company compares the risk of a default occurring on the asset as at the reporting date with the risk of default as at the date of initial recognition. It considers reasonable and supportive forward-looking information.

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

The Company considers factors such as track record, size of the institution, market reputation and service standards to select the banks with which balances and deposits are maintained. Generally, the balances are maintained with the institutions with which the Company has also availed borrowings. The Company does not maintain significant cash and deposit balances other than those required for its day to day operations. For other financial assets the company monitors ratings, credit spreads and financial strengths of its counterparties.



Based on its ongoing assessment of the counter party's risk, the company adjust its exposures to various counter parties. Based on the assessment there is no impairment in other financial assets.

Liquidity Risk

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

Maturity profile of financial liabilities

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

(₹ in Lakhs)

As at March 31, 2021	Less than 1 year	Above 1 year	Total
Non Current borrowings	-	2,997.71	2,997.71
Current borrowings	5,187.36	-	5,187.36
Trade payables	5,029.72	-	5,029.72
Other financial liabilities	359.20	25.13	384.33
Total	10,576.27	3,022.85	13,599.12

(₹ in Lakhs)

As at March 31, 2020	Less than 1 year	Above 1 year	Total
Non Current borrowings	-	1,815.37	1,815.37
Current borrowings	6,159.31	-	6,159.31
Trade payables	5,926.28	-	5,926.28
Other financial liabilities	342.02	94.00	436.02
Total	12,427.61	1,909.37	14,336.98

Capital Risk Management

For the purposes of the Company's capital management, capital includes issued capital and all other equity reserves. The primary objective of the Company's Capital Management is to maximize shareholder value. The company manages its capital structure and makes adjustments in the light of changes in economic environment and the requirements of the financial covenants. In order to achieve this overall objective, the Company's capital management, amongst other things, aims to ensure that it meets financial covenants attached to the interest-bearing loans and borrowings that define capital structure requirements. Breaches in meeting the financial covenants would permit the bank to immediately call loans and borrowings. There have been no breaches of the financial covenants of any interest bearing loans and borrowing for reported periods.

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

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Interest-bearing loans and borrowings	8,189.35	8,118.29
Equity & Other Equity	9,994.45	8,782.82
Capital and net debt	18,183.80	16,901.11
Gearing ratio in %	45.04%	48.03%

34. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES

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

(₹ in Lakhs)

Particulars	March 31,2021		March 31,2020	
	Carrying Amount	Fair Value	Carrying Amount	Fair Value
Financial assets designated at amortised cost				
Trade Receivables	5,225.58	5,225.58	7,214.99	7,214.99
Cash & cash Equivalents	2,207.68	2,207.68	1,311.65	1,311.65
Bank balances other than above	-	-	-	-
Other Financial assets	1,235.02	1,235.02	847.29	847.29
Total	8,668.27	8,668.27	9,373.93	9,373.93
Financial liabilities designated at amortised cost				
Non Current Borrowings	2,997.71	2,997.71	1,815.37	1,815.37
Current Borrowings	5,187.36	5,187.36	6,159.31	6,159.31
Trade payables	5,029.72	5,029.72	5,926.28	5,926.28
Other financial liabilities	384.33	384.33	436.02	436.02
Total	13,599.12	13,599.12	14,336.98	14,336.98

Fair Value Hierarchy

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

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

- Level 1:** Quoted prices/ NAV for Identical instruments in an active market.
- Level 2:** Directly or indirectly observable market inputs, other than level 1 inputs; and
- Level 3:** Inputs which are not based on observable market data.

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

Fair Value Technique

- The carrying amounts of trade receivables, trade payables and cash and cash equivalents are considered to be the same as their fair values due to their short term nature.
- The fair value of security deposit given was calculated based on cash flows discounted using the current lending rate. They are classified as a level 2 fair values in the fair value hierarchy due to the inclusion of unobservable inputs including counterparty credit risk.



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

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

Assets/ Liabilities measured at fair value (Accounted)

(₹ in Lakhs)

Particulars	As at March 31, 2021		
	Level 1	Level 2	Level 3
Financial Assets			
Security deposits'	-	104.57	-

(₹ in Lakhs)

Particulars	As at March 31, 2020		
	Level 1	Level 2	Level 3
Financial Assets			
Security deposits'	-	100.36	-

(₹ in Lakhs)

Particulars	As at March 31, 2021		
	Level 1	Level 2	Level 3
Financial Liabilities			
Borrowings-fixed rate	-	75.61	-
Other financial liabilities	-	384.33	-

(₹ in Lakhs)

Particulars	As at March 31, 2020		
	Level 1	Level 2	Level 3
Financial Liabilities			
Borrowings-fixed rate	-	92.15	-
Other financial liabilities	-	436.02	-

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

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

(a) Assets/ Liabilities measured at Fair value

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

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

35. SEGMENT REPORTING

The Company is carrying out the activity of Manufacturing of Pipes and Trading of steel related products. However as its wholly owned subsidiary company in Dubai viz. RST International Trading FZE is pursuing the business of Trading of Steel Products and Non Ferrous Metal Products. Company has established a new foreign company namely RST Industries Limited in Lagos, Nigeria through the investment by its wholly owned subsidiary RST International Trading FZE, Dubai in the same line of business. The Segment wise Results of Manufacturing and Trading are given below :

Statement of Segment wise Revenue, Results, Assets & Liabilities:-

(₹ in Lakhs)

Particulars	Quarter ended March 31,2021	Quarter ended Dec 31,2020	Quarter ended March 31,2020	Year ended March 31,2021	Year ended March 31,2020"
Segment Total Revenue					
Manufacturing - Steel Pipe	9,713.49	10,448.37	4,048.23	31,177.44	28,418.23
Trading- Steel Products	4,654.21	5,013.07	4,492.99	16,479.90	7,227.73
Total	14,367.70	15,461.44	8,541.22	47,657.35	35,645.96
Segment Results					
Manufacturing - Steel Pipe	480.86	447.37	431.34	1,264.48	1,075.44
Trading- Steel Products	679.58	100.71	50.20	975.94	98.99
Total	1,160.45	548.08	481.54	2,240.42	1,174.44
Less : Finance Cost	177.07	182.23	225.63	769.78	963.14
Add : Exceptional Items	-	-	-	-	-
Profit before Tax	983.38	365.85	255.91	1,470.65	211.30
Segment Assets					
Manufacturing - Steel Pipe	19,342.23	17,101.84	20,201.43	19,342.23	20,127.80
Trading- Steel Products	5,413.60	5,038.45	3,625.12	5,413.60	3,625.13
	24,755.84	22,140.29	23,826.55	24,755.84	23,752.93
Segment Liabilities					
Manufacturing - Steel Pipe	10,862.89	12,902.50	14,970.12	10,862.89	14,970.12
Trading- Steel Products	3,898.50	4,133.97	2,902.40	3,898.50	2,902.40
	14,761.39	17,036.47	17,872.52	14,761.39	17,872.52

36. INCOME TAX EXPENSES

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
1	Current Tax	287.93	18.99
2	Deferred Tax	(55.09)	149.20
3	Previous year taxation adjustments	-	0.48
4	MAT credit entilement	-	-
	Total	232.83	168.67



Effective Tax Reconciliation

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
	Net Loss/ Income before Taxes	1,470.65	284.94
	Enacted tax rates Computed Tax	25.168%	25.168%
	Income (Expense)	370.13	71.71
	Increase /(Reduction) in taxes on account of :-		
1	Amount Not taxable/ exempt	(155.62)	(52.73)
2	Previous year taxation adjustments	-	0.48
3	Deferred tax	(55.09)	149.20
	Total	159.43	168.67
	Effective Tax Rate	11%	59%

37. DEFERRED TAX

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

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Book base and tax base of Fixed Assets	44.96	167.32
(Disallowance)/ Allowance (net) Under Income Tax	(102.95)	(18.44)
Ind-As adjustments	(2.23)	0.32
Total	(60.21)	149.20

Component of tax accounted in OCI

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Deferred Tax Gain/ (Loss) on defined benefit	(2.23)	0.32
Total	(2.23)	0.32

38. RETIREMENT BENEFIT OBLIGATION

I. Expenses recognised for Defined Contribution plan

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Company's Contribution to provident fund	9.05	13.00
Company's Contribution to ESI	3.38	5.45
Company's Contribution to superannuation fund	-	-
Total	12.44	18.45

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

II. Movement in Defined benefit obligation

(₹ in Lakhs)

Particulars	Gratuity (unfunded)	Leave encashment (unfunded)
Present value of obligation-April 1, 2019'	65.87	7.61
Current Service Cost	7.79	1.49
Interest Cost	5.05	0.58
Benefits paid	(5.09)	(1.39)
Remeasurements-actuarial loss/ (gain)	1.32	0.64
Present value of obligation-March 31, 2020'	74.94	8.93
Present value of obligation-April 1, 2020	74.93	8.93
Current Service Cost	6.35	1.53
Interest Cost	5.07	0.60
Benefits paid	-	(0.04)
Remeasurements-actuarial loss/ (gain)	(8.86)	0.86
Present value of obligation-March 31, 2021'	77.49	11.89

III. Movement in Plan Assets-Gratuity

(₹ in Lakhs)

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

IV. Recognised in Profit & Loss

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
Current Service Cost	7.79	1.49
Interest Cost	5.05	0.58
Expected return on plan assets	-	-
Remeasurements-actuarial loss/ (gain)	1.32	0.64
Past Service cost	-	-
For the year ended March 31, 2020	14.16	2.71
Current Service Cost	6.35	1.95
Interest Cost	5.07	0.60
Expected return on plan assets	-	-
Remeasurements-actuarial loss/ (gain)	(8.86)	0.86
Past Service cost	-	-
For the year ended March 31, 2021	2.56	3.42
Actual return on plan assets	-	-



V. Recognised in other comprehensive income

(₹ in Lakhs)

Particulars	Employee Benefit Expenses
Remeasurement-Actuarial loss/ (gain)	1.32
For the year ended March 31, 2020	1.32
Remeasurement-Actuarial (loss)/ gain	(8.86)
For the year ended March 31, 2021	(8.86)

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

(₹ in Lakhs)

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

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

VII. Sensitivity Analysis:-

For the year ended March 31, 2021

(₹ in Lakhs)

Particulars	Change in Assumption	Effect on Gratuity obligation	Effect on compensated absence obligation
Discount rate	0.50%	-2.74	-0.47
	-0.50%	2.98	0.52
Salary Growth rate	0.50%	2.48	0.52
	-0.50%	-2.29	-0.48
Withdrawal rate*	-	-	-

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

For the year ended March 31, 2020

(₹ in Lakhs)

Particulars	Change in Assumption	Effect on Gratuity obligation	Effect on compensated absence obligation
Discount rate	0.50%	-2.98	-0.38
	-0.50%	3.25	0.42
Salary Growth rate	0.50%	3.26	0.42
	-0.50%	-3.01	-0.39
Withdrawal rate	-	-	-

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

VIII. History of experience adjustments is as follows:

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

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

Particulars	(₹ in Lakhs)	
	Gratuity	
01 Apr 2020 to 31 Mar 2021	29.10	
01 Apr 2021 to 31 Mar 2022	2.51	
01 Apr 2022 to 31 Mar 2023	0.87	
01 Apr 2023 to 31 Mar 2024	0.76	
01 Apr 2024 to 31 Mar 2025	1.88	
01 Apr 2025 to 31 Mar 2026	2.20	
01 Apr 2026 Onwards	39.37	

IX. Statement of Employee benefit provision

Particulars	(₹ in Lakhs)	
	Year ended March 31, 2021	Year ended March 31, 2020
Gratuity	77.50	74.94
Compensated absences	11.89	8.93
Other employee benefits	-	-
Total	89.39	83.87

X. Current and non-current provision for Gratuity and Leave Encashment
For the year ended March 31, 2021

Particulars	(₹ in Lakhs)	
	Gratuity	Compensated absence
Current Provision	29.10	4.54
Non Current Provision	48.40	7.36
Total Provision	77.50	11.89

**For the year ended March 31, 2020**

(₹ in Lakhs)

Particulars	Gratuity	Compensated absence
Current Provision	26.58	3.37
Non Current Provision	48.36	5.56
Total Provision	74.94	8.93

XI. Employee benefits expenses

(₹ in Lakhs)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Salary and Wages	685.15	654.21
Costs-defined contribution plan	18.09	35.11
Welfare expenses	18.77	7.30
Total	722.00	696.62

(Figures in no.)

Particulars	Year ended March 31, 2021	Year ended March 31, 2020
Average no of people employed	95	112

OCI presentation of defined benefit plan

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

Presentation in Statement of Profit and Loss and Balance Sheet

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

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

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

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

39. OTHER DISCLOSURES

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

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
I	Statutory Auditors Fees		
	a) Audit Fees	4.02	2.50
	b) Certification /Others	-	-
	c) Out of Pocket Expenses	0.21	0.21
	Total	4.22	2.71
II	Tax Auditors Fees		
	a) Audit Fees	2.25	2.25
	Total	2.25	2.25
III	GST Auditors Fees		
	a) Audit Fees	-	0.75
	Total	-	0.75
IV	Cost Auditors Fees		
	a) Audit Fees	0.35	0.35
	Total	0.35	0.35
V	Secretarial Auditors Fees		
	a) Audit Fees	0.40	0.40
	Total	0.40	0.40

- b) The company has not proposed any dividend to its shareholders during the year.
- c) The Company has not given any loan or given any guarantee with respect to the parties covered under section 186 (4) of the Companies Act, 2013.
- c) Certain balances of trade receivables, loan and advances, trade payable and other liabilities are subject to confirmation and / or reconciliation.

40. EXPENDITURE INCURRED ON CORPORATE SOCIAL RESPONSIBILITY:

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

(₹ in Lakhs)

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



41. CONTINGENT LIABILITES NOT PROVIDED FOR IN RESPECT OF:

(₹ in Lakhs)

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

42. There are no amounts due and outstanding to be credited to Investor Education and Protection Fund as at March, 2021.
43. Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances) is ₹ NIL (Previous Year ₹ NIL).
44. Exceptional item consists of Loss (Net) of ₹ NIL (Previous year Loss (Net) of ₹ NIL on the provision of employees benefits pertaining to previous years.
45. Based on the intimation received from supplier regarding their status under the Micro, Small and Medium Enterprises Development Act, 2006, the required disclosure is given below:-

(₹ in Lakhs)

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

46. PURSUANT TO IND AS-116-'LEASES', THE FOLLOWING INFORMATION IS DISCLOSED:

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

(₹ in Lakhs)

Particulars	Category of ROU Asset "Land"	Category of ROU Asset "Commercial Vehicles"	Total
Balance as at April 1, 2020	65.24	96.75	161.99
Reclassified on adoption of Ind AS 116			
Additions	-	-	-
Deletions	-	-	-
Depreciation	1.59	16.02	17.61
Balance as at March 31, 2021	63.65	80.73	144.39

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

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

Included in the Financial Statements as

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Current lease liability	24.98	24.25
Non-current lease liability	15.67	39.58
Total	40.64	63.83

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

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Balance at the beginning	63.83	46.55
Finance Cost accrued during the period	4.52	5.92
Deletions	-	-
Additions	-	38.40
Payment of lease liabilities	27.34	27.04
Total	41.01	63.83

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

(₹ in Lakhs)

Particulars	As at March 31, 2021	As at March 31, 2020
Less than one year	70.91	53.95
One to Five Years	69.31	69.31
More than Five Years	-	-
Total	140.22	123.26

The Company does not face a significant liquidity risk with regard to its lease liabilities as the current assets are sufficient to meet the obligations related to lease liabilities as and when they fall. Rental expenses recorded for short-term leases was ₹ 70.91 Lakhs for the year ended March 31, 2021 and ₹ 43.33 Lakhs for the year ended March 31, 2020 respectively.

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

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

48. RELATED PARTY TRANSACTIONS

In accordance with the requirements of IND AS 24, on related party disclosures, name of the related party, related party relationship, transactions and outstanding balances including commitments where control exists and with whom transactions have taken place during reported periods, are:



List of related parties

1. A. Key Management Personnel

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

B. Non-executive and Independent Directors

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

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

S.No.	Entities	Principal activities
1	M/s Advance Hightech Agro Products Pvt. Ltd.	Chemicals Manufacturer
2	M/s Ravi Developers Pvt. Ltd.	Agriculture Goods Producer
3	M/s Pir Panchal Construction Pvt. Ltd., Joint Venture	Erection of Electric Poles
4	M/s Virinder Engineering and Chemical Pvt. Ltd.	Warehouse Renting
5	M/s Naresh Kumar & Sons HUF	HUF

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

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

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

S.No.	Name of transaction/ relationship	₹ in Lakhs	
		Year ended March 31, 2021	Year ended March 31, 2020
I	Payment of Rent		
	Mrs. Kumud Bansal	12.00	12.00
	Mr. Richi Bansal	-	1.30
	Mr. Nikhil Naresh Bansal	-	1.30
II	Payment of Interest		
	M/s Advance Hightech Agro Products Pvt. Ltd.	2.90	2.89
III	Receipt of Interest		
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	60.18	58.55
IV	Sales of finished goods		
	M/s Virinder Engineering and Chemicals Pvt. Ltd.	0.19	2.81
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	-	116.06

(₹ in Lakhs)

S.No.	Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
V	Unsecured Loan given		
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	10.00	395.00
	M/s Ravi Developers Pvt. Ltd.	1.10	-
VI	Unsecured Loans received back		
	M/s Pir Panchal Constuction Pvt. Ltd Joint Venture	10.00	85.00
VII	Unsecured Loan taken		
	Mr. Naresh Kumar Bansal	698.28	273.74
	Mr. Richi Bansal	16.25	7.44
	Mr. Nikhil Naresh Bansal	10.67	2.95
VIII	Unsecured Loans repaid		
	Mr. Naresh Kumar Bansal	518.48	505.08
	M/s Advance Hightech Agro Products Pvt. Ltd.	-	9.00
	Mr. Richi Bansal	34.23	72.44
	Mr. Nikhil Naresh Bansal	10.67	2.95
IX	Payment of Compensation*		
	Mr. Nikhil Bansal	9.29	9.60
X	Director sitting Fee's		
	Mr. Bharat Bhushan Sahny	0.40	0.30
	Ms. Anju Gupta	0.35	0.35
	Mr. Jai Prakash Gupta	0.20	0.10

Compensation of Key Management Personnel of the Company

(₹ in Lakhs)

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

- Short-term benefits comprises the expenses recorded under the head employee benefit expenses (eg. Salary and wages, contribution to provident and other funds and staff welfare expenses).
- The liability for gratuity and compensated absences are provided on actuarial basis for the Company as a whole, amounts accrued pertaining to key managerial personnel are not included above.
- The remuneration of directors and key executives is determined by the remuneration committee having regard to the performance of individuals and market trends.



5. Balance at the end of the year

(₹ in Lakhs)

Name of transaction/ relationship	Year ended March 31, 2021	Year ended March 31, 2020
Receivable amount of unsecured loan		
M/s Pir Panchal Construction Pvt. Ltd., Joint Venture	612.87	558.55
M/s Ravi Developers Pvt. Ltd.	-	0.50
Payable amount of unsecured Loans & Interest		
M/s Advance Hightech Agro Products Pvt. Ltd.	50.17	48.59
Mr. Naresh Kumar Bansal	339.81	160.00
Mr. Richi Bansal	-	17.98

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

49. Earning Per Share (EPS)

(₹ in Lakhs)

S.No.	Particulars	Year ended March 31, 2021	Year ended March 31, 2020
a.	Net Profit / Loss after tax as per Profit and Loss for basic EPS	1,211.64	81.88
b.	Add: Interest Expenses on potential equity shares (net of tax)	-	-
c.	Net Profit / Loss after tax as per Profit and Loss for diluted EPS	1,211.64	81.88
d.	No of Equity Share Outstanding at the end of the year	16,794,000	16,794,000
e.	Weighted Average No. of Equity Shares for basic EPS	16,794,000	16,794,000
f.	Weighted Average No. of Potential Equity Shares	-	-
g.	Weighted Average No. of Equity Shares for diluted EPS	16,794,000	16,794,000
h.	Basic EPS per Share (in ₹)	7.21	0.49
i.	Diluted EPS per Share (in ₹)	7.21	0.49
j.	Face Value Per share (in ₹)	5.00	5.00

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

50. Prior period income booked amounting to ₹ 73.63 Lakhs has been reversed and the same has been treated retrospectively by restating the financial statement of FY 2019-2020 for the comparison purpose according to Ind AS 8 'Accounting Policies, Changes in Accounting Estimates and Errors'.
51. The Group has practice of getting balance confirmations from its Debtor, Creditor and other parties on annual basis. However, the confirmations of balances as on 31.03.2021 with respect to certain parties could not be received due to current situation of pandemic COVID-19 thereby the Government of various states have imposed lockdown along with several restrictions, which is still going on, hence to that extent the balances have been taken as per book balances in the absence of balance confirmations.

As and when the confirmations with respect to the balances are received, the reconciliation would be made and the adjustments, if any, on this account would be recorded in the books of account.

- 52.** The Group has evaluated the impact of COVID pandemic on the operations of the Company, revenue, inventories, investments, property, plant & equipment, current borrowings and trade payables. The management has considered the possible effects, if any, on the carrying amounts of these assets and liabilities up to the date of approval of these results. As per the management's current assessment, no significant impact on carrying amounts of inventories, tangible assets, trade receivables, investments and other financial assets is expected, and management continue to monitor changes in future economic conditions. The Group values its inventory of finished goods at lower of cost and Net realisable value. The Net realisable value of all the inventories of the Group is higher than their cost based on subsequent sales taken place till date and their present market prices. Hence there is no impairment risk in the inventory.
- 53.** Previous year figures have been regrouped/ rearranged, wherever considered necessary to conform to current year's classification.
- 54.** Notes 1 to 52 are annexed to and form an integral part of financial statements.

As per our attached report of even date

For Alok Mittal & Associates

Chartered Accountants
Firm Reg. No. 005717N

Sd/-
Alok Kumar Mittal
Partner
Membership No. 071205

Place : Delhi
Date : June 18, 2021

For and On Behalf of the Board

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

Sd/-
Rajeev Kumar Agarwal
(Chief Financial Officer)

Sd/-
Richi Bansal
(Director)
DIN: 00119206

Sd/-
Kapil Datta
(Company Secretary)

**FORM NO. AOC-1**

Statement containing salient features of the financial statements of subsidiaries/ associate companies/ joint ventures Pursuant to first proviso to sub-section (3) of section 129 read with rule 5 of Companies (Accounts) Rules, 2014

Part A-Subsidiaries

(₹ In Lakhs)

Particulars	As at March 31, 2021		
	Lepakshi Tubes Pvt. Ltd.	RST International Trading FZE	*RST Industries Ltd.
Reporting Period	Year Ended March 31, 2021	Year Ended March 31, 2021	Year Ended March 31, 2021
Share Capital	490.00	90.20	19.83
Reserves & Surplus	(367.54)	849.23	612.52
Total Assets	2294.07	2696.52	3025.44
Total Liabilities	2294.07	2696.52	3025.44
Investments	-	-	-
Turnover	4798.13	4402.05	8362.21
Profit / (Loss) before taxation	(180.62)	204.11	768.87
Provision for Taxation	(55.38)	-	147.74
Profit / (Loss) after Taxation	(125.24)	204.11	621.13
Proposed Dividend	-	-	-
% of Shareholding	100%	100%	100%

* Step down Foreign Subsidiary.

Part B-Associates and Joint Venture

(₹ In Lakhs)

S.No.	Name of Joint Venture	Pir Panchal Constructions Pvt. Ltd.- Joint Venture
1	Latest audited Balance sheet date	March 31, 2021
2	Shares of Associate/ Joint Ventures held by the company on the year end No.	-
	Amount of investment in Associates/ Joint Ventures	825.56
	Extent of Holding %	25%
3	Description of how there is significant influence	We don't have significant influence on Board
4	Reason why the associate / Joint Venture is not consolidated	Ind AS 28 does not allow to consolidate the associate / Joint Venture
5	Net Worth attributable to Shareholding as per latest audited Balance Sheet	825.56
6	Profit / Loss for the year (after tax)	561.74
I	Considered in Consolidation	140.44
II	Not considered in Consolidation	421.30

For and on behalf of the Board of

Sd/-

Rama Steel Tubes Limited

Naresh Kumar Bansal

Chairman & Managing Director

DIN : 00119213

Place: Delhi

Date: June 18, 2021

NOTICE

Notice is hereby given that the 47th Annual General Meeting of the members of Rama Steel Tubes Limited will be held on Thursday, the 30th day of September, 2021 at 12:30 p.m. through Video Conferencing ("VC") / Other Audio Visual Means ("OAVM") , to transact the following business:-

ORDINARY BUSINESS

Item no. 1 – Adoption of financial statements

To consider and adopt the audited financial statement of the Company for the financial year ended 31st March 2021, the reports of the Board of Directors and Auditors thereon.

Item no. 2 – Appointment of Director in place of those retire by rotation

To appoint a Director in place of Mr. Richi Bansal (DIN: 00119206), who retires by rotation and being eligible, offers himself for re-appointment.

SPECIAL BUSINESS

Item no. 3 – Approval of remuneration of the Cost Auditors for the financial year ending March 31, 2022

To consider and if thought fit, to pass with or without modification(s), the following resolution as an **ORDINARY RESOLUTION:**

"RESOLVED THAT pursuant to Section 148 and other applicable provisions, if any, of the Companies Act, 2013 and the Companies (Audit and Auditors) Rules, 2014 (including any statutory modification(s) or re-enactment(s) thereof, for the time being in force), the Cost Auditors appointed by the Board of Directors of the Company, to conduct the audit of the cost records of the Company for the financial year ending March 31, 2022, be paid the remuneration as set out in the Statement annexed to the Notice convening this Meeting."

Item no. 4 – Appointment of Mr. Vinod Pal Singh Rawat (DIN: 09228722) as a Director of the Company, in the category of Independent Director.

To consider and if thought fit, to pass with or without modification(s), the following resolution as an **ORDINARY RESOLUTION:**

"RESOLVED THAT Mr. Vinod Pal Singh Rawat (DIN - 09228722) who was appointed by the Board of Directors as an Additional Director of the Company with effect from July 8, 2021 and who holds office upto the date of this Annual General Meeting of the Company in terms of Section 161 of the Companies Act, 2013 ("Act") and in respect of whom the Company has received a notice in writing from a Member under Section 160 of the Act proposing his candidature for the office of Director of the Company, be and is hereby appointed a Director of the Company."

Item no. 5 – Borrowing funds in excess of the limits as prescribed under Section 180(1)(c) of the Companies Act, 2013

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

"RESOLVED THAT pursuant to the provisions of Section 180(1)(c), 180(2) and other applicable provisions, if any, of the Companies Act, 2013 read with the Companies (Meetings of Board and its Powers) Rules, 2014, including any statutory modification(s) or re-enactment(s) thereof, for the time being in force, and the enabling provisions of the Memorandum and Articles of Association of the Company, consent of the members of the Company, be and is hereby accorded to the Board of Directors of the Company (hereinafter referred to as "the Board", which expression shall be deemed to include any Committee duly constituted/ to be constituted by the Board to exercise its powers, including the powers conferred by this Resolution), to borrow any sum or sums of money (in foreign currency or Indian rupees) including by way of fully/ partly Convertible Debentures and/ or Non-Convertible Debentures, from time to time, at its discretion, from any one or more of the combinations of banks, financial institutions, firms, companies, bodies corporate, mutual funds, trusts, other organizations, institutions and/or any other persons, notwithstanding that the monies to be borrowed together with the monies already borrowed by the Company (apart from temporary loans obtained from the Company's Bankers in the ordinary course of business) may, at any time, exceed the aggregate of the paid-up share capital of the Company, its free reserves (that is to say reserves not set apart for any specific purpose) and



securities premium, subject to such aggregate borrowings not exceeding the amount of ₹ 300 Crores (Rupees Three Hundred Crore only) and that the Board be and is hereby empowered and authorized to arrange funds and fix the terms and conditions of all such monies to be borrowed from time to time as to interest, repayment, security or otherwise as it may, in its absolute discretion, think fit.

RESOLVED FURTHER THAT for the purpose of giving effect to this resolution, the Board be and is hereby authorized to do all such acts, deeds, matters and things as it may in its absolute discretion deem necessary, proper, or desirable and to settle any question, difficulty, doubt that may arise in respect of the borrowing(s) aforesaid and to execute all documents and writings to give effect to this resolution.”

Item no. 6 – Creation of charge on the assets of the Company as prescribed under Section 180(1)(a) of the Companies Act, 2013

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

“RESOLVED THAT pursuant to the provisions of Section 180(1)(a) and other applicable provisions, if any, of the Companies Act, 2013 read with the Companies (Meetings of Board and its Powers) Rules, 2014 (“the Act”), including any statutory modification(s) or re-enactment(s) thereof, for the time being in force, and the enabling provisions of the Memorandum and Articles of Association of the Company, consent of the members of the Company, be and is hereby accorded to the Board of Directors of the Company (hereinafter referred to as “the Board”, which expression shall be deemed to include any Committee duly constituted/ to be constituted by the Board to exercise its powers, including the powers conferred by this Resolution) for creation of charge / mortgage / pledge / hypothecation / security or other encumbrances in addition to existing charge / mortgage / pledge / hypothecation / security or other encumbrances, in such form and manner and with such ranking and at such time and on such terms as the Board may determine, on all or any of the moveable and / or immovable properties, tangible or intangible assets of the Company, both present and future and / or the whole or substantially the whole or one or more or all or any

part of the undertaking(s) of the Company, as the case may be in favour of the Lender(s), Agent(s) and Trustee(s), for securing the borrowings availed / to be availed by the Company by way of loan(s) (in foreign currency and / or rupee currency) and securities (comprising fully / partly convertible debentures and / or non-convertible debentures, bonds or other debt instruments), issued / to be issued by the Company, subject to the limits approved by the members of the Company under Section 180(1)(c) of the Act, from time to time, together with interest at the respective agreed rates, additional interest, compound interest in case of default, accumulated interest, liquidated damages, commitment charges, premium on prepayment, remuneration of the Agent(s) / Trustee(s), premium (if any) on redemption, all other costs, charges and expenses, including any increase as a result of devaluation / revaluation / fluctuation in the rates of exchange and all other monies payable by the Company in terms of the loan agreement(s), debenture trust deed(s) or any other document, entered into / to be entered into between the Company and the Lender(s) / Agent(s) / Trustee(s), etc. in respect of the said loans / borrowings / debentures / securities and containing such specific terms and conditions and covenants in respect of enforcement of security as may be stipulated in that behalf and agreed to between the Board and the Lender(s) / Agent(s) / Trustee(s), etc.

RESOLVED FURTHER THAT the securities to be created by the Company as aforesaid may rank prior / pari-passu / subservient with / to the mortgages and /or charges already created or to be created in future by the Company or in such other manner and ranking as may be thought expedient by the Board and as may be agreed to between the concerned parties.

RESOLVED FURTHER THAT for the purpose of giving effect to this resolution, the Board be and is hereby authorized to finalize, settle, and execute such documents / deeds / writings / papers / agreements as may be required and to do all such acts, deeds, matters and things, as it may in its absolute discretion deem necessary, proper or desirable and to settle any question, difficulty or doubt that may arise in regard to creation of mortgages / charges / pledge / hypothecation / security or other encumbrances as aforesaid.”

Item no. 7 – Conversion of loan into Shares or Convertible instruments or other securities

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

"RESOLVED THAT pursuant to Sections 62(1) and 62(3) and other applicable provisions, if any, of the Companies Act, 2013 and relevant rules made thereunder, including any statutory modification(s) or reenactment(s) thereof for the time being in force, and in accordance with the enabling provisions of the Memorandum and Articles of Association of the Company and subject to all applicable circulars, notifications, guidelines issued by the Securities and Exchange Board of India, Reserve Bank of India, Stock Exchanges and such other statutory/regulatory authorities, and subject to all such other approvals, permissions, consents and sanctions of any authorities, as may be necessary, and subject to such conditions and modifications, as may be prescribed by any one of them while granting any such approval, permission, consent and / or sanction which may be agreed to by the Board, the consent of the members of the Company, be and is hereby accorded to the Board of Directors of the Company (hereinafter referred to as "the Board", which expression shall be deemed to include any Committee duly constituted/ to be constituted by the Board to exercise its powers, including the powers conferred by this Resolution) to convert the whole or part of the outstanding loans, extended / to be extended by any one or more of the combinations of banks, financial institutions, firms, companies, bodies corporate, mutual funds, trusts, other organizations, institutions and/or any other persons (hereinafter referred to as "the Lenders") (whether disbursed on or prior to or after the date of this resolution and whether then due or payable or not) by the Company under the lending arrangements (existing and future arrangements), in the event of default or exercise of an option provided under the lending arrangements in facility agreements, into shares, or convertible instruments or other securities, of the Company, as per the terms contained in the respective loan documents executed/ to be executed between the Company and its Lenders (as already stipulated or as may be specified by the Lenders under the financing documents executed or to be executed in respect of the financial assistance which have already been availed or which may be availed) and such conversion shall be subject to the applicable statutory and regulatory

guidelines for conversion of loans into shares, or convertible instruments or other securities of the Company.

RESOLVED FURTHER THAT within the overall existing borrowing limit of the Company under Section 180(1)(c) of the Companies Act, 2013, as may be approved by the shareholders of the Company, from time to time, the Board, be and is hereby authorized to negotiate and finalize the terms and conditions with the Lenders for raising further loans from time to time, and provide the Lenders with a right to convert such loans into shares, or convertible instruments or other securities, of the Company any time until there are amounts outstanding under such loans in accordance with the terms of the lending agreements, in the event of default or exercise of an option provided under the lending arrangements in facility agreements and subject to the applicable statutory and regulatory guidelines for conversion of loans into shares, or convertible instruments or other securities of the Company.

RESOLVED FURTHER THAT the Board be and is hereby authorized to accept such modifications and to accept such terms and conditions as may be imposed or required by the Lenders arising from or incidental to the aforesaid terms providing for such option and to do all such acts, deeds and things as may be necessary to give effect to this resolution.

RESOLVED FURTHER THAT subject to the applicable provisions of the Companies Act, 2013 and in accordance with the Memorandum of Association and Articles of Association of the Company and subject to all applicable circulars, notifications, guidelines issued by the Securities and Exchange Board of India, Reserve Bank of India, Stock Exchanges and such other statutory/ regulatory authorities, and all such other approvals, permissions, consents and sanctions of any authorities, as may be necessary, the Board be and is hereby authorized to offer, issue and allot from time to time to the Lenders such number of shares, or convertible instruments or other securities, of the Company, upon conversion of the outstanding portion of the loans, extended by the Lenders, into shares, or convertible instruments or other securities, of the Company in accordance with the terms of the lending agreements subject to the applicable statutory and regulatory guidelines for conversion of loans into shares, or convertible instruments or other securities of the Company.



RESOLVED FURTHER THAT the shares, or convertible instruments or other securities, of the Company to be issued pursuant to this resolution shall rank pari-passu with the respective existing shares, or convertible instruments or other securities of the Company in all respects.

RESOLVED FURTHER THAT for the purpose of giving effect to this resolution, the Board, be and is hereby authorized to do all such acts, deeds, matters and things, as it may in its absolute discretion deem necessary, proper or desirable as may be required to create, offer, issue and allot the aforesaid shares or convertible instruments or other securities, to dematerialize the shares of the Company and to resolve and settle any question, difficulty or doubt that may arise in this regard and to do all such other acts, deeds, matters and things in connection or incidental thereto as the Board in its absolute discretion may deem fit, without being required to seek any further consent or approval of the Members or otherwise to the end and intent that they shall be deemed to have given their approval thereto expressly by the authority of this resolution.

Notes:

1. An Explanatory Statement pursuant to section 102 of the Companies Act, 2013 (Act) in respect of the Special Business to be transacted at the Annual General Meeting is annexed hereto.
2. General instructions for accessing and participating in the 47th AGM through VC/OAVM Facility and voting through electronic means including remote e-Voting:
 - a. In compliance with the applicable provisions of the Act and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), and the Circulars issued by MCA and SEBI, the 47th AGM of the Company is being conducted through VC/OAVM Facility, which does not require physical presence of members at a common venue. The deemed venue for the 47th AGM shall be the Registered Office of the Company.
 - b. In compliance with **MCA Circular No. 02/2021 dated January 13, 2021 read with Circular No. 20 dated May 5, 2020 and SEBI Circular No. SEBI/HO/CFD/CMD2/CIR/P/2021/11 dated January 15, 2021**, Notice of AGM along with the Annual Report

2020-21 is being sent only through electronic mode to those Members whose email addresses are registered with Company/Depositories.

In line with the MCA Circulars and SEBI Circular, the Notice of 47th AGM will be available on the website of the Company at www.ramasteel.com, on the website of BSE Limited at www.bseindia.com, on website of National Stock Exchange of India Limited at www.nseindia.com and also on the **website of NSDL at www.evoting.nsdl.com**.

Since the AGM will be held through VC/OAVM Facility, the Route Map is not annexed in this Notice.

Members may join 47th AGM through VC/ OAVM Facility 15 minutes before and after the scheduled time of the commencement of the Meeting by following the procedure mentioned in the Notice.

Members may note that the VC/OAVM Facility, allows participation of upto 1,000 Members on a first-come-first served basis. The large shareholders (i.e. shareholders holding 2% or more shareholding), promoters, institutional investors, directors, key managerial personnel, the Chairpersons of the Audit and Risk Management Committee, Nomination and Remuneration Committee and Stakeholders Relationship Committee, auditors, etc. can attend 47th AGM without any restriction on account of first-come-first-served principle.

Attendance of the Members participating in 47th AGM through VC/OAVM Facility shall be counted for the purpose of reckoning the quorum under Section 103 of the Act.

Pursuant to the provisions of Section 108 of the Act read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (as amended), Secretarial Standard on General Meetings (SS-2) issued by the Institute of Company Secretaries of India ("ICSI") and Regulation 44 of Listing Regulations read with MCA Circulars and SEBI Circular, the Company is providing remote e-Voting facility to its Members in respect of the business to be transacted at 47th AGM and facility for those Members participating in 47th AGM to cast vote through e-Voting system during 47th AGM.

3. Instructions for Members for Remote e-Voting are as under:-

a. **Remote e-Voting period will commence on September 27, 2021 (9:00 am IST) and end on September 29, 2021 (5:00 pm IST).** During this period, Members of the Company, holding shares either in physical form or in dematerialized form, as on the **cut-off date of September 23, 2021**, may cast their vote by remote e-Voting. The remote e-Voting module shall be disabled by NSDL for voting thereafter. Once the vote on resolution(s) is cast by the Member, the Member shall not be allowed to change it subsequently.


b. Shareholders who have already voted prior to the meeting date would not be entitled to vote at the meeting venue.

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

Pursuant to abovesaid SEBI Circular, Login method for e-voting and joining virtual meetings **for Individual Shareholders holding securities in Demat mode** is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in demat mode with NSDL.	<ol style="list-style-type: none"> Existing IDeAS user can visit the e-Services website of NSDL Viz. https://eservices.nsdl.com either on a Personal Computer or on a mobile. On the e-Services home page click on the "Beneficial Owner" icon under "Login" which is available under 'IDeAS' section , this will prompt you to enter your existing User ID and Password. After successful authentication, you will be able to see e-Voting services under Value added services. Click on "Access to e-Voting" under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider i.e. NSDL and you will be re-directed to e-Voting website of NSDL for casting your vote during the remote e-Voting period. If you are not registered for IDeAS e-Services, option to register is available at https://eservices.nsdl.com. Select "Register Online for IDeAS Portal" or click at https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com/ either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/ Member' section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period.



	<p>4. Shareholders/Members can also download NSDL Mobile App "NSDL Speede" facility by scanning the QR code mentioned below for seamless voting experience.</p> <div data-bbox="826 351 1209 567" style="text-align: center;"> <p>NSDL Mobile App is available on</p>  </div>
<p>Individual Shareholders holding securities in demat mode with CDSL</p>	<ol style="list-style-type: none"> Existing users who have opted for Easi / Easiest, they can login through their user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are https://web.cdslindia.com/myeasi/home/login or www.cdslindia.com and click on New System Myeasi. After successful login of Easi/Easiest the user will be also able to see the E Voting Menu. The Menu will have links of e-Voting service provider i.e. NSDL. Click on NSDL to cast your vote. If the user is not registered for Easi/Easiest, option to register is available at https://web.cdslindia.com/myeasi/Registration/EasiRegistration Alternatively, the user can directly access e-Voting page by providing demat Account Number and PAN No. from a link in www.cdslindia.com home page. The system will authenticate the user by sending OTP on registered Mobile & Email as recorded in the demat Account. After successful authentication, user will be provided links for the respective ESP i.e. NSDL where the e-Voting is in progress.
<p>Individual Shareholders (holding securities in demat mode) login through their depository participants</p>	<p>You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. upon logging in, you will be able to see e-Voting option. Click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period</p>

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

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

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

B) Login Method for e-Voting shareholders other than Individual shareholders holding securities in demat mode and shareholders holding securities in physical mode.

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

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

4. Your User ID details are given below :

Manner of holding shares i.e. Demat (NSDL or CDSL) or Physical	Your User ID is:
a) For Members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID
b) For Members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID
c) For Members holding shares in Physical Form.	EVEN Number followed by Folio Number registered with the company

5. Password details for shareholders other than Individual shareholders are given below:
 - a) If you are already registered for e-Voting, then you can use your existing password to login and cast your vote.
 - b) If you are using NSDL e-Voting system for the first time, you will need to retrieve the 'initial password' which was communicated to you. Once you retrieve your 'initial password', you need to enter the 'initial password' and

the system will force you to change your password.

- c) How to retrieve your 'initial password'?
 - (i) If your email ID is registered in your demat account or with the company, your 'initial password' is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a .pdf file. Open the .pdf file. The password to open the .pdf file is your 8 digit client ID for NSDL account, last 8 digits of client ID for CDSL account or folio number for shares held in physical form. The .pdf file contains your 'User ID' and your 'initial password'.
 - (ii) If your email ID is not registered, please follow steps mentioned below in **process for those shareholders whose email ids are not registered.**
6. If you are unable to retrieve or have not received the " Initial password" or have forgotten your password:
 - a) Click on **"Forgot User Details/Password?"** (If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com.
 - b) **Physical User Reset Password?"** (If you are holding shares in physical mode) option available on www.evoting.nsdl.com.
 - c) If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.co.in mentioning your demat account number/folio number, your PAN, your name and your registered address etc.
 - d) Members can also use the OTP (One Time Password) based login for casting the votes on the e-Voting system of NSDL.
7. After entering your password, tick on Agree to "Terms and Conditions" by selecting on the check box.



8. Now, you will have to click on "Login" button.
5. After you click on the "Login" button, Home page of e-Voting will open.

Cast your vote electronically on NSDL e-Voting system.

1. After successful login, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle
2. Select "EVEN" of company for which you wish to cast your vote during the remote e-Voting period Now you are ready for e-Voting as the Voting page opens.
3. Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on "Submit" and also "Confirm" when prompted.
4. Upon confirmation, the message "Vote cast successfully" will be displayed.
5. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.
6. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

General Guidelines for shareholders

1. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/ JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail to csarungupta@gmail.com with a copy marked to evoting@nsdl.co.in.
2. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the "Forgot User Details/Password?" or "Physical User Reset Password?" option available on www.evoting.nsdl.com to reset the password.
3. In case of any queries, you may refer the Frequently Asked Questions (FAQs) for Shareholders and e-voting user manual for Shareholders available at the

download section of www.evoting.nsdl.com or call on toll free no.: 1800 1020 990 and 1800 22 44 30 or send a request at evoting@nsdl.co.in

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

1. In case shares are held in physical mode please provide Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) by email to investors@ramasteel.com.
2. In case shares are held in demat mode, please provide DPID-CLID (16 digit DPID + CLID or 16 digit beneficiary ID), Name, client master or copy of Consolidated Account statement, PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) to investors@ramasteel.com. If you are an Individual shareholders holding securities in demat mode, you are requested to refer to the login method explained at **step 1 (A) i.e. Login method for e-Voting for Individual shareholders holding securities in demat mode.**
3. Alternatively shareholder/members may send a request to evoting@nsdl.co.in for procuring user id and password for e-voting by providing above mentioned documents.

In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are required to update their mobile number and email ID correctly in their demat account in order to access e-Voting facility.

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

Those Members, who hold shares in physical form or who have not registered their email address with the Company and who wish to participate in 47th AGM or

cast their vote through remote e-Voting or through the e-Voting system during the meeting, may obtain the login ID and password by sending scanned copy of:

- i) a signed request letter mentioning your name, folio number and complete address; and
- ii) self-attested scanned copy of the PAN Card and any document (such as Driving Licence, Bank Statement, Election Card, Passport, AADHAR Card) in support of the address of the Member as registered with the Company; to the email address of the Company **investors@ramasteel.com**.

In case shares are held in demat mode, Members may obtain the login ID and password by sending scanned copy of (i) a signed request letter mentioning your name, DP ID-Client ID (16 digit DP ID + Client ID or 16 digit beneficiary ID); (ii) self attested scanned copy of client master or Consolidated Demat Account statement; and (iii) self attested scanned copy of the PAN Card, to the email address of the Company **investors@ramasteel.com**.

Instructions for Members for participating at 47th AGM through VC/OAVM are as under:

Members will be able to attend the 47th AGM through VC/OAVM Facility through the NSDL e-Voting system at <https://www.evoting.nsdl.com> under shareholders login by using the remote e-Voting credentials and selecting the EVEN for the Company's 47th AGM. Please note that the Members who do not have User ID and Password for e-Voting or have forgotten User ID and Password may retrieve the same by following remote e-Voting instructions mentioned in the Notice of 47th AGM to avoid last minute rush. Further, Members can also use OTP based login for logging into the e-Voting system of NSDL.

- a. Further, Members will be required to use Internet with a good speed to avoid any disturbance during the Meeting.
- b. Please note that Members connecting from mobile devices or tablets or through laptops etc connecting via mobile hotspot, may experience Audio/Video loss due to fluctuation in their respective network. It is therefore recommended to use stable Wi-Fi or LAN connection to mitigate any kind of aforesaid technical glitches.

- c. Members, who would like to ask questions during 47th AGM with regard to the financial statements or any other matter to be placed at the 47th AGM, need to register themselves as a speaker by sending their request from their registered email address mentioning their name, DP ID and Client ID number/folio number and mobile number, to reach the Company's email address **investors@ramasteel.com** **at least 3 (three) days prior to meeting**. Only those Members who have registered themselves as a speaker shall be allowed to ask questions during the 47th AGM, depending upon the availability of time.

Further, Members who would like to have their questions/queries responded to during the AGM are requested to send such questions/queries in advance within the aforesaid date and time, by following similar process as stated above.

Instructions for Members for e-Voting during the 47th AGM are as under:

- a. Members may follow the same procedure for e-Voting during 47th AGM as mentioned above for remote e-Voting.
- b. Only those Members, who will be present in AGM through VC/OAVM Facility and have not cast their vote on the Resolutions through remote e-Voting and are otherwise not barred from doing so, shall be eligible to vote through e-Voting system in AGM.
- c. The Members who have cast their vote by remote e-Voting prior to the AGM may also participate in the AGM through VC/ OAVM Facility but shall not be entitled to cast their vote again.

Other Guidelines for Members

- a. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-Voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the "Forgot User Details/ Password?" or "Physical User Reset Password?" option available on www.evoting.nsdl.com to reset the password.



- b. The voting rights of Members shall be in proportion to their share in the paid up equity share capital of the Company as on the **cut- off date of September 23, 2021**.
 - c. Any person, who acquires shares of the Company and becomes Member of the Company after the Company sends the Notice of the 47th AGM by email and holds shares as on the **cut-off date i.e. September 23, 2021**, may obtain the User ID and password by sending a request to the Company's email address **investors@ramasteel.com**. However, if you are already registered with NSDL for remote e-Voting then you can use your existing user ID and password for casting your vote. If you forgot your password, you can reset your password by using "Forgot User Details/ Password?" or "Physical User Reset Password?" option available on **www.evoting.nsd.com**.
 - d. A person, whose name is recorded in the Register of Members or in the Register of Beneficial Owners maintained by depositories as on the Cut-off date only shall be entitled to avail the facility of remote e-Voting or casting vote through e-Voting system during the Meeting.
 - e. M/s. Arun Kumar Gupta & Associates, Company Secretaries, New Delhi, has been appointed as the Scrutinizer to scrutinize remote e-Voting process and casting vote through e-Voting system during the Meeting in a fair and transparent manner.
 - f. The Results of voting will be declared within 48 hours from the conclusion of the AGM and the Resolutions will be deemed to be passed on the date of the AGM, subject to receipt of requisite number of votes. The declared results, along with the Scrutinizer's Report, will be available forthwith on the Company's corporate website **www.ramasteel.com** and on the website of NSDL; such results will also be forwarded to the National Stock Exchange of India Limited, BSE Limited, where the Company's shares are listed.
4. Pursuant to the MCA Circulars and SEBI Circular, in view of prevailing situation, owing to the difficulties involved in dispatching of physical copies of the **Notice of 47th AGM and the Annual Report for the year 2020-**

21 including therein the Audited Financial Statements for year 2020-21, are being sent only by email to the Members. Therefore, those Members, whose email address is not registered with the Company or with their respective Depository Participant/s, and who wish to receive the Notice of 47th AGM and Annual Report for the year 2020-21 and all other communication sent by the Company, from time to time, can get their email address registered by following the steps as given below:-

- a. For Members holding shares in physical form, please send scan copy of a signed request letter mentioning your folio number, complete address, email address to be registered alongwith scanned self attested copy of the PAN and any document (such as Driving Licence, Passport, Bank Statement, AADHAR) supporting the registered address of the Member, by email to the Company's email address **investors@ramasteel.com**.
- b. For the Members holding shares in demat form, please update your email address through your respective Depository Participant/s.

Notice of 47th AGM and Annual Report for the year 2020-21 including therein the Audited Financial Statements for the year, will be available on the website of the Company at **www.ramasteel.com** and the website of Stock Exchanges at BSE Limited at **www.bseindia.com** and National Stock Exchange of India Limited at **www.nseindia.com**. The Notice of 47th AGM will also be available on the website of NSDL at **www.evoting.nsd.com**.

5. The Securities and Exchange Board of India (SEBI) has mandated submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in electronic form are, therefore, requested to submit PAN to their Depository Participants with whom they are maintaining their demat accounts. Members holding shares in physical form can submit their PAN details to the Company.
6. In terms of the Listing Regulations, securities of listed companies can only be transferred in dematerialized form with effect from April 1, 2019. In view of the above, Members are advised to dematerialize shares held by them in physical form.

7. During 47th AGM, Members may access scanned copy of Register of Directors and Key Managerial Personnel and their shareholding maintained under Section 170 of the Act and the Register of Contracts and Arrangements in which Directors are interested maintained under Section 189 of the Act, upon Login to NSDL e-Voting system at <https://www.evoting.nsdl.com>.
8. The Register of Members and Share Transfer Books of the Company will remain closed from September 23, 2021 to September 30, 2021 (both days inclusive).
9. Details as required in sub-regulation (3) of Regulation 36 of the Listing Regulations and Secretarial Standard on General Meeting (SS-2) of ICSI, in respect of the Directors seeking appointment/ re-appointment at the AGM, are detailed in Annexure-I of the Notice of the AGM. Requisite declarations have been received from the Directors for seeking appointment/ reappointment.
10. The Ministry of Corporate Affairs has undertaken a 'Green Initiative in the Corporate Governance' by allowing paperless compliance by companies. Also, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, permits companies to send soft copies of Annual Report to all those shareholders who have registered their email address for the said purpose. Members are requested to support this Green Initiatives by registering / updating their e-mail address for receiving electronic communications. The Notice for Annual General Meeting along with the Annual Report of the Company will be made available on the Company's website -www.ramasteel.com.

By order of the Board of Directors
Sd/-

Date: August 14, 2021
Place : Delhi

NARESH KUMAR BANSAL
Chairman & Managing Director



EXPLANATORY STATEMENT (PURSUANT TO SECTION 102 OF THE COMPANIES ACT, 2013)

As required by section 102 of the Companies Act, 2013 (Act), the following explanatory statement sets out all material facts relating to the business mentioned under **Item no. 3 to 7** of the accompanying Notice:

ITEM NO. 3

The Board, on the recommendation of the Audit Committee, has approved the appointment and remuneration of the M/s. Subodh Kumar & Co., Cost Accountants, New Delhi (Firm Registration No. 104250) as Cost Auditors to conduct the audit of the cost records of the Company across various segments, for the financial year ending March 31, 2022 at a remuneration of ₹35,000/- excluding applicable taxes.

In accordance with the provisions of Section 148 of the Act read with the Companies (Audit and Auditors) Rules, 2014, the remuneration payable to the Cost Auditors as recommended by the Audit Committee and approved by the Board of Directors, has to be ratified by the members of the Company.

Accordingly, consent of the members is sought for passing an Ordinary Resolution as set out at Item No. 3 of the Notice for ratification of the remuneration payable to the Cost Auditors for the financial year ending March 31, 2022.

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

The Board recommends the Ordinary Resolution set out at Item No. 3 of the Notice for approval by the members.

ITEM NO. 4

The Board appointed Mr. Vinod Pal Singh Rawat, as Additional Director with effect from July 8, 2021. The Board has also appointed him as Executive Director effective the same date, subject to the approval of the Members.

As per the provisions of Section 161(1) of the Act, he holds office of Additional Director only up to the date of the forthcoming Annual General Meeting of the Company, and is eligible for appointment as Director. The Company has received a notice under Section 160 of the Act proposing his candidature for the office of Director of the Company, along with the requisite deposit.

The Board recommends the Ordinary Resolution set out at Item No. 4 of the Notice for approval by the members.

ITEM NO. 5 & 6

The members of the Company at their 41st Annual General Meeting held on September 29, 2015, had accorded approval to the Board of Directors of the Company to borrow money/moneys up to an aggregate amount of ₹100 Crores, by way of a Special Resolution passed under Section 180(1)(c) of the Companies Act, 2013 (the "Act").

Keeping in view your Company's existing and future funding requirements towards capital expenditures, operational expenditure and working capital expenditure and for general corporate purposes, the Company will require to borrow funds, from time to time.

It is proposed to borrow funds from one or more of the combinations of banks, financial institutions, firms, companies, bodies corporate, mutual funds, trusts, other organizations, institutions and/or any other persons (hereinafter referred to as the "Lenders") as may deem fit by the Company, which may, together with money already borrowed by the Company (apart from temporary loans obtained from the Company from ordinary course of business), exceed the borrowing limits under the provisions of Section 180(1)(c) of the Act. The Company may borrow funds by way of issuing Secured/Unsecured Redeemable Non-Convertible/ Partly Convertible/ Wholly Convertible Bonds/ Debentures as well.

It is, therefore, proposed to increase the maximum borrowing limits up to ₹ 300 Crores (Rupees Three hundred Crores only), in terms of Section 180(1)(c) and 180(2) of the Act.

Further, the borrowings by the Company, in general, are required to be secured by charge / mortgage / pledge / hypothecation / security or other encumbrances on all or any of the moveable or immovable or tangible or intangible properties of the Company, in such form, manner and ranking, as may be determined by the Board, from time to time, in consultation with the Lender(s). In order to facilitate securing the borrowings made by the Company or to be made in future, it would be necessary to create charge on the assets or the whole or substantially the whole or

one or more or all or any part of the undertaking(s) of the Company.

Section 180(1)(a) of the Act provides for the power to the Board of Directors to sell, lease or otherwise dispose of the whole or substantially the whole of the undertaking of the Company, subject to the approval of members in the general meeting.

The consent of the members is required under the provisions of Sections 180(1)(c) and 180(1)(a) of the Act, to borrow funds in excess of the limits and to mortgage and / or create a charge on any of the moveable and / or immovable properties and / or the whole or any part of the undertaking(s) of your Company to secure its borrowings.

Accordingly, the proposed Resolutions at Item Nos. 5 & 6 of the accompanying Notice is placed for approval of the Members by way of Special Resolutions to enable the Company to exercise the aforesaid powers as and when required.

None of the Directors or Key Managerial Personnel of the Company including their relatives, except to the extent of their respective shareholdings in the Company, in any way, financially or otherwise, is interested or concerned in the aforesaid Resolutions.

ITEM NO. 7

To meet funding requirements towards capital expenditures, operational expenditure and working capital expenditure and for general corporate purposes, your Company has availed / will avail financial assistance by way of loans, issue of debentures etc., from time to time, from any one or more of the combinations of banks, financial institutions, firms, companies, bodies corporate, mutual funds, trusts, other organizations, institutions and/or any other persons (hereinafter referred to as the "Lenders"), upon such terms and conditions as may be stipulated by them and approved by the Board.

In line with the regulatory changes in the recent past, the changes in the Companies Act, 2013 and in line with various directives issued by Reserve Bank of India, from time to time, the Company has been advised to pass a Special Resolution under Section 62(3) and other applicable provisions of the Companies Act, 2013 and the rules made thereunder to enable the Lenders to convert the outstanding loans

or any other financial assistance categorized as loans (hereinafter referred to as the "Financial Assistance"), in foreign currency or Indian Rupee, already availed from the Lenders or as may be availed from the Lenders, from time to time, at their option, into equity shares of the Company upon such terms and conditions as may be deemed appropriate by the Board and at a price to be determined in accordance with the applicable Securities and Exchange Board of India Regulations (SEBI Regulations) at the time of such conversion.

The proposed resolution at Item no. 10 is an enabling resolution under the provisions of the Section 62(3) and other applicable provisions of the Companies Act, 2013 in view of the fact that under the lending arrangements, the Bank(s) / Financial Institution(s) or lenders insist for inclusion of an option to convert the outstanding facility into Equity in the event of default or upon exercise of an option provided under the lending arrangements in the facility agreements.

Accordingly, the Board recommends the resolution as set out at Item No. 7 and seek approval of the members of the Company, to enable the Lenders, in terms of the lending arrangements, entered/to be entered and as may be specified by the Lenders under the financing documents already executed or to be executed in respect of the Financial Assistance availed/ to be availed, in the event of default or exercise of an option provided under the lending arrangements in facility agreements, to convert the whole or part of their respective outstanding Financial Assistance into equity shares of the Company, upon such terms and conditions as may be deemed appropriate by the Board and at a price to be determined in accordance with the applicable SEBI Regulations at the time of such conversion.

None of the Directors or Key Managerial Personnel of the Company including their relatives, except to the extent of their respective shareholdings in the Company, in any way, financially or otherwise, is interested or concerned in the aforesaid Resolutions.

By order of the Board of Directors
Sd/-

Date: August 14, 2021
Place : Delhi

NARESH KUMAR BANSAL
Chairman & Managing Director



DETAILS PURSUANT TO REGULATION 36 OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATION 2015 AND 1.2.5 OF SECRETARIAL STANDARD (SS-2) ON GENERAL MEETING AS ISSUED BY THE INSTITUTE OF COMPANY SECRETARIES OF INDIA:

Name of Director	Sh. Richi Bansal	Sh. Vinod Pal Singh Rawat
Age	41	39
DIN	00119206	09228722
Date of first appointment on the Board	01.05.2007	08.07.2021
Qualification	BSc(H) in Management from Bradford University, U.K.	Graduate
Experience in Specific Functional Area	Experience of more than 12 years in Steel Tube Industry	He has over 16 years of experience in steel pipe industry.
Directorship held in other Companies	LEPAKSHI TUBES PRIVATE LIMITED ATI PROPERTIES PRIVATE LIMITED TR OIL & GAS PRIVATE LIMITED	NIL
Chairman/Member of Committees of Board of other Companies of which he is a Director	NIL	NIL
No. of Shares held	1443000	NIL
Terms and conditions of re-appointment	Director Liable to retire by rotation	Director Liable to retire by rotation
Last Drawn Remuneration incl. Sitting Fees for Board & Committee(s) Meeting (2020-21)	Salary - ₹ 40.31 Lakhs	Salary - ₹ 6.44 Lakhs
Relationship with other directors and Key Managerial Personnel	Son of Sh. Naresh Kumar Bansal	No
Number of Board Meetings attended during the year	8 (Eight)	N.A.

*Refer Report on Corporate Governance for more details

Four Decades of Embracing the **CHANGE**

1981

Set up initial unit at Sahibabad, UP with Installed capacity of 10,000 metric tonnes p.a. Close proximity to Delhi's Road and Rail networks

1984

Increased capacity to 25,000 mtpa

1987

Started plant to galvanize black Pipes Received contracts from D.G.S&D and various other government departments

1990

Started manufacturing larger dia Pipes under IS Specification and trademark "TTT Rama" and "Gujarat Rama"

1992

Further, Increased capacity to 36,000 mtpa at the Sahibabad plant

2001

Further, Increased capacity to 24,000 mtpa

2015

Set up new plant at Khopoli, Raigad, Maharashtra with initial capacity of 36,000 mtpa Set up a wholly owned subsidiary; RST International Trading FZE in Dubai, UAE

2016

Added capacity of 36,000 mtpa at Khopoli unit, total installed capacity 72,000 mtpa Bagged prestigious export orders worth ₹ 300 mn

2017

Setup India's largest captive solar energy project in ERW Pipes Segment at Khopoli

2018

Set up a wholly owned subsidiary; Lepakshi Tubes Private Limited in Anantpur District Andhra Pradesh with an initial capacity of 36000 mtpa

2019

Set up a step down subsidiary; RST Industries Ltd, Lagos, Nigeria

2020

Further increased capacity by 60,000 metric tonnes from 72,000 mtpa to 132,000 mtpa at Khopoli plant, commercial production began in November 2020

2021

Upgradation at Sahibabad plant is under way for revamping and modernization
New Brand Identity rolled-out



Rama Steel Tubes Ltd.

(CIN: L27201DL1974PLC007114)

Registered Office:

B-5, 3rd Floor, Main Road, Ghazipur , New Delhi-110096

Tel. No. +91 11-43446600,

E-Mail: investors@ramasteel.com | Website: www.ramasteel.com

Form No. MR-3
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021
[Pursuant to section 204(1) of the Companies Act, 2013 and Rule No. 9 of the Companies
(Appointment and Remuneration of Managerial Personnel) Rules, 2014]

To,
The Members,
LEPAKSHI TUBES PRIVATE LIMITED
B-5, 3rd Floor, Main Road, Ghazipur, New Delhi 110096

We have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Lepakshi Tubes Private Limited** (hereinafter called the Company). Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on our verification of the **Lepakshi Tubes Private Limited** 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, We hereby report that in our opinion, the company has, during the audit period covering the financial year ended on **31st March, 2021** complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by **Lepakshi Tubes Private Limited** for the financial year ended on 31st March, 2021 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made there under;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under- **Not Applicable as the shares of the Company are not listed in any stock exchange in India;**
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under; **Not Applicable as the shares of the Company are in physical form;**
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings; **Not Applicable**
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):- **Not Applicable as the shares of the Company are not listed in any stock exchange in India**
 - a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Not Applicable**

- b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **Not Applicable**
- c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009; **Not Applicable**
- d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulation, 2014; **Not Applicable**
- e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- 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; **Not Applicable**
- g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **Not Applicable**
- h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998; **Not Applicable**

(vi) Having regard to the compliance system prevailing in the Company and on examination of the relevant documents and records in pursuance thereof, on test-check basis, the Company has complied with the following laws applicable specifically to the Company:

- Income Tax Act 1961, Wealth Tax Act, Goods and Services Tax Act, 2016 and rules made thereof.
- Goods and Service Tax (GST) Laws.

We 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 SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015, (erstwhile Listing Agreement) entered into by the Company with Bombay Stock Exchange Limited. **(Not Applicable as the shares of the Company are not listed in any stock exchange in India)**

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

We further report that

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

Adequate notice is given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance and a system exists for seeking and

obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

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

We further report that there are adequate systems and processes in the company commensurate with the size and operations of the company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

For **ARUN KUMAR GUPTA & ASSOCIATES**
COMPANY SECRETARIES

Sd/-

(ARUN KUMAR GUPTA)

FCS: 5551

CP: 5086

UDIN: F005551C000787200

Place: Delhi

Date: 14/08/2021

Annexure A'
Annexure to the Secretarial Audit Report

In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished and representations made to us by the Company, its officers and agents, we report that the Company has, during the financial year under review, complied with the provisions of the Acts, the Rules made there under and the Memorandum and Articles of Association of the Company with regard to:-

1. Maintenance of various statutory registers and documents and making necessary entries therein;
2. Contracts, Common Seal, Registered Office and Publication of name of the Company;
3. Forms, Returns, Documents and resolutions required to be filed with the Registrar of Companies, Regional Director, Central Government, Company Law Board and such other authorities;
4. Service of documents by the Company on its Members, Directors, Auditors and Registrar of Companies;
5. Appointment, Re-appointment, Retirement of Directors and payment of remuneration.
6. Disclosure of Interest and Concerns in Contracts and Arrangements, Shareholdings and Directorships in other Companies and interest in other entities by Directors and Key Managerial Personnel;
7. Disclosures requirements in respect of their eligibility for appointment;
8. Related party transactions which were in the ordinary course of business and at arm's length basis and were placed before the Board for their review/approval as and when required;
9. Appointment and remuneration of Statutory Auditors;
10. Notice of the meetings of the Board;
11. Minutes of the meeting of the Board;
12. Notice convening Annual General Meeting held on November 18, 2020 and holding of the meeting on that date;
13. Minutes of General Meeting;
14. Approval of the Members, Board of Directors and Government Authorities wherever required;
15. Form of the Balance Sheet as at March 31, 2020 as prescribed under part I of schedule III of the Companies Act, 2013 and requirements as to Profit & Loss Account for the year ended on that date as per Part II of the said schedule;
16. Report of the Board of Directors for the financial year ended March 31, 2020;
17. Transfer of Equity Shares and issue and delivery of share certificates;
18. Borrowings and registration of charges;
19. Investment of Company's funds and inter-corporate loans and investments.
