

**EASTCOAST**  
**STEEL LIMITED**

**38<sup>th</sup> Annual Report**  
**2020-2021**

**Regd. Office:** Flat No. A-123, Royal Den Apartments, No.16,  
Arul Theson Street, Palaniraja Udayar Nagar, Lawspet, Pondicherry - 605008.

**EASTCOAST STEEL LIMITED**

<b>Board of Directors</b>	Shri Prithviraj S. Parikh Shri Hitesh V. Raja Smt. Sharmila S. Chitale	Chairman & Non-Executive Director Independent Director Independent Director
<b>Company Secretary</b>	Shri P.K.R.K. Menon	
<b>Chief Executive Officer &amp; Chief Financial Officer</b>	Shri Babush Narayan Kamath	
<b>Statutory Auditors</b>	M/s. Paresh Rakesh & Associates LLP Chartered Accountants Mumbai	
<b>Internal Auditors</b>	M/s. Krishnan & Giri Chartered Accountants Chennai	
<b>Secretarial Auditors</b>	P. S. Ramnath Company Secretary Mumbai	
<b>Bankers</b>	Central Bank of India Dena Bank HDFC Bank Limited State Bank of India	
<b>Registered Office (w.e.f. 1<sup>st</sup> April, 2021)</b>	Flat No. A-123, Royal Den Apartments, No.16, Arul Theson Street, Palaniraja Udayar Nagar, Lawspet, Pondicherry - 605008. Website: <a href="http://www.eastcoaststeel.com">www.eastcoaststeel.com</a> Tel: 022 - 40750100 Fax: 022 - 22044801 E-mail: <a href="mailto:esl@eastcoaststeel.com">esl@eastcoaststeel.com</a>	
<b>CIN</b>	L27109PY1982PLC000199	
<b>Registrar &amp; Share Transfer Agents</b>	Link Intime India Private Limited C-101, 247 Park, L.B.S. Marg, Vikhroli (West), Mumbai - 400 083. Tel: 022 - 49186000 Fax: 022 - 49186060 E-mail: <a href="mailto:rnt.helpdesk@linkintime.co.in">rnt.helpdesk@linkintime.co.in</a> Website : <a href="http://www.linkintime.co.in">www.linkintime.co.in</a>	
<b>ISIN (Demat)</b>	INE315F01013	

**NOTICE**

Notice is hereby given that the **Thirty-Eighth Annual General Meeting (“AGM”)** of the Members of **EASTCOAST STEEL LIMITED** will be held on **Wednesday, 29<sup>th</sup> September, 2021 at 3:00 p.m. (IST) through Video Conferencing/Other Audio Visual Means** to transact the following business:

**ORDINARY BUSINESS**

1. To receive, consider and adopt the Financial Statements of the Company for the financial year ended 31<sup>st</sup> March, 2021 and the report of the Board of Directors and Auditors thereon and in this regard to pass the following resolution as an **Ordinary Resolution**.

“**RESOLVED THAT** the Audited Financial Statements of the Company for the financial year ended 31<sup>st</sup> March, 2021 together with the reports of the Auditors and Directors thereon be and are hereby received, considered, approved and adopted.”

2. To re-appoint a Director in place of Shri. Prithviraj S. Parikh (DIN:00106727) who retires by rotation and being eligible, offers himself for re-appointment and in this regard to pass the following resolution as an **Ordinary Resolution**:

“**RESOLVED THAT** Shri. Prithviraj S. Parikh (DIN:00106727) who retires by rotation in accordance with Section 152 of the Companies Act, 2013 be and is hereby re-appointed as a Director of the Company, liable to retire by rotation.”

**By order of the Board of Directors**

Sd/-

**Prithviraj S. Parikh**

Chairman

DIN : 00106727

**Place :** Mumbai

**Date :** 13<sup>th</sup> August, 2021

**NOTES:**

1. In view of the outbreak of COVID-19, the Ministry of Corporate Affairs (“**MCA**”), has vide its General Circular No. 14/2020 dated April 08, 2020, General Circular No. 17/2020 dated April 13, 2020, in relation to “Clarification on passing of ordinary and special resolutions by Companies under the Companies Act, 2013 and the rules made thereunder on account of the threat posed by COVID-19” and General Circular No. 20/2020 dated May 05, 2020 and General Circular No. 02/2021 dated January 13, 2021, in relation to “Clarification on holding of Annual General Meeting (“**AGM**”) through Video Conferencing (“**VC**”) or Other Audio Visual Means (“**OAVM**”) and all other relevant circulars issued from time to time (collectively referred to as “**MCA Circulars**”) and Securities and Exchange Board of India vide Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/79 dated May 12, 2020 and Circular No. SEBI/HO/CFD/CMD2/CIR/P/2021/11 dated January 15, 2021, in relation to “relaxation in relation to compliance with certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015: COVID-19 pandemic” (“**SEBI Circulars**”) have permitted the holding of the AGM through VC/OAVM, without the physical presence of the members at a common venue. In compliance with the applicable provisions of the Companies Act, 2013 (**the “Act”**) (including any statutory modification or re-enactment

thereof for the time being in force) read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (the “Rules”), as amended from time to time, read with the MCA Circulars, SEBI Circulars and pursuant to Regulation 44 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) the AGM of the Company is scheduled to be held on Wednesday, September 29, 2021 at 3:00 p.m. (IST) through VC/OAVM and the voting for items to be transacted in the notice to this AGM only through electronic voting process (“e-voting”).

2. The deemed venue for 38<sup>th</sup> AGM shall be the registered office of the Company at Flat No. A-123, Royal Den Apartments, No.16, Arul Theson Street, Palaniraja Udayar Nagar, Lawspet, Pondicherry - 605008.
3. Details as required under Regulation 36(3) of the SEBI Listing Regulations and under Secretarial Standard-2 on General Meetings issued by the Institute of Company Secretaries of India, in respect of Director seeking re-appointment is annexed hereto as “Annexure-A”.
4. Pursuant to the provisions of the Act, a member entitled to attend and vote at the AGM is entitled to appoint a proxy to attend and vote on his/her behalf and the proxy need not be a member of the Company. Since this AGM is being held pursuant to the MCA circulars through VC/OAVM, the requirement of physical attendance of members has been dispensed with. Accordingly, in terms of the MCA circulars and the SEBI circulars, the facility for appointment of proxies by the members will not be available for this AGM and hence, the proxy form, attendance slip and route map of AGM are not annexed to this notice.
5. Institutional Investors, who are members of the Company, are encouraged to attend and vote at the AGM through VC/OAVM facility. Corporate members intending to appoint their authorized representatives to attend the AGM through VC/OAVM and to vote thereat through remote e-voting are requested to send a certified copy of the Board Resolution to the Scrutinizer by e-mail at [amisi999@gmail.com](mailto:amisi999@gmail.com) with a copy marked to [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in) and [esl@eastcoaststeel.com](mailto:esl@eastcoaststeel.com).
6. In case of joint holders attending the AGM, only such joint holder who is higher in the order of names will be entitled to vote.
7. The attendance of the members attending the AGM through VC/OAVM will be counted for the purpose of reckoning the quorum under Section 103 of the Act.
8. The members can join the AGM through VC/OAVM mode 30 minutes before the scheduled time of the commencement of the AGM and the members can also join after the commencement of the AGM till the expiry of 15 minutes after such scheduled time by following the procedure mentioned in the notice. The members will be able to view the proceedings on National Securities Depository Limited (“NSDL”) e-voting website at [www.evoting.nsdl.com](http://www.evoting.nsdl.com). The facility of participation at the AGM through VC/OAVM will be made available to atleast 1,000 members on a first come first served basis as per the MCA Circulars. This will not include large shareholders (Shareholders holding 2% or more shareholding), Promoters, Institutional Investors, Directors, Key Managerial Personnels, the Chairpersons of the Audit Committee, Nomination and Remuneration Committee and Stakeholders’ Relationship Committee, Auditors etc. who are allowed to attend the AGM without restriction on account of first come first served basis.

9. Pursuant to MCA General Circular No. 02/2021 dated January 13, 2021 and SEBI Circular SEBI/HO/CFD/CMD2/CIR/P/2021/11 dated January 15, 2021, the Company is sending this AGM notice along with the Annual Report for the financial year 2020-21, in electronic form only to those members whose e-mail addresses are registered with the Company/Depositories. The notice convening the AGM and the Annual Report for the financial year 2020-21, has been uploaded on the website of the Company at **www.eastcoaststeel.com** and may also be accessed from the relevant section of the website of Stock Exchange i.e. BSE Limited (“BSE”) at **www.bseindia.com**. The AGM notice is also available on the website of NSDL at **www.evoting.nsdl.com**.
10. As per Regulation 40 of the SEBI Listing Regulations, as amended, securities of listed companies can be transferred only in dematerialised form, except in case of request received for transmission or transposition of securities. In view of this and to eliminate all risks associated with physical shares and for ease of portfolio management, members holding shares in physical form are requested to consider converting their holdings to dematerialised form.
11. Members are requested to intimate changes, if any, pertaining to their name, postal address, e-mail address, telephone/mobile numbers, PAN, registering of nomination and power of attorney, Bank mandate details such as name of the bank and branch details, bank account number, MICR code, IFSC code, etc., to their DP in case the shares are held in electronic form and to the RTA in case the shares are held in physical form.
12. To prevent fraudulent transactions, members are advised to exercise due diligence and notify the Company of any change in address or demise of any member as soon as possible. Members are also advised to not leave their demat account(s) dormant for long.
13. To receive communications through electronic means, including Annual Reports and Notices, members are requested to kindly register/update their e-mail address with their respective depository participant, where shares are held in electronic form. In case of shares held in physical form, members are advised to register their e-mail address with RTA: Link Intime, by mailing on **rnt.helpdesk@linkintime.co.in**.
14. As per the provisions of Section 72 of the Act, the facility for making nomination is available for the members in respect of the shares held by them. Members, who have not yet registered their nomination, are requested to register the same by submitting Form No. SH-13. Members are requested to submit the said form to their DP in case the shares are held in electronic form and to the RTA in case the shares are held in physical form.
15. Members holding shares in physical form, in identical order of names, in more than one folio, are requested to send to the Company or RTA, the details of such folios together with the share certificates for consolidating their holdings in one folio. A consolidated share certificate will be issued to such members after making requisite changes.
16. Members desiring inspection of statutory registers and other relevant documents of the Company during the AGM may send their request in writing to the Company at **esl@eastcoaststeel.com** upto the date of the AGM.

17. This AGM notice is being sent by e-mail only to those eligible members who have already registered their e-mail address with the Depositories/the DP/the Company's RTA/the Company before 20<sup>th</sup> August, 2021.
18. For registration of e-mail address, members are requested to register their e-mail address, in respect of electronic holdings, with their concerned DP and in respect of physical holdings, with the RTA.
19. Process and manner for members opting for e-voting is, as under:
  - I. In compliance with the provisions of Section 108 and other applicable provisions of the Act, read with Rule 20 of the Rules and Regulation 44 of the SEBI Listing Regulations, the Company is offering only e-voting facility to all the members of the Company and the business will be transacted only through the electronic voting system. The Company has engaged the services of NSDL for facilitating e-voting to enable the members to cast their votes electronically as well as for e-voting during the AGM. Resolution(s) passed by members through e-voting is/are deemed to have been passed as if it/they have been passed at the AGM.
  - II. Members are provided with the facility for voting through voting system during the VC/OAVM proceedings at the AGM and members participating at the AGM, who have not cast their vote by remote e-voting, are eligible to exercise their right to vote at the AGM.
  - III. Members who have already cast their vote by remote e-voting prior to the AGM will also be eligible to participate at the AGM but shall not be entitled to cast their vote again on such resolution(s) for which the member has already cast the vote through remote e-voting.
  - IV. Members of the Company holding shares either in physical form or electronic form as on the cut-off date of September 22, 2021, may cast their vote by remote e-voting. The remote e-voting period commences on Sunday, September 26, 2021 at 9:00 a.m. (IST) and ends on Tuesday, September 28, 2021 at 5:00 p.m. (IST). The remote e-voting module shall be disabled by NSDL for voting thereafter. Once the vote on a resolution is cast by the member, the member shall not be allowed to change it subsequently.
  - V. The way to vote electronically on NSDL e-voting system consists of "Two Steps" which are mentioned below:

#### **Step 1: Access to NSDL e-voting system**

##### **A) Login method for e-voting and joining virtual meeting for individual members holding securities in demat Mode**

Individual members holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Members are advised to update their mobile number and email Id in their demat accounts in order to access e-voting facility.

Login method for individual members holding securities in demat mode is given below:

Type of members	Login Method
Individual members holding securities in demat mode with NSDL.	<p>If you are already registered for <b>NSDL IDeAS facility</b>, please visit the e-Services website of NSDL. Open web browser by typing the following URL: <a href="https://eservices.nsdl.com/">https://eservices.nsdl.com/</a> either on a computer or on a mobile. Once the home page of e-Services is launched, click on the “<b>Beneficial Owner</b>” icon under “<b>Login</b>” which is available under “<b>IDeAS</b>” section. A new screen will open. You will have to enter your User ID and Password. After successful authentication, you will be able to see e-voting services. Click on “<b>Access to e-voting</b>” under e-voting services and you will be able to see e-voting page. Click on options available against Company name or <b>e-voting service provider - NSDL</b> and you will be re-directed to NSDL e-voting website for casting your vote during the remote e-voting period or joining virtual meeting &amp; voting during the meeting.</p> <p>If the user is not registered for IDeAS e-services, option to register is available at <a href="https://eservices.nsdl.com">https://eservices.nsdl.com</a>. Select “<b>Register Online for IDeAS</b>” portal or click at <a href="https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp">https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp</a>.</p> <p>Visit the e-voting website of NSDL. Open web browser by typing the following URL: <a href="https://www.evoting.nsdl.com/">https://www.evoting.nsdl.com/</a> either on a computer or on a mobile. Once the home page of e-voting system is launched, click on the icon “<b>Login</b>” which is available under “<b>Shareholder/Member</b>” section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number held with NSDL), Password/OTP and a Verification Code as shown on the screen.</p> <p>After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-voting page. Click on options available against Company name or e-voting service provider - NSDL and you will be redirected to e-voting website of NSDL for casting your vote during the remote e-voting period or joining virtual meeting &amp; voting during the meeting.</p>
Individual members holding securities in demat mode with CDSL	<p>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 <a href="https://web.cdslindia.com/myeasi/home/login">https://web.cdslindia.com/myeasi/home/login</a> or <a href="http://www.cdslindia.com">www.cdslindia.com</a> and click on New System Myeasi.</p> <p>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 <b>NSDL</b> to cast your vote.</p> <p>If the user is not registered for Easi/Easiest, option to register is available at <a href="https://web.cdslindia.com/myeasi/Registration/EasiRegistration">https://web.cdslindia.com/myeasi/Registration/EasiRegistration</a>.</p>

	<p>Alternatively, the user can directly access e-voting page by providing Demat Account Number and PAN No. from a link in <a href="http://www.cdslindia.com">www.cdslindia.com</a> home page.</p> <p>The system will authenticate the user by sending OTP on registered mobile and e-mail id 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 members (holding securities in demat mode) login through their depository participants	<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. Once login, you will be able to see e-voting option. Once you click on e-voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-voting feature. Click on options available against Company name or e-voting service provider-NSDL and you will be redirected to e-voting website of NSDL for casting your vote during the remote e-voting period or joining virtual meeting &amp; voting during the meeting.</p>

**Important note:**

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

Members are encouraged to submit their questions in advance with regards to the financial statements or any other matter to be placed at the AGM, from their registered e-mail address, mentioning their name, DP ID and Client ID /folio number and mobile number, to reach the Company's e-mail address at [esl.compliance@gmail.com](mailto:esl.compliance@gmail.com) on or before 22<sup>th</sup> September, 2021.

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

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

Login method for members other than individual members holding securities in demat mode and members holding securities in physical mode:

**How to Log-in to NSDL e-voting website?**

1. Visit the e-voting website of NSDL. Open web browser by typing the following URL: <https://www.evoting.nsdl.com/> either on a computer or on a mobile.



2. Once the home page of e-voting system is launched, click on the icon “**Login**” which is available under ‘**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.
4. Alternatively, if you are registered for NSDL e-Services i.e. IDEAS, you can log-in at <https://eservices.nsdl.com/> with your existing IDEAS login. Once you log-in to NSDL e-Services after using your log-in credentials, click on e-voting and you can proceed to Step 2 i.e. cast your vote electronically.
5. Your User ID details are given below:

<b>Manner of holding shares i.e. Demat (NSDL or CDSL) or Physical</b>	<b>Your User ID is:</b>
a) For members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID For example if your DP ID is IN300*** and Client ID is 12***** then your user ID is IN300***12*****.
b) For members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID For example if your Beneficiary ID is 12***** then your user ID is 12*****.
c) For members holding shares in Physical Form.	EVEN number followed by folio number registered with the Company. For example if folio number is 001*** and EVEN is 101456 then user ID is 101456001***.

6. Password details for members other than individual members 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 members whose email ids are not registered.

7. 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](http://www.evoting.nsdl.com).
  - b) “**Physical User Reset Password**” (If you are holding shares in physical mode) option available on [www.evoting.nsdl.com](http://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](mailto: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.
8. After entering your password, tick on Agree to “**Terms and Conditions**” by selecting on the check box.
9. Now, you will have to click on “**Login**” button.
10. After you click on the “**Login**” button, Home page of e-voting will open.

## **Step 2: Cast your vote electronically and join general meeting on NSDL e-voting system:**

How to cast your vote electronically and join general meeting on NSDL e-voting system?

1. After successful login at Step 1, you will be able to see all the Companies “**EVEN**” in which you are holding shares and whose voting cycle and general meeting is in active status.
2. Select “**EVEN**” of Company for which you wish to cast your vote during remote e-voting period and casting your vote during the general meeting. For joining virtual meeting, you need to click on “**VC/OAVM**” link placed under “**Join General Meeting**”.
3. Now you are ready for e-voting as the voting page opens.
4. 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.
5. Upon confirmation, the message “**Vote cast successfully**” will be displayed.
6. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.
7. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

## **GENERAL GUIDELINES FOR MEMBERS**

1. 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](http://www.evoting.nsdl.com) to reset the password.

2. In case of any queries, you may refer the Frequently Asked Questions (FAQs) for members and e-voting user manual for members available at the download section of [www.evoting.nsdl.com](http://www.evoting.nsdl.com) or call on toll free no.: 1800 1020 990 and 1800 22 44 30 or send a request to [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in).

**Process for those shareholders whose email ids are not registered with the depositories for procuring user id and password and registration of email 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 member, 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 [esl@eastcoaststeel.com](mailto:esl@eastcoaststeel.com).
2. In case shares are held in demat mode, please provide DP ID CLIENT ID (16 digit DP ID + CLIENT ID 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 [esl@eastcoaststeel.com](mailto:esl@eastcoaststeel.com). If you are an Individual member 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 and joining virtual meeting for individual members holding securities in demat mode.
3. Alternatively members may send a request to [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in) for procuring User ID and Password for e-voting by providing above mentioned documents.
4. In terms of SEBI circular dated December 9, 2020 on e-voting facility provided by Listed Companies, individual members holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Members are required to update their mobile number and email Id correctly in their demat account in order to access e-voting facility.

**THE INSTRUCTIONS FOR MEMBERS FOR E-VOTING ON THE DAY OF THE AGM ARE AS UNDER:**

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

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

1. Members will be provided with a facility to attend the AGM through VC/OAVM through the NSDL e- voting system. Members may access by following the steps mentioned above for Access to NSDL e-voting system. After successful login, you can see link of “**VC/OAVM link**” placed under “**Join General Meeting**” menu against Company name.

You are requested to click on VC/OAVM link placed under Join General Meeting menu. The link for VC/OAVM will be available in members login where the EVEN of Company will be displayed. Please note that the members who do not have the User ID and Password for e-voting or have forgotten the User ID and Password may retrieve the same by following the remote e-voting instructions mentioned in the notice to avoid last minute rush.

2. Members are encouraged to join the meeting through Laptops for better experience.
3. Further, members will be required to allow camera and use internet with a good speed to avoid any disturbance during the meeting.
4. Please note that participants connecting from mobile devices or tablets or through laptop connecting via mobile hotspot may experience Audio/Video loss due to fluctuation in their respective network. It is therefore recommended to use stable Wi-Fi or LAN connection to mitigate any kind of aforesaid glitches.

## ANNEXURE-A

Information pursuant to Regulation 36(3) of the SEBI Listing Regulations and Secretarial Standard on General Meetings (SS-2) of The Institute of Company Secretaries of India ("ICSI") in respect of individuals proposed to be appointed/re-appointed as Director:

<b>Name of the Director</b>	Shri. Prithviraj S. Parikh
<b>DIN</b>	00106727
<b>Date of Birth</b>	19 <sup>th</sup> February, 1946
<b>Age</b>	75 years
<b>Date of Appointment: First appointment on the Board</b>	08 <sup>th</sup> January, 1987
<b>Qualification</b>	MS., M.E. from N.Y.U./C.C.N.Y.
<b>Expertise in Specific Functional area</b>	Has completed his Masters in Engineering in U.S. On returning to India he joined family owned business of manufacturing steel. He has over four decades of experience in management of Steel Plants & allied activities, international trade etc.
<b>Directorship in other Companies (Excludes Directorship in Eastcoast Steel Limited, Foreign and Section 8 Companies) as on March 31, 2021</b>	<ul style="list-style-type: none"> <li>• Western Ministil Limited</li> <li>• WRM Private Limited</li> <li>• Satori Realty Private Limited</li> <li>• Wist Overseas Private Limited</li> <li>• Aspher Foods Private Limited</li> <li>• Western India Steel Company Private Limited</li> <li>• Gunjar Finance and Investment Private Limited</li> <li>• Anagha Enterprises Private Limited</li> <li>• R and A Foods Private Limited</li> </ul>
<b>Chairmanship/Membership of the Committees as on March 31, 2021 (Includes only Audit and Stakeholders' Relationship Committee)</b>	<p><b><u>Audit Committee</u></b> Eastcoast Steel Limited: Member</p> <p><b><u>Stakeholders' Relationship Committee</u></b> Eastcoast Steel Limited: Member</p>
<b>Number of Shares held as on March 31, 2021</b>	8,600
<b>Number of Board Meetings attended (During the F.Y. 2020-21)</b>	4

<b>Relationship with other Directors/Key Managerial Personnel</b>	Not related to any Director /Key Managerial Personnel
<b>Terms and conditions of appointment or re-appointment</b>	In terms of Section 152(6) of the Act, Shri. Prithviraj S. Parikh shall be liable to retire by rotation.
<b>Remuneration last drawn (including sitting fees, if any) for the financial year 2020-21</b>	Nil
<b>Remuneration proposed to be paid</b>	Nil

**Registered office:**

Flat No. A-123, Royal Den Apartments,  
No.16, Arul Theson Street,  
Palaniraja Udayar Nagar,  
Lawspet, Pondicherry - 605008.

**By order of the Board of Directors**

Sd/-  
**Prithviraj S. Parikh**  
Chairman  
DIN: 00106727

**Place :** Mumbai**Date :** 13<sup>th</sup> August, 2021.

## BOARD'S REPORT

Dear Shareholders,

The Directors of your Company are pleased to present their Thirty Eighth Annual Report together with the Audited Financial Statements for the financial year ended 31<sup>st</sup> March, 2021.

### 1. FINANCIAL PERFORMANCE

The financial performance of the Company for the year ended 31<sup>st</sup> March, 2021 is summarised below:

(Amount in ₹)

Sr. No.	Particulars	2020-21	2019-20
1.	Revenue from operations	Nil	Nil
2.	Gain on sale of property, plant and equipment	42,20,27,447	Nil
2.	Other Income	29,59,418	2,03,698
<b>3.</b>	<b>Total Income</b>	<b>42,49,86,865</b>	<b>2,03,698</b>
4.	Profit/(Loss)Before Exceptional items, Depreciation & Tax (PBDT)	40,53,10,420	(2,00,56,323)
5.	Less: Depreciation	2,33,950	3,15,123
	Less: Exceptional items	Nil	Nil
<b>6.</b>	<b>Profit/(Loss) for the year before taxation</b>	<b>40,50,76,470</b>	<b>(2,03,71,446)</b>
7.	Less: Provision for tax	5,28,10,000	Nil
	Income tax pertaining to earlier years	Nil	Nil
<b>8.</b>	<b>Profit/(Loss) for the year after tax</b>	<b>35,22,66,470</b>	<b>(2,03,71,446)</b>
9.	Other Comprehensive Income / (Loss)	(84,322)	2,21,211
<b>10.</b>	<b>Total Comprehensive Income / (Loss) for the year</b>	<b>35,21,82,148</b>	<b>(2,01,50,235)</b>

### 2. REVIEW OF OPERATIONS

During the year under review, the Company has sold/disposed of an area of 54.86 acres or thereabout situated at Pondicherry, for a consideration of ₹ 43.24 Crores, subject to the deduction of tax, to Sri. Balaji Vidyapeeth, Pondicherry, in accordance with the Resolution passed by the shareholders vide postal ballot result dated 13<sup>th</sup> July, 2019 and further Resolution passed by the Board of Directors on 27<sup>th</sup> November, 2020. Pursuant to the aforesaid sale/disposal, the Company has recognised the gain thereto.

The Company has further utilised part of the sale consideration received from the sale of the said area towards repayment of its existing debt liability.

### 3. DIVIDEND AND RESERVES

Your Directors have not recommended any dividend to the equity shareholders.

Further, no amount has been transferred to the reserves as well.

**4. CHANGE IN NATURE OF BUSINESS, IF ANY**

Your Company has not deviated its line of business activity nor has expanded the area of activities during the year under review. The activities of the Company continue to remain standstill since 1995.

**5. SUBSIDIARIES, ASSOCIATES AND JOINT VENTURES**

During the financial year under review, the Company did not have any Subsidiary, Joint Venture or Associate Companies.

**6. MATERIAL CHANGES AND COMMITMENTS IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR TO WHICH THESE FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT**

No material changes and commitments affecting the financial position of the Company have occurred in the Company since the end of Financial Year 2020-21 till the date of this report.

**7. SHARE CAPITAL**

The paid up Equity Share Capital of the Company was ₹ 5,39,64,680/- as on 31<sup>st</sup> March, 2021:

**a) Buy Back of Securities**

The Company has not bought back any of its securities during the year under review.

**b) Sweat Equity**

The Company has not issued any Sweat Equity Shares during the year under review.

**c) Bonus Shares**

The Company has not issued any bonus shares during the year under review.

**d) Employees Stock Option**

The Company does not have Employee Stock Option Scheme.

**e) Rights Issue of equity shares**

The Company has not issued any shares on right basis during the financial year under review.

**f) Equity Shares with differential rights**

The Company has not issued equity shares with differential rights as to dividend, voting or otherwise.

**8. DEPOSITS**

The Company has neither invited nor accepted any deposits pursuant to the provisions of the Companies Act, 2013.

**9. INFORMATION ON THE STATE OF AFFAIRS OF THE COMPANY**

Information on the operational and financial performance, among others, are given in the Management Discussion and Analysis which forms part of the Directors' Report.



**10. CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO****(A) Conservation of Energy****(i) The steps taken or impact on conservation of energy:**

The Company makes conscious efforts to reduce its energy consumption. Some of the measures undertaken by the Company during the year, were use of LED Lights at office premises instead of conventional lighting, usage of energy efficient air-conditioning and energy efficient office equipments such as printer, scanner and photocopy machines.

**(ii) Steps taken by the Company for utilizing alternate source of energy:**

Apart from steps mentioned above to conserve energy, the management has been continuously exploring feasible alternate sources of energy.

**(iii) The capital investment on energy conservation equipment:**

There is no capital investment on energy conservation equipment during the year under review.

**(B) Technology Absorption****(i) The efforts made towards technology absorption:**

The Company evaluates technology developments on a continuous basis and keeps the organisation updated.

**(ii) The benefits derived:**

The Company has benefited from technology development. It has helped to understand in better way the requirement for the business.

**(iii) The Company has not imported any technology from the beginning of the financial year.****(iv) The Company has not incurred any expenditure on Research and Development during the year under review.****(C) Foreign Exchange Earnings and Outgo**

There were no foreign exchange earnings and outgo during the financial year under review.

**11. ENVIRONMENT AND SAFETY**

Since the Company has not been engaged in any activity after the closure of the plant since 1995, environment and safety measures are not applicable to the Company for the time being.

**12. DIRECTORS AND KEY MANAGERIAL PERSONNEL (“KMP”)****a) Independent Directors**

The Company has received declaration from all the Independent Directors confirming that they meet the criteria of independence as laid down under Section

149(6) of the Act, and abide by the Code for Independent Directors as prescribed under Schedule IV of the Act.

During the year under review, the Independent Directors met on 12<sup>th</sup> February, 2021 in order to evaluate:

- (i) The performance of Non-Independent Directors and Board, as a whole
- (ii) The performance of Chairman of the Company taking into account the views of all the Directors on Board.
- (iii) The quality, quantity and timeliness of flow of information between the management and the Board that is necessary for the Board to effectively and reasonably perform their duties.

All the Independent Directors attended the meeting.

#### **b) Retirement by Rotation**

In terms of the provisions of Section 152(6) of the Act, Shri. Prithviraj S. Parikh, Director (DIN: 00106727), retires by rotation at the forthcoming Annual General Meeting and being eligible offers himself for re-appointment. In accordance with Regulation 36 of the SEBI Listing Regulations and Secretarial Standard – 2 on General Meetings, brief profile of the Director to be re-appointed is included in the notice which forms part of the Annual Report.

A resolution seeking shareholders' approval for his re-appointment forms part of the notice of the AGM.

#### **c) Key Managerial Personnel**

Pursuant to the provisions of Section 203 of the Act read with the rules made thereunder, the following employees are the Key Managerial Personnel of the Company:

1. Shri. Babush Kamath – Chief Executive Officer and Chief Financial Officer
2. Shri. P K R K Menon – Company Secretary and Compliance Officer

### **13. BOARD MEETINGS AND AGM**

The Board meets at regular intervals as and when required to discuss the business polices and strategies apart from other routine business matters.

During the financial year 2020-21, the Board met 5 (Five) times i.e. on 16<sup>th</sup> July, 2020, 31<sup>st</sup> August, 2020, 12<sup>th</sup> November, 2020, 27<sup>th</sup> November, 2020 and 13<sup>th</sup> February, 2021.

However, in wake of the nationwide lockdown declared by the Government of India due to COVID-19 pandemic, Ministry of Corporate Affairs vide its General Circular No. 11/2020 dated 24<sup>th</sup> March, 2020 had extended mandatory requirement of holding meetings of the Board of the Companies as provided under Section 173 of the Companies Act, 2013 by a period of 60 days till next two quarters i.e., till 30<sup>th</sup> September, 2020. In view of the relaxations granted above, the Board Meetings of the Company as required under the aforesaid provisions for the quarter and year ended 31<sup>st</sup> March, 2020 and for the quarter ended 30<sup>th</sup> June, 2020, was convened according to the relaxed timelines.

Apart from as aforesaid, the gap between two meetings did not exceed one hundred and twenty days and the necessary quorum was present for all the meetings held during the year.

The attendance of the Directors at the Board Meetings and the AGM held during the financial year 2020-21 is as under:

Name of the Directors	Category	Number of Board Meetings		Last AGM attended
		Entitled to attend	Attended	
Shri Prithviraj S. Parikh	Chairman & Non-Executive Director	5	4	Yes
Shri Hitesh V. Raja	Independent, Non-Executive Director	5	5	No
Smt. Sharmila S. Chitale	Independent, Non-Executive Director	5	4	Yes

#### 14. COMMITTEES OF THE BOARD

##### a) AUDIT COMMITTEE

###### Constitution of the Audit Committee

A qualified and independent Audit Committee has been set up by the Board in compliance with the requirements of Section 177 of the Act, read with rules framed thereunder.

The composition, quorum, powers, role and scope are in accordance with Section 177 of the Companies Act, 2013. All the members of the Audit Committee are financially literate and have experience in financial management.

The Board has accepted all the recommendations of the Audit Committee during the financial year 2020-21.

###### Meeting and Attendance

The Committee met 4 (Four) times during the financial year 2020-21 i.e. on 16<sup>th</sup> July, 2020, 31<sup>st</sup> August, 2020, 12<sup>th</sup> November, 2020 and 13<sup>th</sup> February, 2021. The necessary quorum was present for all the meetings held during the year.

The composition of the Audit Committee and the details of meetings attended by members of the committee are given below:

Name of the Members	Category	Number of committee meetings	
		Entitled to attend	Attended
Shri Hitesh V. Raja Chairman	Independent, Non-Executive Director	4	4
Shri Prithviraj S. Parikh Member	Non-Executive Director	4	4
Smt. Sharmila S. Chitale Member	Independent, Non-Executive Director	4	3

The previous AGM of the Company was held on 30<sup>th</sup> September, 2020 and Shri Prithviraj S. Parikh, member, duly authorized by Chairman of the Committee, was present at the last AGM to answer the shareholders queries.

## b) NOMINATION AND REMUNERATION COMMITTEE

### Constitution of the Nomination and Remuneration Committee

The Nomination and Remuneration Committee of the Company is constituted in compliance with Section 178 of the Act, read with rules framed thereunder.

The Committee comprises of three Non-Executive Directors out of which two are Independent Directors as on 31<sup>st</sup> March, 2021 and the Chairman of the Committee is an Independent Director.

The Committee met 1 (One) time during the financial year 2020-21. i.e on 12<sup>th</sup> November, 2020. The necessary quorum was present for the meeting held during the year.

The composition of the Nomination and Remuneration Committee and the details of meetings attended by members of the Committee are given below:

Name of the Members	Category	Number of committee meetings	
		Entitled to attend	Attended
Shri Hitesh V. Raja Chairman	Independent, Non-Executive Director	1	1
Shri Prithviraj S. Parikh Member	Non-Executive Director	1	1
Smt. Sharmila S. Chitale Member	Independent, Non-Executive Director	1	1

The previous AGM of the Company was held on 30<sup>th</sup> September, 2020 and Shri Prithviraj S. Parikh, member, duly authorized by the Chairman of the Committee, was present at the last AGM to answer the shareholders queries

## c) STAKEHOLDERS RELATIONSHIP COMMITTEE

### Constitution of the Stakeholders Relationship Committee

The Board has constituted the Stakeholders Relationship Committee comprising of three members i.e. Shri Prithviraj S. Parikh, Non-Executive Director, Shri Hitesh V. Raja, Independent, Non-Executive Director and Smt. Sharmila S. Chitale, Independent, Non-Executive Director. Smt. Sharmila S. Chitale is the Chairperson of the Committee. The composition of the Stakeholders Relationship Committee is in compliance with the provisions of Section 178 of the Act, read with rules framed thereunder.

The Committee met 4 (Four) times during the financial year 2020-21 i.e., on 16<sup>th</sup> July, 2020, 31<sup>st</sup> August, 2020, 12<sup>th</sup> November, 2020 and 13<sup>th</sup> February, 2021. The necessary quorum was present for the meeting held during the year.

The composition of the Committee and the attendance of the members of the Stakeholders Relationship Committee during the financial year 2020-21 are as given below:

Name of the Members	Category	Number of committee meetings Held	
		Entitled to attend	Attended
Smt. Sharmila S. Chitale Chairman	Independent, Non-Executive Director	4	3
Shri Prithviraj S. Parikh Member	Non-Executive Director	4	4
Shri Hitesh V. Raja Member	Independent, Non-Executive Director	4	4

The Company obtains half-yearly certificate from a Company Secretary in Practice confirming the issue of certificates for transfer, sub-division, consolidation etc. and submits a copy thereof to the Stock Exchange where the shares of the Company are Listed in terms of Regulation 40(9) of the SEBI Listing Regulations. Further, the Compliance Certificate under Regulation 7(3) of the SEBI Listing Regulations, confirming that all activities in relation to share transfer facility are maintained by Registrar and Share Transfer Agents is also submitted to the Stock Exchange where the shares of the Company are Listed on a half yearly basis. The previous AGM of the Company was held on 30<sup>th</sup> September, 2020 and Smt. Sharmila S. Chitale, Chairperson of the Committee, was present at the last AGM to answer the shareholders queries.

## 15. CORPORATE GOVERNANCE

Pursuant to Chapter IV of the SEBI Listing Regulations, the provision with regard to Corporate Governance is not applicable to the Company as the paid up equity share capital of the Company does not exceed ₹ 10 crores and net worth does not exceed ₹ 25 crores as on the last day of the previous financial year.

## 16. ANNUAL EVALUATION OF THE BOARD, ITS COMMITTEES AND INDIVIDUAL DIRECTORS

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 Act and the SEBI Listing Regulations.

The Board evaluated its performance after seeking inputs from all the directors on the basis of criteria such as the Board composition and structure, effectiveness of board processes, information and functioning etc. Additionally, the Chairman of the Board was also evaluated on key aspects of his role, taking into account the views of executive directors and non-executive directors in the aforesaid meeting.

The performance of the Committees was evaluated by the Board after seeking inputs from the committee members on the basis of criteria such as the composition of committees, effectiveness of committee meetings etc. The above criteria are as provided by the Guidance Note on Board Evaluation issued by SEBI.

In a separate meeting of Independent Directors, performance of Non-Independent Directors, the Board as a whole and the Chairman of the Company was evaluated, taking into account the views of executive directors and non-executive directors. Performance evaluation of Independent Directors was done by the entire board, excluding the Independent Director being evaluated.

**17. TRAINING IMPARTED TO THE INDEPENDENT DIRECTORS**

Every Independent Director, Executive Director / Senior Managerial Personnel is familiarized about the Company's strategy, operations, organisation structure, human resources, quality, finance and risk management.

Further, at the time of appointment of an Independent Director, the Company issues a formal letter of appointment outlining his/her role, functions, duties and responsibilities as a Director. The terms and conditions of letter of appointment is available on the Company's website at [www.eastcoaststeel.com](http://www.eastcoaststeel.com)

**18. CRITERIA FOR DETERMINING QUALIFICATIONS, POSITIVE ATTRIBUTES AND INDEPENDENCE OF A DIRECTOR**

The company has adopted a policy on Director's appointment and remuneration including criteria for determining qualifications, positive attributes, independence of Director and also remuneration for key managerial personnel and other employees. The policy is available on the website of the Company at [www.eastcoaststeel.com](http://www.eastcoaststeel.com).

**19. DETAILS OF LOANS AVAILED FROM DIRECTORS OR THEIR RELATIVES**

The Company had availed Loan from Shri Prithviraj S. Parikh, Chairman and Director of the Company, during the year under review.

(Amount in ₹)

Sr. No.	Name	Opening Balance at the beginning of the year	Amount Borrowed	Amount Repaid	Closing Balance at the end of the year
1.	Shri Prithviraj. S. Parikh	38,25,000	1,50,000	39,75,000	Nil

The Company has received the declaration from the Director as required under rule 2(viii) of the Companies (Acceptance of Deposits) Rules, 2014.

**20. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS**

There was no loan or guarantee given or investment made or security provided pursuant to Section 186 of the Act, during the financial year under review.

**21. PARTICULARS OF CONTRACTS OR ARRANGEMENT MADE WITH RELATED PARTIES**

All the related party transactions entered into by the Company during the financial year were on an arm's length basis and were carried out in the ordinary course of business. There are no materially significant related party transactions made by the Company during the year under consideration with the Promoters, Directors or Key Managerial Personnel which may have a potential conflict with the interest of the Company at large. All the related party transactions as required under Ind-AS 24 'Related Party Disclosures' are reported in other explanatory information, forming part of the financial statements.

Details of related party transactions are regularly placed before the Audit Committee and also before the Board for its approval. Wherever required prior approval of the Audit Committee is obtained.

The Company has not entered into any related party transaction during the financial year pursuant to the provisions of Section 188 of the Act, read with Companies (Meetings of Board and its Powers) Rules, 2014, as amended from time to time. Hence, disclosure in Form AOC-2 has not been given.

## 22. PARTICULARS OF EMPLOYEES

The information required under Section 197 of the Companies Act, 2013 read with rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 are given below:

- a) The Board affirms that the remuneration paid is as per the Remuneration Policy of the Company.
- b) The percentage increase in the median remuneration of employees in the financial year is - Nil.
- c) 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 managerial remuneration: Average percentile increase already made in the salaries of employees other than the managerial personnel in the last financial year is Nil and the percentile increase in the managerial remuneration is Nil.
- d) Number of permanent employees on the rolls of the Company as on 31<sup>st</sup> March, 2021 is 4
- e) The ratio of the remuneration paid to each Director to the median remuneration of the employees of the Company during the financial year 2020-21:

Name of Directors	Remuneration	Median Remuneration of the employees	Ratio
Shri Prithviraj S. Parikh	-	-	-
Shri Hitesh V. Raja	-	-	-
Smt Sharmila S. Chitale	-	-	-

- f) The percentage increase in remuneration of Director: Nil.
- g) The percentage increase in remuneration of Chief Financial Officer: Nil.
- h) The percentage increase in remuneration of Chief Executive Officer : Nil.
- i) The percentage increase in remuneration of Company Secretary: Nil.
- j) There has been no remuneration or sitting fees paid to the Directors during the year under review.

The Company does not have any employee who is drawing a remuneration of ₹ 10,200,000/- per annum or ₹ 850,000/- per month as stipulated in the Companies Act, 2013 and the rules made thereunder. Hence, disclosures required under Rule 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 have not been provided, during the year under review.

The Company does not have any scheme or provision of money for the purchase of or subscription to its own shares by the employees/ directors or by trustees for the benefit of the employees/ directors.

### 23. VIGIL MECHANISM / WHISTLE BLOWER POLICY

Pursuant to Section 177(9) and (10) of the Act, read with the rules framed thereunder, the Company has formulated a Whistle Blower Policy for Directors and Employees to report to the management about the unethical behavior, fraud or violation of Company's Code of Conduct. The mechanism provides for adequate safeguards against victimisation of Employees and Directors who use such mechanism and makes provision for direct access to the Chairman of the Audit Committee and no personnel of the Company have been denied access to the Audit Committee. The policy is available on the website of the Company at [www.eastcoaststeel.com](http://www.eastcoaststeel.com).

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

The Company is committed to provide an environment, which is free of discrimination, intimidation and abuse. Pursuant to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made thereunder, the Company has a Policy for prevention of Sexual Harassment in the Company. All employees (permanent, contractual, temporary and trainees) are covered under this policy. Internal Complaints Committee has also been set up to redress the complaints received regarding sexual harassment. There were no cases reported during the financial year 2020-21.

### 25. OTHER MATERIAL ORDERS

M/s. M.B. Gupta HUF through Karta, Mahesh Chand Gupta and others have filed C.P. No: 347/2020 and I.A. No: 701/2020 before the National Company Law Tribunal, Chennai, against the Company and others, as and by way of re-litigation of grievances which were already dealt with in the previous round of litigation in C.P. No. 56 of 2013 filed by Mr. Suresh Kumar Jalan and others before the erstwhile Company Law Board, Chennai, which were dismissed by the said judicial authority on 11<sup>th</sup> May, 2015 and such dismissal have also been confirmed in Company Appeal No: 20 of 2015 by the Hon'ble High Court, Madras on 26<sup>th</sup> August 2019.

The Company and others have filed C.P. No: 248 of 2020 and I.A. No. 1177 of 2020 before the National Company Law Tribunal, Chennai, challenging the maintainability of the aforesaid petition filed by the Petitioners viz. M.B. Gupta HUF and others, which are pending for hearing before the Hon'ble NCLT, Chennai, having been adjourned to 5<sup>th</sup> July, 2021.

### 26. RISK MANAGEMENT POLICY

The Company in order to comply with the provisions of the Companies Act, 2013 and to provide an effective mechanism for implementing risk management system had



adopted the policy on risk management for evaluating and monitoring various risks that could threaten the existence of the Company. The Company had not faced any major risks and no major deviations from the actuals as attained by the Company. The Audit Committee has reviewed the policy periodically. The Board takes overall responsibility for the overall process of risk management in the organisation.

The Board shall take note of any future threats and shall report to the Company for formulating an effective mechanism and strategy. The risk management policy is available on the website of the Company at [www.eastcoaststeel.com](http://www.eastcoaststeel.com).

## 27. EXTRACT OF ANNUAL RETURN

Pursuant to the provisions of Section 92(3) of the Companies Act, 2013, an extract of Annual Return is annexed hereto as “**Annexure- A**” and forms part of this report.

## 28. SECRETARIAL AUDITORS

Pursuant to the provisions of Section 204 of the Act and Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, Shri P. S. Ramnath, Practicing Company Secretaries, (CP: 4159; F.C.S. 819), was been re-appointed as the Secretarial Auditors to conduct the Secretarial Audit of the Company for the financial year 2020-21, the Secretarial Audit Report is annexed herewith as “**Annexure- B**” and forms part of this report.

The Secretarial Audit Report does not contain any adverse remark, reservation, qualification or disclaimer remark.

## 29. STATUTORY AUDITORS

M/s. Paresh Rakesh & Associates LLP (earlier known as M/s. Paresh Rakesh & Associates), Chartered Accountants (FRN: 119728W/W100743) were appointed as Statutory Auditors of the Company, for a term of 5 (five) consecutive years i.e. upto the conclusion of 42<sup>nd</sup> AGM to be held in the year 2025, at the AGM held on 30<sup>th</sup> September, 2020.

The Company has received written consent and certificate of eligibility pursuant to the provisions of Sections 139, 141 and other applicable provisions of the Act and rules framed thereunder (including any statutory modification(s) or re-enactment(s) thereof for the time being in force) from M/s. Paresh Rakesh & Associates LLP, Chartered Accountants.

### Disclosure under Section 143(12) of the Act

The Statutory Auditors of the Company have not reported any fraud or irregularities, as specified under the Second provision of Section 143(12) of the Act (including any Statutory modification(s) or re-enactment(s) for the time being in force), read with Rule 13 of the Companies (Audit and Auditors) Rules, 2014, during the financial year under review.

### Statutory Auditor's Report

There are no qualifications, reservations or adverse remarks or disclaimers made by the Statutory Auditors, in their report for the financial year ended 31<sup>st</sup> March, 2021.

### 30. COMPLIANCE OF SECRETARIAL STANDARDS

The Company has complied with the applicable Secretarial Standards issued by the Institute of Company Secretaries of India, i.e., SS-1 and SS-2, relating to “Meetings of the Board of Directors” and “General Meetings”, respectively.

### 31. COST AUDIT

The Company is not required to maintain cost record as prescribed by the Central Government under the provisions of Section 148 of the Act in view of the closure of the plant in 1995 and cessation of manufacturing activities. No activities or services have been undertaken by the Company since then.

### 32. INTERNAL AUDITORS

The Board of Directors had appointed M/s. Krishnan & Giri, Chartered Accountants, (FRN No. 1512S) as Internal Auditors of the Company for the financial year 2020-21.

### 33. INTERNAL FINANCIAL CONTROL SYSTEMS AND THEIR ADEQUACY

The Company has in place a robust internal financial control system, commensurate with the size of its operations and nature of its business activities. The Company has a standard operating procedure for various activities and operations and follows this standard operating procedure for its internal control procedures. The Internal Auditor monitors and evaluates the efficacy and adequacy of internal financial control system in the Company, its compliance with operating systems, accounting procedures, application of the instructions and policies fixed by the senior management at all locations of the Company. The Audit Committee reviews the report on Internal Control submitted by the Internal Auditors on a quarterly basis.

Based on the assessment carried out by the Audit Committee, the internal financial controls were adequate and effective and no reportable material weakness or significant deficiencies in the design or operation of internal financial controls were observed during the financial year 2020-21.

### 34. DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to Section 134(5) of the Act, your Directors, based on the representations received from the Operating Management and after due enquiry, hereby confirm that:

- a) In the preparation of annual accounts for the financial year ended 31<sup>st</sup> March, 2021, the applicable accounting standards had been followed along with proper explanation relating to material departures;
- b) They had in consultation with Statutory Auditors, selected accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company as at 31<sup>st</sup> March, 2021 and Profit of the Company for the year ended on that date;
- c) They have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;

- d) They have prepared the annual accounts for the financial year ended 31<sup>st</sup> March, 2021 on a “going concern” basis;
- e) They have laid down internal financial controls, which are adequate and operating effectively;
- f) They have devised proper system to ensure compliance with the provisions of all applicable laws and such systems are adequate and operating effectively.

### 35. CORPORATE SOCIAL RESPONSIBILITY (CSR) INITIATIVES

Provisions of Section 135 of the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time, are not applicable to your Company as the Company does not fall under any of the criteria specified therein.

### 36. LISTING

The shares of the Company are listed on BSE Limited. The annual listing fee had been paid to the stock exchange before due date.

### 37. CAUTIONARY STATEMENT

Statements in these reports describing company’s projections statements, expectations and hopes are forward looking. Though, these expectations are based on reasonable assumptions, the actual results might differ.

### 38. ACKNOWLEDGEMENT

Your Directors wish to place on record the appreciation and values, the dedicated efforts and contribution made by the employees at all levels. The Directors also wish to place on record their word of sincere appreciation for the continued support.

**For and on behalf of the Board of Directors**

Sd/-

**Prithviraj S. Parikh**

Chairman

DIN: 00106727

**Place :** Mumbai

**Date :** 30<sup>th</sup> June, 2021

**ANNEXURE – A**  
**FORM NO. MGT 9**  
**EXTRACT OF ANNUAL RETURN**

As on financial year ended on March 31, 2021

Pursuant to Section 92(3) of the Companies Act, 2013 and  
 Rule 12(1) of the Companies (Management and Administration) Rules, 2014.

**I. REGISTRATION & OTHER DETAILS:**

1.	CIN	L27109PY1982PLC000199
2.	Registration Date	20 <sup>th</sup> August, 1982
3.	Name of the Company	EASTCOAST STEEL LIMITED
4.	Category/Sub-category of the Company	Public Company
5.	Address of the Registered office & contact details	Flat No. A-123, Royal Den Apartments, No.16, Arul Theson Street, Palaniraja Udayar Nagar, Lawspet, Pondicherry - 605008. (w.e.f April 01, 2021) Ph. No.: 0413-2202225 Fax No.: 0413-2202224 E-mail: esl@eastcoaststeel.com
6.	Whether listed company	Yes
7.	Name, address & contact details of the Registrar & Share Transfer Agents, if any.	Link Intime India Private Limited C-101, 247 Park, L.B.S. Marg, Vikhroli (West), Mumbai – 400 083. Ph. No.: 022-49186000 Fax. No.: 022-49186060 E-mail: rnt.helpdesk@linkintime.co.in

**II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY**

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

Sr. No.	Name and Description of main products / services	NIC Code of the product/service	% to total turnover of the Company
1.	Manufacture of steel in ingots or other primary forms, and other semi-finished products of steel	24103	Nil

**III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES:**

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

Sr. No.	Name and Address of the Company	CIN/ GLN	Holding/ Subsidiary/ Associates	% of shares held	Applicable Section
1.			Nil		

**IV. A) SHAREHOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)**

Category-wise Shareholding

Category of Shareholders	No. of Shares held at the beginning of the year [As on 01-April-2020]				No. of Shares held at the end of the year [As on 31-March-2021]				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
<b>A. Promoters</b>									
<b>(1) Indian</b>									
a) Individual/ HUF	42791	Nil	42791	0.79	42791	Nil	42791	0.79	Nil
b) Central Govt.	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
c) State Govt.(s)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
d) Bodies Corp.	977835	Nil	977835	18.12	977835	Nil	977835	18.12	Nil
e) Banks / FI	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
f) Any other	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
<b>Sub-total (A) (1)</b>	<b>1020626</b>	<b>Nil</b>	<b>1020626</b>	<b>18.91</b>	<b>1020626</b>	<b>Nil</b>	<b>1020626</b>	<b>18.91</b>	<b>Nil</b>
<b>(2) Foreign</b>									
a) Individuals (Non-Resident Individuals / Foreign Individuals)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
b) Government	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
c) Institutions	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
d) Foreign Portfolio Investor	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
e) Any Other ( Specify )	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
<b>Sub-total (A) (2)</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>
<b>Total shareholding of Promoter (A)</b>	<b>1020626</b>	<b>Nil</b>	<b>1020626</b>	<b>18.91</b>	<b>1020626</b>	<b>Nil</b>	<b>1020626</b>	<b>18.91</b>	<b>Nil</b>
<b>B. Public Shareholding</b>									
<b>1. Institutions</b>									
a) Mutual Funds / UTI	Nil	16900	16900	0.31	Nil	16900	16900	0.31	Nil
b) Venture Capital Fund	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
c) Alternate Investment Funds	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
d) Foreign Venture Capital Investors	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
e) Foreign Portfolio Investor	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
f) Financial Institutions/Banks	150	2750	2900	0.05	150	2750	2900	0.05	Nil
g) Insurance Companies	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
h) Provident Funds/Pension Funds	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
i) Any Others (specify)	Nil	5400	5400	0.10	Nil	5400	5400	0.10	Nil
<b>Sub-total (B)(1)</b>	<b>150</b>	<b>25050</b>	<b>25200</b>	<b>0.47</b>	<b>150</b>	<b>25050</b>	<b>25200</b>	<b>0.47</b>	<b>Nil</b>
<b>2. Central Government / State Government(s) / President of India</b>									
<b>Sub-total (B)(2)</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>
<b>2. Non-Institutions</b>									
a) Bodies Corp.	1859898	33200	1893098	35.08	1858748	33200	1891948	35.06	-0.02
b) Individuals									

Category of Shareholders	No. of Shares held at the beginning of the year [As on 01-April-2020]				No. of Shares held at the end of the year [As on 31-March-2021]				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
i) Individual shareholders holding nominal share capital upto ₹ 1 lakh	498981	914275	1413256	26.19	501681	912325	1414006	26.20	0.01
ii) Individual shareholders holding nominal share capital in excess of ₹ 1 lakh	741620	Nil	741620	13.74	741620	Nil	741620	13.74	0.00
c) NBFCs registered with RBI	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Trust Employee	200	Nil	200	0.00	600	Nil	600	0.01	0.01
d) Overseas Depositories (holding DRs) (balancing figure)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
c) Others (specify)									
Non Resident Indians (Non Repatriable)	5844	9	5853	0.11	5744	9	5753	0.11	0.00
Non Resident Indians (Repatriable)	11040	61380	72420	1.34	10540	61380	71920	1.33	-0.01
Partnership Firm	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
HUF	213795	500	214295	3.97	213945	1200	215145	3.99	0.02
Clearing Members	1400	Nil	1400	0.03	1550	Nil	1550	0.03	0.00
Trusts	450	8050	8500	0.16	50	8050	8100	0.15	-0.01
Foreign Bodies	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
<b>Sub-total (B)(3)</b>	<b>3333228</b>	<b>1017414</b>	<b>4350642</b>	<b>80.62</b>	<b>3334478</b>	<b>1016164</b>	<b>4350642</b>	<b>80.62</b>	<b>0.00</b>
<b>Total Public Shareholding (B)=(B)(1)+(B)(2)+ (B)(3)</b>	<b>3333378</b>	<b>1042464</b>	<b>4375842</b>	<b>81.09</b>	<b>3334628</b>	<b>1041214</b>	<b>4375842</b>	<b>81.09</b>	<b>0.00</b>
<b>C. Non Promoter- Non Public</b>									
i) Custodian/ DR Holder	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
ii) Trust (under SEBI (Share Based Employee Benefits) Regulations, 2014)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
<b>Grand Total (A+B+C)</b>	<b>4354004</b>	<b>1042464</b>	<b>5396468</b>	<b>100</b>	<b>4355254</b>	<b>1041214</b>	<b>5396468</b>	<b>100</b>	<b>Nil</b>

**B) SHAREHOLDING OF PROMOTERS**

Sr. No.	Promoter's Name	Shareholding at the beginning of the year [As on 01-April-2020]			Shareholding at the end of the year [As on 31-March-2021]			% change in shareholding during the year
		No. of Shares	% of total shares of the company	% of shares pledged / encumbered to total shares	No. of Shares	% of total shares of the Company	% of shares pledged / encumbered to total shares	
1.	Anagha Enterprises Private Limited	977835	18.12	Nil	977835	18.12	Nil	Nil
2.	Prithviraj S. Parikh	8600	0.16	Nil	8600	0.16	Nil	Nil
3.	Mina Parikh	34191	0.63	Nil	34191	0.63	Nil	Nil
	<b>Total</b>	<b>1020626</b>	<b>18.91</b>	<b>Nil</b>	<b>1020626</b>	<b>18.91</b>	<b>Nil</b>	<b>Nil</b>

**C) CHANGE IN PROMOTER'S SHAREHOLDING (please specify, if there is no change)**

Sr. No.	Name of the Promoter	Shareholding at the beginning of the year [As on 01-April-2020]		Date	Reason	Increase / Decrease in Shareholding		Cumulative Shareholding at the end of the year [As on 31-March-2021]	
		No. of shares	% of total shares of the Company			No. of Shares	% of total shares of the Company	No. of Shares	% of total shares of the Company
There was no change in Promoters' shareholding during the Financial Year 2020-2021.									

**D) SHAREHOLDING PATTERN OF TOP TEN SHAREHOLDERS****(Other than Directors, Promoters and Holders of GDRs and ADRs):**

Sr. No.	Name of Shareholders	Shareholding at the beginning of the year [As on 01-April-2020]		Date	Reason	Increase / Decrease in Shareholding		Cumulative Shareholding at the end of the year [As on 31-March-2021]	
		No. of Shares	% of total shares of the Company			No. of Shares	% of total shares of the Company	No. of Shares	% of total shares of the Company
1.	Brijwasi Securities Private Limited	676800	12.54	-	-	-	-	676800	12.54
2.	Smit Capital Services Private Limited	527800	9.78	-	-	-	-	527800	9.78
3.	Transfabcon Projects Private Limited	450000	8.34	-	-	-	-	450000	8.34
4.	Suresh Kumar Jalan	398640	7.39	-	-	-	-	398640	7.39
5.	Sisir Kumar Jalan	139400	2.58	-	-	-	-	139400	2.58
6.	Servo Packaging Limited	101550	1.88	-	-	-	-	101550	1.88
7.	Sisir Kumar Jalan HUF	99400	1.84	-	-	-	-	99400	1.84
8.	Ashok Kumar Dalmia	85600	1.59	-	-	-	-	85600	1.59
9.	Suresh Kumar Jalan HUF	82450	1.53	-	-	-	-	82450	1.53
10.	Western Guineas Private Limited	51400	0.95	-	-	-	-	51400	0.95

## E) SHAREHOLDING OF DIRECTOR AND KEY MANAGERIAL PERSONNEL

Sr. No.	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year [As on 01-April-2020]		Cumulative Shareholding during the Year [As on 31-March-2021]	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1.	Mr. Prithviraj S. Parikh At the beginning of the year At the end of the year	8600 8600	0.16 0.16	8600 8600	0.16 0.16
2.	Mr. Hitesh V. Raja At the beginning of the year At the end of the year	200 200	0.00 0.00	200 200	0.00 0.00
3.	Ms. Sharmila Chitale At the beginning of the year At the end of the year	100 100	0.00 0.00	100 100	0.00 0.00

## V) INDEBTEDNESS - Indebtedness of the Company including interest outstanding/ accrued but not due for payment. (Amount in Rs.)

Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Indebtedness at the beginning of the financial year</b>				
i) Principal Amount	N.A.	145,270,393	N.A.	145,270,393
ii) Interest due but not paid	N.A.	Nil	N.A.	Nil
iii) Interest accrued but not due	N.A.	25,354,153	N.A.	25,354,153
<b>Total (i+ii+iii)</b>	<b>N.A.</b>	<b>170,624,546</b>	<b>N.A.</b>	<b>170,624,546</b>
<b>Change in Indebtedness during the financial year</b>				
* Addition	N.A.	25,455,361	N.A.	25,455,361
* Reduction	N.A.	170,538,514	N.A.	170,538,514
<b>Net Change</b>		<b>(145,083,153)</b>		<b>(145,083,153)</b>
<b>Indebtedness at the end of the financial year</b>				
i) Principal Amount	N.A.	25,541,393	N.A.	25,541,393
ii) Interest due but not paid	N.A.	Nil	N.A.	Nil
iii) Interest accrued but not due	N.A.	Nil	N.A.	Nil
<b>Total (i+ii+iii)</b>	<b>N.A.</b>	<b>25,541,393</b>	<b>N.A.</b>	<b>25,541,393</b>



## VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

## A. REMUNERATION TO MANAGING DIRECTOR, WHOLE-TIME DIRECTOR, AND /OR MANAGER.

Sr. No.	Particulars of Remuneration	Name of Director Whole Time Director / Managing Director / Manager	Total Amount
1.	Gross salary		
	(a) Salary as per the provisions contained in Section 17(1) of the Income-tax Act, 1961	N.A.	N.A.
	(b) Value of perquisites u/s 17(2) of the Income-tax Act, 1961	N.A.	N.A.
	(c) Profits in lieu of salary under Section 17(3) of the Income- tax Act, 1961	N.A.	N.A.
2.	Stock Options	N.A.	N.A.
3.	Sweat Equity	N.A.	N.A.
4.	Commission - as % of profit - others, specify	N.A.	N.A.
5.	Others, please specify	N.A.	N.A.
	Total (A)	N.A.	N.A.
	Ceiling as per the Act	N.A.	N.A.

## B. REMUNERATION TO OTHER DIRECTOR (Amount in ₹)

Sr. No.	Particulars of Remuneration	Name of Directors			Total Amount
		Prithviraj S. Parikh	Hitesh V. Raja	Sharmila S. Chitale	
1	Independent Directors	Nil	Nil	Nil	Nil
	Fee for attending Board and Committee Meetings	Nil	Nil	Nil	Nil
	Commission	Nil	Nil	Nil	Nil
	Others, please specify	Nil	Nil	Nil	Nil
	Total (1)	Nil	Nil	Nil	Nil
2	Other Non-Executive Directors	Nil	Nil	Nil	Nil
	Fee for attending Board and Committee Meetings	Nil	Nil	Nil	Nil
	Commission	Nil	Nil	Nil	Nil
	Others, please specify	Nil	Nil	Nil	Nil
	Total (2)	Nil	Nil	Nil	Nil
	Total (B)=(1+2)	Nil	Nil	Nil	Nil
	Total Managerial Remuneration	Nil	Nil	Nil	Nil
	Overall Ceiling as per the Act	Nil	Nil	Nil	Nil

**C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MANAGING DIRECTOR, WHOLE-TIME DIRECTOR / MANAGER**

( Amount in ₹ )

Sr. No.	Particulars of Remuneration	Key Managerial Personnel		Total
		Company Secretary	Chief Financial officer	
		P.K.R.K. Menon	B. N. Kamath	
1	Gross salary	13,00,000	4,42,000	17,42,000
	(a) Salary as per the provisions contained in Section 17(1) of the Income-tax Act, 1961	Nil	Nil	Nil
	(b) Value of perquisites u/s 17(2) of the Income-tax Act, 1961	Nil	Nil	Nil
	(c) Profits in lieu of salary under Section 17(3) of the Income-tax Act, 1961	Nil	Nil	Nil
2	Stock Option	Nil	Nil	Nil
3	Sweat Equity	Nil	Nil	Nil
4	Commission	Nil	Nil	Nil
	- as % of profit			
	Other			
5	Medical Allowance	1,32,014	NIL	1,32,014
	<b>Total</b>	<b>14,32,014</b>	<b>442,000</b>	<b>18,74,014</b>

**VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:**

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
<b>A. COMPANY</b>					
Penalty			None		
Punishment					
Compounding					
<b>B. DIRECTORS</b>					
Penalty			None		
Punishment					
Compounding					
<b>C. OTHER OFFICERS IN DEFAULT</b>					
Penalty			None		
Punishment					
Compounding					

For and on behalf of the Board of Directors

Sd/-

**Prithviraj S. Parikh**

Chairman

DIN: 00106727

Place : Mumbai

Date : 30<sup>th</sup> June, 2021

**ANNEXURE – B**  
**SECRETARIAL AUDIT REPORT**  
**FOR THE FINANCIAL YEAR ENDED ON MARCH 31, 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,  
Eastcoast Steel Limited  
Flat No A-123, Royal Den Apartments,  
No.16 Arul Theson Street Palaniraja Udayar Nagar,  
Lawspet, Pondicherry, PY 605008.

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by Eastcoast Steel Limited (hereinafter called the Company). The Secretarial Audit was conducted in a manner which provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the company has, during the audit period covering the Financial Year ended on March 31, 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:

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

- (i) The Companies Act, 2013 (the Act) and the Rules made there under except provisions of section 203 of the Act;
- (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 Overseas Direct Investment; (Not applicable to the Company during audit period)
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-
  - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (Not applicable to the Company during audit period);
  - (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 audit period);
  - (d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not applicable to the Company during audit period);
  - (e) The Securities and Exchange Board of India; (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the Company during audit period);
  - (f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
  - (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (Not applicable to the Company during audit period); and
  - (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the Company during audit period);
- (vi) We have relied on the representation made by the Company and its Officers for systems and mechanism formed by the Company for compliances under other applicable Acts, Laws and Regulations to the Company. The Company having had stopped production at its Pondicherry plant owing to uneconomical operations since 1995, the activity have remained at a standstill.

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

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

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

#### **I further report that**

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors, if any 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 and agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting. Majority decision is carried through while the dissenting members' views, if any, are captured and recorded as part of the minutes.

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

**I further report that** during the audit period the Company has passed the following special resolution, which is having major bearing on the company's affairs, in pursuance of the above referred laws, rules, regulations, guidelines, standards, etc:

1. Reappointment of Mr. Hitesh Raja (DIN: 02681574) as an Independent Director of the Company for second term.
2. Reappointment of Mrs. Sharmila S. Chitale (DIN: 07146530) as an Independent Director of the Company for second term.

Sd/-

**P.S. Ramnath**

Practicing Company Secretary

FCS No: 819

C.P. No. 4159

UDIN: F000819C000548355

**Place :** Mumbai**Date :** 30<sup>th</sup> June, 2021

Note : This report is to be read with our letter of even date which is annexed as Annexure I and forms an integral part of this report.

### **Annexure -I**

To,  
The Members,  
Eastcoast Steel Limited  
Flat No A-123, Royal Den Apartments,  
No.16 Arul Theson Street Palaniraja Udayar Nagar,  
Lawspet, Pondicherry, PY 605008.

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

1. Maintenance of secretarial record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of accounts of the Company.
4. Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Sd/-

**P.S. Ramnath**

Practicing Company Secretary

FCS No: 819

C.P. No. 4159

UDIN: F000819C000548355

**Place :** Mumbai**Date :** 30<sup>th</sup> June, 2021

## MANAGEMENT DISCUSSION AND ANALYSIS

The Management Discussion and Analysis (“MDA”) mainly focuses on various factors and their impact on the business of Eastcoast Steel Limited (the “Company”) during the financial year 2020-21 and to the date of this report. MDA also contains the overall scenario of the industry, its growth at global and domestic level, this further contains the possible effect of such industry scenario on the business of the Company.

The management of the Company opine and give their comments on the various resources that may affect necessary development of the Company’s business.

## ECONOMIC AND INDUSTRY OVERVIEW

### GLOBAL ECONOMY

It is one year since COVID-19 was declared a global pandemic, a year of terrible loss of lives and livelihoods. The rising human toll worldwide and the millions of people that remain unemployed are grim markers of the extreme social and economic strain that the global community still confronts. Yet, even with high uncertainty about the path of the pandemic, a way out of this health and economic crisis is increasingly visible. Thanks to the ingenuity of the scientific community, we have multiple vaccines that can reduce the severity and frequency of infections. Once the health crisis is over, policy efforts can focus more on building resilient, inclusive, and greener economies, both to bolster the recovery and to raise potential output. The priorities should include investing in green infrastructure to help mitigate climate change, strengthening social assistance and social insurance to arrest rising inequality, introducing initiatives to boost productive capacity and adapt to a more digitalized economy, and resolving debt overhangs.

The International Monetary Fund (IMF) is now projecting a stronger recovery in 2021 and 2022 for the global economy compared to their previous forecast, with growth projected to be 6 percent in 2021 and 4.4 percent in 2022. Nonetheless, the outlook presents daunting challenges related to divergences in the speed of recovery both across and within countries and the potential for persistent economic damage from the crisis.

### INDIAN ECONOMY

Last year, the coronavirus pandemic and shutdown measures to contain it plunged the Indian economy into a recession for the first time in nearly a quarter of a century. Based on the OECD’s Economic Outlook 2021, the Indian economy contracted by 7.7% in 2020 as domestic consumption declined. Despite the downturn last year, the OECD has projected India’s economy to expand by 9.9% and become the fastest-growing G20 economy in 2021.

Policy announcements in the Union Budget 2021 are expected to provide further impetus to build India’s competitiveness and foster inclusive growth. Higher capital expenditure outlay along with heightened spends on agriculture and rural infrastructure development augur well for the economy and will spur a virtuous consumption-investment-employment cycle. Notwithstanding the execution challenges in the near term, reforms announced in the agricultural sector hold promise to foster a new era of growth for farmers and rural India that comprise nearly half of the country’s workforce.

## INDUSTRY STRUCTURE AND DEVELOPMENTS

The Steel Plant of the Company located at Pondicherry was operational till 1995 and suspended thereafter.

**OPERATIONAL PERFORMANCE, OPPORTUNITIES, THREATS, RISKS AND CONCERNS**

The Company ceased to operate its Steel Plant in 1995 and since then, there has been no activity in the Company. During the year under review, the Company has sold/disposed of an area of 54.86 acres or thereabout of its Steel Plant, for a consideration of ₹ 43.24 Crores in accordance with the resolution passed by the shareholders vide postal ballot result dated 13 July 2019 and further resolution passed by the Board on 27 November 2020. Pursuant to aforesaid the sale/disposal, the Company has recognised the gain thereto. The Company has further utilised part of the sale consideration received from the sale of the said area towards repayment of its existing debt liability.

**FINANCIAL PERFORMANCE**

Since the Company did not have regular operations during the year ended 31<sup>st</sup> March, 2021 and 31<sup>st</sup> March, 2020, the operating ratios have not been computed.

**INTERNAL CONTROL SYSTEMS**

The Company has effectively and efficiently laid down policies, guidelines and procedures keeping in mind the nature, size and complexity of Company's business objectives. The Company maintains proper and adequate system of internal controls with well-defined policies, systems, process guidelines and operating procedures. The Company positively ensures strict adherence to various procedures, laws, rules and statutes. All transactions are recorded and reported in accordance with the applicable Accounting Standards and within the terms of accounting policies.

The Company has also ensured the periodical Internal Audit by an independent auditor, whose report is submitted to the Audit Committee and Board of Directors for consideration. During the Audit Process no material discrepancies have been reported by the Internal Auditor.

The Audit Committee is responsible to ensure the monitoring of Internal Control System and oversees the various financial transactions on a regular basis and any deviations are promptly reported to the Senior Management to ensure normalcy is established at the earliest, though, no such deviations had been reported by the Audit Committee during the FY 2020-21.

**CAUTIONARY STATEMENT**

*Statements made in the Management Discussion and Analysis describing the Company's projection, estimates and expectations may be interpreted as "forward looking statements" within the meaning of applicable securities, laws and regulations. The Company assumes no responsibility to publicly amend, modify or revise any forward looking statements on the basis of any subsequent information or events.*

## INDEPENDENT AUDITOR'S REPORT

To the Members of  
Eastcoast Steel Limited

### Report on the Financial Statements

#### Opinion

We have audited the accompanying financial statements of Eastcoast Steel Limited ("the Company"), which comprise the Balance Sheet as at 31<sup>st</sup> March 2021, the Statement of Profit and Loss including the Statement of Other Comprehensive Income, the Cash Flow Statement and the Statement of Changes in Equity for the year then ended, and a summary of significant accounting policies and other explanatory information (hereinafter referred to as "Financial Statements").

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the 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, 31<sup>st</sup> March 2021, its Profit including Other Comprehensive Loss and its Cash flows and the Statement of Changes in Equity 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 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 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.

#### Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. We have determined that there are no key audit matters to be communicated in our report.

#### Other Matter

The Financial Statements of Eastcoast Steel Limited for the year ended 31<sup>st</sup> March, 2020, were audited by another auditor who expressed an unmodified opinion on those statements as on 31<sup>st</sup> March, 2020.

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

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



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

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears, to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information; we are required to report that fact. We have nothing to report in this regard.

### **Management's Responsibility for the 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 Financial Statements that give a true and fair view of the Financial Position, Financial Performance including Other Comprehensive Loss, Cash Flows and the Statement Of Changes in Equity of the Company in accordance with the accounting principles generally accepted in India, including the Indian Accounting Standards (Ind AS) specified under Section 133 of the Act, read with the Companies (Indian Accounting Standards) Rules, 2015, as amended.

This responsibility also includes maintenance of adequate accounting records in accordance with the provision of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of the appropriate accounting policies; making judgements and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that we are operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and fair presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

Those Board of Directors are also responsible for overseeing the company's financial reporting process.

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

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

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

- Identify and assess the risks of material misstatement of the Financial Statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a

basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on whether company has in place an adequate internal financial control system over financial reporting and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the Financial Statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the Financial Statements, including the disclosures, and whether the Financial Statements represent the underlying transactions and events in a manner that achieves fair presentation.

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

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

### 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 ("the Act"), we give in the "**Annexure 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 appears from our examination of those books.
  - c) The Balance Sheet, Statement of Profit and Loss including Statement of Other Comprehensive Income, Cash Flow Statement and the Statement of Changes in Equity dealt with by this report are in agreement with the books of account.

- d) In our opinion, the aforesaid 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 written representations received from the directors as on 31<sup>st</sup> March, 2021 taken on record by the Board of Directors, none of the directors are disqualified as on 31<sup>st</sup> 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 Rules 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 does not have any pending litigations which would have any material impact on its financial position.
  - ii. The Company did not have any material foreseeable losses on long-term contracts including derivative contracts that require provision under any law or accounting standards for which there were any material foreseeable losses; and
  - iii. There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.

**For Paresh Rakesh & Associates LLP**

(Firm Registration No. 119728W/W100743)

Chartered Accountants

Sd/-

**Nimit Sheth**

Partner

Membership No.142645

UDIN: 21142645AAAACV3116

**Date** : 30<sup>th</sup> June, 2021

**Place** : Mumbai

**“Annexure A” to Independent Auditors’ Report referred to in Paragraph 1 under the heading of “Report on other legal and regulatory requirements” of our report of even date.**

1. In respect of its fixed assets:
  - a) The Company has maintained proper records showing full particulars including quantitative details and situation of fixed assets on the basis of available information.
  - b) According to explanation provided to us the Company has carried out physical verification of fixed assets, which in our opinion appears to be reasonable having regard to the size of the Company and the nature of its assets. No material discrepancies were noticed on such verification
  - c) According to the information, explanations and records given to us, Immovable properties owned by the Company, are held in the name of the Company as at the balance sheet date.
2. Since, the Company does not have any inventory, the clause (ii) of paragraph 3 of the Order is not applicable to the Company.
3. Since, the Company has not granted any loans to parties covered in in the register maintained under Section 189 of the Companies Act, 2013, the clause (iii) of paragraph 3 of the Order is not applicable to the Company.
4. Since, the Company has not granted any loans, made Investments or provided guarantees, the clause (iv) of paragraph 3 of the Order is not applicable to the Company.
5. According to the information and explanations given to us, the Company has not accepted any deposits within the meaning of provisions of sections 73 to 76 or any other relevant provisions of the Act and the rules framed there under. Therefore, the clause (v) of paragraph 3 of the Order is not applicable to the Company.
6. To the best of our knowledge and explanations given to us, the Central Government has not prescribed the maintenance of cost records under sub section (1) of Section 148 of the Act in respect of the activities undertaken by the Company.
7.
  - (a) According to the records examined by us, the Company has regularly deposited, undisputed statutory dues including direct taxes, indirect taxes and any other statutory dues with appropriate authorities and there were no outstanding dues as at 31<sup>st</sup> March, 2021 for a period of more than six months from the date they became payable.
  - (b) According to the information and explanations given to us, there are no dues of direct or indirect taxes on account of any dispute, which have not been deposited.
8. In our opinion and according to the information and explanations given to us, the Company has not defaulted in repayment of loans to its financial institutions. The Company has not raised loans from banks or government or by issue of debentures.
9. The Company has not raised money by way of initial public offer or further public offer (including debt instruments) or term Loan and hence clause (ix) of paragraph 3 of the Order is not applicable to the Company.

10. Based on the audit procedures performed for the purpose of reporting the true and fair view of the financial statements and as per information and explanations given to us, no fraud by the Company or on the Company by its officers or employees has been noticed or reported during the year.
11. The Company has not paid any managerial remuneration during the year and hence clause (xi) of paragraph 3 of the Order is not applicable to the Company
12. In our opinion company is not a nidhi company. Therefore, the provisions of clause (xii) of paragraph 3 of the Order are not applicable to the Company.
13. In our opinion and according to the information and explanations given to us, in respect of transactions with related parties :
  - a) All transactions with related parties are in compliance with Section 177 of the Act.
  - b) The Company is in compliance with the Section 188 of the Act and details have been disclosed in the financial statements etc., as required by the applicable accounting standards.
14. In our opinion and according to the information and explanations given to us, the Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year and hence clause (xiv) of paragraph 3 of the Order is not applicable to the Company.
15. In our opinion and according to the information and explanations given to us, the Company has not entered into any non-cash transaction with the directors or persons connected with them and covered under Section 192 of the Act. Hence, clause (xv) of the paragraph 3 of the Order is not applicable to the Company.
16. In our opinion and according to the information and explanations given to us, the Company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934.

**For Paresh Rakesh & Associates LLP**

(Firm Registration No. 119728W/W100743)

Chartered Accountants

Sd/-

**Nimit Sheth**

Partner

Membership No.142645

UDIN: 21142645AAAACV3116

**Date** : 30<sup>th</sup> June, 2021

**Place** : Mumbai

“Annexure B” to Independent Auditors’ Report referred to in paragraph 2(f) under the heading “Report on other legal and regulatory requirements” of our report of even date.

### **Report on the Internal Financial Controls under clause (i) of sub-section 3 of Section 143 of the Companies Act, 2013 (“the Act”)**

We have audited the Internal Financial Control over financial reporting of Eastcoast Steel Limited (“the Company”) as of 31<sup>st</sup> March, 2021, in conjunction with our audit of the financial statements of the Company for the year then ended.

#### **Management Responsibility for the Internal Financial Controls**

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

#### **Auditor’s Responsibility**

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

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

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

#### **Meaning of Internal Financial Controls Over Financial Reporting**

A company’s internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of

financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that:

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

### **Inherent Limitations of Internal Financial Controls Over Financial Reporting**

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

### **Opinion**

In our opinion, considering nature of business, size of operations and organizational structure of the entity, 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 31<sup>st</sup> March, 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 ICAI.

### **For Paresh Rakesh & Associates LLP**

(Firm Registration No. 119728W/W100743)  
Chartered Accountants

Sd/-

**Nimit Sheth**

Partner

Membership No.142645

UDIN: 21142645AAAACV3116

**Date** : 30<sup>th</sup> June, 2021

**Place** : Mumbai

## Balance Sheet as at 31 March 2021

(Amount in ₹)

	Notes	As at 31 March 2021	As at 31 March 2020
<b>Assets</b>			
<b>Non - Current Assets</b>			
Property, Plant and Equipment	2	2,68,061	1,08,12,164
<b>Financial Assets</b>			
(i) Other Financial Assets	3	-	4,92,206
		<b>2,68,061</b>	<b>1,13,04,370</b>
<b>Current Assets</b>			
<b>Financial Assets</b>			
(i) Investments	4	23,01,75,366	9,097
(ii) Cash and Cash Equivalents	5	5,84,264	2,41,788
(iii) Other Financial Assets	6	-	54,000
Current Tax Assets (net)	7	-	11,76,493
Other Current Assets	8	15,652	12,035
		<b>23,07,75,282</b>	<b>14,93,413</b>
<b>Total Assets</b>			
		<b>23,10,43,343</b>	<b>1,27,97,783</b>
<b>Equity and Liabilities</b>			
<b>Equity :</b>			
Equity Share Capital	9	5,39,64,680	5,39,64,680
Other Equity	10	13,56,15,449	(21,65,66,699)
		<b>18,95,80,129</b>	<b>(16,26,02,019)</b>
<b>Liabilities</b>			
<b>Non Current Liabilities</b>			
<b>Financial Liabilities</b>			
(i) Borrowings	11	-	11,59,04,000
(iii) Financial Liabilities	12	-	2,11,13,038
Provisions	13	2,36,116	5,70,784
		<b>2,36,116</b>	<b>13,75,87,822</b>
<b>Current Liabilities</b>			
<b>Financial Liabilities</b>			
(i) Borrowings	14	2,55,41,393	2,93,66,393
(ii) Trade Payables	15	-	-
- Micro, Small and Medium Enterprises		-	-
- Others		1,26,569	49,622
(iii) Other Financial Liabilities	16	5,81,886	63,56,647
Provisions	17	16,06,836	16,65,028
Current Tax Liabilities	18	1,32,83,670	-
Other Current Liabilities	19	86,744	3,74,290
		<b>4,12,27,098</b>	<b>3,78,11,980</b>
<b>Total Equity and Liabilities</b>			
		<b>23,10,43,343</b>	<b>1,27,97,783</b>

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As per our report of even date

**For Paresb Rakesh & Associates LLP**  
(Firm Registration No. 119728W/W100743)  
Chartered Accountants

For and on behalf of the Board of Directors

Sd/-  
**Nimit Sheth**  
Partner  
Membership No.142645

Sd/-  
**Prithviraj. S. Parikh**  
Director  
(DIN: 00106727)

Sd/-  
**Hitesh V Raja**  
Director  
(DIN: 02681574)

Place : Mumbai  
Date : 30<sup>th</sup> June, 2021

Sd/-  
**P. K. R. K. Menon**  
Company Secretary  
(FCS:1074)

Sd/-  
**B N Kamath**  
C.F.O. & C.E.O.  
(PAN: AESPK5610C)



## Statement of Profit and Loss for the year ended 31 March 2021

(Amount in ₹)

	Notes	For the Year ended 31 March 2021	For the Year ended 31 March 2020
<b>Income</b>			
Revenue from Operations		-	-
Gain on sale of property, plant and equipment		42,20,27,447	-
Other Income	20	29,59,418	2,03,698
<b>Total Income</b>		<b>42,49,86,865</b>	<b>2,03,698</b>
<b>Expenses</b>			
Employee Benefits Expense	21	46,97,608	33,24,027
Finance Cost	22	87,16,540	1,22,24,799
Depreciation and Amortization Expenses	2	2,33,950	3,15,123
Other Expenses	23	62,62,297	47,11,195
<b>Total Expenses</b>		<b>1,99,10,395</b>	<b>2,05,75,144</b>
<b>Profit / (Loss) Before Tax</b>		<b>40,50,76,470</b>	<b>(2,03,71,446)</b>
<b>Tax expense:</b>			
Current tax	32	5,28,10,000	-
Deferred tax		-	-
<b>Profit / (Loss) for the Year</b>		<b>35,22,66,470</b>	<b>(2,03,71,446)</b>
<b>Other Comprehensive Income</b>			
Items that will not be reclassified to profit or loss			
Re-measurement gain/ (losses) on defined benefit plans		(84,322)	2,21,211
Income tax effect		-	-
<b>Other Comprehensive Income / (Loss) for the year (net of tax)</b>		<b>(84,322)</b>	<b>2,21,211</b>
<b>Total Comprehensive Income / (Loss) for the year</b>		<b>35,21,82,148</b>	<b>(2,01,50,235)</b>
Basic and Diluted Earnings Per Share (in ₹) (Face Value ₹10)	31	65.28	(3.77)
Significant Accounting Policies and	1 to 36		

As per our report of even date

**For Paresb Rakesh & Associates LLP**  
(Firm Registration No. 119728W/W100743)  
Chartered Accountants

For and on behalf of the Board of Directors

Sd/-  
**Nimit Sheth**  
Partner  
Membership No.142645

Sd/-  
**Prithviraj. S. Parikh**  
Director  
(DIN: 00106727)

Sd/-  
**Hitesh V Raja**  
Director  
(DIN: 02681574)

**Place :** Mumbai  
**Date :** 30<sup>th</sup> June, 2021

Sd/-  
**P. K. R. K. Menon**  
Company Secretary  
(FCS:1074)

Sd/-  
**B N Kamath**  
C.F.O. & C.E.O.  
(PAN: AESPK5610C)

## Cash Flow Statement for the year ended 31 March 2021

(Amount in ₹)

	For the Year ended 31 March 2021	For the Year ended 31 March 2020
<b>A Cash Flows From Operating Activities</b>		
<b>Profit / (Loss) Before Tax</b>	<b>40,50,76,470</b>	<b>(2,03,71,446)</b>
<b>Adjustments For:</b>		
Depreciation and Amortization Cost	2,33,950	3,15,123
Finance Cost	87,16,540	1,22,24,799
Sundry Balances written back / off	4,91,489	(11,509)
Dividend	(27,37,269)	(454)
Net (gain) / loss on Current Investments	(2,14,396)	(15)
Gain on sale of property, plant and equipment	(42,20,27,447)	-
Interest Income	-	(1,31,720)
Interest Income on tax refunds	(7,753)	-
Gratuity and Compensated Absences	2,38,489	2,62,422
<b>Operating Loss before Working Capital Changes</b>	<b>(1,02,29,927)</b>	<b>(77,12,800)</b>
(Increase)/Decrease in Short Term Financial and other Current Assets	50,383	(18,365)
(Increase)/Decrease in Trade Receivables	-	21,600
Increase/(Decrease) in Trade Payables	76,947	20,473
Increase/(Decrease) in Other Financial Liabilities	(2,68,87,799)	1,21,96,589
Increase/(Decrease) in Other Current Liabilities	(2,87,546)	29,835
Increase/(Decrease) in Provisions	(7,15,671)	-
<b>Cash Generated from / (Used in) Operating Activities</b>	<b>(3,79,93,613)</b>	<b>45,37,332</b>
Direct taxes paid (net of refunds)	(3,83,42,082)	-
<b>Net Cash Generated from / (Used in) Operations (A)</b>	<b>(7,63,35,695)</b>	<b>45,37,332</b>
<b>B Cash Flows From Investing Activities</b>		
Purchase of Property, Plant and Equipment	(62,400)	(12,980)
Proceeds from Sale of Property, Plant and Equipment	43,24,00,000	-
Proceeds from Sale/Redemption of Investments	34,20,75,000	56,475
Purchase of Investments	(57,20,26,158)	(454)
Dividend Received	27,37,269	454
Interest Received	-	1,31,720
<b>Net Cash Generated from / (Used in) Investing Activities (B)</b>	<b>20,51,23,711</b>	<b>1,75,215</b>

(Amount in ₹)

	For the Year ended 31 March 2021	For the Year ended 31 March 2020
<b>C Cash Flows From Financing Activities</b>		
Short term borrowings (net)	(38,25,000)	(1,47,15,000)
Proceeds from long term borrowings	1,65,88,821	2,22,54,000
Repayment of long term borrowings	(13,24,92,821)	-
Interest and processing fees paid	(87,16,540)	(1,22,24,799)
<b>Net Cash Generated from / (Used in) Financing Activities (C)</b>	<b>(12,84,45,540)</b>	<b>(46,85,799)</b>
<b>Net Increase/(Decrease) in Cash &amp; Cash Equivalents (A+B+C)</b>	<b>3,42,476</b>	<b>26,748</b>
Cash and Cash Equivalent at the beginning of the year (refer note 5)	2,41,788	2,15,040
Cash and Cash Equivalent at the end of the year (refer note 5)	5,84,264	2,41,788

**Note:**

- 1) The above cash flow statement has been prepared under the "Indirect Method" as per Indian Accounting Standard (Ind-AS) 7.
- 2) Figures in brackets indicate cash outflow and without brackets indicate cash inflow.
- 3) Change in Liability arising from financing activities.

Particulars	Non-Current Borrowings	Current Borrowings	Total
As at 01 April 2020	11,59,04,000	2,93,66,393	14,52,70,393
Cash proceeds from borrowings	1,65,88,821	1,50,000	1,67,38,821
Repayment of borrowings	13,24,92,821	39,75,000	13,64,67,821
As at 31 March 2021	-	2,55,41,393	2,55,41,393

As per our report of even date

**For Paresh Rakesh & Associates LLP**  
(Firm Registration No. 119728W/W100743)  
Chartered Accountants

For and on behalf of the Board of Directors

Sd/-  
**Nimit Sheth**  
Partner  
Membership No.142645

Sd/-  
**Prithviraj. S. Parikh**  
Director  
(DIN: 00106727)

Sd/-  
**Hitesh V Raja**  
Director  
(DIN: 02681574)

Place : Mumbai  
Date : 30<sup>th</sup> June, 2021

Sd/-  
**P. K. R. K. Menon**  
Company Secretary  
(FCS:1074)

Sd/-  
**B N Kamath**  
C.F.O. & C.E.O.  
(PAN: AESPK5610C)

## Statement of Changes in Equity for the year ended 31 March 2021

(Amount in ₹)

a	Equity share capital	Number	Amount
	As at 1 April 2019	53,96,468	5,39,64,680
	Issue of share capital	-	-
	<b>Balance as at 31 March 2020</b>	<b>53,96,468</b>	<b>5,39,64,680</b>
	Issue of share capital	-	-
	<b>Balance as at 31 March 2021</b>	<b>53,96,468</b>	<b>5,39,64,680</b>

b	Other equity	Reserves and surplus			Other Comprehensive Income (OCI)	Total Equity
		Securities premium	Capital Reserve	Retained earnings	Re-measurement gain/(loss) on defined benefit plans through OCI	
	Balance as at 1 April 2019	9,43,23,634	25,00,000	(29,30,66,464)	(1,73,634)	(19,64,16,464)
	Profit / (Loss) for the year			(2,03,71,446)	-	(2,03,71,446)
	Other comprehensive income / (loss) for the year				2,21,211	2,21,211
	<b>Balance as at 31 March 2020</b>	<b>9,43,23,634</b>	<b>25,00,000</b>	<b>(31,34,37,910)</b>	<b>47,577</b>	<b>(21,65,66,699)</b>
	Profit / (Loss) for the year			35,22,66,470	-	35,22,66,470
	Other comprehensive income / (loss) for the year				(84,322)	(84,322)
	<b>Balance as at 31 March 2021</b>	<b>9,43,23,634</b>	<b>25,00,000</b>	<b>3,88,28,560</b>	<b>(36,745)</b>	<b>13,56,15,449</b>

Significant Accounting Policies and Other Explanatory Information 1 to 36

As per our report of even date

**For Paresb Rakesh & Associates LLP**  
(Firm Registration No. 119728W/W100743)  
Chartered Accountants

**For and on behalf of the Board of Directors**

Sd/-  
**Nimit Sheth**  
Partner  
Membership No.142645

Sd/-  
**Prithviraj. S. Parikh**  
Director  
(DIN: 00106727)

Sd/-  
**Hitesh V Raja**  
Director  
(DIN: 02681574)

**Place** : Mumbai  
**Date** : 30<sup>th</sup> June, 2021

Sd/-  
**P. K. R. K. Menon**  
Company Secretary  
(FCS:1074)

Sd/-  
**B N Kamath**  
C.F.O. & C.E.O.  
(PAN: AESPK5610C)

**Summary of the significant accounting policies and other explanatory information for the year ended 31 March 2021****1 SIGNIFICANT ACCOUNTING POLICIES:****1.1 Corporate Information**

Eastcoast Steel Limited ('the Company') is a public limited company incorporated in India under the provisions of the Companies Act, 1956 and its shares are listed on Bombay Stock Exchange. The registered office of the Company is situated at Flat No. A-123, Royal Den Apartments, No.16, Arul Theson Street, Palaniraja Udayar Nagar, Lawspet, Pondicherry - 605008, which is also the principal place of business. These financial statements were approved and adopted by Board of Directors in meeting dated 30 June 2021.

**1.2 Basis of preparation and presentation:**

These Financial Statements of the Company have been prepared to comply with the Indian Accounting Standards ('Ind-AS') as notified by Ministry of Corporate Affairs pursuant to section 133 of the Companies Act, 2013 (hereinafter referred to as 'the Act'), read with the Companies (Indian Accounting Standards) Rules, 2015, as amended and other provisions of the Act.

The financial statements have been prepared on a historical cost convention and accrual basis, except for certain financial assets and liabilities measured at fair value and plan assets towards defined benefit plans, which are measured at fair value.

The financial statements of the Company are for the year ended 31 March 2021 and are prepared in Indian Rupees being the functional currency.

**1.3 Current non-current classification:**

The Company presents assets and liabilities in the balance sheet based on current/non-current classification.

An asset is treated as current when it is:

- (i) expected to be realised or intended to be sold or consumed in normal operating cycle,
- (ii) held primarily for the purpose of trading,
- (iii) expected to be realised within twelve months after the reporting period,
- (iv) cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period, or
- (v) carrying current portion of non current financial assets.

All other assets are classified as non-current.

A liability is current when:

- (i) it is expected to be settled in normal operating cycle ;
- (ii) it is held primarily for the purpose of trading ;

- (iii) it is due to be settled within twelve months after the reporting period,
- (iv) there is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period, or
- (v) It includes current portion of non current financial liabilities.

All other liabilities are classified as non-current.

#### 1.4 Operating cycle

All assets and liabilities have been classified as current and non-current as per the company's normal operating cycle and other criteria set out above which are in accordance with the schedule III to the Act. Based on the nature of services and time between the acquisition of assets for providing of services and their realisation in cash and cash equivalents, the Company has ascertained its operating cycle as 12 months for the purpose of current / non-current classification of assets and liabilities.

#### 1.5 Property Plant and Equipment:

Freehold land is carried at cost. All other items of property, plant and equipment are stated at cost less depreciation and impairment, if any. Historical cost includes expenditure that is directly attributable to the acquisition of the items.

Subsequent costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Company and the cost of the item can be measured reliably. The carrying amount of any component accounted for as a separate asset is derecognised when replaced. All other repairs and maintenance are charged to the Statement of Profit and Loss during the reporting period in which they are incurred.

Depreciation is provided in the manner prescribed in Part C of Schedule II to the Companies Act, 2013, over their useful life and management believe that useful life of assets are same as those prescribed in Part C of Schedule II to the Act.

Useful life considered for calculation of depreciation for various assets class are as follows-

<b>Asset Class</b>	<b>Useful Life</b>
Office Building	60 years
Furniture and Fixtures	10 years
Office Equipment	5 years
Computers	3 years
Vehicles	8 years

The property, plant and equipment residual values, useful lives and method of depreciation are reviewed, and adjusted if appropriate, at the end of each reporting period.

Gains and losses arising from derecognition of a property, plant and equipment are measured as the difference between the net disposal proceeds and the carrying amount of the assets and are recognised in the Statement of Profit and Loss, when the asset is derecognised.

An property, plant and equipment carrying amount is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount.

## **1.6 Investments and other financial assets:**

### **Initial recognition**

In the case of financial assets, not recorded at fair value through profit or loss (FVTPL), financial assets are recognised initially at fair value plus transaction costs that are directly attributable to the acquisition of the financial asset. Purchases or sales of financial assets that require delivery of assets within a time frame established by regulation or convention in the market place (regular way trades) are recognised on the trade date, i.e., the date that the Company commits to purchase or sell the asset.

### **Subsequent measurement**

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

#### **(a) Financial Assets at amortised cost**

Financial assets are subsequently measured at amortised cost if these financial assets are held within a business model with an objective to hold these assets 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. Interest income from these financial assets is included in finance income using the effective interest rate ("EIR") method. Impairment gains or losses arising on these assets are recognised in the Statement of Profit and Loss.

#### **(b) Financial Assets measured at fair value**

Financial assets are measured at fair value through other comprehensive income (FVOCI) if these financial assets are held within a business model with an objective to hold these assets in order to collect contractual cash flows or to sell these 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. Movements in the carrying amount are taken through OCI, except for the recognition of impairment gains or losses, interest revenue and foreign exchange gains and losses which are recognised in the Statement of Profit and Loss.

Financial assets that do not meet the criteria for amortised cost or FVOCI are measured at fair value through profit or loss.

**Impairment of Financial Assets**

In accordance with Ind-AS 109, the Company applies the expected credit loss ("ECL") model for measurement and recognition of impairment loss on financial assets and credit risk exposures.

The Company follows 'simplified approach' for recognition of impairment loss allowance on trade receivables. Simplified approach does not require the Company to make changes in credit risk. Rather, it recognises impairment loss allowance based on lifetime ECL at each reporting date, right from its initial recognition.

For recognition of impairment loss on other financial assets and risk exposure, the Company determines whether there has been a significant increase in the credit risk since initial recognition. If credit risk has not increased significantly, 12-month ECL is used to provide for impairment loss. However, if credit risk has increased significantly, lifetime ECL is used. If, in a subsequent period, credit quality of the instrument improves such that there is no longer a significant increase in credit risk since initial recognition, then the entity reverts to recognising impairment loss allowance based on 12-month ECL.

ECL is the difference between all contractual cash flows that are due to the Company in accordance with the contract and all the cash flows that the entity expects to receive (i.e., all cash shortfalls), discounted at the original EIR. Lifetime ECL are the expected credit losses resulting from all possible default events over the expected life of a financial instrument. The 12-month ECL is a portion of the lifetime ECL which results from default events that are possible within 12 months after the reporting date. ECL impairment loss allowance (or reversal) recognised during the period is recorded as expense/ income in the Statement of Profit and Loss.

**De-recognition of Financial Assets**

The Company de-recognises a financial asset only when the contractual rights to the cash flows from the asset expire, or it transfers the financial asset and substantially all risks and rewards of ownership of the asset to another entity.

If the Company neither transfers nor retains substantially all the risks and rewards of ownership and continues to control the transferred asset, the Company recognizes its retained interest in the assets and an associated liability for amounts it may have to pay.

If the Company retains substantially all the risks and rewards of ownership of a transferred financial asset, the Company continues to recognise the financial asset and also recognises a collateralised borrowing for the proceeds received.

**Equity investments**

All equity investments in the scope of Ind-AS 109, Financial Instruments, are measured at fair value. For equity instruments, the Company may make an irrevocable election to present the subsequent fair value changes in Other Comprehensive Income (OCI). The Company makes such election on an instrument-by-instrument basis.



The classification is made on initial recognition and is irrevocable. There is no recycling of the amounts from OCI to profit or loss, even on sale of investment.

Equity instruments included within the FVTPL (fair value through profit and loss) category are measured at fair value with all changes in fair value recognized in the profit or loss.

## 1.7 Financial Liabilities

### Initial Recognition

Financial liabilities are classified, at initial recognition, as financial liabilities at FVTPL, loans and borrowings and payables as appropriate. All financial liabilities are recognised initially at fair value and, in the case of loans and borrowings and payables, net of directly attributable transaction costs.

### Subsequent measurement

#### Financial liabilities at FVTPL

Financial liabilities at FVTPL include financial liabilities held for trading and financial liabilities designated upon initial recognition as FVTPL. Financial liabilities are classified as held for trading if they are incurred for the purpose of repurchasing in the near term. Gains or losses on liabilities held for trading are recognised in the Statement of Profit and Loss.

#### Financial liabilities at amortised cost

After initial recognition, interest-bearing loans and borrowings are subsequently measured at amortised cost using the EIR method. Any difference between the proceeds (net of transaction costs) and the settlement or redemption of borrowings is recognised over the term of the borrowings in the Statement of Profit and Loss.

Amortised cost is calculated by taking into account any discount or premium on acquisition and fees or costs that are an integral part of the EIR. The EIR amortisation is included as finance costs in the Statement of Profit and Loss.

Where the terms of a financial liability is re-negotiated and the Company issues equity instruments to a creditor to extinguish all or part of the liability (debt for equity swap), a gain or loss is recognised in the Statement of Profit and Loss; measured as a difference between the carrying amount of the financial liability and the fair value of equity instrument issued.

### De-recognition of Financial Liabilities

Financial liabilities are de-recognised when the obligation specified in the contract is discharged, cancelled or expired. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as de-recognition of the original liability and recognition of a new liability. The difference in the respective carrying amounts is recognised in the Statement of Profit and Loss.

### Offsetting 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.

### 1.8 Fair value measurement

The Company measures financial assets and financial liability 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 a 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 minimizing 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) market prices in active markets for identical assets or liabilities
- Level 2 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable
- Level 3 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable. 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.

### 1.9 Impairment of non-financial assets

Assessment is done at each Balance Sheet date to evaluate whether there is any indication that a non-financial asset may be impaired. For the purpose of assessing impairment, the smallest identifiable group of assets that generates cash inflows from continuing use that are largely independent of the cash inflows from other assets or groups of assets, is considered as a cash generating unit. If any such indication exists, an estimate of the recoverable amount of the asset/cash generating unit is made. Assets whose carrying value exceeds their recoverable amount are written down to their recoverable amount. Recoverable amount is higher of an asset's or cash generating unit's net selling price and its value in use. Value in use is the present value of estimated future cash flows expected to arise from the continuing use of an asset and from its disposal at the end of its useful life. A previously recognised impairment loss is increased or reversed depending on changes in circumstances. However, the carrying value after reversal is not increased beyond the carrying value that would have prevailed by charging usual depreciation if there was no impairment.

### 1.10 Provisions, Contingent Liabilities and Contingent Assets:

Provisions are recognised when the Company has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources will be required to settle the obligation and the amount can be reliably estimated. Provisions are not recognised for future operating losses.

Provisions are measured at the present value of management's best estimate of the expenditure required to settle the present obligation at the end of the reporting period. The discount rate used to determine the present value is a pre tax rate that reflects current market assessments of the time value of money and the risks specific to the liability. The increase in the provision due to the passage of time is recognised as interest expense.

Contingent Liabilities are disclosed in respect of possible obligations that arise from past events but their existence will be confirmed by the occurrence or non occurrence of one or more uncertain future events not wholly within the control of the Company or where any present obligation cannot be measured in terms of future outflow of resources or where a reliable estimate of the obligation cannot be made.

A contingent asset is disclosed, where an inflow of economic benefits is probable. An entity shall not recognize contingent asset unless the recovery is virtually certain.

### 1.11 Borrowing costs

General and specific borrowing costs directly attributable to the acquisition/ construction of qualifying assets, which are assets that necessarily take a substantial period of time to get ready for their intended use, are added to the cost of those assets, until such time the assets are substantially ready for their intended use. All other borrowing costs are recognised as an expense in Statement of Profit and Loss in the period in which they are incurred.

### 1.12 Recognition of income

Interest income from a financial asset is recognised when it is probable that the economic benefits will flow to the Company and the amount of income can be measured reliably. Interest income is accrued on a time basis, by reference to the principal outstanding and at the effective interest rate applicable, which is the rate that exactly discounts estimated future cash receipts through the expected life of the financial asset to that asset's net carrying amount on initial recognition.

Dividends are recognised in the Statement of Profit and Loss only when the right to receive payment is established.

### 1.13 Employee benefits

#### a) Short term employee benefits

Short term employee benefits are recognised as expenditure at the undiscounted value in the Statement of Profit and Loss of the year in which the related service is rendered.

#### b) Post employment benefits

##### i) Defined contribution plan

The Company's contribution to Provident Fund and Employees State Insurance Scheme is determined based on a fixed percentage of the eligible employees' salary and charged to the Statement of Profit and Loss on accrual basis. The Company has categorised its Provident Fund, Labour Welfare Fund and the Employees State Insurance Scheme as a defined contribution plan since it has no further obligations beyond these contributions.

##### ii) Defined benefits plan

The Company's liability towards gratuity, being a defined benefit plan are accounted for on the basis of an independent 'actuarial valuation based on Projected Unit Credit Method.

Service cost and the net interest cost is included in employee benefit expense in the Statement of Profit and Loss. Actuarial gains and losses comprise experience adjustments and the effects of changes in actuarial assumptions and are recognised immediately in 'Other Comprehensive Income' as income or expense.

##### iii) Compensated absences

Accumulated compensated absences, which are expected to be availed or encashed within 12 months from the end of the year are treated as short term employee benefits. The obligation towards the same is measured at the expected cost of accumulating compensated absences as the additional amount expected to be paid as a result of the unused entitlement as at the year end. The Company's liability is actuarially determined (using the Projected Unit Credit method).

### 1.14 Income Tax

Income tax expense comprises current tax, deferred tax charge or credit. The deferred tax charge or credit and the corresponding deferred tax liability and assets are recognized using the tax rates that have been enacted or substantially enacted on the Balance Sheet date.

Deferred Tax assets arising from unabsorbed depreciation or carry forward losses are recognized only if there is virtual certainty of realization of such amounts. Other deferred tax assets are recognized only to the extent there is reasonable certainty of realization in future. Deferred tax assets are reviewed at each Balance Sheet date to reassess their reliability. “

### 1.15 Cash and cash equivalents

Cash and cash equivalents includes cash in hand and deposits with any qualifying financial institution repayable on demand or maturing within three months from the date of acquisition and which are subject to an insignificant risk of change in value.

### 1.16 Earnings per share

Basic earnings per share (EPS) is calculated by dividing the net profit or loss for the year attributable to equity shareholders by the weighted average number of equity shares outstanding during the year. Diluted EPS is computed using the weighted average number of equity and dilutive equity equivalent shares outstanding during the year.

### 1.17 Significant management judgements in applying accounting policies and estimation of uncertainty

When preparing the financial statements, management makes a number of judgments, estimates and assumptions about the recognition and measurement of assets, liabilities, income and expenses. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of assets or liabilities affected in future periods.

#### a) Impairment of non-financial assets

In assessing impairment, management estimates the recoverable amount of each asset or cash-generating unit based on expected future cash flows and uses an interest rate to discount them. Estimation uncertainty relates to assumptions about future operating results and the determination of a suitable discount rate.

#### b) Depreciation and useful lives of property, plant and equipment

Property, plant and equipment are depreciated over the estimated useful lives of the assets, after taking into account their estimated residual value. Management reviews the estimated useful lives and residual values of the assets annually in order to determine the amount of depreciation to be recorded during any reporting period. The useful lives and residual values are based on the Company's historical experience with similar assets and take into account anticipated technological changes. The depreciation for future periods is adjusted if there are significant changes from previous estimates.

**c) Provisions**

Provisions and liabilities are recognized in the period when it becomes probable that there will be a future outflow of funds resulting from past operations or events and the amount of cash outflow can be reliably estimated. The timing of recognition and quantification of the liability require the application of judgment to existing facts and circumstances, which can be subject to change. Since the cash outflows can take place many years in the future, the carrying amounts of provisions and liabilities are reviewed regularly and adjusted to take account of changing facts and circumstances.

**d) Defined benefit obligation (DBO)**

Management's estimate of the DBO is based on a number of critical underlying assumptions such as standard rates of inflation, mortality, discount rate and anticipation of future salary increases. Variation in these assumptions may significantly impact the DBO amount and the annual defined benefit expenses.

**e) Material uncertainty about going concern:**

In preparing financial statements, management has made an assessment of Company's ability to continue as a going concern. Financial statements are prepared on a going concern basis. The Management is aware, in making its assessment, of material uncertainties related to events or conditions that may cast significant doubt upon the Company's ability to continue as a going concern.

## 2 Property, plant and equipment

(Amount in ₹)

Particulars	Freehold land	Office Building	Furniture and Fixtures	Office Equipment	Computers	Vehicles	Total
<b>Gross block:</b>							
As at 01 April 2019	28,32,179	1,41,24,924	12,78,841	20,17,467	1,68,605	9,85,000	2,14,07,016
Additions	-	-	-	-	12,980	-	12,980
Disposals	-	-	-	-	-	-	-
<b>Balance as at 31 March 2020</b>	<b>28,32,179</b>	<b>1,41,24,924</b>	<b>12,78,841</b>	<b>20,17,467</b>	<b>1,81,585</b>	<b>9,85,000</b>	<b>2,14,19,996</b>
Additions	-	-	-	62,400	-	-	62,400
Disposals	27,77,714	1,41,24,924	-	-	-	-	1,69,02,638
<b>Balance as at 31 March 2021</b>	<b>54,465</b>	<b>-</b>	<b>12,78,841</b>	<b>20,79,867</b>	<b>1,81,585</b>	<b>9,85,000</b>	<b>45,79,758</b>
<b>Accumulated depreciation:</b>							
As at 01 April 2019	-	60,94,039	12,78,840	20,17,466	1,68,604	7,33,760	1,02,92,709
Depreciation charge	-	2,59,060	-	-	3,219	52,844	3,15,123
Reversal on disposal of assets	-	-	-	-	-	-	-
<b>Balance as at 31 March 2020</b>	<b>-</b>	<b>63,53,099</b>	<b>12,78,840</b>	<b>20,17,466</b>	<b>1,71,823</b>	<b>7,86,604</b>	<b>1,06,07,832</b>
Depreciation charge	-	1,76,986	-	8	4,112	52,844	2,33,950
Reversal on disposal of assets	-	65,30,085	-	-	-	-	65,30,085
<b>Balance as at 31 March 2021</b>	<b>-</b>	<b>-</b>	<b>12,78,840</b>	<b>20,17,474</b>	<b>1,75,935</b>	<b>8,39,448</b>	<b>1,73,71,867</b>
<b>Net block:</b>							
<b>Balance as at 31 March 2020</b>	<b>28,32,179</b>	<b>77,71,825</b>	<b>1</b>	<b>1</b>	<b>9,762</b>	<b>1,98,396</b>	<b>1,08,12,164</b>
<b>Balance as at 31 March 2021</b>	<b>54,465</b>	<b>-</b>	<b>1</b>	<b>62,393</b>	<b>5,650</b>	<b>1,45,552</b>	<b>2,68,061</b>

(Amount in ₹)

Note 3	As at 31 March 2021	As at 31 March 2020
<b>Non Current Financial Assets - Other</b> (Unsecured and considered good)		
Security Deposits	-	4,92,206
<b>Total</b>	<b>-</b>	<b>4,92,206</b>

(Amount in ₹)

Note 4	As at 31 March 2021	As at 31 March 2020
<b>Current Investments (Non-Trade)</b>		
<b>Unquoted investments in Mutual Funds at FVTPL</b>		
Investment in DSP Low Duration Fund-Regular Plan-Growth 64,26,005.384 Units (Previous year: NIL Units)	9,97,63,733	-
Investment in HDFC Low Duration Fund-Regular Plan- Weekly IDCW 28,97,385.989 Units (Previous year: NIL Units )	13,04,11,633	-
Investment in HDFC Cash Management Fund - Treasury Advantage Plan, Retail, Regular Plan NIL Units (Previous year: 889.126 Units )	-	9,097
<b>Total</b>	<b>23,01,75,366</b>	<b>9,097</b>

(Amount in ₹)

Note 5	As at 31 March 2021	As at 31 March 2020
<b>Cash and Cash Equivalents</b>		
Cash on hand	2,411	16,787
Balances with Banks - in current accounts	5,81,853	2,25,001
<b>Total</b>	<b>5,84,264</b>	<b>2,41,788</b>

(Amount in ₹)

Note 6	As at 31 March 2021	As at 31 March 2020
<b>Current Financial Assets - Others</b> (Unsecured and considered good)		
Employee Advances	-	54,000
<b>Total</b>	<b>-</b>	<b>54,000</b>

(Amount in ₹)

Note 7	As at 31 March 2021	As at 31 March 2020
Current Tax Assets (net)	-	11,76,493
<b>Total</b>	<b>-</b>	<b>11,76,493</b>

(Amount in ₹)

Note 8	As at 31 March 2021	As at 31 March 2020
<b>Other Current Assets</b> (Unsecured and considered good)		
Prepaid Expenses	15,652	12,035
<b>Total</b>	<b>15,652</b>	<b>12,035</b>

(Amount in ₹)

Note 9	As at 31 March 2021	As at 31 March 2020
<b>Equity Share Capital</b>		
<b>Authorised Share Capital</b> 10,000,000 Equity Shares (Previous year: 10,000,000 Equity Shares) of ₹ 10/- each	10,00,00,000	10,00,00,000
<b>Issued, Subscribed and Fully Paid up</b> 5,396,468 Equity Shares (Previous year: 5,396,468 Equity Shares) of ₹ 10/- each fully paid	5,39,64,680	5,39,64,680
<b>Total</b>	<b>5,39,64,680</b>	<b>5,39,64,680</b>



(Amount in ₹)

<b>a) Reconciliation of number of Equity Shares</b>		
Balance as at the beginning of the year	53,96,468	53,96,468
Add : Issued during the year	-	-
Balance as at the end of the year	53,96,468	53,96,468

**b) Shareholders holding more than 5% of the Equity Shares:**

Name of Shareholders	As at 31 March 2021		As at 31 March 2020	
	Anagha Enterprises Private Limited	9,77,835	18.12%	9,77,835
Brijwasi Securities Private Limited	6,76,800	12.54%	6,76,800	12.54%
Smit Capital Services Private Limited	5,27,800	9.78%	5,27,800	9.78%
Transfabcon Projects Private Limited	4,50,000	8.34%	4,50,000	8.34%
Suresh Kumar Jalan	3,98,640	7.39%	3,98,640	7.39%

**c) Rights, preferences and restrictions attached to shares:**

The Company has only one class of equity shares having face value of ₹ 10 per share. Each holder of equity share is entitled to one vote per share. Equity shareholders are also entitled to dividend as and when proposed by the Board of Directors and approved by shareholders in Annual General Meeting. In the event of liquidation of the Company, the holders of equity shares will be entitled to receive remaining assets of the Company, after distribution of all preferential amounts in proportion to their shareholding.

(Amount in ₹)

Note 10	As at 31 March 2021	As at 31 March 2020
<b>Other Equity</b>		
<b>a) Securities premium</b>		
Balance at the beginning of the year	9,43,23,634	9,43,23,634
Add: Premium received / utilised during the year	-	-
<b>Balance at the end of the year</b>	<b>9,43,23,634</b>	<b>9,43,23,634</b>
<b>b) Capital Reserve</b>		
Balance at the beginning of the year	25,00,000	25,00,000
Less: Additions / Deductions during the year	-	-
<b>Balance at the end of the year</b>	<b>25,00,000</b>	<b>25,00,000</b>
<b>c) Items of Other Comprehensive Income</b>		
Re-measurement gain/(loss) on defined benefit plans through OCI		
Balance at the beginning of the year	47,577	(1,73,634)
Add: Changes during the year	(84,322)	2,21,211
<b>Balance at the end of the year</b>	<b>(36,745)</b>	<b>47,577</b>

(Amount in ₹)

	As at 31 March 2021	As at 31 March 2020
<b>d) Surplus / (Deficit) in the Statement of Profit and Loss</b>		
Balance at the beginning of the year	(31,34,37,910)	(29,30,66,464)
Add: Profit / (loss) for the year	35,22,66,470	(2,03,71,446)
<b>Balance at the end of the year</b>	<b>3,88,28,560</b>	<b>(31,34,37,910)</b>
<b>Total</b>	<b>13,56,15,449</b>	<b>(21,65,66,699)</b>

**Nature and purpose of reserves****(i) Securities premium :**

The amount received in excess of face value of Equity Shares is recognised as Securities Premium. The reserve will be utilised in accordance with the provisions of the Act.

**(ii) Capital reserve:**

The Capital Reserve is the capital subsidy received by the Company from the Government of Pondicherry (now Puducherry) during the financial year 1988-89 and 1989-90.

**(iii) Other Comprehensive Income:**

Items of Other Comprehensive Income consists of remeasurement of defined benefit liability / asset.

**(iv) Statement of Profit and Loss:**

Retained earnings pertain to the accumulated earnings by the Company over the years.

(Amount in ₹)

Note 11	As at 31 March 2021	As at 31 March 2020
<b>Non Current Financial Liabilities - Borrowings</b>		
Unsecured		
Loan from Related Party (refer note 30)	-	5,79,04,000
Loan from Others	-	5,80,00,000
<b>Total</b>	<b>-</b>	<b>11,59,04,000</b>

Notes: The unsecured loans are repayable over a period of 3 to 5 years.

(Amount in ₹)

Note 12	As at 31 March 2021	As at 31 March 2020
<b>Non Current Financial Liabilities - Others</b>		
Interest Accrued but not due to Related Party (refer note 30)	-	1,02,09,731
Interest Accrued but not due to Others	-	1,09,03,307
<b>Total</b>	<b>-</b>	<b>2,11,13,038</b>

(Amount in ₹)

Note 13	As at 31 March 2021	As at 31 March 2020
<b>Non Current Provisions</b>		
Provision for Gratuity (refer note 33)	1,65,052	4,63,572
Provision for Compensated Absences (refer note 33)	71,064	1,07,212
<b>Total</b>	<b>2,36,116</b>	<b>5,70,784</b>

(Amount in ₹)

Note 14	As at 31 March 2021	As at 31 March 2020
<b>Current Financial Liabilities - Borrowings</b>		
Unsecured		
Loan from Director (refer note 30)	-	38,25,000
Loan from Related Party (refer note 30)	2,55,41,393	2,55,41,393
<b>Total</b>	<b>2,55,41,393</b>	<b>2,93,66,393</b>

(Amount in ₹)

Note 15	As at 31 March 2021	As at 31 March 2020
<b>Current Financial Liabilities - Trade Payables</b>		
Micro, Small and Medium Enterprises (refer note below)	-	-
Others	1,26,569	49,622
<b>Total</b>	<b>1,26,569</b>	<b>49,622</b>

The Company has amount due to suppliers under the Micro, Small and Medium Enterprises Development Act, 2006, (MSMED Act). The disclosure pursuant to the said Act is as under:

(Amount in ₹)

	As at 31 March 2021	As at 31 March 2020
Principal amount due to suppliers under MSMED Act	-	-
Interest accrued and due to suppliers under MSMED Act on the above unpaid amount	-	-
Interest accrued and not due to suppliers under MSMED Act	-	-
Payment made to suppliers (other than interest) beyond the appointed day during the year	-	-
Interest paid to suppliers under MSMED Act	-	-
Interest due and payable to suppliers under MSMED Act for payment already made	-	-
Interest accrued and remaining unpaid at the end of the period to suppliers under MSMED Act	-	-

Note:- This information has been given in respect of such vendors to the extent they could be identified as Micro and Small enterprises on the basis of information available with the Company.

(Amount in ₹)

Note 16	As at 31 March 2021	As at 31 March 2020
<b>Current Financial Liabilities - Others</b>		
Interest Accrued but not due to Related Party (refer note 30)	-	42,41,115
Other Accrued Liabilities	5,81,886	21,15,532
<b>Total</b>	<b>5,81,886</b>	<b>63,56,647</b>

(Amount in ₹)

Note 17	As at 31 March 2021	As at 31 March 2020
<b>Current Provisions</b>		
Provision for Gratuity (refer note 33)	15,06,116	15,07,942
Provision for Compensated Absences (refer note 33)	1,00,720	1,57,086
<b>Total</b>	<b>16,06,836</b>	<b>16,65,028</b>

(Amount in ₹)

Note 18	As at 31 March 2021	As at 31 March 2020
<b>Current Tax Liabilities</b>		
Provision For Income tax (net)	1,32,83,670	-
<b>Total</b>	<b>1,32,83,670</b>	<b>-</b>

(Amount in ₹)

Note 19	As at 31 March 2021	As at 31 March 2020
<b>Other Current Liabilities</b>		
Statutory Dues	86,744	3,74,290
<b>Total</b>	<b>86,744</b>	<b>3,74,290</b>

(Amount in ₹)

Note 20	For the year ended 31 March 2021	For the year ended 31 March 2020
<b>Other Income</b>		
On assets measured at amortised cost		
- Interest Income	-	1,31,720
On assets measured at fair value through profit or loss		
- Net gain on Current Investments	2,14,396	15
- Dividend on Current Investment	27,37,269	454
Sundry Balances written back	-	11,509
Interest on tax refunds	7,753	-
Other Income	-	60,000
<b>Total</b>	<b>29,59,418</b>	<b>2,03,698</b>

(Amount in ₹)

Note 21	For the year ended 31 March 2021	For the year ended 31 March 2020
<b>Employee Benefits</b>		
Salaries and Wages	40,05,851	26,71,277
Contribution to Provident and Other Funds	1,11,659	1,17,334
Gratuity and Compensated Absences (refer note 34)	2,38,489	2,62,422
Employees Welfare Expenses	3,41,609	2,72,994
<b>Total</b>	<b>46,97,608</b>	<b>33,24,027</b>

(Amount in ₹)

Note 22	For the year ended 31 March 2021	For the year ended 31 March 2020
<b>Finance Cost</b>		
Bank Charges	2,422	2,760
Interest Expenses	87,14,118	1,22,22,039
<b>Total</b>	<b>87,16,540</b>	<b>1,22,24,799</b>

(Amount in ₹)

Note 23	For the year ended 31 March 2021	For the year ended 31 March 2020
<b>Other expenses</b>		
Advertisement Expenses	2,48,163	1,26,382
Auditor's Remuneration (refer note 23.1)	1,65,200	94,400
Books and Periodicals Expenses	3,780	4,250
Electricity Charges	80,746	65,824
Entertainment Expenses	13,017	14,565
Printing and Stationery Expenses	42,093	85,886
Legal and Professional Fees	25,88,138	15,12,807
Listing Fees	3,54,000	3,54,000
Postage and Telegram	71,379	2,72,824
Rates and Taxes	5,91,912	95,033
Repairs and Maintenance		
-Building	11,149	-
Others	1,77,319	4,09,938
Security Charges	8,34,000	7,86,660
Travelling Expenses	3,74,969	3,82,370
Miscellaneous Expenses	7,06,432	5,06,257
<b>Total</b>	<b>62,62,297</b>	<b>47,11,195</b>

(Amount in ₹)

Note 23.1	For the year ended 31 March 2021	For the year ended 31 March 2020
<b>Auditor's Remuneration</b>		
Statutory Audit Fees	1,65,200	94,400
<b>Total</b>	<b>1,65,200</b>	<b>94,400</b>

**24. Fair value measurements****Financial instruments by category:**

All financial assets and financial liabilities of the Company are under the amortised cost measurement category at each of the reporting dates except mutual funds investments which are recognised and measured at fair value through profit or loss (FVTPL) and borrowings, which are recognised and measured at fair value through other comprehensive income (FVOCI).

**Fair value hierarchy**

The following table provides the fair value measurement hierarchy of Company's financial assets and financial liabilities

(Amount in ₹)

Category	31 March 2021				
	Non- Current	Current	Level 1	Level 2	Level 3
<b>Financial Assets</b>					
<b>At FVTPL</b>					
Investments	-	23,01,75,366	23,01,75,366	-	-
At Ammortised Cost					
Other financial assets	-	-	-	-	-
Cash and Cash Equivalents	-	5,84,264	-	-	-
<b>Total</b>	-	<b>23,07,59,630</b>	<b>23,01,75,366</b>	-	-
<b>Financial Liabilities</b>					
<b>At Ammortised Cost</b>					
Borrowings	-	2,55,41,393	-	-	-
Trade Payables	-	1,26,569	-	-	-
Other Financial Liabilities	-	5,81,886	-	-	-
<b>Total</b>	-	<b>2,62,49,848</b>	-	-	-

Category	31 March 2020				
	Non- Current	Current	Level 1	Level 2	Level 3
<b>Financial Assets</b>					
<b>At FVTPL</b>					
Investments	-	9,097	9,097	-	-
At Ammortised Cost					
Other Investments	-	-	-	-	-
Other financial assets	4,92,206	54,000	-	-	-
Cash and Cash Equivalents	-	2,41,788	-	-	-
<b>Total</b>	<b>4,92,206</b>	<b>3,04,885</b>	<b>9,097</b>	-	-
<b>Financial Liabilities</b>					
<b>At Ammortised Cost</b>					
Borrowings	11,59,04,000	2,93,66,393	-	-	-
Trade Payables	-	49,622	-	-	-
Other Financial Liabilities	2,11,13,038	63,56,647	-	-	-
<b>Total</b>	<b>13,70,17,038</b>	<b>3,57,72,661</b>	-	-	-

- During the periods mentioned above, there have been no transfers amongst the level 2 and level 3 hierarchy.

**Valuation process**

- The Company evaluates the fair value of financial assets and financial liabilities on periodic basis using the best and most relevant data available.
- Fair value of investments in Mutual Funds is on the basis of Net Assets Value (NAV) declared.
- The carrying amounts of other financial assets, current borrowings, trade payables and other current financial liabilities are considered to be approximately equal to their fair value, since those are current in nature.

**25. Financial risk management objectives and policies**

The Company's principal financial liabilities, comprise borrowings, trade and other payables. The main purpose of the significant portion of these financial liabilities is to finance the dues towards arrears of electricity charges, demurrage charges and other routine expenditure of the Company. The Company's principal financial assets include security deposits, cash and cash equivalents and other financial assets. The Company is exposed to market risk and liquidity risk. Company's senior management oversees the management of these risks. It is Company's policy that no trading in derivatives for speculative purposes may be undertaken. The Board of Directors review and agree policies for managing each of these risks, which are summarised below.

**a) Interest rate risk**

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. Company does not have significant foreign currency risk exposure to the risk of changes in market interest rates as Company's long-term debt obligations is at fixed interest rates.

**b) 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. For the Company, liquidity risk arises from obligations on account of financial liabilities – borrowings, trade payables and other financial liabilities.

**Liquidity risk management**

The Company monitors rolling forecasts of its liquidity requirements to ensure it has sufficient cash to meet operational needs. The table below provides undiscounted cash flows towards financial liabilities into relevant maturity based on the remaining period at the balance sheet to the contractual maturity date.

(Amount in ₹)

As at 31 March 2021							
Particulars	Carrying Amount in ₹	On demand	Less than 6 months	6 to 12 months	1 to 5 years	Beyond 5 years	Total
Borrowings	2,55,41,393	-	-	2,55,41,393	-	-	2,55,41,393
Other financial liabilities	5,81,886	-	5,81,886	-	-	-	5,81,886
Trade payables	1,26,569	-	1,26,569	-	-	-	1,26,569

(Amount in ₹)

As at 31 March 2020							
Particulars	Carrying Amount in ₹	On demand	Less than 6 months	6 to 12 months	1 to 5 years	Beyond 5 years	Total
Borrowings	14,52,70,393	38,25,000	-	12,09,45,393	2,05,00,000	-	14,52,70,393
Other financial liabilities	2,74,69,685	42,41,115	21,15,532	1,91,49,043	19,63,995	-	2,74,69,685
Trade payables	49,622	-	49,622	-	-	-	49,622

**c) Credit risk**

Credit risk arises from the possibility that counter party may not be able to settle their obligations as agreed. Company is exposed to credit risk from loans advanced and deposits with banks. To manage this, the Company exposure to its counter parties are continuously monitored. Company deals with counter parties having high credit rating.

**26. Capital Management**

The primary objective of Company's capital management is to maximise the shareholders value. The Company's primary objective when managing capital is to ensure that it maintains an efficient capital structure, healthy capital ratio's and safeguard the Company's ability to continue as a going concern in order to support its business and provide maximum return for shareholders. The Company also proposes to maintain an optimal capital structure to reduce the cost of capital. No changes were made in the objectives, policies or processes during the year ended 31 March 2021.

**27** The Company has not been carrying on any operations. Hence information pursuant to Ind-AS 108 on "Operating Segments" is not applicable to the Company.

**28** The Company has suspended its operation. In view thereof and in consideration of prudence, the Company has not recognised Deferred Tax Asset in respect of set off of available losses and timing differences.

**29** The Company has opted for tax rate under section 115BAA of the Income Tax Act, 1961 which has been considered to determine the current tax liabilities.

**30 Related Party Disclosures:**

As per Ind-AS 24 "Related Party Disclosures", disclosure of transactions with the related parties and their balances as at the year end are given below:

i) Names of related parties and description of relationship:

Name of the Related Party	Designation	Relationship
Prithviraj S. Parikh	Promoter / Director	Key Management Personnel (KMP)
P. K. R. K. Menon	Company Secretary	
B N Kamath	Chief Financial Officer and Chief Executive Officer	
WRM Private Limited		Companies in which KMP or their relative have significant influence
Anagha Enterprises Private Limited		
Wist Overseas Private Limited		



ii) Disclosures of transactions between the Company and its related parties during the year:

(Amount in ₹)

Particulars	Name of the Party	Amount
1) Short Term Borrowings Taken	Prithviraj S. Parikh	1,50,000
		(14,85,000)
2) Long Term Borrowings Taken	Anagha Enterprises Private Limited	1,30,88,821
		(1,72,54,000)
3) Short Term Borrowings Repaid	Prithviraj S. Parikh	39,75,000
		(1,62,00,000)
4) Long Term Borrowings Repaid	Anagha Enterprises Private Limited	7,09,92,821
		(-)
5) Remuneration expense	P. K. R. K. Menon	13,00,000
		(13,00,000)
	B N Kamath	4,42,000
		(4,42,000)
6) Interest expense	Prithviraj S. Parikh	2,15,120
		(11,72,084)
	Anagha Enterprises Private Limited	42,30,676
		(51,34,955)

Note: Figures in brackets represents Previous Year's amount.

iii) Balance as at year end:

(Amount in ₹)

Particulars	Name of the Party	Financial Year ended	Amount
Short Term Borrowings	Prithviraj S. Parikh	31-Mar-21	-
		31-Mar-20	38,25,000
	WRM Private Limited	31-Mar-21	2,55,41,393
		31-Mar-20	2,55,41,393
Long Term Borrowings	Anagha Enterprises Private Limited	31-Mar-21	-
		31-Mar-20	5,79,04,000
Interest payable	Prithviraj S. Parikh	31-Mar-21	-
		31-Mar-20	42,41,115
	Anagha Enterprises Private Limited	31-Mar-21	-
		31-Mar-20	1,02,09,731

### 31 Earnings per share (EPS)

The amount considered in ascertaining the Company's earnings per share constitutes the net profit after tax and includes post tax effect of any exceptional items. The number of shares used in computing basic earnings per share is the weighted average number of shares outstanding during the year. The number of shares used in computing diluted earnings per share comprises the weighted average number of shares considered for deriving basic earnings per share and also the weighted average number of shares which could have been issued on conversion of all dilutive potential shares.

Particulars	Year ended	Year ended
	31 March 2021	31 March 2020
Net Profit/(loss) after tax attributable to equity shareholders (In ₹)	35,22,66,470	(2,03,71,446)
Weighted average number of shares outstanding during the year – Basic and Diluted	53,96,468	53,96,468
Basic and Diluted earnings per share (In ₹)	65.28	(3.77)
Nominal value per equity share (In ₹)	10.00	10.00

**32 Reconciliation of the income tax expenses to the amount computed by applying the statutory income tax rate to the profit before income taxes is summarised below:**

Particulars	Year ended	Year ended
	31 March 2021	31 March 2020
	(Amount in ₹)	(Amount in ₹)
<b>Enacted income tax rate in India applicable to the Company</b>	22.88%	-
<b>Profit / (Loss) before tax</b>	40,50,76,470	(2,03,71,446)
Current tax expenses on Profit / (Loss) before tax expenses at the enacted income tax rate in India	9,26,81,496	-
<b>Tax effect of the amounts which are not deductible / taxable in calculating taxable income</b>		
Permanent disallowances	53,528	-
Other items	13,05,415	-
<b>Tax effect of the amounts which are deductible / non-taxable in calculating taxable income</b>		
Gain on Sale of Property, Plant and Equipment	(3,04,85,283)	-
Bought forward losses	(1,06,96,102)	-
Other items	(49,054)	-
<b>Total income tax expense</b>	<b>5,28,10,000</b>	-
<b>Effective tax rate</b>	<b>13.04%</b>	-

**33 Employee Benefits Obligations**

As per Ind-AS 19 "Employee Benefits", the disclosures as defined in the Indian Accounting Standard are given below :

**Defined Contribution Plans:**

The Company offers its employees defined contribution plan in the form of provident fund, family pension fund and superannuation fund. Provident fund, family pension fund cover substantially for all regular employees. Contributions are paid during the year into separate funds. While both the employees and the company pay predetermined contributions into the provident fund and pension fund, no fund has been created by

the Company for gratuity. The Company's contribution to the provident fund and family pension fund has been charged to Statement of Profit and Loss.

Contribution to Defined Contribution Plans, recognised as expense for the year is as under :

(Amount in ₹)

Particulars	2020-21	2019-20
Employer's Contribution to Provident Fund	76,424	78,556
Employer's Contribution to Pension Scheme	11,700	13,366
Employer's Contribution to ESIC	20,082	21,962

#### Defined Benefit Plans:

The Company offers its employees defined benefit plans in the form of gratuity (a lump sum amount). Benefits under the defined benefit plans are based on years of service and the employees last drawn salary immediately before exit. The gratuity scheme covers substantially all regular employees. However the Company has not created any fund in accordance with the scheme. Commitments are actuarially determined at year end. As per Ind-AS 19 "Employee Benefits", Actuarial valuation is done based on "Projected Unit Credit Method". Gains and loss of changed actuarial assumptions are charged to Statement of Profit & Loss. The obligation for leave Encashment benefits is recognized in the manner similar to Gratuity.

(Amount in ₹)

	Particulars	Gratuity (Non funded)	
		2020-21	2019-20
<b>I</b>	<b>Change in Defined Benefit Obligation during the year</b>		
	Defined Benefit Obligation at the beginning of the year	19,71,514	19,47,854
	Interest Cost	1,01,582	1,34,402
	Current Service Cost	95,538	93,230
	Benefits paid during the year	(5,68,212)	-
	Actuarial (gain) / loss on Defined Benefit Obligation	70,746	(2,03,972)
	Defined Benefit Obligation at the end of the year	16,71,168	19,71,514
<b>II</b>	<b>Change in fair value of Plan Assets during the year</b>		
	Fair value of Plan Assets at the beginning of the year	-	-
	Expected Return on plan assets	-	-
	Contribution	-	-
	Benefits paid during the year	-	-
	Actuarial (gain) / loss on Plan Assets	-	-
	Fair value of Plan Assets at the end of the year	-	-

(Amount in ₹)

	Particulars	Gratuity (Non funded)	
		2020-21	2019-20
<b>III</b>	<b>Amount to be recognised in Balance Sheet:</b>		
	Present value of Defined Benefit Obligations	16,71,168	19,71,514
	Fair value of plan assets at the end of the year	-	-
	Amount recognised in Balance Sheet	16,71,168	19,71,514
<b>IV</b>	<b>Current / Non-current bifurcation:</b>		
	Current benefit obligation	15,06,116	15,07,942
	Non-current benefit obligation	1,65,052	4,63,572
<b>V</b>	<b>Expenses recognised in the Statement of Profit and Loss for the year</b>		
	Current Service Cost	95,538	93,230
	Interest cost on obligation	1,01,582	1,34,402
	Expected Return on plan assets	-	-
	Expense recognised in the Statement of Profit and Loss	1,97,120	2,27,632
<b>VI</b>	<b>Recognised in Other Comprehensive Income for the year</b>		
	Remeasurement due to:		
	Effect of change in financial assumption	69,926	(5,052)
	Effect of change in plan experience	820	(1,98,920)
	Effect of change in demographic assumption	-	-
	Return on plan of assets (excluding interest)	-	-
	Net Actuarial (gain) / loss recognised for the year	70,746	(2,03,972)
<b>VII</b>	<b>Actuarial assumptions used for estimating defined benefit obligation</b>		
	Discount Rate	6.02%	6.02%
	Salary Escalation Rate	5.00%	5.00%
	Attrition / Withdrawal Rate	5% to 1%	5% to 1%
	Mortality Rate	IALM 2012-2014 (Ultimate)	IALM 2012-2014 (Ultimate)

**Notes:-**

- 1) Estimates of future salaries increases are based on inflation, seniority, promotion and other relevant factors such as demand and supply in the employment market. This assumption has been determined in consultation with the Company.
- 2) Discount rate used for valuing liabilities is based on yield (as on valuation date) of Government with a term equal to the average future working life time of the employees.
- 3) Withdrawal rate used for valuing liabilities have been considered as 5% at younger ages and reducing as per graduated scale to 1%.
- 4) Retirement age has been considered as 65 years.
- 5) The above information is certified by actuary.

These gratuity plan typically expose the Company to actuarial risks such as: investment risk, interest risk, longevity risk and salary risk.

**Investment risk**

The present value of the defined benefit plan liability is calculated using a discount rate which is determined by reference to market yields at the end of the reporting period on government bonds. For other defined benefit plans, the discount rate is determined by reference to market yield at the end of reporting period on high quality corporate bonds when there is a deep market for such bonds; if the return on plan asset is below this rate, it will create a plan deficit.

**Interest risk**

A decrease in the bond interest rate will increase the plan liability; however, this will be partially offset by an increase in the return on the plan debt investments.

**Longevity risk**

The present value of the defined benefit plan liability is calculated by reference to the best estimate of the mortality of plan participants both during and after their employment. An increase in the life expectancy of the plan participants will increase the plan's liability.

**Salary risk**

The present value of the defined plan liability is calculated by reference to the future salaries of plan participants. As such, an increase in the salary of the plan participants will increase the plan's liability.

- 34** Additional Information as required under Section 186 (4) of the Companies Act, 2013 during the year
- (a) No Investment made in Body Corporate.
  - (b) No Guarantee is given by the Company.
  - (c) No Loans are given by the Company to Body Corporate or person.

- 35** During the year under review the Company has sold/disposed of an area of 54.86 acres or thereabout situated at Pondicherry, for a consideration of ₹ 43.24Crores, subject to the deduction of tax, to Sri. Balaji Vidyapeeth, Pondicherry, in accordance with the resolution passed by the shareholders vide postal ballot result dated 13<sup>th</sup> July 2019 and further resolution passed by the Board on 27<sup>th</sup> November 2020. Pursuant to aforesaid the sale/disposal, the Company has recognised the gain thereto. The Company has further utilised part of the sale consideration received from the sale of the said area towards repayment of its existing debt liability.
- 36** The figures of the previous year have been reworked, regrouped, rearranged and reclassified, wherever considered necessary to conform to the current year presentation.

As per our report of even date

**For Paresb Rakesh & Associates LLP**  
(Firm Registration No. 119728W/W100743)  
Chartered Accountants

**For and on behalf of the Board of Directors**

Sd/-  
**Nimit Sheth**  
Partner  
Membership No.142645

Sd/-  
**Prithviraj. S. Parikh**  
Director  
(DIN: 00106727)

Sd/-  
**Hitesh V Raja**  
Director  
(DIN: 02681574)

**Place :** Mumbai  
**Date :** 30<sup>th</sup> June, 2021

Sd/-  
**P. K. R. K. Menon**  
Company Secretary  
(FCS:1074)

Sd/-  
**B N Kamath**  
C.F.O. & C.E.O.  
(PAN: AESPK5610C)