

EASTCOAST
STEEL LIMITED

39th Annual Report
2021-2022

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

EASTCOAST STEEL LIMITED

Board of Directors	Shri Prithviraj S. Parikh Chairman & Non-Executive Director Shri P. K. R. K. Menon Additional Director Smt. Sharmila S. Chitale Independent Director
Company Secretary & Compliance Officer	Shri P. K. R. K. Menon
Chief Executive Officer & Chief Financial Officer	Shri B. N. Kamath
Statutory Auditors	M/s. Paresh Rakesh & Associates LLP Chartered Accountants Mumbai
Internal Auditors	M/s. Krishnan & Giri Chartered Accountants Chennai
Secretarial Auditors	P. S. Ramnath Company Secretary Mumbai
Bankers	Dena Bank HDFC Bank Limited State Bank of India
Registered Office	Flat No. A-123, Royal Den Apartments, No.16, Arul Theson Street, Palaniraja Udayar Nagar, Lawspet, Pondicherry - 605008. Website: www.eastcoaststeel.com Tel: 022 - 40750100 Fax: 022 - 22044801 E-mail: esl@eastcoaststeel.com
CIN	L27109PY1982PLC000199
Registrar & Share Transfer Agents	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: rnt.helpdesk@linkintime.co.in Website : www.linkintime.co.in
ISIN (Demat)	INE315F01013

NOTICE

Notice is hereby given that the **Thirty-Ninth Annual General Meeting (“AGM”)** of the Members of **EASTCOAST STEEL LIMITED** will be held on **Tuesday, September 27, 2022 at 3:00 p.m. (IST) through Video Conferencing/Other Audio Visual Means** to transact the following businesses:

ORDINARY BUSINESS

1. To receive, consider and adopt the Audited Financial Statements of the Company for the Financial Year ended March 31, 2022 and the Reports 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 including Balance Sheet of the Company as at March 31, 2022, the Statement of Profit and Loss, the Statement of Changes in Equity and the Cash Flow Statement for the year ended on that date together with all the notes annexed together with the reports of the Auditors’ and Directors’ thereon, placed before the meeting be and are hereby received, considered and adopted.”

2. To appoint a Director in place of Shri. Prithviraj S. Parikh (DIN:00106727) who retires by rotation at this Annual General Meeting and being eligible, offers himself for re-appointment as a Director of the Company 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 at this Annual General Meeting in accordance with Section 152 of the Companies Act, 2013 and being eligible, has offered himself for re-appointment, be and is hereby re-appointed as a Director of the Company, liable to retire by rotation.”

SPECIAL BUSINESS

3. Appointment of Shri. Radhakrishana Parakkat K Menon (for brevity - P. K. R. K. Menon) (DIN: 00106279) as a Non-Executive and Non-Independent Director of the Company.

To consider, and if thought fit, to pass, with or without modification(s), the following resolution, as an **Ordinary Resolution**:

“**RESOLVED THAT** pursuant to the provisions of Section 152 and all other applicable provisions, if any, of the Companies Act, 2013 (“the Act”) read with the Companies (Appointment and Qualification of Directors) Rules, 2014, and any other applicable rules made thereunder, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) (including any statutory modification(s) or amendment(s) or re-enactment(s) thereof for the time being in force), Shri. P. K. R. K. Menon (DIN: 00106279), who was appointed as an Additional Director in the category of Non-Executive, Non-Independent Director by the Board, with effect from October 14, 2021 in terms of Section 161 of the Act and the Articles of Association of the Company and who holds office up to the date of this Annual General Meeting (“AGM”) and in respect of whom the Company has received a notice in writing from a member under Section 160 of the Act proposing his candidature for the office of Director of the Company, the consent of the Members of the Company

be and is hereby accorded for appointment of Shri. P. K. R. K. Menon (DIN: 00106279), being eligible, as a Non- Independent Director of the Company, liable to retire by rotation.”

**By order of the Board of Director
For Eastcoast Steel Limited**

Sd/-

Prithviraj S. Parikh

Chairman

DIN : 00106727

Place: Mumbai

Date : May 30, 2022

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 followed by , in relation to “Clarification on passing of ordinary and special resolutions by Companies under the Act 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 (“**SEBI**”) 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 (“**SEBI Listing Regulations**”): 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 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 Regulations, 2015 the 39th AGM of the Company is scheduled to be held on Tuesday, September 27, 2022 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 39th AGM shall be the registered office of the Company at Flat No. A-123, Royal Den Apartments, No.16, Arul Theson Street, Palaniraja Udayar Nager, Lawspet, Pondicherry - 605008.
3. The Explanatory Statement pursuant to Section 102 of the Act with respect to the Special business under Item No.3 of the Notice is annexed hereto.
4. 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 (“**ICSI**”), in respect of Director seeking re-appointment is annexed hereto as “**Annexure-A**”. Requisite declarations have been received from Director/s for seeking appointment/re-appointment.

5. 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. However, the Body Corporates are entitled to appoint Authorised Representatives to attend the AGM through VC/OAVM and participate there at and cast their votes through e-voting.
6. 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 there at 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 with a copy marked to evoting@nsdl.co.in and esl@eastcoaststeel.com.
7. 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.
8. 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.
9. 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. 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.
10. 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 2021-22, in electronic form only to those members whose e-mail addresses are registered with the Company/Depositories. In line with the MCA Circular No. 17/2020 dated April 13, 2020, the notice convening the AGM and the Annual Report for the financial year 2021-22, 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.
11. AGM has been convened through VC/OAVM in compliance with applicable provisions of the Companies Act, 2013 read with MCA Circular No. 14/2020 dated April 08, 2020 and MCA Circular No. 17/2020 dated April 13, 2020, MCA Circular No. 20/2020 dated May 05, 2020 and MCA Circular No. 2/2021 dated January 13, 2021.

12. 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.
13. SEBI vide its Circular No. SEBI/HO/MIRSD/MIRSD_ RTAMB/P/CIR/2022/8 dated January 25, 2022 has mandated the Listed Companies to issue securities in demat form only while processing service requests viz. Issue of duplicate securities certificate; claim from Unclaimed Suspense Account; Renewal/ Exchange of securities certificate; Endorsement; Sub-division/ Splitting of securities certificate; Consolidation of securities certificates/ folios; Transmission and Transposition. Accordingly, members are requested to make service requests by submitting a duly filled and signed Form ISR – 4, the format of which is available on the Company's website under the web link at <http://eastcoaststeel.com/wp-content/uploads/2022/08/Form-ISR-4.pdf>.
14. SEBI has recently mandated furnishing of PAN, KYC details (i.e. Postal Address with Pin code, E-mail address, mobile number, bank account details) and nomination details by holders of securities. With effect from January 01, 2022, any service requests or complaints received from the member, will not be processed by RTA till the aforesaid details/ documents are provided to RTA. In case any of the above cited documents/ details are not available in the Folio(s), RTA shall be constrained to freeze such Folio(s) effective from April 01, 2023.
15. 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.
16. 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.
17. Loss of Shares: In case of loss/misplacement of share certificates, members should immediately lodge a complaint/FIR with the police and inform the Company's Registrar and Transfer Agent, Integrated for the procedure of obtaining the duplicate share certificates.
18. Non-Resident shareholders: Non-Resident shareholders are requested to immediately notify the following to the Company in respect of shares held in Physical form and to their Depository Participant in respect of shares held in Dematerialized form:
 - Indian address for sending all communications, if not provided so far;
 - Change in their residential status on return to India for permanent settlement;
 - Particulars of the Bank Account maintained with a bank in India, if not furnished earlier; and
 - RBI Permission number with date to facilitate prompt credit of dividend in their Bank Accounts

19. 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.
20. SEBI vide circular no. SEBI/HO/MIRSD/MIRSD_ RTAMB/P/CIR/2021/655 dated November 03, 2021, has provided the norms for furnishing PAN, KYC details and Nomination by holders of physical securities. Pursuant to aforesaid SEBI Circular, the Company has sent individual communications to all the Members holding shares of the Company in physical form. 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. In case of physical shareholders who have not updated their KYC details may please submit Form No. ISR-1 and Form No. SH-13. The link for downloading the forms is available on the Company's website at www.eastcoaststeel.com.
21. 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.
22. The Company has been maintaining the statutory registers at 163-164/A, Mittal Tower, 16th Floor, Nariman Point, Mumbai-400021, Maharashtra. 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 esi@eastcoaststeel.com upto the date of the AGM.
23. 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 August 25, 2022.
24. 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.
25. The Company has appointed CS Ashish C. Bhatt Company Secretary in Whole-time practice (Membership No. 4650 / CP No. 2956) as the Scrutinizer to scrutinize the remote e-voting process for the 39th AGM in a fair and transparent manner and he/she has consented to act as scrutinizer. The Scrutinizer shall submit his report to the Chairman or any other person authorized by the Chairman, after the completion of the scrutiny of the e-voting (votes cast during the AGM and votes cast through remote e-voting), not later than 48 hours from the conclusion of the AGM. The result declared along with the Scrutinizer's report shall be communicated to the stock exchanges on which the Company's shares are listed, NSDL and RTA and will also be displayed on the Company's website at <http://www.eastcoaststeel.com>.

26. 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 and the Circulars issued by the MCA dated April 08, 2020, April 13, 2020 and May 05, 2020, 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 20, 2022, may cast their vote by remote e-voting. The voting right of shareholders shall be in proportion to their share in the paid-up equity share capital of the Company as on the cut-off date, being September 20, 2022. The remote e-voting period commences on Saturday, September 24, 2022 at 9:00 a.m. (IST) and ends on Monday, September 26, 2022 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

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 advised to update their mobile number and E-mail 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 shareholders	Login Method
Individual Shareholders holding securities in demat mode with NSDL.	<ol style="list-style-type: none"> 1. Existing IDeAS user can visit the e-Services website of NSDL Viz. https://eservices.nsdl.com either on a Personal Computer or on a mobile. On the e-Services home page click on the “Beneficial Owner” icon under “Login” which is available under ‘IDeAS’ Section , this will prompt you to enter your existing User ID and Password. After successful authentication, you will be able to see e-Voting services under Value added services. Click on “Access to e-Voting” under e-Voting services and you will be able to see e-Voting page. Click on Company name or e-Voting service provider i.e. NSDL and you will be re-directed to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. 2. If you are not registered for IDeAS e-Services, option to register is available at https://eservices.nsdl.com. Select “Register Online for IDeAS Portal” or click at https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp. 3. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon “Login” which is available under ‘Shareholder/Member’ Section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number held with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on Company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. 4. Shareholders/Members can also download NSDL Mobile App “NSDL Speede” facility by scanning the QR code mentioned below for seamless voting experience. <div style="text-align: center; border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>NSDL Mobile App is available on</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>App Store</p>  </div> <div style="text-align: center;">  <p>Google Play</p>  </div> </div> </div>

Individual Shareholders holding securities in demat mode with CDSL	<ol style="list-style-type: none"> Existing users who have opted for Easi / Easiest, they can login through their user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are https://web.cdslindia.com/myeasi/home/login or www.cdslindia.com and click on New System Myeasi. After successful login of Easi/Easiest the user will be also able to see the E Voting Menu. The Menu will have links of e-Voting service provider i.e. NSDL. Click on NSDL to cast your vote. If the user is not registered for Easi/Easiest, option to register is available at https://web.cdslindia.com/myeasi/Registration/EasiRegistration. Alternatively, the user can directly access e-Voting page by providing demat Account Number and PAN from a link in www.cdslindia.com home page. The system will authenticate the user by sending OTP on registered Mobile & E-mail 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.
Individual Shareholders (holding securities in demat mode) login through their depository participants	You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. upon logging in, you will be able to see e-Voting option. Click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on Company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.

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 on or before September 17, 2022.

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 evoting@nsdl.co.in 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 helpdesk.evoting@cdslindia.com or contact at 022-23058738 or 022-23058542-43.

B) Login method for e-Voting and joining virtual meeting 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 Personal Computer or on a mobile.
2. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' Section.
3. A new screen will open. You will have to enter your User ID, your Password/OTP and a Verification Code as shown on the screen.

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

4. Your User ID details are given below:

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

5. 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 E-mail ID is registered in your demat account or with the Company, your 'initial password' is communicated to you on your E-mail ID. Trace the E-mail sent to you from NSDL from your mailbox. Open the E-mail 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 E-mail ID is not registered, please follow steps mentioned below in process for those members whose E-mail IDs are not registered.
6. If you are unable to retrieve or have not received the 'initial password' or have forgotten your password:
 - a) Click on **“Forgot User Details/Password”** (If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com.
 - b) **“Physical User Reset Password”** (If you are holding shares in physical mode) option available on www.evoting.nsdl.com.
 - c) If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.co.in mentioning your demat account number/folio number, your PAN, your name and your registered address etc.
 - d) Members can also use the OTP (One Time Password) based login for casting the votes on the e-voting system of NSDL.
7. After entering your password, tick on Agree to **“Terms and Conditions”** by selecting on the check box.
8. Now, you will have to click on **“Login”** button.
9. 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 the 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. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail to amisi999@gmail.com with a copy marked to evoting@nsdl.co.in.
2. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the “**Forgot User Details/Password**” or “**Physical User Reset Password**” option available on www.evoting.nsdl.com to reset the password.
3. In case of any queries, you may refer the Frequently Asked Questions (FAQs) for members and e-voting user manual for members available at the download Section of www.evoting.nsdl.com or call on toll free no.: 1800 1020 990 and 1800 22 44 30 or send a request to evoting@nsdl.co.in.

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

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 E-mail to 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. 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 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 E-mail 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 the 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 the 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.
5. Shareholders who would like to express their views/have questions may send their questions in advance mentioning their name demat account number/folio number, E-mail ID, mobile number at esl@eastcoaststeel.com. The same will be replied by the Company suitably.

EXPLANATORY STATEMENT PURSUANT TO SECTION 102 OF THE ACT**ITEM NO. 3**

The Board of Directors upon the recommendation of the Nomination and Remuneration Committee, have appointed Shri. P. K. R. K. Menon (DIN: 00106279) as an Additional Director of the Company in the category of Non-Executive Non-Independent Director with effect from October 14, 2021.

As an Additional Director, Shri. P. K. R. K. Menon will hold office up to the date of this AGM. The Company has received from a Member the notice under Section 160 of the Act proposing his candidature for the office of Director.

Shri. P. K. R. K. Menon has been associated with the Company as a Company Secretary for more than 18 Years and has provided strategic directions to the business of the Company. Given the knowledge, skills, expertise and rich experience of Shri. P. K. R. K. Menon, the Nomination and Remuneration Committee and the Board are of the opinion that his appointment would immensely benefit the Company.

The Company has received from Shri. P. K. R. K. Menon (i) consent in writing to act as Director in Form DIR-2 pursuant to Rule 8 of the Companies (Appointment & Qualification of Directors) Rules, 2014 (“the Rules”); (ii) intimation in Form DIR-8 pursuant to Rule 14 of the Rules to the effect that he is not disqualified in accordance with sub-section (2) of Section 164 of the Act. (iii) Declaration that he is not related to any Director of the Company and not debarred from holding the office of Director by virtue of any SEBI Order or any other such authority.

Details pursuant to Regulation 36 of SEBI Listing Regulations and Secretarial Standard-2 on General Meetings issued by the Institute of Company Secretaries of India (“ICSI”) is attached as Annexure- A.

Save and except Shri. P. K. R. K. Menon and his relatives to the extent of their shareholding interest, if any, in the Company, none of the other Directors/Key Managerial Personnel and their relatives are in any way, concerned or interested, financially or otherwise, in the Resolution set out at Item No. 3.

The Board of Directors accordingly recommends the Ordinary Resolution set out at Item No. 3 of the Notice for the approval of the members.

ANNEXURE-A

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

Name of the Director	Shri. Prithviraj S. Parikh	Shri. P. K. R. K. Menon
DIN	00106727	00106279
Date of Birth	February 19, 1946	August 09, 1943
Age	76 years	78 years
Date of Appointment: First appointment on the Board	January 08, 1987	October 14, 2021
Qualification	MS., M.E. from N.Y.U./ C.C.N.Y.	M.Com, L.L.M., M.B.A., F.C.S.
Expertise in Specific Functional area	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.	Over four decades of experience in Administration & Finance in industry and Trade Steel, Engineering, etc.
Directorship in other Companies (Excludes Directorship in Eastcoast Steel Limited, Foreign and Section 8 Companies) as on March 31, 2022	<ul style="list-style-type: none"> • WRM Private Limited • Satori Realty Private Limited • Wist Overseas Private Limited • Aspher Foods Private Limited • Western India Steel Company Private Limited • Western Ministil Limited • Gunjar Finance and Investment Private Limited • Anagha Enterprises Private Limited • R and A Foods Private Limited 	<ul style="list-style-type: none"> • Western Ministil Limited • Skandwil India Private Limited

Chairmanship/ Membership of the Committees as on March 31, 2022 (Includes only Audit and Stakeholders' Relationship Committee)	Audit Committee Eastcoast Steel Limited: Member Stakeholders' Relationship Committee Eastcoast Steel Limited: Member	Audit Committee Eastcoast Steel Limited: Chairman Stakeholders' Relationship Committee Eastcoast Steel Limited: Member
Number of Shares held as on March 31, 2022	8,600	Nil
Number of Board Meetings attended (During the F.Y. 2021-22)	5	3
Relationship with other Directors / Key Managerial Personnel	Not related to any Director / Key Managerial Personnel	Not related to any Director / Key Managerial Personnel
Terms and conditions of appointment or re- appointment	In terms of Section 152(6) of the Act, Shri. Prithviraj S. Parikh shall be liable to retire by rotation.	In terms of Section 152(6) of the Act, Shri. P. K. R. K. Menon shall be liable to retire by rotation.
Remuneration last drawn (including sitting fees, if any) for the financial year 2021-22	Nil	Nil
Remuneration proposed to be paid	Nil	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
For Eastcoast Steel Limited**

Place: Mumbai

Date : May 30, 2022

Sd/-
Prithviraj S. Parikh
Chairman
DIN : 00106727

DIRECTORS' REPORT**Dear Shareholders,**

The Directors of your Company are pleased to present their Thirty-Ninth Annual Report of Eastcoast Steel Limited together with the Audited Financial Statements for the Financial Year ended March 31, 2022.

In compliance with the applicable provisions of Companies Act, 2013, (including any statutory modification(s) or re-enactment(s) thereof, for time being in force) ("Act") and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), this report covers the Financial Results and other developments in respect of Eastcoast Steel Limited during the Financial Year ended March 31, 2022 and upto the date of the Board Meeting held on May 30, 2022 to approve this report.

1. FINANCIAL PERFORMANCE

The financial performance of the Company for the Financial Year ended March 31, 2022 is summarised below:

(₹ in Lakhs)

Particulars	2021-22	2020-21
Revenue from operations	1,092.03	Nil
Gain on sale of property, plant and equipment	Nil	4,220.27
Other Income	91.28	29.59
Total Income	1,183.31	4,249.86
Profit/(Loss) Before Exceptional items, Depreciation & Tax	33.52	4,053.10
Less: Depreciation	0.69	2.34
Less: Exceptional items	Nil	Nil
Profit/(Loss) for the year before taxation	32.83	4,050.76
Less: Current tax	6.20	528.10
Previous year tax	49.88	Nil
Deferred Tax	8.85	Nil
Profit/(Loss) for the year after tax	(32.10)	3,522.66
Other Comprehensive Income / (Loss)	(0.73)	(0.84)
Total Comprehensive Income / (Loss) for the year	(32.83)	3,521.82

2. REVIEW OF OPERATIONS

After the suspension of production and closure of plant in 1995, no manufacturing activity has been carried out. Subsequently, the plant, machinery and equipments were disposed of, leading to the disposal of the residuary asset, i.e. land, in November 2020. During the Financial Year under review, the Company has resumed trading in iron & steel products including engineering products in the international market.

During the Financial Year under review, the Company's Total Revenue stood at ₹ 1,183.31 Lakhs as compared to ₹ 4,249.86 Lakhs for the previous Financial Year. The Profit before tax stood at ₹ 32.83 Lakhs during the Financial Year under review as

against ₹ 4,050.76 Lakhs for the previous Financial Year. The Net Loss after Tax for the year was ₹ 32.10 Lakhs as against the Profit after tax ₹ 3,522.66 Lakhs reported in the previous Financial Year.

Further no amount transferred to reserves as well.

3. DIVIDEND AND RESERVES

Considering the losses incurred by the Company and with a view to conserve the funds of the Company, your Directors have not recommended any dividend to the equity shareholders for the Financial Year ended March 31, 2022.

Your Company has not transferred any amount to the reserves.

4. CHANGE IN NATURE OF BUSINESS, IF ANY

There has been no change in the nature of business of the Company except remodeling of the nature of business from manufacturing to trading in iron & steel products, including engineering products, in the international market, necessitated due to the disposal of land and buildings during the Financial Year ended March 31, 2021. Although the foreign trade has been confined to steel & engineering products the Company might explore and expand these activities further as and when opportunities arise in the future within the scope of its objects as per the latest Memorandum of Association of the Company.

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 ended March 31, 2022 till the date of this report.

7. SHARE CAPITAL

The paid up Equity Share Capital of the Company was ₹ 539.65 Lakhs divided into divided into 53.96 Lakhs shares of ₹ 10/- each as on March 31, 2022.

The Company's Equity Share Capital is listed on the BSE Limited ("BSE") and are infrequently traded shares. The shares of the Company have not been suspended from trading. The annual listing fee had been paid to the stock exchange before due date.

During the year under review, the Company has not issued any shares or other convertible securities, bonus shares or made a rights issue of shares or shares with differential voting rights or granted any stock options or any sweat equity shares. Further, the Company did not buy back any of its shares.

8. DEPOSITS

The Company has not accepted any deposits from public within the meaning of Section 73 and 74 of the Act and Rules framed thereunder (including any amendments thereof) during the Financial Year ended March 31, 2022 and, as such, no amount on account of principal or interest on deposit from public was outstanding as on the date of this report.

9. HEALTH, SAFETY AND ENVIRONMENT PROTECTION

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

10. PRESENTATION OF FINANCIAL STATEMENTS

The financial statements of the Company for the Financial Year, has been prepared in compliance with the Act, applicable Accounting Standards and SEBI Listing Regulations and are disclosed in accordance with Schedule III of the Act.

11. DIRECTORS AND KEY MANAGERIAL PERSONNEL (“KMP”)**a) 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 (“AGM”) and being eligible offers himself for re-appointment. The Board recommends his re- appointment for your approval.

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

b) Appointment of Director

Pursuant to the provisions of the Act, SEBI Listing Regulations and upon recommendation of Nomination and Remuneration Committee, the Board of Directors of the Company appointed Shri. P. K. R. K. Menon (DIN: 00106279) as an Additional Director in the category of Non-Executive Non-Independent Director of the Company with effect from October 14, 2021 who holds office up to the date of the ensuing 39th Annual General Meeting. The Company has received Notice pursuant to Section 160 of the Act signifying their intention to propose the candidature of Shri. P. K. R. K. Menon for the office of Director.

A resolution seeking shareholders’ approval for his appointment forms part of the Notice of the AGM.

In accordance with Regulation 36 of the SEBI Listing Regulations and Secretarial Standard-2 on General Meetings, brief particulars and expertise of director to be re-appointed together with their other directorships and committee memberships is given in the annexure to the Notice of the AGM.

c) Resignation of Director

During the Financial Year under review, Mr. Hitesh V. Raja (DIN:02681574) Non-Executive, Independent Director of the Company, has resigned from the Board of the Company w.e.f. October 16, 2021. The Board places on record its sincere appreciation for the valuable contribution made by him during his tenure on the Board.

d) Key Managerial Personnel

Pursuant to the provisions of Section 203 of the Act read with the applicable rules made thereunder, the following employees are appointed as the Whole-Time Key Managerial Personnel of the Company:

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

Apart from above, no other Director or Key Managerial Personnel were appointed or had retired or resigned during the Financial Year ended March 31, 2022.

The Company has devised the following Policies viz:

- a) Policy for selection of Directors and determining Directors' independence; and
- b) Remuneration Policy for Directors, Key Managerial Personnel and other employees.

The Policy for selection of Directors and determining Directors' independence sets out the guiding principles for the Nomination and Remuneration Committee for identifying persons who are qualified to become Directors and to determine the independence of Directors, in case of their appointment as Independent Directors of the Company. The Policy also provides for the factors in evaluating the suitability of individual Board members with diverse background and experience that are relevant for the Company's operations.

The Remuneration Policy for Directors, Key Managerial Personnel and other Employees sets out the guiding principles for the Nomination and Remuneration Committee for recommending to the Board, the remuneration of the Directors, Key Managerial Personnel and other Employees of the Company.

The aforesaid Policies are available on the Company's website at <http://eastcoaststeel.com>.

12. DECLARATION BY 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 Regulation 25(8) of SEBI Listing Regulations, and abide by the Code for Independent Directors as prescribed under Schedule IV of the Act. Further, they have confirmed that there has been no change in the circumstances or situation, which exist or may be reasonably anticipated, that could impair or impact the ability of Independent Directors to discharge their duties with an objective independent judgment and without any external influence.

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 ended March 31, 2022, the Board met 5 (Five) times i.e. on June 30, 2021, August 13, 2021, November 13, 2021, February 14, 2022 and March 23, 2022.

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. 08/2021 dated May 03, 2021 had extended mandatory requirement of holding meetings

of the Board of the Companies as provided under Section 173 of the Act by a period of 60 days till next two quarters i.e., till September 30, 2021 thereby extending gap between two consecutive meetings of the Board to 180 days during the Quarter - April to June 2021 and Quarter - July to September, 2021, instead of 120 days as required. 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 March 31, 2021 and for the quarter ended June 30, 2021, 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 ended March 31, 2022 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	5	Yes
Shri P. K. R. K. Menon*	Additional Director, Non-Executive Director	3	3	N.A
Shri Hitesh V. Raja**	Independent, Non-Executive Director	2	2	Yes
Smt. Sharmila S. Chitale	Independent, Non-Executive Director	5	4	Yes

* Appointed as an Additional Director w.e.f. October 14, 2021

** Resigned w.e.f. October 16, 2021

During the year under review, the Independent Directors met without the presence of non-independent Directors on October 14, 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.

14. COMMITTEES OF THE BOARD

Pursuant to Regulation 15(2) of the SEBI Listing Regulations, provisions of Corporate Governance including Composition of Board are not applicable to the Company.

The composition of the Board of Directors is in conformity with the requirements of the Act read with the Rules framed thereunder.

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 Act. 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 ended March 31, 2022.

Meeting and Attendance

The Committee met 4 (Four) times during the Financial Year ended March 31, 2022, i.e. on June 30, 2021, August 13, 2021, November 13, 2021 and February 14, 2022. 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	2	2
Shri P. K. R. K. Menon** Chairman	Additional Director, Non-Executive Director	2	2
Shri Prithviraj S. Parikh Member	Non-Executive Director	4	4
Smt. Sharmila S. Chitale Member	Independent, Non-Executive Director	4	3

* Resigned w.e.f. October 16, 2021

**Appointed as the member and Chairman of the Committee w.e.f. October 14, 2021

The previous AGM of the Company was held on September 29, 2021 and Shri Hitesh V. Raja, 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 composition, quorum, powers, role and scope are in accordance with Section 178 of the Act.

The Committee met 1 (One) time during the Financial Year ended March 31, 2022, i.e. on October 12, 2021. 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 P. K. R. K. Menon** Chairman	Additional Director, Non-Executive Director	0	0
Shri Prithviraj S. Parikh Member	Non-Executive Director	1	1
Smt. Sharmila S. Chitale Member	Independent, Non-Executive Director	1	1

* Resigned w.e.f. October 16, 2021

** Appointed as the member and Chairman of the Committee w.e.f. October 14, 2021

The previous AGM of the Company was held on September 29, 2021 and Shri Hitesh V. Raja, 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. 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 ended March 31, 2022 i.e., June 30, 2021, August 13, 2021, November 13, 2021 and February 14, 2022. 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 ended March 31, 2022 are as given below:

Name of the Members	Category	Number of committee meetings	
		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	2	2
(Shri P. K. R. K. Menon) Member**	Additional Director, Non-Executive Director	2	2

* Resigned w.e.f. October 16, 2021

**Appointed w.e.f. October 14, 2021

The Company obtains 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 yearly basis. The previous AGM of the Company was held on September 29, 2021 and Smt. Sharmila S. Chitale, Chairman 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.

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.

19. CHANGE IN THE REGISTERED OFFICE OF THE COMPANY

The Registered Office of the Company was changed from "Cuddalore Road, Pillayarkuppam, Bahoure Commune, Pondicherry - 607 403" to "Flat No. A-123, Royal Den Apartments, No.16, Arul Theson Street, Palaniraja Udayar Nagar, Lawspet, Pondicherry - 605008" with effect from April 01, 2022.

20. DETAILS OF LOANS AVAILED FROM DIRECTORS OR THEIR RELATIVES

The Company has not availed any loans from its Directors or from their relatives during the period under review.

21. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS

Following are the details of the loans provided by the Company pursuant to the provisions of Section 186 of the Act during the Financial Year under review:

Name of the Body Corporate	(₹ in Lakhs)	Purpose
Ardour Developers Private Limited	200	Loan towards General Corporate Purpose

There were no guarantee given or investment made or security provided pursuant to Section 186 of the Act during the Financial Year under review.

22. 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.

23. PARTICULARS OF EMPLOYEES

The information required under Section 197 of the Act 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 March 31, 2022 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 ended March 31, 2022:

Name of Director	Remuneration	Median Remuneration of the employees	Ratio
Shri Prithviraj S. Parikh	-	-	-
Shri P. K. R. K. Menon	-	-	-
Smt Sharmila S. Chitale	-	-	-

- f) The percentage increase in remuneration of Director: Nil
- g) The percentage increase in remuneration of Chief Financial Officer and Chief Executive Officer-14.70%
- h) The percentage increase in remuneration of Company Secretary: Nil
- i) 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 ₹ 102 Lakhs per annum or ₹ 8.50 Lakhs per month as stipulated in the Act 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.

24. 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.

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

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 ended March 31, 2022.

26. DETAILS OF SIGNIFICANT MATERIAL ORDERS PASSED BY THE REGULATORS/ COURTS/ TRIBUNAL IMPACTING THE GOING CONCERN STATUS AND COMPANY'S OPERATION IN FUTURE

There are no significant material orders passed by the Regulators/ Courts/ Tribunal which would impact the going concern status of the Company and its future operations. Hence, disclosure pursuant to Rule 8(5)(vii) of Companies (Accounts) Rules, 2014 is not applicable.

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 May 2015 and such dismissal having also been confirmed in Company Appeal No: 20 of 2015 by the Hon'ble High Court, Madras on August 26, 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 and scheduled for hearing before the Hon'ble Tribunal on June 09, 2022.

27. RISK MANAGEMENT POLICY

The Company in order to comply with the provisions of the Act 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.

28. SECRETARIAL AUDITORS

Appointment

Pursuant to the provisions of Section 204 of the Act and Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, Shri P. S. Ramnath, Practising Company Secretaries, (CP: 4159; F.C.S. 819), have been appointed as the Secretarial Auditors to conduct the Secretarial Audit of the Company for the Financial Year ended March 31, 2022.

Secretarial Audit Report

The Report of the Secretarial Audit in Form MR-3 for the Financial Year ended March 31, 2022, is annexed herewith as “**Annexure- A**” and forms part of this report.

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

29. STATUTORY AUDITORS

Appointment

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 42nd AGM to be held in the year 2025, at the AGM held on September 30, 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.

Statutory Auditor's Report

The Auditors' Report as issued by M/s. Paresh Rakesh & Associates LLP, Chartered Accountants for the Financial Year ended March 31, 2022, on the financial statements of the Company is a part of this Annual Report. There are no qualifications, reservations or adverse remarks or disclaimers made by the Statutory Auditors, in their report for the Financial Year ended March 31, 2022.

Disclosure under Section 143(12) of 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.

30. EXTRACT OF THE ANNUAL RETURN

Pursuant to Section 134(3)(a) read with Section 92(3) of the Act, Annual Return of the Company is available on the website and can be accessed at www.eastcoaststeel.com.

31. 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.

32. 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 manufacturing activities or related services have been undertaken by the Company since then.

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 ended March 31, 2022.

34. DETAILS OF APPLICATION MADE OR ANY PROCEEDING PENDING UNDER THE INSOLVENCY AND BANKRUPTCY CODE, 2016 (31 OF 2016) DURING THE PERIOD UNDER REVIEW ALONGWITH THEIR STATUS AS AT THE END OF THE PERIOD

No applications were made or any proceedings are pending by or against the Company under the Insolvency and Bankruptcy Code, 2016 (31 of 2016) during the period under review or as at the end of the period.

35. DISCLOSURE REGARDING EXERCISE OF VOTING RIGHTS BY EMPLOYEES UNDER SECTION 67(3)(c) OF ACT

Disclosure under Section 67(3)(c) of the Act read with Rule 16(4) of Companies (Share Capital and Debentures) Rules, 2014, with respect to voting rights not exercised directly by the employees of the Company is not required to be given.

36. 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 March 31, 2022, 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 March 31, 2022 and Loss 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 March 31, 2022 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.

37. 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.

38. CODE FOR PREVENTION OF INSIDER TRADING

Your Company has adopted a Code of Conduct to regulate, monitor and report trading by designated persons and their immediate relatives as per the requirements under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. This Code of Conduct also includes code for practices and procedures for fair disclosure of unpublished price sensitive information which has been made available on the Company's website and can be accessed at www.eastcoaststeel.com.

39. 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. The Company has been reducing dependence on paper communications and encourages use of electronic means of communication which serves towards environmental protection and sustainable growth.

(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**

(₹ in Lakhs)

	2021-22	2020-21
Foreign Exchange Earnings	1,075.61	NIL
Foreign Exchange Outgo	NIL	NIL

40. CAUTIONARY STATEMENT

Statements in these reports describing the Company's projections statements, expectations and hopes are forward looking. Though, these expectations are based on reasonable assumptions, the actual results might differ. Several factors could make a significant difference to the Company's operations. These include economic conditions, government regulations, taxation, natural calamity and currency rate changes, among others over which the Company does not have any direct control.

41. ACKNOWLEDGEMENT

Your Directors place on record their sincere appreciation for the assistance and guidance extended by Stock Exchanges, Depositories, other statutory bodies and Company's Bankers for the assistance, cooperation and encouragement to the Company.

Your Directors also gratefully acknowledge all stakeholders of the Company viz. customers, members, dealers, vendors and other business partners for the excellent support received from them during the year. Our employees are instrumental in the Company to scale new heights. Their commitment and contribution is deeply acknowledged. Your involvement as members is also greatly valued. Your Directors look forward to your continuing support.

**For and on behalf of the Board of Directors
Eastcoast Steel Limited**

Sd/-

Prithviraj S. Parikh

Director

Sd/-

P. K. R. K. Menon

Additional Director

Place: Mumbai**Date:** May 30, 2022

DIN : 00106727

DIN : 00106279

ANNEXURE – I
SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED ON MARCH 31, 2022

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

To,
The Members,
Eastcoast Steel Limited
Flat No A-123, Royal Den Apartments,
No.16 Arul Theson Street Palaniraja Udayar Nagar,
Lawspet, Pondicherry, 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, 2022 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, 2022 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 and Sweat Equity) Regulations, 2021 (Not applicable to the Company during audit period);
 - (e) The Securities and Exchange Board of India; (Issue and Listing of Non Convertible Securities) Regulations, 2021 (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, 2021 (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 not passed any resolution, which is having major bearing on the Company's affairs, in pursuance of the above referred laws, rules, regulations, guidelines, standards, etc.

Sd/-

P. S. Ramnath

Practicing Company Secretary

FCS No: 819

C.P. No. 4159

UDIN: F000819D000424374

Place: Mumbai

Date : May 30, 2022

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, 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: F000819D000424374

Place: Mumbai

Date : May 30, 2022

MANAGEMENT DISCUSSION AND ANALYSIS

The Management's 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 ended March 31, 2022 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

April 2021 began on a positive note as demand in global markets recovered to pre-pandemic levels amidst hope that the COVID-19 vaccines would contain the Pandemic. When the global economy seemed to be at the cusp of witnessing green shoots of recovery after leaving the worst of the COVID-19 pandemic behind (despite uncertainties associated with subsequent waves of infection and rising global inflationary pressures), the Russia-Ukraine crisis escalated. Consequently, prices of crude oil and gas, food grains such as wheat and corn and several other commodities have shot up. The conflict has also brought in severe financial sanctions and political pressure on Russia from the rest of the world, primarily the Western powers. These will likely have unpredictable and undesired implications on the global financial system and economy.

The International Monetary Fund (IMF) predicts inflation, disruption in commodity markets, trade, financial linkages, to be on the rise in the coming years. There is an urgent need for rebalancing of global supply chains, introduction of government incentives and other measures to accelerate growth across the world. Global inflation is predicted to rise considerably in 2023, following rising commodity prices and pricing pressures as a result of geopolitical tensions. Global growth is projected to slow from an estimated 6.1% in 2021 to 3.6% in 2022 and 2023 (Source: IMF, World Economic Outlook, April 2022).

Since the second half of 2021, global steel prices have risen dramatically, particularly in the United States and Europe. 2020 onwards, HRC (hot- rolled coil) prices in the United States have risen from roughly USD 550 per tonnes to around USD 1,500 per tonne. HRC prices in Europe have also risen sharply, from USD 500 per tonne to USD 1,050 per tonne. Increase in import costs further led to higher production costs for the global steel product makers, negatively impacting profitability thereon. These uncertain events are anticipated to continue till 2022 and relaxation is likely to be observed by 2023.

INDIAN ECONOMY

The Asian Development Bank (ADB) forecasts that India's GDP growth will moderate to 7.5% in 2022-23 from an estimated 8.9% in 2021-22, but will pick up to reach 8% in 2023-24. The year ahead is poised for a pickup in private sector investments with the financial system in good position to provide support for economic revival. Macroeconomic stability indicators suggest that the Indian Economy is well placed to take on the challenges of 2022-23. Combination of high foreign exchange reserves, sustained foreign direct investment, and rising export earnings will provide adequate buffer against possible global liquidity tapering in 2022-23. The Government and the Reserve Bank of India quickly stepped in to put the economy back on track in the quickest possible time and undertook multi-dimensional policy

interventions to minimise the impact of the crisis. Alongside moderation in the virus spread and scaling down of the lockdown restrictions, the Indian economy demonstrated major progress. A strong rural demand, robust Government expenditure and pent-up market demand aided in this recovery process.

India is the world's second- largest producer of steel. The Covid-19 outbreak and supply chain disruptions impacted the Steel market in India. In comparison to international steel pricing, domestic steel prices remain low. Following the ease in lockdowns, the Indian steel producers raised prices significantly in the recent quarter. As a result, discount levels drastically decreased. With improvement in global supply, worldwide prices are expected to drop in the coming quarters, accordingly, the need for decreasing the price will be expected from the Indian steelmakers.

INDUSTRY STRUCTURE AND DEVELOPMENTS

Steel Industry

The global Steel industry witnessed a better than expected growth, despite the pandemic and supply chain disruptions. Due to the Government's severe restrictions against real estate developers, China's steel consumption slowed significantly in 2021. As the Government strives to promote infrastructure investment and stabilise the Real Estate market, steel consumption will remain flat in 2022. Steel consumption is expected to expand somewhat, in 2023, as a result of the stimulus measures implemented in 2022. Larger stimulus measures, which are inevitable if the economy confronts more headwinds from the deteriorating external environment, have upside potential. The World Steel Association anticipates steel demand to edge up 0.4% in 2022 to 1.84 billion MT, and grow a further 2.2% in 2023 to 1.88 billion MT.

RISKS AND CONCERNS

The Company's foray into trading of steel products in international market shall of course be subject to the overall demand stabilising in the world market, which looks promising.

OPERATIONAL PERFORMANCE

The Company ceased to operate its Steel Plant in 1995 after suspension of production and closure of plant, no manufacturing activity has been carried out. Subsequently, the plant, machinery and equipment were disposed of, leading to the disposal of the residuary asset being land in November 2020.

The Company has since resumed trading in Iron & steel products, including engineering products in the international market.

FINANCIAL PERFORMANCE

A brief review of the financial performance of your Company for the Financial Year 2021-22 is given below:-

(₹ in Lakhs)

Particulars	FY2021-22	FY2020-21
Revenue from Operations	1,092.03	-
Profit / (Loss) after taxes	(32.10)	3,522.66

A summary of the major financial ratios of your Company's performance is as under:

Particulars	As at 31 March 2022	As at 31 March 2021	Change in %	Explanations
Current Ratio (in times)	7.09	5.60	26.71%	Due to increase in trade receivable, Cash and cash equivalents, Other current assets and decrease in Investments
Debt – Equity ratio (in times)	0.14	0.13	1.76%	Not applicable
Return on Equity (ROE) (in %)	(1.71%)	2611.51%	(100.07%)	Due to gain on sales of property and plant in Previous year
Trade receivables turnover ratio (in times)	3.85	-	NA	Since the Company has resumed its operations in current year. Ratios are not comparable
Trade payables turnover ratio (in times)	1226.53	-	NA	Since the Company has resumed its operations in current year. Ratios are not comparable
Net capital turnover ratio (in times)	0.58	-	NA	Since the Company has resumed its operations in current year. Ratios are not comparable
Net profit ratio (in times)	(0.03)	-	NA	Since the Company has resumed its operations in current year. Ratios are not comparable
Return on Capital Employed (ROCE) (in times)	0.02	1.92	(99.19%)	Due to gain on sales of property and plant in Previous Year
Return on Investment (in %)	3.59%	2.56%	39.95%	Return on investment are higher than Previous Year

HUMAN RESOURCE

The Company's Human Resource Policy provides an environment that motivates its employees to realise their full potential. The Company respects each employee and motivates them by offering opportunities based on their skill-sets, and in the process, builds mutually benefiting relations between the Company and its employees.

The Company has put in place a recruitment system in the organization wherein right candidates with the right skills are recruited. In addition to this, proper remuneration, regular appraisal and development opportunities provided to the employees has enabled the Company to achieve its goal in a highly competitive market. The Company believes that its employees are most productive when they have a good work-life balance to enable them to meet their responsibilities outside work and minimises employee turnover.

INTERNAL CONTROL SYSTEMS

The Company has effectively and efficiently laid down policies, guidelines and procedures keeping in mind the nature, size and complexity of the 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 2021-22.

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 31st March 2022, 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, 31st March 2022, its Profit / (Loss) including other Comprehensive Income 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.

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 Income, 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, Under Section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by 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, 2020 ("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 Other Comprehensive Income, Cash Flow Statement and 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, 2015, as amended.
 - e) On the basis of written representations received from the directors as on 31st March 2022 taken on record by the Board of Directors, none of the directors is disqualified as on 31st March 2022 from being appointed as a director in terms of Section 164(2) of the Act.
 - f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in “**Annexure B**”.
 - g) In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid / provided if Any by the Company to its directors during year is in accordance with the provisions of Section 197 of the Act.
 - h) With respect to the other matters to be included in the Auditor’s Report in accordance with 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 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.
 - iv. (a) Management has represented to us that, to the best of its knowledge and belief, other than as disclosed in the notes to the accounts no funds have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the Company to or in any other persons or entities, including foreign entities (“Intermediaries”), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, whether, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Company (“Ultimate

Beneficiaries”) or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries;

- (b) Management has represented to us that, to the best of its knowledge and belief, other than as disclosed in the notes to the accounts no funds have been received by the Company from any person(s) or entity(ies), including foreign entities (“Funding Parties”), with the understanding, whether recorded in writing or otherwise, that the Company shall, whether, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party (“Ultimate Beneficiaries”) or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries
 - (c) Based on our audit procedure conducted that are considered reasonable and appropriate in the circumstances, nothing has come to our attention that cause us to believe that the representation given by the management under sub clause (a) and (b) contain any material misstatement.
- v. The Company has not paid, proposed or declared any dividend during the year and until the date of report, hence, compliance in accordance with Section 123 of the Act is not applicable.

For Paresh Rakesh & Associates LLP

Chartered Accountants

FRN: 119728W/W100743

Sd/-

Nimit Sheth

Partner

Membership No.: 142645

UDIN: 22142645AJWRZN6508

Place: Mumbai

Date : May 30, 2022

“ANNEXURE A” TO THE INDEPENDENT AUDITOR’S REPORT ON THE FINANCIAL STATEMENTS OF EASTCOAST STEEL LIMITED

(Referred to in Paragraph 1 under the heading of “Report on other legal and regulatory requirements” of our report of even date)

- 1) a) (A) The Company has maintained proper records showing full particulars including quantitative details and situation of Property, Plant and Equipment on the basis of available information.

(B) The Company does not hold any intangible assets during the year. Accordingly, the provisions of clause (i) (B) of paragraph 3 of the Order are not applicable to the Company.
 - b) As explained to us, Property, Plant & Equipment have been physically verified by the management in a phased periodical manner, which in our opinion is reasonable, having regard to the size of the Company and nature of its assets. No material discrepancies were noticed on such physical verification.
 - c) According to the information and explanations given to us and the records examined by us in respect of immovable properties disclosed as Property, Plant & Equipment in the financial statements are in the name of the Company.
 - d) According to information and explanations given to us and books of accounts and records examined by us, Company has not revalued its Property, Plant and Equipment (including Right of Use assets) or intangible assets or both during the year.
 - e) According to information & explanations and representation given to us by the management, no proceedings have been initiated or are pending against the Company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 and rules made thereunder.
- 2) a) As explained to us and on the basis of the records examined by us, in our opinion, physical verification of the inventories have been conducted at reasonable intervals by the management and having regard to the size and nature of business of the Company and nature of its inventory, the coverage and procedures of such verification by the management is appropriate. As explained to us and on the basis of the records examined by us, the value of the discrepancies noticed on physical verification by management did not exceed 10% or more in aggregate of each class of inventory.

b) As per the information and explanation given to us and examination of books of accounts and other records produced before us, in our opinion the Company was not availed working capital limits in excess of five crore rupees in aggregate, from banks or financial institutions during the year, hence clause (ii)(b) of the Paragraph 3 is not applicable to the Company.
- 3) a) As per the information and explanations given to us and books of accounts and records examined by us, during the year Company has not provided any guarantee

or security or has not granted any advances in the nature of loans to companies, firms, Limited Liability Partnerships or any other entities except

- Loan of ₹ 200 lakhs has been granted to one Company during the year and balance outstanding at balance sheet date with respect to such loans is Nil.
- b) In our opinion and according to information and explanations given us and on the basis of our audit procedures, the investment made during the year and the terms and condition of the grant of all loans provided are prima facie not prejudicial to the Company interest.
 - c) According to the books of accounts and records examined by us in respect of the loans and advances in the nature of loans, where the schedule of repayment of principal and payment of interest has been stipulated, the repayments or receipts are generally regular. According to the books of accounts and records examined by us in respect of the loans, there is no amount overdue for more than ninety days.
 - d) In our opinion and according to information and explanation given and the books of accounts and records examined by us, loans granted which have fallen due during the year have not been renewed or extended and no fresh loans have been granted to settle the overdues of existing loans given to the same parties.
 - e) In our opinion and according to information and explanation given and records examined by us, the Company has not granted any loans either repayable on demand or without specifying any terms or period of repayment.
- 4) In our opinion and according to the information and explanations provided to us, the Company has not granted any loans or provided any guarantees or security to the parties covered under Section 185 of the Act. The Company has complied with the provisions of Section 186 of the Act in respect of loans and investments to the parties covered under Section 186 of the Act.
 - 5) According to the information and explanations given to us, the Company has not accepted any deposits or amounts which are deemed to be 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) The maintenance of cost records has not been specified for the activities of the Company by the Central Government under Section 148(1) of the Companies Act, 2013.
 - 7) In respect of Statutory dues :
 - a) According to the records of the Company examined by us, undisputed statutory dues including Goods and Service tax, provident fund, employees' state insurance, income tax, duty of customs, cess and any other material statutory dues have been generally regularly deposited with appropriate authorities. According to the information and explanations given to us, there were no undisputed amounts payable in respect of the aforesaid dues, which were outstanding as March 31, 2022 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 statutory dues referred to in sub-clause (a) which have not been deposited with the appropriate authority on account of any dispute.
- 8) According to the information and explanations given to us and representation given to us by the management, there were no transactions relating to previously unrecorded income that were surrendered or disclosed as income in the tax assessments under the Income Tax Act, 1961 (43 of 1961) during the year.
- 9) a) In our opinion and according to the information and explanations given and books of accounts and records examined by us, the Company has not defaulted in repayment of loans or other borrowings or in the payment of interest thereon to any lender.
- b) In our opinion, and according to the information and explanations given to us, the Company has not been declared wilful defaulter by any bank or financial institution or government or any government authority.
- c) The Company has not taken any term loan during the year and there are no unutilised term loans at the beginning of the year and hence, reporting under clause 3(ix)(c) of the Order is not applicable to the Company.
- d) According to the information and explanations given to us, and the procedures performed by us, and on an overall examination of the financial statements of the Company, we report that, *prima facie*, no funds raised on short-term basis have been used during the year for long-term purposes by the Company.
- e) According to the information and explanations given to us and on an overall examination of the financial statements of the Company, we report that the Company has not taken any funds from any entity or person on account of or to meet the obligations of its subsidiaries, associates or joint ventures.
- f) According to the information and explanations given to us and procedures performed by us, we report that the Company has not raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies.
- 10) a) The Company has not raised money by way of initial public offer or further public offer (including debt instruments) and hence clause (x)(a) of paragraph 3 of the Order is not applicable to the Company.
- b) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year. Accordingly, clause 3(x)(b) of the Order is not applicable.
- 11) a) 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 has been noticed or reported during the year.

- b) According to the information and explanations given to us, no report under sub-Section 12 of Section 143 of the Act has been filed by auditors in Form ADT-4 as prescribed under Rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government, during the year and upto the date of this report.
- c) As represented to us by the management, there are no whistle blower complaints received by the Company during the year.
- 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, all transactions with related parties are in compliance with Sections 177 and 188 of the Act and their details have been disclosed in the financial statements etc., as required by the applicable accounting standards.
- 14) a) In our opinion, and according to the information and explanations given to us, the Company has an internal audit system commensurate with the size and nature of its business.
- b) We have considered the internal audit reports of the Company issued till date, for the period under audit.
- 15) According to the information and explanations provided by the management, the Company has not entered into any non-cash transaction with directors or persons connected with him as referred to in Section 192 of the Act.
- 16) a) To the best of our knowledge and as explained, the Company is not required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934.
- b) In our opinion, and according to the information and explanations provided to us and on the basis of our audit procedures, the Company has not conducted any Non-Banking Financial or Housing Finance activities during the year as per the Reserve Bank of India Act, 1934.
- c) In our opinion, and according to the information and explanations provided to us, the Company is not a Core Investment Company (CIC) as defined in the regulations made by the Reserve Bank of India.
- d) In our opinion, and according to the information and explanations provided to us, the Group has no Core Investment Company (CIC).
- 17) In our opinion, and according to the information and explanations provided to us, Company has not incurred any cash losses in the financial year and in the immediately preceding financial year.
- 18) There has been no resignation of the statutory auditors during the year. Therefore, provisions of clause (xviii) of Paragraph 3 of the Order are not applicable to the Company.

- 19) According to the information and explanations given to us and on the basis of the financial ratios, ageing and expected dates of realization of financial assets and payment of financial liabilities, other information accompanying the financial statements, our knowledge of the Board of Directors and management plans and based on our examination of the evidence supporting the assumptions, nothing has come to our attention, which causes us to believe that any material uncertainty exists as on the date of the audit report that Company is not capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date. We, however, state that this is not an assurance as to the future viability of the Company. We further state that our reporting is based on the facts up to the date of the audit report and we neither give any guarantee nor any assurance that all liabilities falling due within a period of one year from the balance sheet date, will get discharged by the Company as and when they fall due.
- 20) According to the information and explanations given to us provisions of Section 135 is not applicable to the Company. Hence, Clause (xx) of the Paragraph 3 is not applicable to the Company.

For Paresh Rakesh & Associates LLP

Chartered Accountants

FRN: 119728W/W100743

Sd/-

Nimit Sheth

Partner

Membership No.: 142645

UDIN: 22142645AJWRZN6508

Place: Mumbai**Date :** May 30, 2022

“Annexure B” to Independent Auditor’s 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 31st March 2022, 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 Act, 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 31st March 2022 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

Chartered Accountants

FRN: 119728W/W100743

Sd/-

Nimit Sheth

Partner

Membership No.: 142645

UDIN: 22142645AJWRZN6508

Place: Mumbai

Date : May 30, 2022

Balance Sheet as at 31 March 2022

(Amount in ₹ Lakhs)

	Notes	As at 31 March 2022	As at 31 March 2021
Assets			
Non - Current Assets			
Property, Plant and Equipment	2	1.99	2.68
		1.99	2.68
Current Assets			
Financial Assets			
(i) Investments	3	1,107.96	2,301.75
(ii) Cash and Cash Equivalents	4	204.07	5.84
(iii) Other Financial Assets	5	7.48	-
(iv) Trade Receivables	6	567.99	-
Other Current Assets	7	291.99	0.16
		2,179.49	2,307.75
		2,181.48	2,310.43
Total Assets			
Equity and Liabilities			
Equity :			
Equity Share Capital	8	539.65	539.65
Other Equity		1,323.33	1,356.15
		1,862.98	1,895.80
Liabilities			
Non Current Liabilities			
Deferred Tax Liabilities	9	8.85	-
Provisions	10	2.36	2.36
		11.21	2.36
Current Liabilities			
Financial Liabilities			
(i) Borrowings	11	255.41	255.41
(ii) Trade Payables	12	-	-
- Micro, Small and Medium Enterprises		-	-
- Others		0.56	1.27
(iii) Other Financial Liabilities	13	24.22	5.82
Provisions	14	18.59	16.07
Current Tax Liabilities	15	4.85	132.83
Other Current Liabilities	16	3.66	0.87
		307.29	412.27
		2,181.48	2,310.43
Total Equity and Liabilities			

Significant Accounting Policies and Other Explanatory Information 1 to 38

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/-
Sharmila S. Chitale
Director
(DIN: 07146530)

Place : Mumbai
Date : May 30, 2022

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

Sd/-
B. N. Kamath
Chief Financial Officer
(PAN: AESPK5610C)

Statement of Profit and Loss for the year ended 31 March 2022

(Amount in ₹ Lakhs)

	Notes	For the Year ended 31 March 2022	For the Year ended 31 March 2021
Income			
Revenue from Operations	17	1,092.03	-
Gain on sale of property, plant and equipment		-	4,220.27
Other Income	18	91.28	29.59
Total Income		1,183.31	4,249.86
Expenses			
Purchase of Stock-in-Trade	19	1,033.08	-
Employee Benefits Expenses	20	28.33	46.98
Finance Cost	21	-	87.15
Depreciation and Amortization Expenses	2	0.69	2.34
Clearing and Forwarding Expenses	22	41.49	-
Other Expenses	23	46.89	62.63
Total Expenses		1,150.48	199.10
Profit / (Loss) Before Tax		32.83	4,050.76
Tax expense:			
Current tax	31	6.20	528.10
Previous year tax		49.88	-
Deferred tax	9	8.85	-
Profit / (Loss) for the Year		(32.10)	3,522.66
Other Comprehensive Income			
Items that will not be reclassified to profit or loss			
Re-measurement gain/ (losses) on defined benefit plans		(0.73)	(0.84)
Income tax effect		-	-
Other Comprehensive Income / (Loss) for the year (net of tax)		(0.73)	(0.84)
Total Comprehensive Income / (Loss) for the year		(32.83)	3,521.82
Basic and Diluted Earnings Per Share (in ₹) (Face Value ₹ 10)	30	(0.59)	65.28

Significant Accounting Policies and Other Explanatory Information 1 to 38

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/-
Sharmila S. Chitale
Director
(DIN: 07146530)

Place : Mumbai
Date : May 30, 2022

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

Sd/-
B. N. Kamath
Chief Financial Officer
(PAN: AESPK5610C)

Cash Flow Statement for the year ended 31 March 2022

(Amount in ₹ Lakhs)

	For the year ended 31 March 2022	For the year ended 31 March 2021
A Cash Flows From Operating Activities		
Profit / (Loss) Before Tax	32.82	4,050.76
Adjustments For:		
Depreciation and Amortization Cost	0.69	2.34
Finance Cost and charges	-	87.17
Sundry Balances written off / back	(0.01)	4.91
Dividend	-	(27.37)
Net (gain) or loss on Current Investments	(64.45)	(2.14)
Gain on sale of property, plant and equipment	(0.34)	(4,220.27)
Interest Income	(12.90)	-
Interest on Tax refunds	-	(0.08)
Gratuity and Compensated Absences	1.79	2.38
Operating Loss before Working Capital Changes	(42.40)	(102.30)
(Increase)/Decrease in Short Term Financial and other Current Assets	(299.31)	0.50
(Increase)/Decrease in Trade Receivables	(567.99)	-
Increase/(Decrease) in Trade Payables	(0.70)	0.77
Increase/(Decrease) in Other Financial Liabilities	18.41	(268.88)
Increase/(Decrease) in Other Current Liabilities	2.79	(2.88)
Increase/(Decrease) in Provisions	-	(7.16)
Cash Generated from / (Used in) Operating Activities	(889.20)	(379.95)
Direct taxes paid (net of refunds)	(184.12)	(383.42)
Net Cash Generated from / (Used in) Operations (A)	(1,073.32)	(763.37)
B Cash Flows From Investing Activities		
Purchase of Property, Plant and Equipment	-	(0.62)
Proceeds from Sale of Property, Plant and Equipment	0.40	4,324.00
Proceeds from Sale/Redemption of Investments	3,984.87	3,420.76
Purchase of Investments	(2,731.89)	(5,720.26)
Income from PMS	5.27	-
Interest Received	12.90	27.37
Net Cash Generated from Investing Activities (B)	1,271.55	2,051.25

(Amount in ₹ Lakhs)

	For the year ended 31 March 2022	For the year ended 31 March 2021
C Cash Flows From Financing Activities		
Proceeds from short term borrowings (net)	-	(38.25)
Proceeds from long term borrowings	-	165.89
Repayment of long term borrowings	-	(1,324.93)
Interest and processing fees paid	-	(87.17)
Net Cash Generated from Financing Activities (C)	-	(1,284.46)
Net Increase/(Decrease) in Cash & Cash Equivalents (A+B+C)	198.23	3.42
Cash and Cash Equivalent at the beginning of the year (refer note 4)	5.84	2.42
Cash and Cash Equivalent at the end of the year (refer note 4)	204.07	5.84

Note:

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

Particulars	Non-Current Borrowings	Current Borrowings	Total
As at 01 April 2021	-	255.41	255.41
Cash proceeds from borrowings	-	-	-
Repayment of borrowings	-	-	-
As at 31 March 2022	-	255.41	255.41

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/-
Sharmila S. Chitale
Director
(DIN: 07146530)

Place : Mumbai
Date : May 30, 2022

Sd/-
P. K. R. K. Menon
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Sd/-
B. N. Kamath
Chief Financial Officer
(PAN: AESPK5610C)

Statement of Changes in Equity for the Year ended 31 March 2022

A Equity Share Capital

(Amount in ₹ Lakhs)

Balance as at April 1, 2021	Changes in Equity Shares Capital Due to Prior period errors	Restated balance at April 1, 2021	Changes in Equity Shares Capital During the year	Balance as at March 31, 2022
539.65	-	539.65	-	539.65

(Amount in ₹ Lakhs)

Balance as at April 1, 2020	Changes in Equity Shares Capital Due to Prior period errors	Restated balance at April 1, 2020	Changes in Equity Shares Capital During the year	Balance as at March 31, 2021
539.65	-	539.65	-	539.65

B Other Equity

(Amount in ₹ Lakhs)

Particulars	Reserves and surplus			Total Equity
	Securities premium	Capital reserve	Retained earnings	
Balance as at 01 April 2021	943.24	25.00	387.92	1,356.16
Profit / (Loss) for the year	-	-	(32.10)	(32.10)
Other comprehensive income / (loss) for the year	-	-	(0.73)	(0.73)
Total Comprehensive income for the year ended 31 March 2022	-	-	(32.83)	(32.83)
Balance as at 31 March 2022	943.24	25.00	355.09	1,323.33

(Amount in ₹ Lakhs)

Particulars	Reserves and surplus			Total Equity
	Securities premium	Capital reserve	Retained earnings	
Balance as at 01 April 2020	943.24	25.00	(3,133.91)	(2,165.67)
Profit / (Loss) for the year	-	-	3,522.66	3,522.66
Other comprehensive income (loss) for the year	-	-	(0.84)	(0.84)
Total Comprehensive income for the year ended 31 March 2021	-	-	3,521.82	3,521.82
Balance as at 31 March 2021	943.24	25.00	387.91	1,356.15

Significant Accounting Policies and Other Explanatory Information 1 to 38

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/-
Sharmila S. Chitale
Director
(DIN: 07146530)

Place : Mumbai
Date : May 30, 2022

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

Sd/-
B. N. Kamath
Chief Financial Officer
(PAN: AESPK5610C)

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 Nager, Lawspet, Pondicherry - 605008, which is also the principal place of business. These financial statements were approved and adopted by Board of Directors in its meeting held on 30 May 2022.

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 2022 and are prepared in Indian Rupees being the functional currency and all values are rounded to the nearest lakhs (₹ 00,000), except when otherwise indicated, amount in zero (0.00) represents amount below ₹ 500.

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-

Asset Class	Useful Life
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 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-months 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-months 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-months 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 is 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 is 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 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 ₹ Lakhs)

Particulars	Freehold land	Office Building	Furniture and Fixtures	Office Equipment	Computers	Vehicles	Total
Gross block:							
As at 01 April 2020	28.32	141.25	12.79	20.17	1.82	9.85	214.20
Additions	-	-	-	0.62	-	-	0.62
Disposals	27.78	141.25	-	-	-	-	169.03
Balance as at 31 March 2021	0.54	-	12.79	20.79	1.82	9.85	45.79
Additions	-	-	-	-	-	-	-
Disposals	-	-	-	-	-	5.40	5.40
Balance as at 31 March 2022	0.54	-	12.79	20.79	1.82	4.45	40.39
Accumulated depreciation:							
As at 01 April 2020	-	63.53	12.79	20.17	1.71	7.87	106.07
Depreciation charge	-	1.77	-	-	0.04	0.53	2.34
Reversal on disposal of assets	-	65.30	-	-	-	-	65.30
Balance as at 31 March 2021	-	-	12.79	20.17	1.75	8.40	43.11
Depreciation charge	-	-	-	0.12	0.04	0.53	0.69
Reversal on disposal of assets	-	-	-	-	-	5.40	5.40
Balance as at 31 March 2022	-	-	12.79	20.29	1.79	3.53	38.40
Net block:							
Balance as at 31 March 2021	0.54	-	-	0.62	0.07	1.45	2.68
Balance as at 31 March 2022	0.54	-	-	0.50	0.03	0.92	1.99

(Amount in ₹ Lakhs)

Note 3	As at 31 March 2022	As at 31 March 2021
Current Investments		
Investment measured at Fair value through Profit and Loss		
Investment in Mutual Fund (Non trade, Unquoted) DSP Low Duration Fund-Regular Plan- Growth 34,39,908.233 Units (31 March 2021: 64,26,005.384 Units)	553.88	997.64
HDFC Low Duration Fund-Regular Plan- Weekly IDCW Nil Units (31 March 2021 : 28,97,385.989 Units)	-	1,304.11
Investment in Portfolio Management Service-PMS (Non trade, Unquoted) Aventus Capital Markets Alternate Strategies LLP (refer Note3.1)	504.08	-
Unquoted investments in Securities at Amortised Cost		
500 Units (31 March 2021 : Nil units) 5.00% National Highways Authority of India (having face value of ₹ 10,000 each)	50.00	-
Total	1,107.96	2,301.75

(Amount in ₹ Lakhs)

Note 3.1	For the year ended 31 March 2022	For the year ended 31 March 2021
Components of PMS		
Equity	20.27	-
Fixed Income	252.43	-
Options	0.49	-
Futures	10.36	-
Other Assets	0.27	-
Cash and Cash Equivalents	220.26	-
Total	504.08	-

(Amount in ₹ Lakhs)

Note 4	As at 31 March 2022	As at 31 March 2021
Cash and Cash Equivalents		
Cash on hand	0.14	0.02
Balances with Banks - in current accounts	203.93	5.82
Total	204.07	5.84

(Amount in ₹ Lakhs)

Note 5	As at 31 March 2022	As at 31 March 2021
Current Financial Assets - Others (Unsecured and considered good)		
Other Receivables	4.32	-
Deposit - Rent	1.00	-
Accrued Interest	2.16	-
Total	7.48	-

(Amount in ₹ Lakhs)

Note 6	As at 31 March 2022	As at 31 March 2021
Trade Receivables		
Receivables considered good (refer note 34)	567.99	-
Total	567.99	-

(Amount in ₹ Lakhs)

Note 7	As at 31 March 2022	As at 31 March 2021
Other Current Assets		
(Unsecured and considered good)		
Advance Tax net off provision	10.14	-
Advance for Material	277.15	-
Balances with government authorities	4.52	-
Prepaid Expenses	0.18	0.16
Total	291.99	0.16

(Amount in ₹ Lakhs)

Note 8	As at 31 March 2022	As at 31 March 2021
Equity Share Capital		
Authorised Share Capital		
10,000,000 Equity Shares (Previous year: 10,000,000 Equity Shares) of ₹ 10/- each	1,000.00	1,000.00
Issued, Subscribed and Fully Paid up		
5,396,468 Equity Shares (Previous year: 5,396,468 Equity Shares) of ₹ 10/- each fully paid	539.65	539.65
Total	539.65	539.65

a) Reconciliation of number of Equity Shares

Name of Shareholders	As at 31 March 2022		As at 31 March 2021	
	Number of shares	Amount in ₹ Lakhs	Number of shares	Amount in ₹ Lakhs
Balance as at the beginning of the year	53,96,468	539.65	53,96,468	539.65
Add : Issued during the year	-	-	-	-
Balance as at the end of the year	53,96,468	539.65	53,96,468	539.65

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

Name of Shareholders	As at 31 March 2022		As at 31 March 2021	
	No. of Shares	% held	No. of Shares	% held
Anagha Enterprises Private Limited	9,77,835	18.12%	9,77,835	18.12%
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) Shareholding of Promoters:

Shares held by promoters at the end of the year

Name of the Promoters	Number	Shareholding (%)	% of change during the year
Anagha Enterprises Private Limited	9,77,835	18.12%	0.00%
Mina Parikh	43,691	0.81%	0.18%
Prithviraj S. Parikh	8,600	0.16%	0.00%

d) 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 ₹ Lakhs)

Note 9	As at 31 March 2022	As at 31 March 2021
Deferred Tax Liabilities		
Deferred Tax Liabilities	8.85	-
Total	8.85	-

(Amount in ₹ Lakhs)

Note 10	As at 31 March 2022	As at 31 March 2021
Non Current Provisions		
Provision for Gratuity	1.65	1.65
Provision for Compensated Absences	0.71	0.71
Total	2.36	2.36

(Amount in ₹ Lakhs)

Note 11	As at 31 March 2022	As at 31 March 2021
Current Financial Liabilities - Borrowings		
Unsecured		
Loan from Related Party (refer note 29)	255.41	255.41
Total	255.41	255.41

(Amount in ₹ Lakhs)

Note 12	As at 31 March 2022	As at 31 March 2021
Current Financial Liabilities - Trade Payables		
Micro, Small and Medium Enterprises	-	-
Others (refer note 35)	0.56	1.27
Total	0.56	1.27

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 ₹ Lakhs)

	As at 31 March 2022	As at 31 March 2021
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 (Other than Section 16)	-	-
Interest paid to suppliers under MSMED Act (Section 16)	-	-
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 ₹ Lakhs)

Note 13	As at 31 March 2022	As at 31 March 2021
Other Financial Liabilities		
Other Accrued Liabilities	24.22	5.82
Total	24.22	5.82

(Amount in ₹ Lakhs)

Note 14	As at 31 March 2022	As at 31 March 2021
Provisions		
Provision for Gratuity	16.60	15.06
Provision for Compensated Absences	1.99	1.01
Total	18.59	16.07

(Amount in ₹ Lakhs)

Note 15	As at 31 March 2022	As at 31 March 2021
Current Tax Liabilities		
Provision For Income tax (net)	4.85	132.83
Total	4.85	132.83

(Amount in ₹ Lakhs)

Note 16	As at 31 March 2022	As at 31 March 2021
Other Current Liabilities		
Statutory Dues	3.66	0.87
Total	3.66	0.87

(Amount in ₹ Lakhs)

Note 17	For the year ended 31 March 2022	For the year ended 31 March 2021
Revenue from operations		
Sales of Goods (refer note 17.1)	1,075.61	-
Other operating revenue*	16.42	-
Total	1,092.03	-

* Other operating revenue include from export incentive scheme

(Amount in ₹ Lakhs)

Note 17.1	For the year ended 31 March 2022	For the year ended 31 March 2021
Earning in foreign exchange	1,075.61	-
Total	1,075.61	-

(Amount in ₹ Lakhs)

Note 18	For the year ended 31 March 2022	For the year ended 31 March 2021
Other Income		
On assets measured at amortised cost		
- Interest Income	12.90	-
On assets measured at fair value through profit or loss		
- Net gain on Current Investments	61.19	2.14
- Dividend on Current Investment	-	27.37
Sundry Balances written back	0.01	-
Gain on fluctuation of foreign exchange rate	16.84	-
Interest on tax refunds	-	0.08
Profit on sale of Car	0.34	-
Total	91.28	29.59

(Amount in ₹ Lakhs)

Note 19	For the year ended 31 March 2022	For the year ended 31 March 2021
Purchases of Stock-in-Trade		
Purchases of Steel	1,033.08	-
Total	1,033.08	-

(Amount in ₹ Lakhs)

Note 20	For the year ended 31 March 2022	For the year ended 31 March 2021
Employee Benefits Expenses		
Salaries and Wages	23.40	40.06
Contribution to Provident and Other Funds	0.68	1.12
Gratuity and Compensated Absences	1.79	2.38
Employees Welfare Expenses	2.46	3.42
Total	28.33	46.98

(Amount in ₹ Lakhs)

Note 21	For the year ended 31 March 2022	For the year ended 31 March 2021
Finance Cost		
Interest Expenses	-	87.15
Total	-	87.15

(Amount in ₹ Lakhs)

Note 22	For the year ended 31 March 2022	For the year ended 31 March 2021
Clearing and Forwarding Expenses	41.49	-
Total	41.49	-

(Amount in ₹ Lakhs)

Note 23	For the year ended 31 March 2022	For the year ended 31 March 2021
Other expenses		
Advertisement Expenses	1.50	2.48
Auditor's Remuneration (refer note 23.1)	1.65	1.65
Bank Charges	0.06	0.02
Books and Periodicals Expenses	0.04	0.04
Electricity Charges	0.05	0.81
Entertainment Expenses	0.11	0.13
Printing and Stationery Expenses	0.31	0.42

(Amount in ₹ Lakhs)

	For the year ended 31 March 2022	For the year ended 31 March 2021
Legal and Professional Fees	24.60	25.88
Listing Fees	3.54	3.54
Office Rent	3.00	-
Postage and Telegram	0.82	0.71
Rates and Taxes	3.82	5.92
Repairs and Maintenance		
Building	-	0.11
Others	1.66	1.77
Security Charges	-	8.34
Travelling Expenses	2.81	3.75
Miscellaneous Expenses	2.92	7.06
Total	46.89	62.63

(Amount in ₹ Lakhs)

Note 23.1	For the year ended 31 March 2022	For the year ended 31 March 2021
Statutory Audit Fees	1.65	1.65
Total	1.65	1.65

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 ₹ Lakhs)

Category	31 March 2022				
	Non- Current	Current	Level 1	Level 2	Level 3
Financial Assets					
At FVTPL					
Investments	-	1,107.96	553.88	554.08	-
At Amortised Cost					
Other financial assets	-	7.48	-	-	-
Trade Receivables	-	567.99	-	-	-
Cash and cash equivalents	-	204.07	-	-	-
Total	-	1,887.50	553.88	554.08	-
Financial Liabilities					
At Amortised Cost					
Borrowings	-	255.41	-	-	-
Trade Payables	-	0.56	-	-	-
Other Financial Liabilities	-	24.22	-	-	-
Total	-	280.19	-	-	-

Category	31 March 2021				
	Non- Current	Current	Level 1	Level 2	Level 3
Financial Assets					
At FVTPL					
Investments	-	2,301.75	2,301.75	-	-
At Amortised cost					
Other financial assets	-	-	-	-	-
Cash and cash equivalents	-	5.84	-	-	-
Total	-	2,307.59	2,301.75	-	-
Financial Liabilities					
At Amortised Cost					
Borrowings	-	255.41	-	-	-
Trade Payables	-	1.27	-	-	-
Other Financial liabilities	-	5.82	-	-	-
Total	-	262.50	-	-	-

- 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 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 2022.

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 ₹ Lakhs)

As at 31 March 2022							
Particulars	Carrying Amount	On demand	Less than 6 months	6 to 12 months	1 to 5 years	Beyond 5 years	Total
Borrowings	255.41	-	-	255.41	-	-	255.41
Other financial liabilities	24.22	-	24.22	-	-	-	24.22
Trade payables	0.56	-	0.56	-	-	-	0.56

(Amount in ₹ Lakhs)

As at 31 March 2021							
Particulars	Carrying Amount	On demand	Less than 6 months	6 to 12 months	1 to 5 years	Beyond 5 years	Total
Borrowings	255.41	-	-	255.41	-	-	255.41
Other financial liabilities	5.82	-	-	5.82	-	-	5.82
Trade payables	1.27	-	-	1.27	-	-	1.27

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 trade receivables. 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 2022.

27 The Company had only one business segment while in operation. Since 24 April 1995, after suspension of production and closure of plant, no manufacturing activity has been carried out. Subsequently, the plant, machinery and equipment's were disposed off, leading to the disposal of the residuary asset being land in November 2020. The Company has since resumed trading in Iron & steel products, including engineering products, in the international market. Hence, the Company operates only in single Segment i.e. trading.

28 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.

29 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	Promoter / Director
Anagha Enterprises Private Limited		Promoter
WRM Private Limited	Companies in which KMP or their relative have significant influence	

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

(Amount in ₹ Lakhs)

Particulars	Name of the Party	Amount
1) Short Term Borrowings Taken	Prithviraj S. Parikh	-
		(1.50)
	Anagha Enterprises Private Limited	146.89
2) Long Term Borrowings Taken	Anagha Enterprises Private Limited	(-)
		(130.89)
3) Short Term Borrowings Repaid	Prithviraj S. Parikh	-
		(39.75)
4) Long Term Borrowings Repaid	Anagha Enterprises Private Limited	146.89
		(709.93)
5) Interest expense	Prithviraj S. Parikh	-
		(0.15)
	Anagha Enterprises Private Limited	(42.31)

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

iii) Balance as at year end:

(Amount in ₹ Lakhs)

Particulars	Name of the Party	Financial Year ended	Amount
Short Term Borrowings	WRM Private Limited	31-March-22	255.41
		31-March-21	255.41

30 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 31 March 2022	Year ended 31 March 2021
Net Profit / (loss) after tax attributable to equity shareholders (In ₹ Lakhs)	(32.10)	3,522.66
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 ₹)	(0.59)	65.28
Nominal value per equity share (In ₹)	10.00	10.00

- 31 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:

(Amount in ₹ Lakhs)

Particulars	Year ended 31 March 2022	Year ended 31 March 2021
Enacted income tax rate in India applicable to the Company	25.17%	22.88%
Profit / (Loss) before tax	32.83	4,050.76
Current tax expenses on Profit / (Loss) before tax expenses at the enacted Income tax rate in India	8.26	926.81
Tax effect of the amounts which are not deductible / taxable in calculating taxable income	-	-
Permanent disallowances	0.17	0.54
Other items	(1.33)	13.05
Tax effect of the amounts which are deductible / non-taxable in calculating taxable income	-	-
Gain on Sale of Property, Plant and Equipment	(0.09)	(304.85)
Current year and brought forward losses	7.80	(106.96)
Previous Year Taxes	49.88	-
Other items	0.24	(0.49)
Total income tax expense	64.93	528.10
Effective tax rate	197.76%	13.04%

32 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 ₹ Lakhs)

Particulars	2021-22	2020-21
Employer's Contribution to Provident Fund	0.59	0.76
Employer's Contribution to Pension Scheme	-	0.12
Employer's Contribution to ESIC	0.07	0.20

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 ₹ Lakhs)

	Particulars	Gratuity (Non funded)	
		2021-22	2020-21
I	Change in Defined Benefit Obligation during the year		
	Defined Benefit Obligation at the beginning of the year	16.71	19.72
	Interest Cost	0.72	1.02
	Current Service Cost	0.81	0.95
	Benefits paid during the year	-	(5.69)
	Actuarial (gain) / loss on Defined Benefit Obligation	0.02	0.71
	Defined Benefit Obligation at the end of the year	18.26	16.71
II	Change in fair value of Plan Assets during the year		
	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 ₹ Lakhs)

	Particulars	Gratuity (Non funded)	
		2021-22	2020-21
III	Amount to be recognised in Balance Sheet:		
	Present value of Defined Benefit Obligations	18.26	16.71
	Fair value of plan assets at the end of the year	-	-
	Amount recognised in Balance Sheet	18.26	16.71
IV	Current / Non-current bifurcation:		
	Current benefit obligation	15.63	15.06
	Non-current benefit obligation	2.62	1.65
V	Expenses recognised in the Statement of Profit and Loss for the year		
	Current Service Cost	0.81	0.95
	Interest cost on obligation	0.72	1.02
	Expected Return on plan assets	-	-
	Expense recognised in the Statement of Profit and Loss	1.53	1.97

(Amount in ₹ Lakhs)

	Particulars	Gratuity	
		2021-22	2020-21
VI	Recognised in Other Comprehensive Income for the year		
	Remeasurement due to:		
	Effect of change in financial assumption	(0.06)	0.70
	Effect of change in plan experience	0.07	0.01
	Effect of change in demographic assumption	-	-
	Return on plan of assets (excluding interest)	-	-
	Net Actuarial (gain) / loss recognised for the year	0.01	0.71
VII	Actuarial assumptions used for estimating defined benefit obligation		
	Discount Rate	4.55%	6.02%
	Salary Escalation Rate	3.25%	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.

33 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) Details of loan given by the Company to person or body corporates is as under:

Name of the Body Corporate	(Amount in ₹ Lakhs)	Purpose
Ardour Developers Private Limited	200.00	Loan towards General Corporate Purpose

34 Trade Receivables Ageing Schedule

As at 31st March 2022

(Amount in ₹ Lakhs)

Particulars	Outstanding for following periods from the date of payment					Total
	< 6 Months	6 Months - 1 Year	1-2 years	2-3 Years	More than 3Years	
i) Undisputed Trade receivables— considered good	567.99	-	-	-	-	567.99
ii) Undisputed Trade Receivables – which have significant increase in credit risk	-	-	-	-	-	-
iii) Undisputed Trade Receivables – credit impaired	-	-	-	-	-	-
iv) Disputed Trade Receivables— considered good	-	-	-	-	-	-
(v) Disputed Trade Receivables— which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade Receivables— credit impaired	-	-	-	-	-	-

Trade Receivables Ageing Schedule

As at 31st March 2021

(Amount in ₹ Lakhs)

Particulars	Outstanding for following periods from the date of payment					Total
	< 6 Months	6 Months - 1 Year	1-2 years	2-3 Years	More than 3Years	
i) Undisputed Trade receivables— considered good	-	-	-	-	-	-
ii) Undisputed Trade Receivables – which have significant increase in credit risk	-	-	-	-	-	-
iii) Undisputed Trade Receivables – credit impaired	-	-	-	-	-	-
iv) Disputed Trade Receivables— considered good	-	-	-	-	-	-
(v) Disputed Trade Receivables— which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade Receivables— credit impaired	-	-	-	-	-	-

35 Schedule of Ageing of Trade Payables due for payment :

(Amount in ₹ Lakhs)

FY 2021-22	Not due	Outstanding for following periods from due date of payment				Total
		Less than 1 year	1-2 years	2-3 years	More than 3 years	
(i)MSME	-	-	-	-	-	-
(ii)Others	-	0.56	-	-	-	0.56
(iii) Disputed dues – MSME	-	-	-	-	-	-
(iv) Disputed dues - Others	-	-	-	-	-	-
Total	-	0.56	-	-	-	0.56

(Amount in ₹ Lakhs)

FY 2020-21	Not due	Outstanding for following periods from due date of payment				Total
		Less than 1 year	1-2 years	2-3 years	More than 3 years	
(i)MSME	-	-	-	-	-	-
(ii)Others	-	1.20	-	0.07	-	1.27
(iii) Disputed dues – MSME	-	-	-	-	-	-
(iv) Disputed dues - Others	-	-	-	-	-	-
Total	-	1.20	-	0.07	-	1.27

36 Additional regulatory information

*The ratios for the year ended 31 March 2022 and 31 March 2021 are as follows :

Particulars	Numerator	Denominator	As at 31 March 2022	As at 31 March 2021	% Variance	Remarks
Current Ratio (in times)	Current Assets	Current Liabilities	7.09	5.60	26.71%	Due to increase in trade receivable, Cash and cash equivalents, Other current assets and decrease in Investments
Debt – Equity ratio (in times)	Total Debt	Shareholder's Equity	0.14	0.13	1.76%	Not applicable

Return on Equity (ROE) (in %)	Net Profits after taxes	Average Shareholder's Equity	(1.71%)	2611.51%	(100.07%)	Due to gain on sales of property and plant in Previous year
Trade receivables turnover ratio (in times)	Sales	Average Trade Receivables	3.85	-	NA	Since the Company has resumed its operations in current year. Ratios are not comparable
Trade payables turnover ratio (in times)	Purchases of services and other expenses	Average Trade Payables	1226.53	-	NA	Since the Company has resumed its operations in current year. Ratios are not comparable
Net capital turnover ratio (in times)	Net Sales	Working Capital	0.58	-	NA	Since the Company has resumed its operations in current year. Ratios are not comparable
Net profit ratio (in times)	Net Profit After taxes	Net Sales	(0.03)	-	NA	Since the Company has resumed its operations in current year. Ratios are not comparable
Return on Capital Employed (ROCE) (in times)	Earning before interest and taxes	Capital Employed	0.02	1.92	(99.19%)	Due to Gain on sales of property and plant in Previous year
Return on Investment (in %)	Income generated from investments	Average Investment	3.59%	2.56%	39.95%	Return on investment are higher than Previous Year

- 37** During the previous year the Company had sold/disposed of an land admeasuring of 54.86 acres situated at Pondicherry, for a consideration of ₹ 43.24Crores, and recognised the gain thereto.
- 38** The figures of the previous year have been reworked, regrouped, rearranged and reclassified, wherever considered necessary to conform to the current year presentation and disclosure requirement as per schedule III (as notified by MCA dated 24th March 2021) are mentioned to that extent applicable during the year.

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/-
Sharmila S. Chitale
Director
(DIN: 07146530)

Place : Mumbai
Date : May 30, 2022

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

Sd/-
B. N. Kamath
Chief Financial Officer
(PAN: AESPK5610C)