

RHETAN ROLLING MILLS PRIVATE LIMITED

(Formerly known as Shree Ghantakarna Rolling Mills Private Limited)

ANNUAL REPORT 2019-20

Regd. Office:

7th Floor, Ashoka Chambers,
Rasala Marg, Mithakhali,
Ahmedabad-380006

**Annual Report
2019 - 2020**

BOARD OF DIRECTORS : Mr. Shalin A. Shah Director
Mr. Ashok C. Shah Director

AUDITOR'S : M/s. Sunil Poddar & Co.,
Chartered Accountants,
Ahmedabad

REGISTERED OFFICE : 7th Floor, Ashoka Chambers,
Rasala Marg, Mithakhali,
Ahmedabad-380006

NOTICE

Notice is hereby given that Annual General Meeting of **Rhetan Rolling Mills Private Limited (Formerly Known As Shree Ghantakarna Rolling Mills Private Limited)** will be held at the registered office of the Company on Thursday, 31st Day of December, 2020 at 11:30 A.M. to transact following businesses:

ORDINARY BUSINESS:

1. To receive, consider and adopt the Financial Statements of the Company for the year ended 31st March, 2020 including audited Balance Sheet as at 31st March, 2020 and Statement of Profit and Loss and Cash Flow Statement for the year ended on that date and the Reports of the Directors and the Auditors thereon.
2. **Appointment of Statutory Auditors of the Company and to fix their remuneration:**

"RESOLVED THAT, pursuant to the provisions of section 139 of the Companies Act, 2013 and the Rules made thereunder, M/s. Sunil Poddar & Co. (FRN: 110603W), Chartered Accountants, Ahmedabad, be and are hereby appointed as the Statutory Auditors of the Company, to hold office from the conclusion of this Annual General Meeting (AGM) till the conclusion of the Annual General Meeting to be held in 2025, on a remuneration as may be agreed upon by the Board of Directors and the Auditors."

SPECIAL BUSINESS:

3. **Approval of Related Party Transaction:**

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

"RESOLVED THAT, pursuant to the provisions of Section 188 of the Companies Act, 2013 and Rule 15 of the Companies (Meetings of Board and its Powers) Rules, 2014 and other applicable provisions and rules thereto, and subject to such amendments as may be made therein, the approval of the Members of the Company be and is hereby accorded to the Board of Directors of the Company to enter into transactions with **Lesha Industries Limited**, the Related Party as defined under the Act for purchase/sale of goods, services and/or any other business activities up to Rs. 100 Crores for each of the financial year 2020-21 and 2021-22."

"RESOLVED FURTHER THAT, Mr. Ashok C. Shah, Director and Mr. Shalin A. Shah, Director of the Company be and is hereby authorised to negotiate and finalise other terms and conditions and to do all such acts, deeds and things including delegation of powers as may be necessary, proper or expedient to give effect to this resolution."

4. **Approval of Related Party Transaction:**

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

"RESOLVED THAT, pursuant to the provisions of Section 188 of the Companies Act, 2013 and Rule 15 of the Companies (Meetings of Board and its Powers) Rules, 2014 and other applicable provisions and rules thereto, and subject to such amendments as may be made therein, the approval of the Members of the Company be and is hereby accorded to the Board of Directors of the Company to enter into transactions with **Ashnisha Industries Limited**, the Related Party as defined under the Act for purchase/sale of goods, services and/or any other business activities up to Rs. 100 Crores for each of the financial year 2020-21 and 2021-22."

"RESOLVED FURTHER THAT, Mr. Ashok C. Shah, Director and Mr. Shalin A. Shah, Director of the Company be and is hereby authorised to negotiate and finalise other terms and conditions and to do all such acts, deeds and things including delegation of powers as may be necessary, proper or expedient to give effect to this resolution."

5. Approval of Related Party Transaction:

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

"RESOLVED THAT, pursuant to the provisions of Section 188 of the Companies Act, 2013 and Rule 15 of the Companies (Meetings of Board and its Powers) Rules, 2014 and other applicable provisions and rules thereto, and subject to such amendments as may be made therein, the approval of the Members of the Company be and is hereby accorded to the Board of Directors of the Company to enter into transactions with **Ashoka Metcast Limited**, the Related Party as defined under the Act for purchase/sale of goods, services and/or any other business activities up to Rs. 100 Crores for each of the financial year 2020-21 and 2021-22."

"RESOLVED FURTHER THAT, Mr. Ashok C. Shah, Director and Mr. Shalin A. Shah, Director of the Company be and is hereby authorised to negotiate and finalise other terms and conditions and to do all such acts, deeds and things including delegation of powers as may be necessary, proper or expedient to give effect to this resolution."

Place: Ahmedabad
Date: December 10, 2020

For and on behalf of the Board

Shalin A. Shah

Shalin A. Shah

Director

DIN: 00297447



Notes:

1. A shareholder is entitled to attend and vote at the meeting and is also entitled to appoint a proxy to attend and vote instead of himself/herself and the proxy need not be a shareholder.
2. Proxies in order to be effective must be received by the Company not less than 48 hours before the commencement of the meeting.

EXPLANATORY STATEMENT PURSUANT TO SECTION 102 OF THE COMPANIES ACT, 2013.

The following Statement pursuant to Section 102 of the Companies Act, 2013, sets out all material facts relating to the special business mentioned in the accompanying Notice.

ITEM NO. 3 OF THE NOTICE: APPROVAL OF RELATED PARTY TRANSACTION.

The Board of Directors of the Company, at their meeting held on December 10, 2020 has approved a proposal for entering into following related party transactions:

Name of Related Party	Lesha Industries Limited
Name of Related Director or KMP	Mr. Ashok C. Shah, Mr. Shalin A. Shah
Nature of relationship	Mr. Ashok C. Shah and Mr. Shalin A. Shah, Directors of the Company are also Managing Director and Director of Lesha Industries Limited respectively.
Material terms, monetary value and particulars of the contract or arrangement;	The transaction between the parties will be in the nature of purchase/sale of goods, services and/or any other business activities. The amount of the transaction shall be up to Rs. 100 Crores for each of the financial year 2020-21 and 2021-22 and the same has to be paid as per the terms agreed by both the parties.
The Manner of determining the pricing and other commercial terms, both included as part of contract and not considered as part of the contract	The pricing is commensurate with the market value of the goods and shall be at arm's length.
Any other information relevant or important for the members to take a decision on the proposed resolution	N.A.

The transaction is Related Party Transaction and in terms of Section 188 of the Companies Act, 2013 and the applicable rules there under prior approval of the Shareholders by way of Special Resolution is required.

Accordingly, your directors recommend the resolution at Item No. 3 for approval as Special resolution as set out in the notice of the meeting

Mr. Ashok C. Shah and Mr. Shalin A. Shah, Directors of the Company; Ashoka Metcast Limited (Holding Company) Company in which Director of the Company are Director/Member are concerned or interested in the Resolution.

ITEM NO. 4 OF THE NOTICE: APPROVAL OF RELATED PARTY TRANSACTION.

The Board of Directors of the Company, at their meeting held on December 10, 2020 has approved a proposal for entering into following related party transactions:

Name of Related Party	Ashnisha Industries Limited
Name of Related Director or KMP	Mr. Ashok C. Shah, Mr. Shalin A. Shah

Nature of relationship	Mr. Ashok C. Shah and Mr. Shalin A. Shah, Directors of the Company are also Managing Director and Director of Ashnisha Industries Limited respectively.
Material terms, monetary value and particulars of the contract or arrangement;	The transaction between the parties will be in the nature of purchase/sale of goods, services and/or any other business activities. The amount of the transaction shall be up to Rs. 100 Crores for each of the financial year 2020-21 and 2021-22 and the same has to be paid as per the terms agreed by both the parties.
The Manner of determining the pricing and other commercial terms, both included as part of contract and not considered as part of the contract	The pricing is commensurate with the market value of the goods and shall be at arm's length.
Any other information relevant or important for the members to take a decision on the proposed resolution	N.A.

The transaction is Related Party Transaction and in terms of Section 188 of the Companies Act, 2013 and the applicable rules there under prior approval of the Shareholders by way of Special Resolution is required.

Accordingly, your directors recommend the resolution at Item No. 4 for approval as Special resolution as set out in the notice of the meeting

Mr. Ashok C. Shah and Mr. Shalin A. Shah, Directors of the Company; Ashoka Metcast Limited (Holding Company) Company in which Director of the Company are Director/Member are concerned or interested in the Resolution.

ITEM NO. 5 OF THE NOTICE: APPROVAL OF RELATED PARTY TRANSACTION.

The Board of Directors of the Company, at their meeting held on December 10, 2020 has approved a proposal for entering into following related party transactions:

Name of Related Party	Ashoka Metcast Limited
Name of Related Director or KMP	Mr. Ashok C. Shah, Mr. Shalin A. Shah
Nature of relationship	Mr. Ashok C. Shah and Mr. Shalin A. Shah, Directors of the Company are also Director and Managing Director of Ashoka Metcast Limited respectively.
Material terms, monetary value and particulars of the contract or arrangement;	The transaction between the parties will be in the nature of purchase/sale of goods, services and/or any other business activities. The amount of the transaction shall be up to Rs. 100 Crores for each of the financial year 2020-21 and 2021-22 and the same has to be paid as per the terms agreed by both the parties.
The Manner of determining the pricing	The pricing is commensurate with the

and other commercial terms, both included as part of contract and not considered as part of the contract	market value of the goods and shall be at arm's length.
Any other information relevant or important for the members to take a decision on the proposed resolution	N.A.

The transaction is Related Party Transaction and in terms of Section 188 of the Companies Act, 2013 and the applicable rules there under prior approval of the Shareholders by way of Special Resolution is required.

Accordingly, your directors recommend the resolution at Item No. 5 for approval as Special resolution as set out in the notice of the meeting

Mr. Ashok C. Shah and Mr. Shalin A. Shah, Directors of the Company; Ashoka Metcast Limited (Holding Company) Company in which Director of the Company are Director/Member are concerned or interested in the Resolution.

Place: Ahmedabad
Date: December 10, 2020

For and on behalf of the Board

Shalin A. Shah

Shalin A. Shah
Director
DIN: 00297447



DIRECTORS' REPORT

To,
The Shareholders of
Rhetan Rolling Mills Private Limited

Our Directors have a pleasure in presenting Annual Report together with Audited Balance Sheet as on 31st March, 2020 and Profit & Loss Statement for the year ended on 31st March, 2020.

1. FINANCIAL PERFORMANCE:

(Amount in Rs.)

Particulars	2019-20	2018-19
Total Revenue	20,08,25,954	4,47,823
Total Expenditure	19,94,15,559	4,80,001
Profit/(Loss) before Extraordinary Item and Tax	14,10,395	(32,180)
Extraordinary Item	-	-
Profit/(Loss) before Tax	14,10,395	(32,180)
Provision for Tax	0	0
Deferred tax expense (revenue)	3,61,963	4,301
Profit/(Loss) after Tax	10,48,431	(36,481)

2. PERFORMANCE OVERVIEW:

The Company has earned profit of Rs. 10,48,431 during the Financial Year 2019-20 as compared to loss of Rs. 36,481 during the previous year.

3. DETAILS REGARDING SUBSIDIARY COMPANIES, ASSOCIATE COMPANIES AND JOINT VENTURE COMPANIES:

The Company does not have any subsidiary, associate or joint venture company and hence, details relating to them are not applicable and provided for.

4. MATERIAL CHANGES AND COMMITMENTS AFFECTING THE FINANCIAL POSITION OF THE COMPANY:

There were no such material changes occurred subsequent to the close of the financial year of the Company to which the balance sheet relates and the date of the report which can affect the financial position of the Company.

It is pertinent to note that due to COVID-19 pandemic, the nationwide lockdown was imposed from 23rd March, 2020 which was further extended by various announcements made by the Central and State Government around the time. Manufacturing facility of the Company was shut down during the lockdown period as the Company were not part of Government denominated indispensable services. Manufacturing plant resumed operations from May 10, 2020 and the Company started its operations from May 18, 2020. The Company has made assessment of its liquidity position for the financial year 2020-21 and the recoverability and carrying value of its assets comprising property, plant and equipment, intangible assets, right of use assets, investments, inventory and trade receivables. Based on current indicators of future economic conditions, the Company expects to recover the carrying amount of these assets. The situation is changing rapidly

giving rise to inherent uncertainty around the extent and timing of the potential future impact of the COVID-19 which may be different from that estimated as on balance sheet date.

The Board of Directors of the Company increased the Authorised share Capital of the Company from Rs. 4,00,00,000/- to Rs. 11,40,00,000/- by passing an Ordinary Resolution at Extra-Ordinary General Meeting of the shareholders of the Company held on 1st October, 2020.

The Board has issued and allotted 7,40,000 (Seven Lacs Forty Thousand) Equity shares of face value of Rs. 100/- (Rupees Hundred) each, at a price of Rs. 100/- (Rupees Hundred) each in lieu of and against the conversion of loan of Rs. 7,40,00,000/- (Rupees Seven Crores Forty Lacs only) taken by company from M/s Ashoka Metcast Limited in the Board Meeting held on 12th October, 2020.

5. REASONS FOR REVISION OF FINANCIAL STATEMENT OR REPORT:

During the year, the financial statements or report was not revised. Hence disclosures requirement is not applicable.

6. DIVIDEND:

During the period under review, no dividend was declared by the company.

7. RESERVES:

The Company has transferred profit earned during the year to Reserves and Surplus Account.

8. DIRECTORS & KEY MANAGERIAL PERSONNEL:

No Director has been appointed or resigned from the Company during the period under review. As per the provisions of the Articles read with the Companies Act, 2013; none of the Directors of your Company are liable to retire by rotation during the financial year under review.

9. INDEPENDENT DIRECTOR:

Our Company is not covered under class of Company as prescribed under Section 149(4) of the Companies Act, 2013 read with Rule 4 of Companies (Appointment and Qualification of Directors) Rules, 2014, hence, no disclosures required under sections 134(3)(d), Section 149(6) and 149(10) of the Companies Act, 2013.

10. DIRECTORS' RESPONSIBILITY STATEMENT:

Pursuant to the requirement of section 134(5) of the Companies Act, 2013, with respect to Directors' Responsibility Statement, it is hereby confirmed:

1. that in the preparation of the annual accounts, the applicable accounting standards had been followed along with proper explanation relating to material departures;
2. that the Directors had selected such 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

3. that the Directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of Companies Act, 2013 and Rules made thereunder for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;
4. that the Directors had prepared the annual accounts on a going concern basis; and
5. that the directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

11. DETAILS OF ADEQUACY OF INTERNAL FINANCIAL CONTROLS:

The Company is well equipped with adequate internal financial controls. The Company has a continuous monitoring mechanism which enables the organisation to maintain with the same standard of the control systems and helps them in managing any default on timely basis because of strong reporting mechanisms followed by the Company.

12. FORMAL EVALUATION BY BOARD OF ITS OWN PERFORMANCE:

Being an unlisted Company or having paid up capital of less than Rs. 25 Crores, the Statement in respect of Formal Evaluation by the Board of its own performance and that of its committees and individual directors are not applicable to the Company.

13. NUMBER OF MEETINGS OF BOARD:

The Board of Directors duly met 6 (Six) times during the financial year under review.

Sr. No.	Date of Board Meeting	Name of Directors attended the meeting	
1	10-05-2019	Shalin A. Shah	Ashok C. Shah
2	13-08-2019	Shalin A. Shah	Ashok C. Shah
3	05-10-2019	Shalin A. Shah	Ashok C. Shah
4	12-12-2019	Shalin A. Shah	Ashok C. Shah
5	22-01-2020	Shalin A. Shah	Ashok C. Shah
6	20-03-2020	Shalin A. Shah	Ashok C. Shah

Both the directors were present for all the Meetings.

14. ISSUE OF EQUITY SHARES WITH DIFFERENTIAL VOTING RIGHTS / SWEAT EQUITY SHARES / EMPLOYEE STOCK OPTION SCHEME:

During the year under review, the Company has not issued any equity shares with differential voting rights or sweat equity shares or employee stock option scheme. Hence disclosure regarding the same is not required to be given.

15. AUDITORS & AUDITORS' REPORT:

The Board of Directors of the Company in their meeting held on 13/08/2019 had appointed Sunil Poddar & Co. (FRN: 110603W), Chartered Accountants, as Statutory Auditor of the Company to fill the casual vacancy caused by the resignation of M/s. Khimani & Company, Chartered Accountants (Firm Reg. No. 130022W), to hold the office of the Statutory Auditors of the Company till the conclusion of forthcoming Annual General Meeting and their appointment was ratified by the shareholders in the Extra Ordinary General Meeting held on 7th November, 2019.

As per Section 139 of the Companies Act, 2013, the Board recommends to appoint M/s. Sunil Poddar & Co. (FRN: 110603W), Chartered Accountants, Ahmedabad, as Statutory Auditors of the Company at the forthcoming Annual General Meeting for a term of 5 years to hold office till the conclusion of the Annual General Meeting to be held in 2025 of the Company.

The Company has obtained a written confirmation under section 139 of the Companies Act, 2013 from M/s. Sunil Poddar & Co. (FRN: 110603W), Chartered Accountants, that their appointment, if made, would be in conformity with the limits specified under the Act.

The Report given by the Auditors on the financial statements of the Company is part of the Annual Report. The notes to the accounts referred to in the Auditors' Report are self-explanatory and therefore do not call for any further comments.

There has been no qualification, reservation, adverse remark or disclaimer given by the Auditors in their Report.

16. VIGIL MECHANISM:

As the Company is neither listed Company nor falling under criteria laid down under Rule 7 of Companies (Meetings of Board and its Powers) Rules, 2014, hence the vigil mechanism is not applicable to the Company during the financial year under review.

17. DISCLOSURE UNDER THE SEXUAL HARASSMENT OF WOMEN AT WORK PLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013:

The Company has in place an Anti Sexual Harassment Policy in line with the requirements of The Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013. All employees (permanent, contractual, temporary, trainees) are covered under this policy.

There was no case reported under the Act during the financial year under review.

18. CORPORATE SOCIAL RESPONSIBILITY (CSR):

The Company is not covered under class of Companies as specified under Section 135 of the Companies Act, 2013, hence, reporting requirement pertaining to CSR Committee and CSR is not applicable to our Company during the year under review under section 134(3)(o) read with Rule 9 of Companies (Accounts) Rules, 2014 and Section 135 of the Companies Act, 2013.

19. ANALYSIS OF REMUNERATION:

The Company is not listed on any recognized stock exchange; hence disclosure regarding the ratio of the remuneration of each Director to the median employee's remuneration and other details are not applicable to the Company.

20. POLICY ON DIRECTOR'S APPOINTMENT & REMUNERATION:

Requirement of Nomination and Remuneration Committee is not applicable to the Company. The remuneration policy is in consonance with the existing industry practice.

21. RISK MANAGEMENT POLICY:

As per the applicable requirements of the Companies Act, 2013 a risk management policy/plan of the Company is to ensure sustainable business growth with stability and to promote a pro-active approach in reporting, evaluating and resolving risks associated with the business. In order to achieve the key objective, the policy establishes a structured and disciplined approach to Risk Management, in order to guide decisions on risk related issues.

In today's challenging and competitive environment, strategies for mitigating inherent risks in accomplishing the growth plans of the Company are imperative. The common risks inter alia are: Regulations, competition, Business risk, Technology obsolescence, Investments, retention of talent and expansion of facilities. Business risk, inter-alia, further includes financial risk, political risk, fidelity risk, legal risk.

As a matter of policy, these risks are assessed and steps as appropriate are taken to mitigate the same.

22. PARTICULARS OF EMPLOYEES:

None of the employees draws remuneration in excess of the limits specified under Section 134 of the Companies Act, 2013 read with Rule 5(2) of the Companies (Appointment & Remuneration of Managerial Personnel) Rules, 2014.

23. DETAILS ON CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS & OUTGO:

The Company has taken adequate steps for conservation of energy. The Company has not imported any technology during the year and there are no Foreign exchange earnings and Outgo during the year.

24. DEPOSITS:

During the year under report, your Company has not accepted any deposits pursuant to Section 73 of the Companies Act, 2013. Hence, disclosures as required pursuant to Rule 8(5)(v) of Companies (Accounts) Rules, 2014 are not applicable for the financial year under review.

25. CORPORATE GOVERNANCE:

Our Company is an unlisted entity; hence the requirement of Corporate Governance is not applicable to our Company during the financial year under review.

26. EXTRACT OF ANNUAL RETURN:

The Extract of Annual Return as per Section 92(3) of the Companies Act, 2013 and Rule 12(1) of the Companies (Management and Administration) Rules, 2014 is enclosed herewith as **Annexure - A** and forms part of the report.

27. PARTICULARS OF LOANS, INVESTMENTS OR GUARANTEES UNDER SECTION 186 OF THE COMPANIES ACT, 2013:

Details of loans, investments or guarantees under section 186 of the companies act, 2013 is given in Notes to Financial statements.

28. RELATED PARTY TRANSACTION:

Details of related party transactions entered at arm's length basis during the year are provided in Form AOC-2 attached to the Financial Statements.

29. MATERIAL ORDERS PASSED BY THE REGULATOR/COURT:

During the year under review there is no significant and material order passed by the regulators or courts or tribunals impacting the going concern status and Company's operations in future.

30. OPERATIONAL UPDATE:

The Company has a steel rolling plant situated at Karannagar, Kadi. The commercial production commenced from August, 2019. However, due to COVID-19 pandemic situation and nationwide lockdown, the plant was temporarily shut down; it again resumed operations from May 10, 2020 and is operating at its full capacity.

31. SHARE CAPITAL:

At present, the Company has only one class of shares – Equity shares with face value of Rs.100/- each. The authorised, issued and paid up share capital of the Company as on 31st March, 2020 was Rs. 4,00,00,000/-.

However, the Board of Directors of the Company increased the Authorised share Capital of the Company from Rs. 4,00,00,000/- to Rs. 11,40,00,000/- by passing an Ordinary Resolution at Extra-Ordinary General Meeting of the shareholders of the Company held on 1st October, 2020.

32. EXTRA ORDINARY GENERAL MEETING:

During the period under review, an Extra Ordinary General Meeting of the Company was held on 7th November, 2011 to ratify the appointment of M/s. Sunil Poddar & Co. (FRN: 110603W), Chartered Accountants, as the Statutory Auditors of the Company. Further in the said meeting shareholders approved to alter Memorandum of Association of the Company by deleting all objects mentioned in Clause C – OTHER OBJECTS and inclusion of objects related to trading of chemicals and other ancillary products in its Main Object Clause of the Memorandum of Association. Transactions with related parties up to specified amount were also passed by the member of the Company.

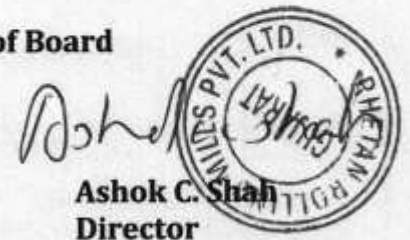
33. ACKNOWLEDGEMENT:

Your Directors wish to place on record their sincere appreciation to the Customers, Employees, Suppliers, Professionals, and Bankers to the Company for their Cooperation and contribution in the affairs of the Company.



For and on behalf of Board

Shalin A. Shah
Shalin A. Shah
Director
DIN: 00297447



Ashok C. Shah
Ashok C. Shah
Director
DIN: 02467830

Place: Ahmedabad
Date: December 10, 2020

Annexure- A
CIN: U27100GJ1984PTC007041
FORM No. MGT-9

**EXTRACT OF ANNUAL RETURN AS ON THE FINANCIAL YEAR ENDED ON
31ST MARCH, 2020**

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

I. REGISTRATION AND OTHER DETAILS:

CIN:	U27100GJ1984PTC007041	Registration Date	26/06/1984
Name of the Company	Rhetan Rolling Mills Private Limited (Formerly Shree Ghantakarna Rolling Mills Private Limited)	Category of the Company	Company limited By shares
		Sub Category of the Company	Indian Non- Government Company
Address	7th Floor, Ashoka Chambers, Rasala Marg, Mithakhali, Ahmedabad-380006	Contact Details	Email ID: info@rhetan.com Tel Ph.: 079 26463226-7
Whether Shares Listed	No		

Details of Registrar and Transfer Agent

Name	NA
Address	
Contact Details	

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY:

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

Sr. No.	Name and description of main products /services	NIC code of the product/service	% of total turnover of the company
1.	Sale of Steel MS TMT Bar	46620	99.9%

ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	-	-	-	-	-	-	-	-	-
c) Others (specify) NRI/OCB	-	-	-	-	-	-	-	-	-
OTHERS	-	-	-	-	-	-	-	-	-
Non Resident Indians	-	-	-	-	-	-	-	-	-
Overseas Corporate Bodies	-	-	-	-	-	-	-	-	-
Foreign Nationals	-	-	-	-	-	-	-	-	-
Clearing Members	-	-	-	-	-	-	-	-	-
Hindu Undivided Family	-	-	-	-	-	-	-	-	-
Foreign Bodies - D R	-	-	-	-	-	-	-	-	-
Sub-total (B)(2):-	-	-	-	-	-	-	-	-	-
Total Public	-	-	-	-	-	-	-	-	-
C. Shares held by Custodian for GDRs & ADRs	-	-	-	-	-	-	-	-	-
Grand Total (A+B+C)	-	400000	400000	100	-	400000	400000	100	-

*100 shares held by Mr. Shalin A. Shah, as registered owner to meet the requirement of minimum 2 members in a private limited company

(ii) SHAREHOLDING OF PROMOTERS:

Sr. no.	Shareholder's Name	No. of Shares held at the beginning of the year as on 1 st April, 2019			No. of Shares held at the end of the year as on 31 st March, 2020			% change in shareholding during the year
		No. of Shares	% of total Shares of the co.	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the co.	% of Shares Pledged / encumbered to total shares	
1.	Shalin A. Shah	*100	0.01	-	*100	0.01	-	-
2.	Ashoka Metcast Limited	399900	99.99	-	399900	99.99	-	-

*100 shares held by Mr. Shalin A. Shah, as registered owner to meet the requirement of minimum 2 members in a private limited company

(iii) CHANGE IN PROMOTERS' SHAREHOLDING (PLEASE SPECIFY, IF THERE IS NO CHANGE):

Sr. No.	Particulars	Shareholding at the beginning of the year		Cumulative Shareholding During the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1.	Ashok C. Shah				
	At the beginning of the year	0	0	0	0

	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment /transfer / bonus/ sweat equity etc.):	No change			
	At the end of the year	0	0	0	0
2.					
3.	Shalin A. Shah				
	At the beginning of the year	*100	0.01	*100	0.01
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment /transfer / bonus/ sweat equity etc.):	No change			
	At the end of the year	*100	0.01	*100	0.01
4.	Ashoka Metcast Limited				
	At the beginning of the year	399900	99.99	399900	99.99
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment /transfer / bonus/ sweat equity etc.):	No change			
	At the end of the year	399900	99.99	399900	99.99

*100 shares held by Mr. Shalin A. Shah, as registered owner to meet the requirement of minimum 2 members in a private limited company

(iv) SHAREHOLDING PATTERN OF TOP TEN SHAREHOLDERS (OTHER THAN DIRECTORS, PROMOTERS AND HOLDERS OF GDRS AND ADRS):

Sr. No.		Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of company	No. of shares	% of total shares of company
	For Each of the Top 10 Shareholders				
	NA				
1.	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
2.					
	At the beginning of the year				

	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
3.					
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
4.					
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
5.					
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
6.					
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
7.					
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
8.					
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding				

	during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
9.					
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				
10.					
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):				
	At the End of the year (or on the date of separation, if separated during the year)				

(v) SHAREHOLDING OF DIRECTORS AND KEY MANAGERIAL PERSONNEL:

Sr. No.	For Each of the Directors and KMP	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1.	Ashok C. Shah				
	At the beginning of the year	0	0	0	0
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	No change			
	At the End of the year (or on the date of separation, if separated during the year)	0	0	0	0
2.	Shalin A. Shah				
	At the beginning of the year	*100	0.01	*100	0.01
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	No change			
	At the End of the year (or on the date of separation, if separated during the year)	*100	0.01	*100	0.01

**100 shares held by Mr. Shalin A. Shah, as registered owner to meet the requirement of minimum 2 members in a private limited company*

V. INDEBTEDNESS:

Indebtedness of the Company including interest outstanding/accrued but not due for payment

	Secured Loan Excluding Deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	00	109840000	00	109840000
ii) Interest due but not paid				
iii) Interest accrued but not due				
Total (i+ii+iii)	00	109840000	00	109840000
Change in Indebtedness during the financial year				
• Addition	85230581	44330370		129560951
• Reduction			00	
Total	85230581	44330370	00	129560951
Indebtedness at the end of the financial year				
i) Principal Amount	85230581	154170370	00	239400951
ii) Interest due but not paid				
iii) Interest accrued but not due				
Total (i+ii+iii)	85230581	154170370	00	239400951

VI. (A) REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Sr. No.	Particulars of Remuneration	Name of MD/WTD/ Manager	Total Amount
1.	Gross salary (a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961		
2.	Stock Option	-	-
3.	Sweat Equity	-	-
4.	Commission - as % of profit - Others, specify...	-	-
5.	Others, please specify	-	-

	Total (A)	-	-
	Ceiling as per the Act	5% of Net Profits of the Company calculated under Section 198 of the Companies Act, 2013	

B. REMUNERATION TO OTHER DIRECTORS:

Sr. No.	Particulars of Remuneration	Name of Directors	Total Amount
	1. Independent Directors		
	• Fee for attending board /committee meetings		
	• Commission		
	• Others, please specify		
	Total (1)	-	-
	2. Other Non-Executive Directors		
	• Fee for attending board committee meetings		
	• Commission		
	• Others, please specify		
	Total (2)	-	-
	3. Other Executive Directors	Ashok C. Shah(Director)	
	• Fee for attending board committee meetings		
	• Commission		
	Others, please specify		
	-Remuneration	2,00,000	2,00,000
	Total (3)	2,00,000	2,00,000
	Total (B)=(1+2+3)	1% of Net Profits of the Company calculated under Section 198 of the Companies Act, 2013	
	Total Managerial Remuneration	2,00,000	2,00,000
	Overall Ceiling as per the Act	11% of Net Profits of the Company calculated under Section 198 of the Companies Act, 2013	

**C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD:
(NOT APPLICABLE)**

Sr. No.	Particulars of Remuneration	Name of KMP			
		CEO	Company Secretary	CFO	Total
1.	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961				
	(b) Value of perquisites u/s 17(2)				

	Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961		NA		
2.	Stock Option				
3.	Sweat Equity				
4.	Commission - as % of profit - Others, specify...				
5.	Others, please specify				
	Total				

VII. PENALTIES / PUNISHMENT / COMPOUNDING OF OFFENCES:

Type	Section of the Company Act	Brief Description	Details of Penalty Punishment/ Compounding fee imposed	Authority [RD / NCLT / COURT]	Appeal made, if any (give Details)
A. COMPANY :					
Penalty					
Punishment			NA		
Compounding					
B. DIRECTORS :					
Penalty					
Punishment			NA		
Compounding					
C. OTHER OFFICERS IN DEFAULT :					
Penalty					
Punishment			NA		
Compounding					

Shakti A. Shah



Abdulcshah



FORM NO. AOC -2

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

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

1. Details of contracts or arrangements or transactions not at Arm's length basis: Nil

SL. No.	Particulars	Details
a)	Name (s) of the related party & nature of relationship	--
b)	Nature of contracts/arrangements/transaction	--
c)	Duration of the contracts/arrangements/transaction	--
d)	Salient terms of the contracts or arrangements or transaction including the value, if any	--
e)	Justification for entering into such contracts or arrangements or transactions'	--
f)	Date of approval by the Board	--
g)	Amount paid as advances, if any	--
h)	Date on which the special resolution was passed in General meeting as required under first proviso to section 188	--

2. Details of contracts or arrangements or transactions at Arm's length basis: Nil

SL. No.	Particulars	Details
a)	Name (s) of the related party & nature of relationship	-
b)	Nature of contracts / arrangements / transaction	-
c)	Duration of the contracts / arrangements / transaction	-
d)	Salient terms of the contracts or arrangements or transaction including the value, if any	-
e)	Date of approval by the Board, if any	-
f)	Amount paid as advances, if any	-

Shahin A Shah

Ashokesh Shah



***RHETAN ROLLING MILLS PRIVATE
LIMITED***

STATUTORY AUDIT REPORT

FINANCIAL YEAR 2019 – 2020

Audited by

M/s. SUNIL PODDAR & CO.

Chartered Accountants

1301, Addor Aspire, Nr. Jhanvi Restaurant,

Panjarapole , University Road,

Ambawadi, Ahmedabad – 380015

Phone : 079-48977222-23



Independent Auditor's Report

To the Members of Rhetan Rolling Mills Private Limited

Report on the Audit of Financial Statements

Opinion

We have audited the accompanying standalone financial statements of Rhetan Rolling Mills Private Limited ('the Company'), which comprise the balance sheet as at 31 March 2020, the statement of profit and loss, cash flow statement and summary of significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the Companies Act, 2013 ("the Act") in the manner so required and give a true and fair view in conformity with the Accounting standards prescribed under section 133 of the Act read with Companies (Indian Accounting Standards) Rules, 2015, as amended, and other accounting principles generally accepted in India, of the state of affairs of the Company as at 31 March 2020, and profit and its cash flows for the year ended on that date.

Basis for Opinion

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

Emphasis of Matter

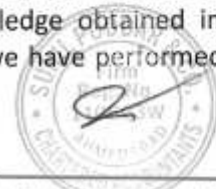
We draw attention to Other disclosures forming part of the standalone Financial Statements, which describes the uncertainties and the impact of Covid-19 pandemic on the Company's operations and results as assessed by the management. Our opinion is not modified in respect of this matter.

Other Information

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 standalone financial statements and our auditor's report thereon.

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

In connection with our audit of the standalone Ind AS financial statements, our responsibility is to read the other information and, in doing so, consider whether such other information is materially inconsistent with the Standalone 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 Standalone Ind AS 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 and presentation of these Ind AS financial statements that give a true and fair view of the financial position, financial performance and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the 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 provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the Ind AS financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

The board of directors are responsible for overseeing the company's financial reporting process.

Auditor's Responsibility for the audit of Standalone financial statements

Our responsibility is to express an opinion on these financial statements based on our audit. We have taken into account the provisions of the Act, the accounting and auditing standards and matters which are required to be included in the audit report under the provisions of the Act and the Rules made thereunder. We conducted our audit in accordance with the Standards on Auditing specified under Section 143(10) of the Act. Those Standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and the disclosures in the financial statements. 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. In making those risk assessments, the auditor considers internal financial control relevant to the Company's preparation of the financial statements that give a true and fair view in order to design audit procedures that are appropriate in the circumstances. An audit also includes evaluating the appropriateness of the accounting policies used and the reasonableness of the accounting estimates made by the Company's Directors, as well as evaluating the overall presentation of the financial statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the 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 entity 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 in preparation of consolidated financial statements and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the appropriateness of this assumption. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report.
- 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.
- Obtain sufficient appropriate audit evidence regarding the financial information of such entities or business activities within the Group to express an opinion on the financial statements.

We are responsible for the direction, supervision and performance of the audit of financial information of such entities.

We believe that the audit evidence obtained by us is sufficient and appropriate to provide a basis for our audit opinion on the financial statements.

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government of India in terms of sub-section (11) of section 143 of the Act, we give in the "**Annexure A**" a statement on the matters specified in the paragraph 3 and 4 of the order.
2. As required by Section 143 (3) of the Act, we report that:
 - (a) we have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
 - (b) in our opinion proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books;
 - (c) the balance sheet, the statement of profit and loss, the cash flow statement 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 the companies (Indian Accounting Standards) Rules 2015 as amended.



(e) on the basis of the written representations received from the directors as on 31 March 2020 taken on record by the Board of Directors, none of the directors is disqualified as on 31 March 2020 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"; and

(g) with respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) 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 its financial position.*

ii. The Company is not required to make provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts as the company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.

iii. There were no amount which were required to be transferred, to the Investor Education and Protection Fund by the Company.

iv. The reporting on disclosures relating to Specified Bank Notes is not applicable to the Company for the year ended March 31, 2020.

f) With respect to the matter to be included in the Auditors' Report under section 197(16): In our opinion and according to the information and explanations given to us, the remuneration paid by the Company to its directors during the current year is in accordance with the provisions of Section 197 of the Act. The remuneration paid to any director is not in excess of the limit laid down under Section 197 of the Act. The Ministry of Corporate Affairs has not prescribed other details under Section 197(16) which are required to be commented upon by us.

FOR, SUNIL PODDAR & CO.

Chartered Accountants

Firm Reg. No 110603W




[CA PANKAJ AGARWAL]

Partner

M. No. 443450

PLACE: AHMEDABAD

DATE :30th July, 2020.

UDIN : 20443450AAAALN3957

Annexure - A to the Independent Auditors' Report

The Annexure referred to in Independent Auditors' Report to the members of the Company on the standalone Ind AS financial statements for the year ended 31 March 2020, we report that:

- (i)(a) The Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets.
- (b) The Company has a regular programme of physical verification of its fixed assets by which fixed assets are verified in a phased manner over a period of three years, which in our opinion, is reasonable having regard to the size of the company and nature of its business. In accordance with this programme, certain fixed assets were verified during the year and no material discrepancies were noticed on such verification.
- (c) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the title deeds of immovable properties are held in the name of the Company.
- (ii) (a) The stock of Inventories has been physically verified by the management at reasonable intervals commensurate with size and nature of the business.
- (b) In our opinion and according to the information and explanation given to us, the procedures for physical verification of Inventories followed by the management is reasonable and adequate in relation to the size of the company and the nature of business.
- (c) The company has maintained reasonable records for Inventories of raw material and finished goods lying at factory premises. As regards to work in process, we were informed that though it is not possible to compare individual items with the available records, on an overall basis, no discrepancy was disclosed.
- (iii) The company has not granted unsecured loans to the companies, firm or other parties covered in the register maintained under section 189 of the Companies Act, 2013.
- (iv) In our opinion and according to the information and explanations given to us, the Company has complied with the provisions of section 185 and 186 of the Act, with respect to the loans and investments made except section 186(7) of the companies act. Details of the same are as under:
- | | | |
|--------------------------------------|---|---------------|
| Total no. of parties | : | 13 |
| Balance outstanding as on 31.03.2020 | : | Rs. 91,81,473 |
- (v) The Company has not accepted any deposits from the public and hence the directives issued by the Reserve Bank of India and the provisions of Section 73 to 76 or any other relevant provisions of the Act and the Companies (Acceptance of Deposit) Rules, 2015 with regard to the deposits accepted from the public are not applicable.
- (vi) The Central Government has not prescribed the maintenance of cost records under section 148(1) of the Act, for any of the goods or services rendered by the Company.



- (vii) (a) According to the information and explanations given to us and on the basis of our examination of the records of the Company, amounts deducted/ accrued in the books of account in respect of undisputed statutory dues including provident fund, income-tax, sales tax, value added tax, duty of customs, service tax, cess and other material statutory dues have been regularly deposited during the year by the Company with the appropriate authorities. As explained to us, the Company did not have any dues on account of employees' state insurance and duty of excise.

According to the information and explanations given to us, no undisputed amounts payable in respect of provident fund, income tax, sales tax, value added tax, duty of customs, service tax, cess and other material statutory dues were in arrears as at 31 March 2020 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 material dues of income tax, sales tax, service tax, duty of customs, duty of excise, value added tax which have not been deposited with the appropriate authorities on account of any dispute.
- (viii) In our opinion and according to the information and explanations given to us, the Company has not defaulted in the repayment of dues to banks. The company has not taken any loan either from financial institutions or from the Government and has not issued any debentures.
- (ix) The Company did not raise any money by way of initial public offer or further public offer (including debt instruments) and term loans during the year. Accordingly, paragraph 3 (ix) of the Order is not applicable.
- (x) Based upon the audit procedures performed and according to the information and explanations given to us, no material fraud by the Company or on the Company by its officers or employees has been noticed or reported during the course of our audit.
- (xi) The provision of section 197 read with schedule V to the act with respect to the managerial remuneration is not applicable to the company; hence, no specific comments with respect to this matter can be made.
- (xii) In our opinion and according to the information and explanations given to us, the Company is not a Nidhi company. Accordingly, paragraph 3(xii) of the Order is not applicable.
- (xiii) According to the information and explanations given to us and based on our examination of the records of the Company, transactions with the related parties are in compliance with sections 177 and 188 of the Act where applicable and details of such transactions have been disclosed in the Ind AS financial statements as required by the applicable accounting standards.
- (xiv) According to the information and explanations give to us and based on 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.
- (xv) According to the information and explanations given to us and based on our examination of the records of the Company, the Company has not entered into non-cash transactions with directors or persons connected with him. Accordingly, paragraph 3(xv) of the Order is not applicable.



- (xvi) The Company is not required to be registered under section 45-IA of the Reserve Bank of India Act 1934.

FOR, SUNIL PODDAR & CO.

Chartered Accountants

Firm Reg. No 110603W



[CA PANKAJ AGARWAL]

Partner

M. No. 443450

PLACE: AHMEDABAD

DATE :30th July, 2020.

UDIN : 20443450AAAALN3957

Annexure - B to Independent Auditors' Report of even date on the Standalone Ind AS financial statement of the Rhetan Rolling Mills Private Limited ("the Company")

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

Opinion

We have audited the internal financial controls over financial reporting of Rhetan Rolling Mills Private Limited ("the Company") as of 31 March 2020 in conjunction with our audit of the Standalone financial statements of the Company for the year ended on that date.

In our opinion the company has, in all material respects, an adequate internal financial controls system over financial reporting and were operating effectively as at 31st March, 2020, 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.

Management's Responsibility for Internal Financial Controls

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

Auditors' Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the "Guidance Note") and the Standards on Auditing, issued by ICAI and deemed to be prescribed under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. 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.

PLACE: AHMEDABAD
DATE :30th July, 2020.
UDIN : 20443450AAAAALN3957

FOR, SUNIL PODDAR & CO.
Chartered Accountants
Firm Reg. No 110603W



[CA PANKAJ AGARWAL]

Partner

M. No. 443450

RHETAN ROLLING MILLS PRIVATE LIMITED

AUDITED STANDALONE BALANCE SHEET AS AT 31ST MARCH, 2020

Particulars	Note No	Figures as at the end of current reporting period	Figures as at the end of the previous reporting period
I. EQUITY AND LIABILITIES			
1 Shareholders' Funds			
(a) Share Capital	2	40,000,000	40,000,000
(b) Reserves and Surplus	3	(30,808,753)	(12,568,733)
(c) Money received against share warrants			
2 Share application pending for allotment		-	-
3 Non-current Liabilities			
(a) Long-term borrowings	4	154,170,370	109,840,000
(b) Deferred Tax liabilities (Net)	5	6,857,119	(1,383)
(c) Other Non Current Liabilities		-	-
(d) Long term provisions		-	-
4 Current Liabilities			
(a) Short-Term Borrowings	6	85,230,581	-
(b) Trade Payables	7		
total outstanding dues of micro enterprises and small enterprises		-	-
total outstanding dues of creditors other than micro enterprises and small enterprises		44,631,302	-
(c) Other Current Liabilities	8	4,588,802	750,082
(d) Short term provisions	9	300,963	-
Total Equity & Liabilities		304,970,384	138,019,966
II. ASSETS			
1 Non-current Assets			
(a) Property Plant and Equipment	10		
Tangible Assets		89,454,781	37,716,772
Capital Work in Progress		-	50,966,653
Intangible assets		-	-
Intangible assets under development		-	-
(b) Non Current Investments	11	10,439,359	10,439,359
(c) Deferred Tax Assets (Net)		-	-
(d) Long-term loans and advances	12	19,153,660	24,375,044
(e) Other Non Current Assets	13	5,900,671	6,646,509
2 Current Assets			
(a) Current Investments			
(b) Inventories	14	84,725,229	-
(c) Trade Receivables	15	73,204,436	-
(d) Cash and cash equivalents	16	1,438,131	933,340
(e) Short Term Loans and Advances		-	-
(f) Other Current Assets	17	20,654,117	6,942,288
TOTAL RS...		304,970,384	138,019,966

NOTES TO ACCOUNTS

Notes referred to above and notes attached there to form an Integral part of Balance Sheet

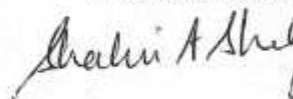
This is the Balance Sheet referred to in our Report of even date.

FOR AND ON BEHALF OF
SUNIL PODDAR & CO.
CHARTERED ACCOUNTANTS
FIRM REG. NO.:110603W


[CA. PANKAJ AGARWAL]
PARTNER
M.No. 443450



FOR AND ON BEHALF OF
RHETAN ROLLING MILLS PVT. LTD.

SHALIN A SHAH
DIRECTOR
DIN: 00297447

ASHOK C SHAH
DIRECTOR
DIN: 02467830

PLACE: Ahmedabad
DATE: 30th July, 2020
UDIN : 20443450AAAALN3957

RHETAN ROLLING MILLS PRIVATE LIMITED

AUDITED STANDALONE STATEMENT OF PROFIT AND LOSS FOR THE YEAR ENDED 31ST MARCH, 2020


Particulars	Note No	Figures as at the end of current reporting period	Figures as at the end of the previous reporting period
I Revenue from operations (Net)	18	200,083,773	-
III Other Income	19	742,181	447,823
III Total Revenue (I + II)		200,825,954	447,823
IV Expenses			
Cost of Material Consumed	20	193,164,660	-
Purchase of Stock in Trade		-	-
Change in inventories of Finished Goods and WIP	21	(36,613,466)	-
Employee Benefit Cost	22	5,354,194	-
Finance Costs	23	2,994,733	6,530
Depreciation and Amortisation Expense	24	2,422,884	116,545
Other Expenses	25	32,092,553	356,928
Total Expenses (IV)		199,415,559	480,003
V Profit before exceptional and extraordinary items and tax (III - IV)		1,410,395	(32,180)
VI Exceptional Items		-	-
VII Profit before extra ordinary items and tax (V-VI)		1,410,395	(32,180)
VIII Extra ordinary Items		-	-
IX Profit/(Loss) before tax (VII-VIII)		1,410,395	(32,180)
X Tax Expense :			
(1) Current Tax		-	-
(2) Deferred Tax	5	361,963	4,301
(3) MAT Credit Entitlement		-	-
XI Profit (Loss) for the period from continuing operations (VII-VIII)		1,048,431	(36,481)
XII Profit/(loss) from discontinuing operations		-	-
XIII Tax expense of discontinuing operations		-	-
XIV Profit/(loss) from Discontinuing operations (after tax) (XII-XIII)		-	-
XV Profit (Loss) for the period (XI + XIV)		1,048,431	(36,481)
X Earning Per Share:			
- Basic		2.62	(0.09)
- Diluted		2.62	(0.09)

NOTES TO ACCOUNTS

Notes referred to above and notes attached there to form an integral part of Profit & Loss Statement

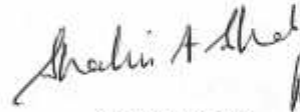
This is the Profit & Loss Statement referred to in our Report of even date.

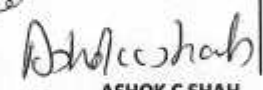
FOR AND ON BEHALF OF
SUNIL PODDAR & CO.
CHARTERED ACCOUNTANTS
FIRM REG. NO.:110603W


[CA. PANKAJ AGARWAL]
PARTNER
M.No. 443450



FOR AND ON BEHALF OF
RHETAN ROLLING MILLS PVT. LTD.


SHALIN A SHAH
DIRECTOR
DIN: 00297447


ASHOK C SHAH
DIRECTOR
DIN: 02467830

PLACE: Ahmedabad
DATE: 30th July, 2020
UDIN : 20443450AAAALN3957

RHETAN ROLLING MILLS PRIVATE LIMITED

AUDITED CASH FLOW STATEMENT FOR THE YEAR ENDED ON 31st MARCH 2020

PARTICULARS	2019-20	2018-19
A. CASH FLOWS FROM OPERATING ACTIVITIES :		
Net Profit before tax as per Profit & Loss Account	1,410,395	(32,180)
Adjustment for :		
Depreciation	2,422,884	116,545
Loss on sale of plant & machinery	-	170,200
Interest Income	(572,650)	(446,473)
Preliminary Expenses Written Off	745,838	121,800
	2,596,072	(37,928)
Operating Profit before Working Capital Changes	4,006,467	(70,108)
Working Capital Changes		
Adjustment for		
Trade Payables	44,631,302	
Inventories	(84,725,229)	
Trade Receivables	(73,204,436)	
Other current Assets	(13,711,828)	(19,428,332)
Other Current Liabilities	3,838,720	226,835
Other Non Current Liabilities	300,963	
Net Changes in Working Capital	(122,870,508)	(19,201,497)
Cash Generated from operations	(118,864,041)	(19,271,605)
Cash Flow from Exceptional Claim	-	-
Direct Tax Paid During the Year (Net off Refund Received)	-	-
NET CASH FROM OPERATING ACTIVITIES	(118,864,041)	(19,271,605)
B. CASH FLOWS FROM INVESTING ACTIVITIES :		
Dividend Income	-	-
Other Investments	-	-
Sale of Property Plant & Equipment	90,800,631	1,888,306
Purchase of Property Plant & Equipment	(106,786,784)	(48,167,169)
NET CASH FLOW FROM IN INVESTING ACTIVITIES	(15,986,153)	(46,278,863)
CASH FLOWS FROM FINANCING ACTIVITIES :		
Interest Income	572,650	446,473
Proceed from Short term borrowings	85,230,581	-
Short Term Loan And Advances	5,221,384	780,182
Proceed from Unsecured Loan	44,330,370	64,390,000
NET CASH FROM FINANCING ACTIVITIES	135,354,986	65,616,655
NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS	504,791	66,188
CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE YEAR	933,340	867,153
CASH AND CASH EQUIVALENTS AT THE CLOSE OF THE YEAR	1,438,131	933,340

FOR AND ON BEHALF OF
SUNIL PODDAR & CO.
CHARTERED ACCOUNTANTS
FIRM REG. NO.:110603W

[CA. PANKAJ AGARWAL]
PARTNER
M.No. 443450



FOR AND ON BEHALF OF
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Shalin A. Shah
DIRECTOR
DIN : 00297447

Ashok C. Shah
DIRECTOR
DIN : 02467830

PLACE: Ahmedabad
DATE: 30th July, 2020
UDIN : 20443450AAAAALN3957

RHETAN ROLLING MILLS PRIVATE LIMITED

SIGNIFICANT ACCOUNTING POLICIES AND NOTES TO ACCOUNTS

NOTE: 1 SIGNIFICANT ACCOUNTING POLICIES

CORPORATE INFORMATION

RHETAN ROLLING MILLS PRIVATE LIMITED was incorporated on 26/06/1984. Formerly known as Shree Ghantakarna Rolling Mills Private limited was converted into Rhetan Rolling Mills Private Limited. The Company has been promoted by Mr. Shalin Shah.

BASIS OF PREPARATION OF FINANCIAL STATEMENTS

The Financial Statements of the Company have been prepared in accordance with generally accepted accounting principles in India (Indian GAAP). The Company has prepared these Financial Statements to comply in all material respects, with the Accounting Standards notified under the Companies (Accounting Standards) Rules, 2006, (as amended) and the relevant provisions of the Companies Act, 2013. The Financial Statements have been prepared on an accrual basis and under the historical cost convention.

The accounting policies adopted in the preparation of financial statements are consistent with those of previous year except for the change in accounting policy, if any explained below.

(i) Basis for Accounting

The financial statements are prepared under the historical cost convention on an accrual basis of accounting in accordance with the Generally Accepted Accounting Principles, Accounting Standards notified under Section 133 of the Companies Act, 2013 and the relevant provisions thereof except those specified otherwise.

(ii) Use of Estimates and Judgments

In preparation of the financial statements, the Company is required to make judgments, estimates and assumptions about the carrying amount of assets and liabilities that are not readily apparent from other sources. The estimates and the associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The estimates and the underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised and future periods affected. Significant judgments and estimates about the carrying amount of assets and liabilities include useful lives of tangible and intangible assets, impairment of tangible assets, intangible assets including goodwill, investments, employee benefits and other provisions and recoverability of deferred tax assets.



(iii) Valuation Of Inventories:

The cost of inventory is determined on Weighted Average cost formula method on relevant categories of inventories on a consistent basis after providing for obsolete, slow moving and defective inventories wherever necessary.

The cost of inventory / finished goods consists of cost of purchase, cost of conversion and cost incurred in bringing the inventory / finished goods to their present location and condition.

Inventories have been valued at lower of cost and net realizable value. Net realizable value has been determined by management.

(iv) Revenue Recognition:

All known income and expenditure quantifiable till the date of finalization of accounts are accounted on accrual basis when virtual certainty is established.

a) Revenue from Operation:

Sales revenue is recognized when property in the goods with all risk rewards and effective control of goods usually associated with ownership are transferred to buyer at price. Sales comprise trading sales and are exclusive of excise duty and local taxes and sales return.

The various Discounts and rate differences on the Sales those accepted/rejected are accounted in the year, however if the same is of material amount effecting the current year profit/loss are separately shown under the Prior Period head of the profit and loss account.

b) Other operational revenue

Other operational revenue represent income earned from the activities incidental to the business and is recognized when the right to receive the income is established as per the terms of the contract.

c) Other Income:

Interest income is recorded at accrued or due whichever is earlier at applicable interest rate and other items of other income are accounted as and when the right to receive arises.

(v) Tangible Assets:

a) Tangible Fixed Assets:

Fixed assets are stated at cost less accumulated depreciation. Cost comprises purchase price including import duties and other non-refundable taxes or levies, expenditure incurred in the course of construction or acquisition, administrative and other general overhead expenses that are directly attributable to the cost of bringing the asset to its working condition for the purpose of use for the business.



b) Base of measurement followed by the Company is "Cost Model."

(vi) Capital Work in Progress

Tangible and intangible assets not ready for intended use on the date of balance sheet are disclosed as capital work in progress. Work in progress includes unallocated expenditure pending for capitalization.

(vii) Intangible Assets:

Intangible Assets are recorded at acquisition cost when the asset is identifiable, non- monetary in nature, without physical substance and it is probable that such expenditure is to result in future economic benefits to the entity.

(viii) Depreciation:

Freehold land is not depreciated. Other items of the tangible assets are depreciated over the useful life of the assets prescribed in the Part C of the Schedule II of the Companies Act, 2013. The value of the asset for depreciation over the period is considered reducing the determined residual value of the asset not more than 5% of the asset. Residual value for building has been considered at 5%. In respect of other assets residual value has been taken at NIL rate. For the purpose of calculation of Depreciation, the method followed by company is Straight Line Method (SLM). The depreciation is provided from the date of the asset ready to use for the commercial operations. The useful lives taken for the purpose of depreciation of different assets are prescribed as follows:

Particulars	Useful Life
Building	30 years
Plant & Machinery	15 years
Furniture and Fixtures	10 years
Office Equipment	5 years
Computers	3 years
Electric Installation	10 years
Vehicle	8 years

(ix) Consolidated Financial Statement

As per the requirement and rules of the consolidated financial statement, the company will follow the same for the preparation of consolidated financial Statement as and when it is required.

(x) Investment in Associates in Consolidated financial Statement:

As per the requirement and rules of the consolidated financial statement, the company will follow the same for the preparation of consolidated financial Statement.



(xi) Leases:

Assets taken on lease by the Company in its capacity as lessee, where the Company has substantially all the risks and rewards of ownership, are classified as finance lease. Such a lease is capitalized at the inception of the lease at lower of the fair value or the present value of the minimum lease payments and a liability is recognized for an equivalent amount. Each lease rental paid is allocated between the liability and the interest cost so as to obtain a constant periodic rate of interest on the outstanding liability for each year.

Lease arrangements where the risks and rewards incidental to ownership of an asset substantially vest with the lessor, are recognized as operating leases. Lease rentals under operating leases are recognized in the statement of profit and loss on a straight-line basis.

(xii) Government Grants:

- a) Government grants of the nature of contribution towards capital expenditure (to the extent utilized in the year) are treated as of Capital Fund.
- b) Government grants for meeting the revenue expenditure are treated as income of the year in which they are realized, except that they will be treated as accrued income where sanctions have been issued before the last day of the year and there is reasonable certainty of collection and realization.
- c) Unutilized government grants are treated as funds to be carried forward and refunded, as per government directions and exhibited as a Liability.

(xiii) Foreign currency transaction:

- a) Transaction denominated in foreign currencies is normally recorded at the exchange rate prevailing at the time of the transaction.
- b) Monetary items denominated in foreign currencies at the year-end are restated at yearend rates. In case of monetary items which are covered by forward exchange contract, the difference between the yearend rate and rate on the date of contract is recognized as exchange difference and the premium paid on forward contract has been recognized over the life of the contract if the forward contract is entered.
- c) Any income or expense on account of exchange difference either on settlement or on translation at the year-end rate is recognized in the profit and loss account except for such adjustment of exchange difference arising on long term foreign currency monetary items in so far they are relatable to the acquisition of a depreciable capital assets which are adjusted to the cost of assets and depreciated over the remaining useful life of such assets.
- d) The premium or discount on the Forward Exchange Contract entered into hedge foreign currency risk of an existing asset/liability is recognized / amortized as an income/expense



over the life of the contract in the statement of profit and loss account for the trade transaction and capitalized to the asset in case the same is capital expenditure.

(xiv) Cash Flow Statement:

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

(xv) Impairment of Tangible and intangible assets:

The Management periodically assesses using external and internal sources, whether there is an indication that an asset may be impaired. An impairment loss is recognized wherever the carrying value of an asset exceeds its recoverable amount. The recoverable amount is higher of the asset's net selling price and value in use, which means the present value of future cash flows expected to arise from the continuing use of the asset and its eventual disposal.

An impairment loss for an asset is reversed if, and only if, the reversal can be related objectively to an event occurring after the impairment loss was recognized. The carrying amount of an asset is increased to its revised recoverable amount, provided that this amount does not exceed the carrying amount that would have been determined (net of any accumulated amortization or depreciation) had no impairment loss been recognized for the asset in prior years.

(xvi) Investment:

All the investment held by the company are long term investments. The investments are valued at their cost of acquisition plus incidental expenses for the acquisition if any incurred, irrespective of any diminution in the value of investments. Provisions for diminution in the value of long-term investments is made only if such decline is other than temporary in the opinion of the management.

(xvii) Provisions and Contingent liabilities:

Provisions are recognized when the present obligation of the past event gives rise to a probable outflow embodying economic benefits on settlement, and the amount of obligation can be reliably estimated.

Contingent liabilities are disclosed after careful evaluation of facts and legal aspects of the matter involved.

Provisions and contingent liability are reviewed at each balance sheet date and adjusted to reflect the current best estimates.



(xviii) Provision for Current and Deferred Tax:

Taxes on income are computed using Tax Deferral Assets or Liability method where taxes accrue in the same period, the respective revenue and expenses arises. The differences that result between the profit offered for income tax and the profit as per financial statements are identified and Deferred Tax Liability is recognized for timing difference, that originate in one accounting period and reverse in another based on the tax effect of the prevailing enacted regulation in force.

Deferred Tax Assets are recognized subject to prudence, only, if there is reasonable certainty that they will be realized and are subject to appropriate reviews at each balance sheet date for the purpose of measurement of Deferred Tax Liability or Assets, the applicable tax rates and enacted regulations expected to apply in the year in which the temporary differences are expected to be recovered or settled are applied.

Minimum Alternative Tax Credit is recognized as an asset only when and to the extent there is convincing evidence that the company will pay normal income tax furnishing the specified period. In the year, MAT credit becomes eligible to be recognized as an asset in accordance with the recommendations contained in guidance note issued by the Institute of Chartered Accountants of India, the said asset is created by way of credit to the profit and loss statement and shown as MAT Credit entitlement.

(xix) Borrowing Cost:

Borrowing cost directly attributable and/or funds borrowed generally and used for the purpose of acquisition/construction of an asset that necessarily takes a substantial period of time to get ready for its intended use are capitalized, at its capitalization rate to expenditure on that assets, for the period, until all activities necessary to prepare qualifying assets for its intended use are complete. All other borrowing costs are recognized as an expense in the year in which they are incurred.

(xx) Retirement Benefits:

Company does not have any defined benefit plan. The company does not permit accumulating of unused leaves. The company does not provide any long-term employee benefits.

(xxi) Sundry Debtors:

No provision has been made for the bad and doubtful debts. The bad debts are charged to revenue in the year of, as and when they arise.

(xxii) Earnings Per Share:

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



For the purpose of calculation of Diluted Earnings per share, the net profit or loss for the period attributable to equity shareholders and the weighted average number of shares outstanding during the period are adjusted for the effect of all dilutive potential shares.

(xxiii) Cash & Cash Equivalents:

Cash and cash equivalents for the propose of cash flow statement comprise of cash in hand, cash at bank, fixed deposit, margin money deposit and short-term deposit in bank with original maturity of 12 months or less.



Note - 2 : SHARE CAPITAL

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
1.	AUTHORISED EQUITY SHARE CAPITAL 4,00,000 Equity Shares of Rs. 100/- each.	40,000,000	40,000,000
2.	ISSUED, SUBSCRIBED & PAID UP EQUITY SHARE CAPITAL 4,00,000 Equity Shares of Rs.100/- each, fully paid.	40,000,000	40,000,000
		40,000,000	40,000,000

3. Reconciliation of number of shares outstanding at the beginning & at the end of the reporting period

Particulars	As at 31st March 2020		As at 31st March 2019	
	No of Shares	Value Rs.	No of Shares	Value Rs.
-- At the beginning of the year	400,000	40,000,000	400,000	40,000,000
-- Movement during the period	-	-	-	-
-- Outstanding at the end of the period	400,000	40,000,000	400,000	40,000,000

4. Details of shares held by shareholders holding more than 5% of the aggregate shares in the Company

Name of the Shareholders	As at 31st March 2020		As at 31st March 2019	
	No of Shares	% of Holding	No of Shares	% of Holding
Shalin A Shah	100	0.01%	100	0.01%
Ashoka Metcast Ltd	399,900	99.99%	399,900	99.99%
Total	400,000	100%	400,000	100%

5. 3,99,900 shares are held by Ashoka Metcast Ltd. (Holding Company) as on 31.03.2020.

No Ordinary Shares have been reserved for issue under options and contracts/commitments for the sale of shares/disinvestment as at the Balance Sheet date.

No Ordinary Shares have been bought back by the Company during the period of 5 years preceding the date as at which the Balance sheet is prepared.

Note - 3 : RESERVES & SURPLUS

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
a	General Reserve		
	Balance brought forward from previous year	A	738,500
			738,500
b	Revaluation Reserve		
	Balance brought forward from previous year		18,605,585
	Add/(Less) : On account of Sale of Asset		(12,791,913)
	Closing Balance	B	5,813,672
c	Profit & Loss Account		
	Balance brought forward from previous year		(31,912,818)
	Add/(Less) : Net Profit/ (Net Loss) for the year		1,048,431
	Add DTL / DTA Adjusted for Previous years		(6,496,539)
	Surplus in the statement of Profit & Loss Account	C	(37,360,925)
	TOTAL	(A + B + C)	(30,808,753)
			(12,568,733)



Note - 4 : LONG TERM BORROWINGS

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
	UNSECURED LOAN		
	Loans & advances from related parties	154,170,370	109,840,000
	TOTAL	154,170,370	109,840,000

Terms of repayment for unsecured loans

To be repayable on demand

Note - 5: Deferred Tax Liability

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
I	Balance at the beginning	(1,383)	(5,684)
	Add/(Less) : On account of depreciation	1,110,299	4,301
	Add/(Less) : On account of current year losses	(748,336)	-
	Add / (Less) : Earlier Year DTA adjustment	6,496,539	-
	Balance at the end	6,857,119	(1,383)



Note - 6 : SHORT TERM BORROWINGS

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Loans Repayable on demand (Secured)		
	From Banks		
	Working Capital Loan	85,230,581	-
	TOTAL	85,230,581	-

Above Working Capital Loan are secured by hypothecation of Company's Stock and Receivables and Collateral Security of block of all fixed assets of company.
Moreso, the above working capital loan has been sanctioned on personal guarantees of Mr. Ashok Shah and Shalin Shah and corporate guarantee of Ashoka Metcast Ltd.

Note - 7 : Trade Payables

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Sundry Payables		
	Dues to micro and small enterprises	-	-
	Dues to Others	44,631,302	-
	TOTAL	44,631,302	-

Note:-

The Company do not have the details of MSME status of their creditors. Hence the company is unable to separate dues to SME and non SME and henceforth they have disclosed all the creditors under the status of non SME.

Note - 8 : OTHER CURRENT LIABILITIES

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Other Payables		
	Duties and Taxes	89,269	-
	Other Current Liability	1,150,000	647,621
	Advances from customers	100,000	-
	Creditor for Capital Goods		
	- Dues to micro and small enterprises		
	- Dues to Others	1,355,962	102,461
	Creditors for Expenses		
	- Dues to micro and small enterprises		
	- Dues to Others	1,893,571	-
	TOTAL	4,588,802	750,082

Note:-

The Company do not have the details of MSME status of their creditors. Hence the company is unable to separate dues to SME and non SME and henceforth they have disclosed all the creditors under the status of non SME.



NOTE - 10
PROPERTY PLANT & EQUIPMENT

ASSETS	GROSS BLOCK			DEPRECIATION BLOCK			NET BLOCK			
	AS ON 01/04/2019	ADDITION	DEDUCTION	AS ON 31/03/2020	DEPR. AS ON 01/04/2019	DEDUCTION	DEP. FOR THE YEAR	AS ON 31/03/2020	WDV 31/03/2020	WDV 31/03/2019
A. Tangible Assets										
Land	6,000,000			6,000,000	-				6,000,000	6,000,000
Building	2,656,426	21,881,147		24,537,573	-		370,576	370,576	24,166,997	2,656,426
Plant and Machinery	28,107,685	57,374,787	27,849,644	57,632,829	30,437		1,797,623	1,828,060	55,804,769	28,077,248
Office Equipment	-	51,794	-	51,794	-		6,467	6,467	45,327	-
Furniture and Fixtures	17,967	-	-	17,967	16,792		276	17,068	899	1,175
Computer	53,250	35,806	53,250	35,806	50,588	50,588	8,512	8,512	27,294	2,663
Electric Installations	402,771	2,669,667	-	3,072,438	115,522		158,608	274,131	2,798,307	287,249
Vehicles	807,071	-	5,420	801,651	115,060	5,420	80,822	190,462	611,189	692,011
Sub Total (A)	36,045,170	82,013,201	27,908,314	92,150,057	326,399	56,008	2,422,884	2,695,275	89,454,781	37,716,772
B. Capital Work In Progress										
Factory Building	13,961,178	3,908,615	17,767,793	-	-				-	13,961,178
Plant & Machinery	28,572,485	17,495,607	46,068,092	-	-				-	28,572,485
Electric Installation	1,981,369	237,210	2,218,579	-	-				-	1,981,369
Pre - Operating Exp. (To Be Capitalised)	6,451,622	3,234,151	9,685,773	-	-				-	6,451,622
Sub Total (B)	50,966,653	24,773,583	75,740,237	-	-	-	-	-	-	50,966,653
Current Year	89,011,823	106,786,784	103,648,551	92,150,057	326,399	56,008	2,422,884	2,695,275	89,454,781	88,683,425
Previous Year	44,077,910	48,167,169	3,233,256	89,011,823	211,854	-	116,545	328,399	88,683,425	43,866,056



Note - 9 : SHORT TERM PROVISIONS

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Others		
	Provision for Expenses	300,963	
	TOTAL	300,963	-

Note - 11 : NON CURRENT INVESTMENT

S.I.	Particulars	No. Of shares	No. Of shares	As at	As at
		31st March , 2020	31st March, 2019	31st March , 2020	31st March, 2019
i	Investment in Equity Shares (Non Trade)				
	Quoted				
	Others				
	Lesha Industries Ltd	545,940	54,594	2,101,850	2,101,850
	Ashnisha Industrles Ltd	145,584	145,584	3,287,509	3,287,509
	Gujarat Natural Resources Ltd	505,000	505,000	5,050,000	5,050,000
	TOTAL			10,439,359	10,439,359
	Market value of Quoted Investment			5,909,714	6,224,815

Note - 12 : LONG TERM LOANS & ADVANCES

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
	Unsecured		
i	Security Deposits	8,928,084	8,981,134
ii	Capital Advances	719,103	7,104,910
iii	Other loans and advances		
	Loan to staff	325,000	500,000
	Loan to others	9,181,473	7,789,000
	TOTAL	19,153,660	24,375,044

Note - 13 : Other Non Current Assets

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
I	Others		
	Deferred Revenue Expenditure	5,616,341	6,240,379
	Preliminary Expenses not written off	284,330	406,130
	TOTAL	5,900,671	6,646,509



Note - 14 : Inventories

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Raw Materials	46,298,353	-
ii	Work in Progress	839,821	-
iii	Finished goods	26,203,222	-
iv	Stores & Spares	1,813,410	-
v	Scrap	9,570,423	-
	TOTAL	84,725,229	-

Note - 15 : TRADE RECEIVABLES

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Outstanding for a period exceeding six months from its due date Unsecured, Considered Good :	-	-
ii	Others Unsecured, Considered Good :	73,204,436	-
	TOTAL	73,204,436	-

Note - 16 : CASH AND CASH EQUIVALENTS

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Balances with Banks - In Current Account	1,252,386	145,430
ii	Cash on hand Cash Balance	185,746	787,910
	TOTAL	1,438,131	933,340



Note - 17 : OTHER CURRENT ASSETS

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Balance with Revenue Authorities	17,345,675	6,527,365
ii	Others		
	Prepaid Expenses	118,919	13,097
	Other Receivables	858,211	401,826
	Advance to Suppliers	2,331,312	-
	TOTAL	20,654,117	6,942,288

Note - 18 : REVENUE FROM OPERATIONS

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Sale of Products	200,076,731	-
ii	Other Operating Revenue	7,042	-
	TOTAL	200,083,773	-

Note - 19 : OTHER INCOME

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
	Interest income	572,650	446,473
	Other non operating Income		
	Excess provision written off	25,220	1,350
	Balance written off	144,311	-
	TOTAL	742,181	447,823

Note - 20 : Cost of Material Consumed

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
I	Raw Materials		
	Opening Stock of Raw Materials	-	-
	Add: Purchase of Materials	239,463,013	-
	Less: Closing Stock of Raw Materials	46,298,353	-
	TOTAL	193,164,660	-

Note - 21 : CHANGE IN INVENTORIES OF STOCK IN TRADE, WORK IN PROCESS AND FINISHED GOODS

S.I.	Particulars	As at 31st March , 2020	As at 31st March, 2019
i	Opening Stock		
	Finished Goods	-	-
	WIP	-	-
ii	Closing stock		
	Finished Goods	26,203,222	-
	Work in process	839,821	-
	Scrap	9,570,423	-
	TOTAL	(36,613,466)	-



Note - 22 : EMPLOYEE BENEFIT COST

S.I.	Particulars	As at 31st March, 2020	As at 31st March, 2019
i	Salaries and bonus expenses	5,203,256	-
ii	Employee Welfare Expense	110,241	-
iii	Contribution to provident and other funds	40,697	-
	TOTAL	5,354,194	-

Note - 23 : FINANCE COST

S.I.	Particulars	As at 31st March, 2020	As at 31st March, 2019
i	Interest Expense		
	Working Capital Facility	2,958,963	-
		2,958,963	-
ii	Other Financial Cost		
	Bank Charges	9,810	6,530
	Other Processing & Related Expenses	25,960	-
		35,770	6,530
	TOTAL	2,994,733	6,530

Note - 24 : DEPRECIATION AND AMORTISATION EXPENSE

S.I.	Particulars	As at 31st March, 2020	As at 31st March, 2019
i	Depreciation	2,422,884	116,545
	TOTAL	2,422,884	116,545

Note - 25 : OTHER EXPENSES

S.I.	Particulars	As at 31st March, 2020	As at 31st March, 2019
i	Manufacturing Expenses		
	Stores & Spares Consumed	7,744,402	-
	Power & Fuel	11,118,377	-
	Wages to contractors	6,381,687	-
	Loading & Unloading Expense	77,396	-
	Material Handling Charges	1,180,126	-
	Roll Design Charges	111,100	-
	Miscellaneous manufacturing expense	404,248	-
		27,017,336	-
ii	Other Administrative and Selling Expense		
	Audit Fees	75,000	7,500
	Director Remuneration	200,000	-
	Donation	11,000	-
	Freight & Forwarding Charges	2,439,271	-
	Miscellaneous Expense	10,474	28,468
	Insurance Expense	95,866	-
	Printing & Stationery Expense	32,975	-
	Membership Fees	6,000	-
	Travelling expenses and Conveyance	125,616	15,515
	Legal & Professional Charges	351,040	-
	Loss on sale of asset	-	170,200
	Repair and Maintenance Expense	-	-
	Building	24,000	-
	Vehicle	11,433	-
	Plant & Machinery	65,050	-
	Others	182,653	-
	Preliminary Expenses written Off	121,800	121,800



Deferred Revenue Expenditure written off	624,038	-
Income Tax Exp	16,680	-
Rates & Taxes	134,925	13,445
Security Expense	401,726	-
Software Expense	5,000	-
Telephone & Internet Charges	50,031	-
Office Exp	87,076	-
Website Exp	3,564	-
	5,075,217	356,928
TOTAL	32,092,553	356,928



DISCLOSURE TO THE FINANCIAL STATEMENT FOR THE YEAR ENDED ON 31ST MARCH, 2020:

(i) Accounting for Taxes on Income:

- (a) Deferred tax assets/liabilities Charges/credit during the year given in Note "5" of the Balance Sheet.
- (b) The provision of current taxes has been made in the accounts as the taxable income computed as per Income Tax Act, 1961.

(ii) Related Party Disclosures:

During the year the company has entered into transactions with the related parties. Those transactions along with related balances as at the Balance Sheet date and for the year ended are presented in the following.

List of related parties with whom transaction have taken place during the year along with nature and volume of transactions.

Name of the person	Relation with the Company
Ashoka Metcast Ltd.	Holding Company
Shalin Shah	Director
Ashok Shah	Director

➤ **Transactions with the Related parties**

The transactions entered during the year with the above parties are tabulated as below and the same are at length's price.

Sl.	Nature of Transactions	Current Year	Previous Year
1	Remuneration	200000	
2	Loan Taken	45055370	800000
3	Loan Repaid	175000	1620000

(iii) Segmentation Reporting:

Primary Segment Reporting (Business Segment):

During the year company is in single business segments that is in manufacturing of TMT bars, hence the reporting on the primary business segment in pursuance to Accounting Standard No.17 issued by ICAI is not applicable.

Secondary Reporting (Geographical Segment):

Geographical environment in which company operates does not materially differ considering the political and economic environment, the type of customers, assets employed and the risk associated in respect of each of the geographical area. Hence the reporting on the secondary business segment in pursuance to accounting Standard No. 17 issued by ICAI is not applicable.



(iv) Earnings Per Share:

Particulars	2019-20	2018-19
Profit Available to Equity Share Holders (A)	10,48,431	(36,481)
Number of Equity Share at the beginning	4,00,000	4,00,000
Shares allotted during the year	-	-
Proportionate No. of Equity Shares (B)	4,00,000	4,00,000
Basic Earnings Per Share (A/B)	2.62	(0.09)
Potential Earnings (C)	10,48,431	(36,481)
Potential No. of Equity Shares (D)	4,00,000	4,00,000
Diluted Earnings Per share (C/D)	2.62	(0.09)

(v) World Health Organization (WHO) declared outbreak of Coronavirus Disease (COVID-19) a global pandemic on March 11, 2020. Consequent to this, Government of India declared lockdown as effective from March 25, 2020 and the Company temporarily suspended the operations and manufacturing activities in compliance with the lockdown instructions issued by the Central and State Governments. COVID-19 has impacted the normal business operations of the Company by way of interruption in production, supply chain disruption, unavailability of personnel, closure/lock down of production facilities etc. during the lock-down period which has been extended till May 31, 2020. However, the production and supply of goods has commenced as on 8th May 2020 after obtaining permissions from the appropriate government authorities. The Company has made assessment of its liquidity position for the financial year 2020-21 and the recoverability and carrying value of its assets comprising property, plant and equipment, intangible assets, right of use assets, investments, inventory and trade receivables. Based on current indicators of future economic conditions, the Company expects to recover the carrying amount of these assets. The situation is changing rapidly giving rise to inherent uncertainty around the extent and timing of the potential future impact of the COVID-19 which may be different from that estimated as on balance sheet date.

(vi) There are no contingent liabilities as on balance sheet date which needs to be disclosed more so there is no inflow or outflow of foreign currency during the financial year 2019-20.

(vii) Previous year figures have been regrouped and rearranged as and when required to bring uniformity in comparison with current year figures

For and on behalf of
M/s. SUNIL PODDAR & COMPANY
Chartered Accountants
Firm Reg. No. 110603W

[C.A. PANKAJ AGARWAL]
Partner
M. No. 443450



For and on behalf of
RHETAN ROLLING MILLS PRIVATE LIMITED

[SHALIN A SHAH]
Director
DIN :00297447

[ASHOK C SHAH]
Director
DIN :02467830

Place: Ahmedabad
Date: 30th July, 2020.
UDIN: 20443450AAAALN3957

Place: Ahmedabad
Date: 30th July, 2020.