

RHETAN ROLLING MILLS PRIVATE LIMITED

ANNUAL REPORT 2020-21

Regd. Office:

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

**Annual Report
2020 - 2021**

BOARD OF DIRECTORS	:	Mr. Shalin A. Shah Mr. Ashok C. Shah	Director 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** will be held at the registered office of the Company on Tuesday, 30th Day of November, 2021 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, 2021 including audited Balance Sheet as at 31st March, 2021 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.

SPECIAL BUSINESS:

2. 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 as detailed hereunder with following Related Parties as defined under the Act for purchase/sale of goods, services and/or any other business activities during the below mentioned financial years.

Name of related party	Maximum Amount of transaction/s	Financial Year	Type of transaction
Lesha Industries Limited	100 Crores	2022-23	purchase/sale of goods, services and/or any other business activities
Ashnisha Industries Limited	100 Crores	2022-23	purchase/sale of goods, services and/or any other business activities
Ashoka Metcast Limited	100 Crores	2022-23	purchase/sale of goods, services and/or any other business activities
Gujarat Natural Resources Limited	100 Crores	2022-23	purchase/sale of goods, services and/or any other business activities

“**RESOLVED FURTHER THAT**, Mr. Ashok C. Shah, Director and Mr. Shalin A. Shah, Director of the Company be and is hereby authorised, on behalf of the Company, 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.”



3. Split/Sub-Division Of Equity Shares Of The Company :

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

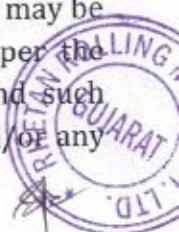
"RESOLVED THAT pursuant to the provisions of Section 61(1)(d), 64 and other applicable provisions, if any, of the Companies Act, 2013 read with the rules made thereunder [including any statutory modification(s) or re-enactment thereof, for the time being in force], the provisions of the Memorandum and Articles of Association of the Company and subject to such approvals and consents from appropriate authorities, the consent of the members of the Company be and is hereby accorded for split/sub-division of each equity share of face value of Rs. 100/- (Rupees Hundred only) each fully paid up into 10 (Ten) equity shares of face value of Rs. 10/- (Rupee Ten only) each fully paid up."

"RESOLVED FURTHER THAT pursuant to the split/sub-division of equity shares of the Company from face value of Rs. 100/- (Rupees Hundred only) each to face value of Rs. 10/- (Rupee Ten only) each, the existing Authorised and Paid-up Equity Share Capital of the Company as on the Record Date as may be decided by the Board shall stand sub-divided as given below:

Particulars	Pre Split/Sub-Division			Post Split/Sub-Division		
	No. of shares	Face Value (in Rs.)	Total Share Capital (in Rs.)	No. of Shares	Face Value (In Re.)	Total Share Capital (in Rs.)
Authorised Share Capital	11,40,000	100	11,40,00,000	1,14,00,000	10	11,40,00,000
Paid Up Share Capital	11,40,000	100	11,40,00,000	1,14,00,000	10	11,40,00,000

"RESOLVED FURTHER THAT upon the split/sub-division of the Equity Shares as aforesaid, the existing Share Certificate(s) in relation to the existing Equity Shares of the Face Value of Rs. 100/- each held in physical form, shall be deemed to have been automatically cancelled with effect from the Record Date and the Board be and is hereby authorised to recall the same from the shareholders, if necessary, and to issue new shares certificates in lieu thereof, with regard to sub-divided Equity Shares in accordance with the provisions of the Companies (Share Capital and Debentures) Rules, 2014 (as amended) and other applicable regulations as may be necessary in relation to the existing Equity Shares.

"RESOLVED FURTHER THAT Mr. Ashok Shah, and/or Mr. Shalin Shah, the Directors of the Company, be and are hereby Jointly/Severally authorized to do all such acts, deeds, matters and things as may be necessary in relation to the above including the matters incidental thereto and to execute all such documents, instruments and writings as may be required in this connection and to give effect to the aforesaid resolution as per the requirement of Companies Act, 2013 and subsequent amendments thereto and such other applicable provisions/ enactments and amendments from time to time and/or any



other relevant statutory authority, if any, cancellation or rectification of the existing physical share certificates in lieu of the old certificates and to settle any question or difficulty that may arise with regard to the split/sub-division of the Equity Shares as aforesaid or for any matters connected therewith or incidental thereto."

4. Alteration in Capital Clause of Memorandum Of Association In Connection With The Split/Sub-Division Of Equity Shares Of The Company.

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

"RESOLVED THAT pursuant to the provisions of Sections 13, 61, 64 and other applicable provisions, if any of the Companies Act, 2013 and the rules made thereunder (including any statutory modification(s) or re-enactment thereof for the time being in force), the approval of the members of the Company be and is hereby accorded for the amendment and substitution of the existing Clause V of the Memorandum of Association of the Company with the following new clause V:

"V. The Authorized Share Capital of the Company is Rs. 11,40,00,000 (Rupees Eleven Crores Forty Lakhs Only) divided into 1,14,00,000 (One Crores Fourteen Lakhs Only) Equity Shares of Rs. 10/- (Rupee Ten Only) each."

"RESOLVED FURTHER THAT Mr. Ashok Shah, and/or Mr. Shalin Shah, the Directors of the Company, be and are hereby Jointly/Severally authorized to do all such acts, deeds, matters and things as may be necessary in relation to the above including the matters incidental thereto and to execute all such documents, instruments and writings as may be required in this connection and, to give effect to the aforesaid resolution."

5. To Borrow Funds.

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

"RESOLVED THAT pursuant to Section 180(1)(c) and other applicable provisions, if any, of the Companies Act, 2013, as amended from time to time and rules made thereunder (including any statutory modification(s) or re-enactment thereof for the time being in force) the consent of the Company be and is hereby accorded to the Board of Directors of the Company for borrowing from time to time, any sum or sums of monies, which together with the monies already borrowed by the Company (apart from temporary loans obtained or to be obtained from the Company's bankers in the ordinary course of business), may exceed the aggregate of the paid-up capital of the Company and its free reserves, that is to say, reserves not set apart for any specific purpose, provided that the total outstanding amount so borrowed shall not at any time exceed the limit of Rs. 100 Crores."

"RESOLVED FURTHER THAT the Board be and is hereby authorized and empowered to arrange or settle the terms and conditions on which all such monies are to be borrowed



from time to time as to interest, repayment, security or otherwise howsoever as it may think fit and to do all such acts, deeds and things, to execute all such documents, instruments and writings as may be required."

6. Conversion Of Loan Into Equity Share Capital

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

"RESOLVED THAT pursuant to Section 62(3) and other applicable provisions, if any, of the Companies Act, 2013 and Rules made there under and subject to all such approvals, permissions or sanctions as may be necessary and subject to such condition(s) and modification(s) as may be prescribed or imposed, while granting such approval(s), permission(s) or sanction(s) which may be agreed to by the Board of Directors of the Company (hereinafter referred to as "the Board") the consent of the Members be and is hereby accorded to the Board in respect of the financial assistance to be extended by the parties not exceeding Rs. 30 Crores, such that upon exercise of an option provided under the financial arrangements, parties at its option may be able to convert the outstanding facility or part thereof to ordinary Equity Shares in the Company at such price as may be mutually agreed upon between such parties and management and upon such terms and conditions of such financial assistance or as deemed appropriate by the Board and in accordance with the following conditions:

- i. the conversion right reserved as aforesaid may be exercised by the parties on one or more occasions during the currency of the Financial Assistances;
- ii. on receipt of the Notice of Conversion, the Company shall, subject to the provisions of the financing documents, allot and issue the requisite number of fully paid-up equity shares to the parties extending financial assistance as from the date of conversion and the parties may accept the same in satisfaction of the part of the loans so converted;
- iii. Upon such conversion, the repayment installments of the loan payable after the date of conversion as per the financing documents shall stand reduced proportionately by the amounts of the loan so converted. The equity shares so allotted and issued to the parties shall carry, from the date of conversion, the right to receive proportionately the dividends and other distributions declared or to be declared in respect of the equity capital of the Company. Save as aforesaid, the said shares shall rank *pari passu* with the existing equity shares of the Company in all respects.

"RESOLVED FURTHER THAT on receipt of the notice of conversion, the Board be and is hereby authorized to do all such acts, deeds and things as the Board may deem necessary and shall allot and issue the requisite number of fully paid-up ordinary Equity Shares in the Company to such parties.'

"RESOLVED FURTHER THAT for the purpose of giving effect to this resolution, the Board, be and is hereby authorised to do all such acts, deeds, matters and things, as it may in its absolute discretion deem necessary, proper or desirable as may be required to create, offer, issue and allot the aforesaid shares and to resolve and settle any question, difficulty or doubt that may arise in this regard and to do all such other acts, deeds, matters and things in connection or incidental thereto as the Board in its absolute discretion may deem fit, without being required to seek any further consent or approval



of the members or otherwise to the end and intent that they shall be deemed to have given their approval thereto expressly by the authority of this resolution."

"RESOLVED FURTHER THAT the Board be and is hereby authorized to delegate all or any of the powers herein conferred by this Resolution to any Director or Directors or any other executive(s) or officer(s) of the Company to give effect to the aforesaid Resolution."

Place: Ahmedabad
Date: October 04, 2021

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. 2 OF THE NOTICE: APPROVAL OF RELATED PARTY TRANSACTION.

The Board of Directors of the Company, at their meeting held on October 4, 2021, has approved a proposal for entering into following related party transactions:

Name of Related Party	1. Lesha Industries Limited 2. Ashnisha Industries Limited 3. Ashoka Metcast Limited 4. Gujarat Natural Resources Limited
Name of Related Director or KMP	Mr. Ashok C. Shah, Mr. Shalin A. Shah
Nature of relationship	Mr. Ashok C. Shah, Director of the Company is also Director of Ashoka Metcast Limited and Gujarat Natural Resources Limited and Managing Director of Lesha Industries Limited and Ashnisha Industries Limited. Mr. Shalin A. Shah, Director of the Company is also Director of Lesha Industries Limited and Ashnisha Industries Limited and Managing Director of Ashoka Metcast Limited and Gujarat Natural Resources Limited. Mr. Ashok C. Shah and Mr. Shalin A. Shah, Directors of the Company are Promoters of Lesha Industries Limited, Ashnisha Industries Limited, Ashoka Metcast Limited and Gujarat Natural Resources Limited.
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 the financial year 2022-23 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. 2 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. 3 OF THE NOTICE: SPLIT/SUB-DIVISION OF EQUITY SHARES OF THE COMPANY.

In order to improve the liquidity of Equity Shares of the Company, the Board of Directors of the Company ("Board"), at its Meeting held on October 4, 2021, have proposed the split/sub-division of each Equity Share having a face value of Rs. 100/- each into 10 Equity Shares of the face value of Rs. 10/- each, subject to the approval of members and all authorities concerned.

As per the provisions of Section 61, 64 and all other applicable provisions, if any, of the Companies Act, 2013 (including any statutory modification(s) or re-enactment thereof, for the time being in force), approval of the Members is required for such split/subdivision of shares.

Accordingly, your directors recommend the resolution at Item No. 3 for approval as Ordinary 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: ALTERATION IN CAPITAL CLAUSE OF MEMORANDUM OF ASSOCIATION IN CONNECTION WITH THE SPLIT/SUB-DIVISION OF EQUITY SHARES OF THE COMPANY.

The proposed split/sub-division of face value of equity shares of the Company requires alteration to the Capital Clause (Clause V) of the Memorandum of Association of the Company. In view of this Clause V of Memorandum of Association is proposed to be altered and substituted with the new clause V as mentioned in Item No. 4 of this Notice.

As per the provisions of Section 13, 61, 64 and other applicable provisions of the Companies Act, 2013 and the rules made thereunder (including any statutory modification(s) or re-enactment thereof for the time being in force), approval of the Members is required for such amendment to the Memorandum of Association.

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

A copy of the proposed set of new Memorandum of Association of the Company (MOA) would be available for inspection for the members at the Registered Office of the Company during the office hours on any working day, except Saturday and Sunday, between 11:00 a.m. to 1:00 p.m.

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: TO BORROW FUNDS.

As per Section 180 (1) (c) of the Companies Act, 2013, borrowings (apart from temporary loans obtained from the Company's bankers in ordinary course of business) by the Company beyond the aggregate of the paid up capital of the company and its free reserve requires approval from the shareholders of the Company. Keeping in view of enhanced requirement of loan and also the legal requirement that Section 180(1) of the Companies Act, 2013 provides that the Board of Directors of a company shall exercise the said power only with the consent of the Company by a special resolution. Hence, the Special Resolution at Item No. 5 for authorizing the Board of Directors to borrow monies (apart from temporary loans obtained or to be obtained from the Company's bankers in the ordinary course of business) from time to time on behalf of the Company not exceeding Rs.100 Crores is intended for this purpose.

In view of this context Board recommends the resolution for the acceptance by the members.

None of the directors of the company is interested in the resolution except in the capacity as a member

ITEM NO. 6 OF THE NOTICE: CONVERSION OF LOAN INTO EQUITY SHARE CAPITAL

To meet funding requirements towards proposed capital expenditures, operational expenditure and working capital with respect to the projects to be undertaken by the Company and for general corporate purposes, the Company will avail financial assistance by way of Corporate Loans etc., from time to time from various parties upon such terms and conditions stipulated by them and approved by the Board.

The terms of sanction provides that upon exercise of an option provided under these arrangements the parties may be entitled to exercise the option to convert whole or part of their outstanding facility into fully paid up ordinary Equity Shares of the Company.

The proposed resolution is an enabling resolution under the provisions of the Section 62(3) and other applicable provisions of the Companies Act, 2013 in view of the fact that under the financial arrangements, the parties do insist for inclusion of an option to convert the outstanding facility into Equity upon exercise of an option provided under the arrangements in the facility agreements.

Allotment of Equity Shares as above requires prior approval of the Members by way of Special Resolution. Hence this enabling resolution.

The Board of Directors accordingly recommends the Special Resolution set out at Item No. 6 of the Notice for the approval of the Members.

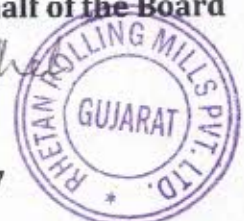
None of the directors of the company is interested in the resolution except in the capacity as a member.

Place: Ahmedabad

Date: October 04, 2021

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, 2021 and Profit & Loss Statement for the year ended on 31st March, 2021.

1. FINANCIAL PERFORMANCE:

(Amount in Rs.)

Particulars	2020-21	2019-20
Total Revenue	52,13,01,488	20,08,25,954
Total Expenditure	51,95,07,746	19,94,15,559
Profit/(Loss) before Extraordinary Item and Tax	17,93,742	14,10,395
Extraordinary Item	-	-
Profit/(Loss) before Tax	17,93,742	14,10,395
Provision for Tax	0	0
Deferred tax expense (revenue)	4,58,945	3,61,963
Profit/(Loss) after Tax	13,34,797	10,48,431

2. PERFORMANCE OVERVIEW:

The Company has earned profit of Rs. 13, 34,797 during the Financial Year 2020-21 as compared to profit of Rs. 10, 48,431 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:

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.

There were no other 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.

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 that:

- a) in the preparation of the annual accounts, the applicable accounting standards had been followed along with proper explanation relating to material departures;
- b) 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 at the end of the financial year 31st March, 2021 and of the profit and loss of the company for that period;
- c) 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;
- d) the Directors had prepared the annual accounts on a going concern basis; and
- e) 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 7 (seven) times during the financial year under review.

Sr. No.	Date of Board Meeting	Name of Directors attended the meeting	
1	14.04.2020	Shalin A. Shah	Ashok C. Shah
2	02.06.2020	Shalin A. Shah	Ashok C. Shah
3	30.09.2020	Shalin A. Shah	Ashok C. Shah
4	12.10.2020	Shalin A. Shah	Ashok C. Shah
5	10.11.2020	Shalin A. Shah	Ashok C. Shah
6	08.02.2021	Shalin A. Shah	Ashok C. Shah
7	11.03.2021	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 the Annual General Meeting held on 31/12/2020 had appointed M/s. Sunil Poddar & Co. (FRN: 110603W), Chartered Accountants, Ahmedabad, as Statutory Auditors of the Company for a term of 5 years to hold office from 2020 till the conclusion of the Annual General Meeting to be held in 2025.

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 proactive 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. WEB LINK OF ANNUAL RETURN, IF ANY

The Company is having website <http://rhetan.com/> and annual return of Company has been published on such website.

23. 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.

24. 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.

25. 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.

26. 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.



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. ACKNOWLEDGEMENT:

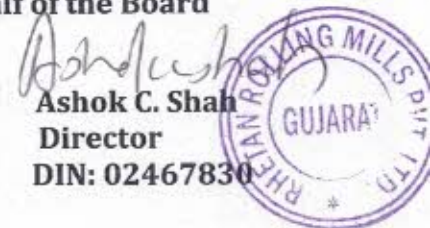
Your Directors wish to place on record their sincere appreciation to the Customers, Employees, Suppliers, Professionals, and Bankers to the Company for their Cooperation and contribution in the affairs of the Company.

Place: Ahmedabad
Date: October 04, 2021

For and on behalf of the Board



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



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

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:

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	-



RHETAN ROLLING MILLS PRIVATE LIMITED.

AUDIT REPORT

FINANCIAL YEAR 2020 – 2021

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 the 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 2021, the statement of profit and loss, and cash flow statement for the year ended, and a summary of significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the 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 2021, and profit and its cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit of the financial statements 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.

Information Other than the Financial Statements and Auditors' Report Thereon

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

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

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

Responsibilities of Management for the Financial Statements

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

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

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional scepticism 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 and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw



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

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

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the Financial Statements for the financial year ended March 31, 2021. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by 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 and 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 (Accounting Standards) Rules 2015 as amended.
 - (e) on the basis of the written representations received from the directors as on 31 March 2021 taken on record by the Board of Directors, none of the directors is disqualified as on 31 March 2021 from being appointed as a director in terms of Section 164 (2) of the Act;
 - (f) with respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate report in "Annexure B"; and



(g) In our opinion, the managerial remuneration for the year ended March 31, 2021 has been paid / provided by the Company to its directors in accordance with the provisions of Section 197 read with Schedule V to the Act;

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

- i. *The Company 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.



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

[CA PANKAJ AGARWAL]

Partner

M. No. 443450

PLACE : AHMEDABAD

DATE : 30/06/2021

UDIN : 21443450AAAAPV2744

Annexure - A to the Independent Auditors' Report

The Annexure referred to in Independent Auditors' Report to the members of the Company on the financial statements for the year ended 31 March 2021, 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) The stock of Inventories has been physically verified by the management at reasonable intervals commensurate with size and nature of the business.

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.

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) According to the information and explanations given to us, the Company has not granted any loans, secured or unsecured to companies, firms, Limited Liability Partnerships or other parties covered in the register maintained under Section 189 of the Act. Accordingly, the provisions of clause 3(iii) (a), (b) and (c) of the Order are not applicable to the Company and hence not commented upon.
- (iii) In our opinion and according to the information and explanations provided to us, the Company has not granted any loans or provided any guarantees or security to the parties covered under Section 185 of the Act. The Company has not complied with the provisions of Section 186(7) of the Act in respect of investments made or loans or guarantee or security provided to the parties covered under Section 186 of the Act.

Details of the same are as under:

Total no. of parties	:	13
Balance outstanding as on 31.03.2021	:	Rs. 1,73,84,312

- (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 2021 for a period of more than six months from the date they became payable except Professional Tax amounting Rs. 12650.
- (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 for the purpose of reporting the true and fair view of the Financial Statements and according to the information and explanations provided by the management, we report that no fraud by the Company or no material fraud on the Company by the officers and employees of the Company has been noticed or reported during the year.
- (xi) According to the information and explanations give to us and based on our examination of the records of the Company, the Company has paid/provided for managerial remuneration in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Companies Act 2013.
- (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 provided by the management, transactions with the related parties are in compliance with Section 177 and 188 of the Act where applicable and the details have been disclosed in the financial statements, as required by the applicable accounting standards.
- (xiv) According to the information and explanations provided to us and on an overall examination of the balance sheet, the Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review and hence, reporting requirements under clause 3(xiv) of the Order are not applicable to the Company and, not commented upon.



- (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) According to the information and explanations provided to us, the provisions of Section 45-IA of the Reserve Bank of India Act, 1934 are not applicable to the Company.

FOR, SUNIL PODDAR & CO.

Chartered Accountants

Firm Reg. No 110603W



[CA PANKAJ AGARWAL]

Partner

M. No. 443450

PLACE : AHMEDABAD

DATE : 30.06.2021

UDIN : 21443450AAAAPV2744

Annexure - B to Independent Auditors' Report of even date on the financial statement of the Rhetan Rolling Mills Private Limited

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

We have audited the internal financial controls over financial reporting of Rhetan Rolling Mills Private Limited ("the Company") as of 31 March 2021 in conjunction with our audit of the financial statements of the Company for the year ended on that date.

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 with reference to these financial statements.

Meaning of Internal Financial Controls Over Financial Reporting with reference to these Financial Statements

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



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

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

Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

Opinion

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

PLACE : AHMEDABAD
DATE : 30.06.2021
UDIN : 21443450AAAAPV2744



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


[CA PANKAJ AGARWAL]

Partner
M. No. 443450

RHETAN ROLLING MILLS PRIVATE LIMITED
STANDALONE BALANCE SHEET AS AT 31ST MARCH , 2021

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	11,40,00,000	4,00,00,000
(b) Reserves and Surplus	3	(2,94,73,956)	(3,08,08,753)
2 Share application pending for allotment		-	-
3 Non-current Liabilities			
(a) Long-term borrowings	4	14,87,78,849	15,41,70,370
(b) Deferred Tax liabilities (Net)	5	73,16,064	68,57,119
(c) Other Non Current Liabilities		-	-
(d) Long term provisions		-	-
4 Current Liabilities			
(a) Short-Term Borrowings	6	10,07,71,730	8,52,30,581
(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		3,60,44,047	4,46,31,302
(c) Other Current Liabilities	8	2,01,64,322	45,88,802
(d) Short term provisions	9	6,26,184	3,00,963
Total Equity & Liabilities		39,82,27,239	30,49,70,384
II. ASSETS			
1 Non-current Assets			
(a) Property Plant and Equipment	10		
Tangible Assets		8,64,44,762	8,94,54,781
Capital Work in Progress		-	-
(b) Non Current Investments	11	1,04,39,359	1,04,39,359
(c) Deferred Tax Assets (Net)		-	-
(d) Long-term loans and advances	12	2,63,23,396	1,91,53,660
(e) Other Non Current Assets	13	45,30,795	59,00,671
2 Current Assets			
(a) Current Investments			
(b) Inventories	14	11,57,94,700	8,47,25,229
(c) Trade Receivables	15	14,02,95,374	7,32,04,436
(d) Cash and cash equivalents	16	18,59,005	14,38,131
(e) Short Term Loans and Advances		-	-
(f) Other Current Assets	17	1,25,39,848	2,06,54,117
Total Assets		39,82,27,239	30,49,70,383

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



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

PLACE: Ahmedabad
DATE: 30/06/2021
UDIN :21443450AAAAPV2744

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

[Signature] *[Signature]*
SHALIN A SHAH ASHOK C SHAH
DIRECTOR DIRECTOR
DIN: 00297447 DIN: 02467830

RHETAN ROLLING MILLS PRIVATE LIMITED

STANDALONE STATEMENT OF PROFIT AND LOSS FOR THE YEAR ENDED 31ST MARCH, 2021

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	52,08,89,569	20,00,83,773
III Other Income	19	4,11,920	7,42,181
III Total Revenue (I + II)		52,13,01,488	20,08,25,954
IV Expenses			
Cost of Material Consumed	20	47,40,41,981	19,31,64,660
Purchase of Stock in Trade		-	-
Change in inventories of Finished Goods and WIP	21	(4,06,62,606)	(3,66,13,466)
Employee Benefit Cost	22	1,13,93,842	53,54,194
Finance Costs	23	97,97,017	29,94,733
Depreciation and Amortisation Expense	24	48,29,779	25,44,684
Other Expenses	25	6,01,07,734	3,19,70,753
Total Expenses (IV)		51,95,07,746	19,94,15,559
V Profit before exceptional and extraordinary items and tax (III - IV)		17,93,742	14,10,395
VI Exceptional Items		-	-
VII Profit before extra ordinary items and tax (V-VI)		17,93,742	14,10,395
VIII Extra ordinary Items		-	-
IX Profit/(Loss) before tax (VII-VIII)		17,93,742	14,10,395
X Tax Expense :			
(1) Current Tax		-	-
(2) Deferred Tax		4,58,945	3,61,963
(3) MAT Credit Entitlement		-	-
XI Profit (Loss) for the period from continuing operations (VII-VIII)		13,34,797	10,48,431
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)		13,34,797	10,48,431
X Earning Per Share:			
- Basic		1.74	2.62
- Diluted		1.74	2.62

NOTES TO ACCOUNTS

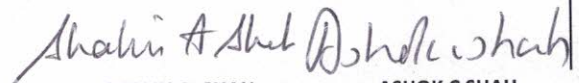
Notes referred to above and notes attached there to form an integral part of Profit & Loss Statement
This is the Profit & Loss Statement referred to in our Report of even date.

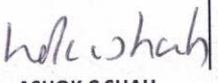
FOR AND ON BEHALF OF
SUNIL PODDAR & CO.
CHARTERED ACCOUNTANTS
FIRM REG. NO.:110603W


[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: 30/06/2021
UDIN :21443450AAAAPV2744

RHETAN ROLLING MILLS PRIVATE LIMITED

STANDALONE CASH FLOW STATEMENT FOR THE YEAR ENDED ON 31ST MARCH, 2021

PARTICULARS	2020-21	2019-20
A. CASH FLOWS FROM OPERATING ACTIVITIES :		
Net Profit before tax as per Profit & Loss Account	17,93,742	14,10,395
Adjustment for :		
Depreciation	47,07,979	24,22,884
Finance Cost	97,97,017	-
Interest Income	(4,11,920)	(5,72,650)
Preliminary Expenses Written Off	13,69,876	7,45,838
	1,54,62,951	25,96,072
Operating Profit before Working Capital Changes	1,72,56,693	40,06,467
Working Capital Changes		
Adjustment for		
Trade Payables	(85,87,255)	4,46,31,302
Inventories	(3,10,69,471)	(8,47,25,229)
Trade Receivables	(6,70,90,938)	(7,32,04,436)
Other current Assets	81,14,268	(1,37,11,828)
Other Current Liabilities	1,55,75,519	38,38,720
Other Non Current Liabilities	3,25,221	3,00,963
Net Changes in Working Capital	(8,27,32,655)	(12,28,70,508)
Cash Generated from operations	(6,54,75,962)	(11,88,64,041)
Cash Flow from Exceptional Claim	-	-
Direct Tax Paid During the Year (Net off Refund Received)	-	-
NET CASH FROM OPERATING ACTIVITIES	(6,54,75,962)	(11,88,64,041)
B. CASH FLOWS FROM INVESTING ACTIVITIES :		
Dividend Income	-	-
Other Investments	-	-
Sale of Property Plant & Equipment		9,08,00,631
Purchase of Property Plant & Equipment	(16,97,959)	(10,67,86,784)
NET CASH FLOW FROM IN INVESTING ACTIVITIES	(16,97,959)	(1,59,86,153)
CASH FLOWS FROM FINANCING ACTIVITIES :		
Interest Income	4,11,920	5,72,650
Proceed from Short term borrowings	1,55,41,149	8,52,30,581
Short Term Loan And Advances	(71,69,736)	52,21,384
Issue of Share Capital	7,40,00,000	
Finance Cost	(97,97,017)	
Proceed from Unsecured Loan	(53,91,521)	4,43,30,370
NET CASH FROM FINANCING ACTIVITIES	6,75,94,795	13,53,54,986
NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS	4,20,874	5,04,791
CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE YEAR	14,38,131	9,33,340
CASH AND CASH EQUIVALENTS AT THE CLOSE OF THE YEAR	18,59,005	14,38,131

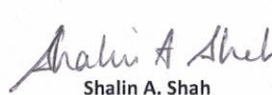
FOR AND ON BEHALF OF
SUNIL PODDAR & CO.
CHARTERED ACCOUNTANTS
FIRM REG. NO.:110603W



[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: 30/06/2021
UDIN :21443450AAAAPV2744

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 First in First out 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.



RHETAN ROLLING MILLS PRIVATE LIMITED

Note - 2 : SHARE CAPITAL

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
1.	AUTHORISED EQUITY SHARE CAPITAL 11,40,000 (4,00,000) Equity Shares of Rs. 100/- each.	11,40,00,000	4,00,00,000
2.	ISSUED, SUBSCRIBED & PAID UP EQUITY SHARE CAPITAL 11,40,000(4,00,000) Equity Shares of Rs.100/- each, fully paid.	11,40,00,000	4,00,00,000
	Total	11,40,00,000	4,00,00,000

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

Particulars	As at 31st March 2021		As at 31st March 2020	
	No of Shares	Value Rs.	No of Shares	Value Rs.
At the beginning of the year	4,00,000	4,00,00,000	4,00,000	4,00,00,000
Movement during the period	7,40,000	7,40,00,000	-	-
Outstanding at the end of the period	11,40,000	11,40,00,000	4,00,000	4,00,00,000

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 2021		As at 31st March 2020	
	No of Shares	% of Holding	No of Shares	% of Holding
Shalin A Shah	100	0.00%	100	0.00%
Ashoka Metcast Ltd	11,39,900	99.99%	3,99,900	99.99%
Total	11,40,000	100%	4,00,000	100%

11,39,900 shares are held by Ashoka Metcast Ltd. (Holding Company) as on 31.03.2021.

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

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
a	General Reserve Balance brought forward from previous year A	7,38,500	7,38,500
b	Revaluation Reserve Balance brought forward from previous year Add/(Less) : On account of Sale of Asset Closing Balance B	58,13,672 - 58,13,672	1,86,05,585 (1,27,91,913) 58,13,672
C	Profit & Loss Account Balance brought forward from previous year Add/(Less) : Net Profit/ (Net Loss) for the year Add DTL / DTA Adjusted for Previous years Surplus in the statement of Profit & Loss Account C	(3,73,60,925) 13,34,797 - (3,60,26,128)	(3,19,12,818) 10,48,431 (64,96,539) (3,73,60,925)
	Total	(2,94,73,956)	(3,08,08,753)



Note - 4 : LONG TERM BORROWINGS

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
	SECURED LOAN		
	Term Loan	1,19,07,730	-
	UNSECURED LOAN		
	Loans & advances from related parties	9,81,73,370	15,41,70,370
	Inter Coporate Borrowings	3,86,97,749	-
	Total	14,87,78,849	15,41,70,370

Terms of repayment for unsecured loans

To be repayable on demand

Terms of repayment for secured loans

GECL 1	To be repayable in 36 Instalments of Rs. 2,75,873/- commencing from July, 2021.
GECL 2	To be repayable in 36 Instalments of Rs. 1,43,977/- commencing from November, 2021.

Details of Security :

Term Loans :

Primary Security : Extension of charge on entire present and future current assets of the company.

Moreso, the above secured loan has been sanctioned on personal guarantees of Mr. Ashok Shah and Shalin Shah and corporate guarantee of Ashoka Metcast Ltd.

Note : Out of the above loan amount outstandings Installments falling due during 01.04.2020 to 31.03.2021 have been grouped under "Current Maturities of Long Term Debt".

Note - 5: Deferred Tax Liability

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Balance at the beginning	68,57,119	(1,383)
	Add/(Less) : On account of depreciation	3,70,381	11,10,299
	Add/(Less) : On account of losses	88,563	(7,48,336)
	Add / (Less) : Earlier Year DTA adjustment	-	64,96,539
	Total	73,16,064	68,57,119

Note - 6 : SHORT TERM BORROWINGS

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Loans Repayable on demand (Secured)		
	From Banks		
	Working Capital Loan	10,07,71,730	8,52,30,581
	Total	10,07,71,730	8,52,30,581

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

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Sundry Payables		
	Dues to micro and small enterprises	-	-
	Dues to Others	3,60,44,047	4,46,31,302
	Total	3,60,44,047	4,46,31,302

Note:-

Disclosure under the Micro, Small and Medium Enterprises Development Act, 2006 are provided as under for the year 2018-19, to the extent the company has received intimation from the "Suppliers" regarding their status under the Act.

a.	Principal and interest amount remaining unpaid	-	-
b.	Interest due thereon remaining unpaid	-	-
c.	Interest paid by the company in terms of section 16 of the Micro, Small and Medium enterprise Development Act, 2006, along with the amount of the payment made to the supplier beyond the appointed day	-	-
d.	Interest due and payable for the period of delay in making payment (which have been paid but beyond the appointed day during the period) but without adding interest specified under the Macro, Small and Medium Enterprise Act, 2006	-	-
e.	Interest accrued and remaining unpaid	-	-
f.	Interest remaining due and payable even in the succeeding years, until such date when the interest dues as above are actually paid to the small enterprises	-	-

Moreso, company has not provided interest to the parties to whom payment has been made after the specified period (i.e. 45 days).

Note - 8 : OTHER CURRENT LIABILITIES

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Other Payables		
	Current Maturities of Long Term Debts	46,70,573	-
	Interest Accrued and due on Borrowings	96,912	-
	Duties and Taxes	1,84,621	89,269
	Other Current Liability	10,00,000	11,50,000
	Advances from customers	51,06,694	1,00,000
	Creditor for Capital Goods		
	- Dues to micro and small enterprises	-	-
	- Dues to Others	9,76,411	13,55,962
	Creditors for Expenses		
	- Dues to micro and small enterprises	3,12,162	-
	- Dues to Others	78,16,948	18,93,571
	Total	2,01,64,322	45,88,802



Note:-

Note:-

Disclosure under the Micro, Small and Medium Enterprises Development Act, 2006 are provided as under for the year 2018-19, to the extent the company has received intimation from the "Suppliers" regarding their status under the Act.

a.	Principal and interest amount remaining unpaid	3,12,162	-
b.	Interest due thereon remaining unpaid	-	-
c.	Interest paid by the company in terms of section 16 of the Micro, Small and Medium enterprise Development Act, 2006, along with the amount of the payment made to the supplier beyond the appointed day	-	-
d.	Interest due and payable for the period of delay in making payment (which have been paid but beyond the appointed day during the period) but without adding interest specified under the Macro, Small and Medium Enterprise Act, 2006	-	-
e.	Interest accrued and remaining unpaid	-	-
f.	Interest remaining due and payable even in the succeeding years, until such date when the interest dues as above are actually paid to the small enterprises	-	-

Moreso, company has not provided interest to the parties to whom payment has been made after the specified period (i.e. 45 days).

Note - 9 : SHORT TERM PROVISIONS

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Others Provision for Expenses	6,26,184	3,00,963
	Total	6,26,184	3,00,963



NOTE - 10
PROPERTY PLANT & EQUIPMENT

ASSETS	GROSS BLOCK			DEPRECIATION BLOCK			NET BLOCK			
	AS ON 01/04/2020	ADDITION	DEDUCTION	AS ON 31/03/2021	DEPR. AS ON 01/04/2020	DEDUCTION	DEP. FOR THE YEAR	AS ON 31/03/2021	WDV 31/03/2021	WDV 31/03/2020
A. Tangible Assets										
Land	60,00,000			60,00,000					60,00,000	60,00,000
Building	2,45,37,573	2,06,503	-	2,47,44,076	3,70,576	-	7,68,782	11,39,358	2,36,04,719	2,41,66,997
Plant and Machinery	5,76,32,829	14,51,456	-	5,90,84,285	18,28,060	-	35,81,451	54,09,510	5,36,74,774	5,58,04,769
Office Equipment	51,794	40,000	-	91,794	6,467	-	8,612	15,079	76,715	45,327
Furniture and Fixtures	17,967	-	-	17,967	17,069	-	-	17,069	898	898
Computer	35,806	-	-	35,806	8,512	-	8,643	17,155	18,651	27,294
Electric Installations	30,72,438	-	-	30,72,438	2,74,131	-	2,67,151	5,41,282	25,31,156	27,98,306
Vehicles	8,01,651	-	-	8,01,651	1,90,462	-	73,340	2,63,802	5,37,849	6,11,189
Sub Total (A)	9,21,50,057	16,97,959	-	9,38,48,016	26,95,276	-	47,07,979	74,03,255	8,64,44,762	8,94,54,781
B. Capital Work In Progress										
Factory Building	-	48,858	48,858	-	-	-	-	-	-	-
Sub Total (B)	-	48,858	48,858	-	-	-	-	-	-	-
Current Year Grand Total (A+B)	9,21,50,057	17,46,817	48,858	9,38,48,016	26,95,276	-	47,07,979	74,03,255	8,64,44,762	8,94,54,781
Previous Year Grand Total	4,40,77,910	4,81,67,169	32,33,256	8,90,11,823	2,11,854	-	1,16,545	3,28,399	8,86,83,425	4,38,66,056



Note - 11 : NON CURRENT INVESTMENT

Sr. No	Particulars	No. Of shares	No. Of shares	As at	As at
		31st March , 2021	31st March , 2020	31st March , 2021	31st March , 2020
i	Investment in Equity Shares (Non Trade)				
	Quoted				
	Others				
	Lesha Industries Ltd	5,45,940	5,45,940	21,01,850	21,01,850
	Ashnisha Industries Ltd	1,45,584	1,45,584	32,87,509	32,87,509
	Gujarat Natural Resources Ltd	5,05,000	5,05,000	50,50,000	50,50,000
	Total			1,04,39,359	1,04,39,359

Market value of Quoted Investment

76,65,705

59,09,714

Note - 12 : LONG TERM LOANS & ADVANCES

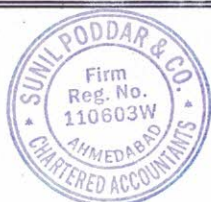
Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
	Unsecured , considered good		
i	Security Deposits	89,29,084	89,28,084
ii	Capital Advances	-	7,19,103
iii	Other loans and advances		
	Loan to staff	10,000	3,25,000
	Loan to others	1,73,84,312	91,81,473
	Total	2,63,23,396	1,91,53,660

Note - 13 : Other Non Current Assets

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Others		
	Deferred Revenue Expenditure	43,68,265	56,16,341
	Preliminary Expenses		
	Written Down Balance	2,84,330	4,06,130
	Less : Written off during the year	1,21,800	1,21,800
		1,62,530	2,84,330
	Total	45,30,795	59,00,671

Note - 14 : Inventories

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Raw Materials	3,45,66,401	4,62,98,353
ii	Work in Progress	9,58,650	8,39,821
iii	Finished goods	7,63,17,421	2,62,03,222
iv	Stores , Spares & Consumables	39,52,227	18,13,410
v	Scrap	-	95,70,423
	Total	11,57,94,700	8,47,25,229



Note - 15 : TRADE RECEIVABLES

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Outstanding for a period exceeding six months from its due date Unsecured, Considered Good :	1,25,47,509	-
ii	Others Unsecured, Considered Good :	12,77,47,865	7,32,04,436
	Total	14,02,95,374	7,32,04,436

Note - 16 : CASH AND CASH EQUIVALENTS

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Balances with Banks	13,23,690	-
	(a) Earmarked Funds	1,50,350	12,52,386
	(b) Unearmarked Funds		
ii	Cash on hand Cash Balance	3,84,965	1,85,746
	Total	18,59,005	14,38,131

Note - 17 : OTHER CURRENT ASSETS

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Balance with Revenue Authorities	1,08,78,493	1,73,45,675
ii	Others		
	Prepaid Expenses	5,62,915	1,18,919
	Advance to Suppliers	-	23,31,312
	Other Assets	10,98,441	8,58,211
	Total	1,25,39,848	2,06,54,117



Note - 18 : REVENUE FROM OPERATIONS

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Sale of Products	52,08,89,569	20,00,76,731
ii	Other Operating Revenue	-	7,042
	Total	52,08,89,569	20,00,83,773

Note - 19 : OTHER INCOME

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
	Interest income	4,11,920	5,72,650
	Other non operating Income		
	Excess provision written off	-	25,220
	Balance written off	-	1,44,311
	Total	4,11,920	7,42,181

Note - 20 : Cost of Material Consumed

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Raw Materials		
	Opening Stock of Raw Materials	4,62,98,353	-
	Add: Purchase During the year	46,23,10,029	23,94,63,013
	Less: Closing Stock of Raw Materials	3,45,66,401	4,62,98,353
	Total	47,40,41,981	19,31,64,660

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

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Opening Stock		
	Finished Goods	2,62,03,222	-
	WIP	8,39,821	-
	Scrap	95,70,423	-
		3,66,13,466	-
ii	Closing stock		
	Finished Goods	7,63,17,421	2,62,03,222
	Work in process	9,58,650	8,39,821
	Scrap	-	95,70,423
		7,72,76,071	3,66,13,466
	Total	(4,06,62,606)	(3,66,13,466)

Note - 22 : EMPLOYEE BENEFIT COST

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Salaries and bonus expenses	1,10,79,566	52,03,256
ii	Employee Welfare Expense	1,54,317	1,10,241
iii	Contribution to provident and other funds	1,59,959	40,697
	Total	1,13,93,842	53,54,194



Note - 23 : FINANCE COST

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Interest Expense		
	Working Capital	84,23,416	29,58,963
	Term Loan	9,34,772	-
		93,58,188	29,58,963
ii	Other Financial Cost		
	Bank Charges	25,515	9,810
	Other Processing & Other Charges	4,13,314	25,960
		4,38,829	35,770
	Total	97,97,017	29,94,733

Note - 24 : DEPRECIATION AND AMORTISATION EXPENSE

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Depreciation	47,07,979	24,22,884
ii	Amortization	1,21,800	1,21,800
	Total	48,29,779	25,44,684

Note - 25 : OTHER EXPENSES

Sr. No	Particulars	As at 31st March , 2021	As at 31st March , 2020
i	Manufacturing Expenses		
	Stores & Spares Consumed	78,54,043	77,44,402
	Power & Fuel	2,40,40,275	1,11,18,377
	Wages to contractors	1,43,39,613	63,81,687
	Loading & Unloading Expense	1,39,873	77,396
	Material Handling Charges	17,77,300	11,80,126
	Roll Design Charges	2,05,500	1,11,100
	Miscellaneous manufacturing expense	3,73,438	4,04,248
	Freight & Forwarding Charges	61,29,823	24,39,271
		5,48,59,864	2,94,56,607
ii	Other Administrative and Selling Expense		
	Audit Fees	75,000	75,000
	Balance written off	1,781	-
	Director Remuneration	2,00,000	2,00,000
	Donation Expenses	11,000	11,000
	Miscellaneous Expense	8,651	10,474
	Insurance Expense	2,20,404	95,866
	Printing & Stationery Expense	28,022	32,975
	Membership Fees	-	6,000
	Travelling expenses and Conveyance	62,852	1,25,616
	Legal & Professional Charges	5,84,716	3,51,040
	Late fees & Interest Expenses	18,638	-
	Repair and Maintenance Expense	-	-
	- Buidling	1,05,452	24,000
	- Vehicle	83,477	11,433
	- Plant & Machinery	64,300	65,050



- Others	2,98,220	1,82,653
Deferred Revenue Expenditure written off	12,48,076	6,24,038
Income Tax Expenses	-	16,680
Rates & Taxes	8,88,375	1,34,925
Security Expense	7,26,000	4,01,726
Software Expense	-	5,000
Telephone & Internet Charges	50,431	50,031
Office Expenses	-	87,076
Stamp Duty & Valuation Charges	5,68,100	-
Website Expenses	4,375	3,564
	52,47,870	25,14,146
Total	6,01,07,734	3,19,70,753



DISCLOSURE TO THE FINANCIAL STATEMENT FOR THE YEAR ENDED ON 31ST MARCH, 2021:

(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 MetcastLtd.	Holding Company
Shalin Shah	Director
Ashok Shah	Director
Leena Shah	Relative of KMP

➤ **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	200000
2	Loan Taken	29728000	45055370
3	Loan Repaid	85725000	175000
4	Issue of Share Capital	74000000	-

(iii) Segmentation Reporting:

Primary Segment Reporting (Business Segment):

During the year company is in single business segments, 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	2020-21	2019-20
Profit Available to Equity Share Holders (A)	13,34,797	10,48,431
Number of Equity Share at the beginning	4,00,000	4,00,000
Shares allotted during the year	7,40,000	-
Proportionate No. of Equity Shares (B)	7.64.932	4,00,000
Basic Earnings Per Share (A/B)	1.74	2.62
Potential Earnings (C)	13,34,797	10,48,431
Potential No. of Equity Shares (D)	7,64,932	4,00,000
Diluted Earnings Per share (C/D)	1.74	2.62

(v) 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 2020-21.

(vi) 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

Pankaj

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



For and on behalf of
RHETAN ROLLING MILLS PRIVATE LIMITED

Shalin A Shah *Ashok C Shah*

[SHALIN A SHAH]
Director
DIN :00297447

[ASHOK C SHAH]
Director
DIN :02467830

Place: Ahmedabad

Date: 30th June, 2021.

UDIN: 21443450AAAAPV2744

Place: Ahmedabad

Date: 30th June, 2021.