

STAR WIRE (INDIA) LIMITEDRegd. Office : 35 Link Road, 2nd Floor, Lajpat Nagar-III, New Delhi-110024

Tel No.-011-29832650-52 Fax-011-29832542

www.starwire.in , info@starwire.in

CIN: U27109DL1963PLC117600

NOTICE

Notice is hereby given that the 57th Annual General Meeting of the members of **STAR WIRE (INDIA) LIMITED** will be held on Wednesday, the 30th day of December, 2020 at 11.00 A.M. at its Registered Office at 35, Link Road, 2nd Floor, Lajpat Nagar-III, New Delhi-110024 to transact the following business:-

ORDINARY BUSINESS:

1. To receive, consider and adopt the Financial Statements of the Company for the Financial Year ended on 31st March, 2020, including Balance Sheet as at 31st March, 2020, the statement of Profit and Loss for the year ended on that date and the Reports of Board of Directors and Auditors thereon.
2. To declare 4 % dividend on preference shares.
3. To appoint a Director in place of Mrs. Mahima Gupta (DIN 02237504), who retires by rotation and being eligible, offers herself for re-appointment.
4. To appoint a Director in place of Mrs. Rekha Gupta (DIN 00054073), who retires by rotation and being eligible, offers herself for re-appointment.
5. To authorize Board of Directors of the Company to fix the remuneration of the Statutory Auditors for the financial year 2020-21 and if thought fit, to pass the following resolution as an Ordinary Resolution:

“RESOLVED THAT pursuant to the provisions of Section 142 read with relevant provisions of the Companies Act, 2013 and the Companies (Audit and Auditors) Rules, 2014 (including any statutory modification(s) or reenactment thereof, for the time being in force), the Board of Directors be and is hereby authorized to fix the remuneration of Statutory Auditors for the financial year 2020-21.”

“RESOLVED FURTHER THAT the Board of Directors of the Company be and is hereby authorized to do all acts and take all such steps as may be necessary, proper or expedient to give effect to this resolution.”

SPECIAL BUSINESS:

6. To ratify the remuneration to the Cost Auditors for the financial year 2020-21 and if thought fit to pass the following resolution as an Ordinary Resolution:



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“RESOLVED THAT pursuant to the provision of Section 148 of the Companies Act, 2013 read with the Companies (Audit and Auditors) Rules, 2014 and Companies (Cost Records and Audit) Rules, 2014 {including any statutory modification(s) or re-enactment(s) thereof, for the time being in force}, the remuneration payable to M/s. S. Chander & Associates, Cost Accountants (Firm Regn. No.100105) appointed by the Board as Cost Auditors to conduct Audit of the cost records of the Company for the Financial Year 2020-21, as set out in the Statement annexed to the Notice convening this meeting, be and is hereby ratified.”

7. 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 196, 197, 203 and any other applicable provisions of the Companies Act, 2013 and the rules made thereunder (including any statutory modification(s) or re-enactment thereof), read with Schedule V to the Companies Act, 2013 and pursuant to Article 95 and any other applicable Article of the Articles of Association of the Company, subject to provisions of section 188 of the Companies Act, 2013, the consent of the Company be and is hereby accorded to the re-appointment of Mr. Mohinder Kumar Gupta (DIN: 000543110), as a Managing Director of the Company for a period of five years commencing from 01.12.2020 on the existing terms & conditions as set out in the Explanatory Statement annexed to the notice.”

“RESOLVED FURTHER THAT the Board of Directors be and is hereby authorized to alter or vary the terms of appointment, to the extent recommended by the Nomination and Remuneration Committee from time to time as may be considered appropriate, in accordance with the relevant provisions of the Companies Act, 2013.”

“RESOLVED FURTHER THAT any one of the Directors or Company Secretary of the Company be and are hereby authorized to do all necessary acts, deeds and things, which may be usual, expedient or proper to give effect to the above resolution.”

8. 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 196, 197, 203 and any other applicable provisions of the Companies Act, 2013 and the rules made thereunder (including any statutory modification(s) or re-enactment thereof), read with Schedule V to the Companies Act, 2013 and pursuant to Article 95 and any other applicable Article of the Articles of Association of the Company, subject to provisions of section 188 of the Companies Act, 2013, the consent of the Company be and is hereby accorded to the



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re-appointment of Mr. Abhishek Gupta (DIN: 00054145), as a Whole Time Director of the Company for a period of five years commencing from 01.12.2020 on the existing terms & conditions as set out in the Explanatory Statement annexed to the notice."

"RESOLVED FURTHER THAT the Board of Directors be and is hereby authorized to alter or vary the terms of appointment, to the extent recommended by the Nomination and Remuneration Committee from time to time as may be considered appropriate, in accordance with the relevant provisions of the Companies Act, 2013."

"RESOLVED FURTHER THAT any one of the Directors or Company Secretary of the Company be and are hereby authorized to do all necessary acts, deeds and things, which may be usual, expedient or proper to give effect to the above resolution."

Place: New Delhi

Date: 21.09.2020

By order of the Board of Directors

(Rekha Sharma)

Sr. DGM Legal & Company Secretary
M.NO.-FCS-6428

Notes:

1. ***A MEMBER ENTITLED TO ATTEND AND VOTE AT THE ANNUAL GENERAL MEETING (THE MEETING) IS ENTITLED TO APPOINT A PROXY TO ATTEND AND VOTE ON A POLL, INSTEAD OF HIMSELF / HERSELF.***

THE PROXY NEED NOT BE A MEMBER OF THE COMPANY. THE INSTRUMENT APPOINTING A PROXY SHOULD, HOWEVER, BE DEPOSITED AT THE REGISTERED OFFICE OF THE COMPANY NOT LESS THAN FORTY-EIGHT HOURS BEFORE THE COMMENCEMENT OF THE MEETING.

2. ***A PROXY CAN ACT ON BEHALF OF MEMBERS NOT EXCEEDING FIFTY AND HOLDING IN THE AGGREGATE NOT MORE THAN TEN PERCENT OF THE TOTAL SHARE CAPITAL OF THE COMPANY CARRYING VOTING RIGHTS.***
3. ***A MEMBER HOLDING MORE THAN TEN PERCENT OF THE TOTAL SHARE CAPITAL OF THE COMPANY CARRYING VOTING RIGHTS MAY APPOINT A SINGLE PERSON AS PROXY FOR HIS ENTIRE SHAREHOLDING AND SUCH***

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PERSON SHALL NOT ACT AS A PROXY FOR ANOTHER PERSON OR SHAREHOLDER.

- 4. THE PROXY HOLDER SHALL PROVE HIS IDENTITY AT THE TIME OF ATTENDING THE MEETING.***
- 5. WHEN A MEMBER APPOINTS A PROXY AND BOTH THE MEMBER AND PROXY ATTEND THE MEETING, THE PROXY STANDS AUTOMATICALLY REVOKED.***
- 6. REQUISITION FOR INSPECTION OF PROXIES SHALL HAVE TO BE MADE IN WRITING BY MEMBERS ENTITLED TO VOTE ON ANY RESOLUTION THREE DAYS BEFORE THE COMMENCEMENT OF THE MEETING.***
- 7. PROXIES SHALL BE MADE AVAILABLE FOR INSPECTION DURING TWENTY FOUR HOURS BEFORE THE TIME FIXED FOR THE COMMENCEMENT OF THE MEETING AND ENDING WITH THE CONCLUSION OF THE MEETING.***
8. The Explanatory Statement pursuant to Section 102 of the Companies Act, 2013 in respect of the businesses set out above is annexed hereto.
9. Corporate members are required to send to the Company a Certified copy of the Board Resolution, pursuant to section 113 of the Companies Act 2013, authorizing their representative to attend and vote at the Annual General Meeting.
10. Members are requested to bring their attendance slip duly signed as per the specimen signature recorded with the Company for admission into the Meeting Hall along with their copy of annual report to the meeting.
11. Members who hold shares in dematerialized form are requested to write their Client ID and DP ID Numbers and who hold shares in physical form are requested to write their Folio Number in the attendance slip for attending meeting.
12. Pursuant to Section 72 of the Companies Act, 2013, members holding shares in physical form are advised to file nomination in the prescribed Form SH-13 with the Company's share transfer agent. In respect of shares held in electronic/ Dematerialized form, the members may please contact their respective depository participant.

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13. In case of joint holders attending the Meeting, only such joint holder who is higher in the order of names will be entitled to vote.
14. In terms of provisions of Section 136(1) read with its relevant provision of the Companies Act, 2013, the Annual Report is being sent to the members of the Company. The said Annual Report along with the documents stated in the notice are available for inspection at the Registered Office of the Company on all working days except Saturday, between 10.00 a.m. to 5.00 p.m. up to the date of Meeting and including the date of the Annual General Meeting of the Company and any member interested in obtaining such information may write to the Company Secretary and the same will be furnished without any fee and free of cost.
15. In terms of Article of Association of the Company, Mrs. Mahima Gupta (DIN **02237504**) and Mrs. Rekha Gupta (DIN 00054073), Directors are liable to retire by rotation and being eligible offered themselves for re-appointment as Directors. The Board of Directors of the Company recommends their re-appointment.
16. Relevant Documents referred to in the accompanying Notice are open for inspection by the members at the registered office of the Company on all working days except Saturday, between 10.00 a.m. to 5.00 p.m. up to the date of Meeting and including the date of the Annual General Meeting of the Company.
17. The Register of Directors and Key Managerial Personnel and their shareholding, maintained under Section 170 and Register of Contracts or Arrangements in which Directors are interested, maintained under Section 189 of the Companies Act, 2013 read with Rules issued thereunder and other statutory Registers will be available for inspection by the members at the Meeting
18. For the purpose of determining the names of the Members eligible for dividend on Preference Shares, if declared at the meeting, 29th December, 2020 has been fixed as Record Date. The dividend, if declared, will be paid on or after 30th December, 2020 to the Shareholders, whose names will appear in the Register of Member on 29th December, 2020.
19. Queries on accounts and operations of the Company, if any, my please be sent at the Corporate Office of the Company, at least seven days in advance of the meeting so that the answers may be made readily available at the meeting.



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20. In keeping with the Ministry of Corporate Affairs' Green Initiative measures, the Company hereby requests members who have not registered their email addresses so far, to register their email addresses for receiving all communication including annual report, notices, circulars etc. from the Company electronically.

Place: New Delhi

Date: 21.09.2020

By order of the Board of Directors

(Rekha Sharma)

Sr. DGM Legal & Company Secretary
M. NO.-FCS 6428



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

As required under Section 102 of the Companies Act, 2013 the following Explanatory Statement sets out all material facts relating to the Special Businesses set out from Item No. 6 , 7 and 8 of the accompanying Notice dated 21.09.2020 _.

Item No. 6 Ratification of remuneration of Cost Auditor

As the members are aware, in terms of Section 148 of the Companies Act, 2013 and Rule 3A and Rule 4 of Companies (Cost Records and Audit) Rules, 2014, the Company is required to appoint a Cost Auditor to conduct Audit of the cost records of the Company, M/s S. Chander & Associates, Cost Accountants have been appointed as the Cost Auditors of the Company for the Financial Year 2020-21 by the Board of Directors, in its meeting held on 13th June, 2020, on the recommendation of the Audit Committee of the Company. The Board has fixed remuneration of Rs. 1,50,000/- (Rupees One Lac Fifty Thousand only).

In terms of Section 148 of the Companies Act, 2013 and the Companies (Audit and Auditors) Rules, 2014, the remuneration of the Cost Auditors fixed by the Board of Directors shall be ratified by the members.

None of the Directors or Key Managerial Personnel (KMP) or relatives of Directors and KMP is concerned or interested, financially or otherwise, in this Resolution. The Board commends the Resolution for approval of the members as an Ordinary Resolution.

Item No. 7 – Re-appointment of Mr. Mohinder Kumar Gupta as a Managing Director

Mr. Mohinder Kumar Gupta was appointed as a Managing Director of the Company for a period of five years commencing from 01.12.2015 to 30.11.2020 on the terms and conditions as approved by the shareholders at the Annual General Meeting held on 30/09/2015. The present term of appointment of Mr. Mohinder Kumar Gupta as a Managing Director to be expired on 30.11.2020. The Board of Directors at their meeting held on 21/09/2020 have, subject to the approval of the Shareholders, re-appointed Mr. Mohinder Kumar Gupta as Managing Director of the Company with effect from 01.12.2020 for a period of 5 years on the same remuneration and terms & conditions as are prevalent.

The Board is of the opinion that his services should continue to be available to the Company to achieve still greater heights, by re-appointing him as a Managing Director.

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Mr. Mohinder Kumar Gupta and his relatives may be deemed to be concerned or interested in the said resolution. No other Director, key managerial personnel or their relatives are concerned or interested in the said resolution.

The Board recommends the resolution, for his re-appointment as a Managing Director, by the shareholders, as an Ordinary Resolution as set out at Item No. 7 of this Notice.

Item No. 8 – Re-appointment of Mr. Abhishek Gupta as Whole-Time Director

Mr. Abhishek Gupta was appointed as a Whole Time Director of the Company for a period of five years commencing from 01.12.2015 to 30.11.2020 on the terms and conditions as approved by the shareholders at the Annual General Meeting held on 30/09/2015. The present term of appointment of Mr. Abhishek Kumar Gupta as a Whole Time Director to be expired on 30.11.2020. The Board of Directors at their meeting held on 21/09/2020 have, subject to the approval of the Shareholders, re-appointed Mr. Abhishek Gupta as a Whole Time Director of the Company with effect from 01.12.2020 for a period of 5 years on the same remuneration and terms & conditions as are prevalent.

The Board is of the opinion that his services should continue to be available to the Company to achieve still greater heights, by re-appointing him as a Managing Director.

Mr. Abhishek Gupta and his relatives may be deemed to be concerned or interested in the said resolution. No other Director, key managerial personnel or their relatives are concerned or interested in the said resolution.

The Board recommends the resolution, for his re-appointment as a Managing Director, by the shareholders, as an Ordinary Resolution as set out at Item No. 8 of this Notice.



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PROXY FORM

[Pursuant to Section 105(6) of the Companies Act, 2013 and Rule 19(3) of the Companies (Management and Administration) Rules, 2014 Form No. MGT-11]

CIN : U27109DL1963PLC117600
Name of the Company : Star Wire (India) Limited
Registered Office : 35, Link Road, 2nd Floor, Lajpat Nagar-III, New Delhi - 110024.
Website : www.starwire.in

Name : _____ address: _____

E-mail Id: _____ Folio No./DP ID No.- Client ID No. _____

I / We, being the member(s) of _____ Equity Shares of the above named Company, hereby appoint:

1. Name: _____ Address: _____

E-mail Id: _____ signature: _____, or failing him/ her

2. Name: _____ Address: _____

E-mail Id: _____ signature: _____, or failing him/ her

3. Name: _____ Address: _____

E-mail Id: _____ signature: _____, or failing him/ her

as my / our proxy to attend and vote (on a poll) for me / us and on my / our behalf at the Annual General Meeting of the Company, to be held on Wednesday, the 30th day of December, 2020 at 11:00 A.M. at its Registered Office at 35, Link Road, 2nd Floor, Lajpat Nagar-III, New Delhi-110024 and at any adjournment thereof, in respect of such resolutions set out in the Notice convening the meeting, as are indicated below:

Resolutions			
Ordinary Business:		For	Against
1.	Adoption of Financial Statements for the year ended March 31, 2020		
2.	Declaration of dividend on Preference Shares		

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3.	Re-appointment of Mrs. Mahima Gupta, who retires by rotation		
4.	Re-appointment of Mrs. Rekha Gupta, who retires by rotation		
5.	Fixation of Remuneration of M/s. PRYD & Co., Chartered Accountants, Statutory Auditors of the Company for the F.Y. 2020-21		
Special Business:			
6.	Ratification of Remuneration of Cost Auditor		
7.	Re-appointment of Mr. Mohinder Kumar Gupta as a Managing Director		
8.	Re-appointment of Mr. Abhishek Gupta as a Whole Time Director		

Signed this _____ day of _____, 2020.

Signature of Shareholder: _____

Signature of Proxy Holder(s): _____

Affix
Revenue
Stamp of
Re.1/-

Notes:

- This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company, not less than 48 hours before the commencement of the Meeting.**
- This form of Proxy shall be signed by the member or his duly authorized attorney, or if the member is a body corporate, it should be duly sealed and signed by an officer or an attorney. The Proxy form which unstamped or inadequately stamped or where the stamp has not been cancelled or is undated or which does not state the name of the Proxy shall not be considered valid.
- Proxy need not be a member of the company. Pursuant to the provisions of Section 105 of the Companies Act, 2013, a person cannot act a proxy on behalf of members exceeding fifty and holding in aggregate not more than ten percent of the total share capital of the company carrying voting rights. A Member holding more than ten percent of the total share capital of the company carrying Voting Rights may appoint a single person as proxy for his entire shareholding and such person shall not act as a Proxy for another member.
- The submission by a member of this form of Proxy will not preclude such member from attending in person and voting at the meeting. If both member and proxy attend the meeting, the proxy shall automatically revoked.



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ATTENDANCE SLIP

Folio No.* _____ No. of Shares _____

DP ID _____ Client ID _____

Members or their Proxies are requested to present this Slip in accordance with the Specimen Signatures registered with the Company, at the entrance of the Meeting Hall, for admission.

Name of the attending Member / Proxy _____
(in BLOCK LETTERS)

I hereby record my presence at the Annual General Meeting of the Company held on Wednesday, the 30th Day of December, 2020 at 11:00 A.M. at the Registered Office of the Company at 35, Link Road, 2nd Floor, Lajpat Nagar-III, New Delhi-110024.

Member's Signatures

Proxy's Signatures

*Applicable for Members holding shares in Physical form.

'DIRECTORS' REPORT

The Members

Star Wire (India) Limited,

Dear Members,

On behalf of the Board of Directors, we have pleasure in presenting the 57th Annual Report on the performance and achievements of your company for the year ended 31st March, 2020 together with the Audited Statements of Accounts, Auditors' Report and Financial highlights.

1. Financial Highlights

- 1.1. The financial performance of company has been impacted by economic slowdown during the year more particularly in domestic automobile sector. Though company managed to sail across the same to significant extent, the nationwide lockdown in last week of March due to COVID-19 affected final inspection, certification and dispatch of materials which were planned during March, 2020.

Revenues from operations & Operating Income for the year ended March 31, 2020 stood at Rs.57263.44/- lakhs against Rs. 62163.51/- lakhs in the previous year. However, in spite of decline in revenue, company was able to maintain the EBIDTA margin at 14.39% against 14.52% of previous year.

Your Company is continuously engaged in up-gradation and modernization of Plant & Machineries to manufacture the products in more refined manner with optimized cost.

- 1.2. The highlights of the Company's performance are as under:

Profit Before Tax stood at Rs.37.73 Crs –at 6.59% of sales;

Net Profit After Tax for the year is 7.47% (Rs. 42.78 Crs) as against 5.13% (Rs. 31.91 Crs) of previous year;

- 1.3. Your Company achieved the following results during FY 2019-20:

(Rs. In Lakhs)

Particulars	Current Year	Previous Year
Profit before depreciation, Interest and Tax	8242.82	9023.65
Less: Interest	2758.08	2423.85
Depreciation	1711.17	1572.53
Profit before tax	3773.57	5027.27
Less: Current Tax	525.31	1089.38
Deferred Tax	(1109.77)	747.01
Income Tax expense of earlier years	79.84	-
Profit after tax	4278.19	3190.88
Add: Balance b/f from previous year	24993.11	21883.09
Total	29271.30	25073.97
Less: Appropriations:		
Proposed Dividend on:		
Preference Shares **	0.00	0.00

Equity Shares	0.00	0.00
Dividend Distribution Tax	0.00	0.00
Provisions for CSR	93.02	80.85
Profit carried forward to Balance Sheet	29178.29	24993.11

***The Interest Amount includes Rs.12.90 lacs/- towards Dividend on Redeemable Preference Shares & Taxes thereon.**

**** During the financial year approval from Hon'ble NCLT was obtained for re-issue of 4 % Redeemable Preference Shares which were due for redemption on or before August, 2020 on the same terms & conditions as were prevalent.**

2. Future Outlook & Expansion:

- 2.1. The company continues to evolve modern production techniques and processes to improve production efficiency and optimize cost by efficient utilization of resources. We intend to leverage our Design, Engineering and Manufacturing capabilities to improve our focus on advanced technology products.
- 2.2. Your company further plans to develop new grades of steel in valve steel segment which are emerging as fast growing replacement of existing high nickel alloys. With the development of new grades, it is expected to achieve significant volume growth in Valve steel segment.
- 2.3. Your company expects that effect of new investments in cost saving and capacity expansions to be operational from next financial year. This should significantly increase the operational margin for next financial year onwards and strengthen our competitive positioning
- 2.4. In its plan to move to next level by investing in triple melt processes in order to produce super-alloys/titanium based material for Defense, Aerospace and Automotive sectors, project activity has started and it is expected to complete the same by end of FY 21-22. We have already developed some produces by streamlining downstream process and with these investments we will increase our presence in these markets.
- 2.5. Your company plans to shift it foundry operations to Plant-II with addition of modern equipment which will provide larger space to cast larger dia castings and reduce the costs. The project is likely to be completed by end of FY 20-21.
- 2.6. The efforts of company on development of high performance materials to be used for application in marine, aerospace and defense sectors are continuing.
- 2.7. With a view to expand existing business and enter into new areas of business, your company has tied up with experts in overseas countries to provide opportunities for new product development and customers.
- 2.8. Atmanirbhar Bharat Abhiyan led by Government of India is giving significant impetus to self reliance and local production which may favorably impact the operations of company.

3. Dividend & Transfer to General Reserve

Your Directors, this year also, have decided not to recommend dividend to equity shareholders, for the long term growth objectives of the Company which are to be met by internal cash accruals. However, your Directors are pleased to recommend 4% dividend to the Preference Shareholders, which is payable on obtaining Share Holders approval in the ensuing Annual General Meeting.

During the year no amount has been transferred to General Reserve by the Company.

4. Credit Rating:

Credit rating of company has been reaffirmed at CRISIL "A" with negative outlook.

5. Impact of Business due to COVID-19

Financial Year 2019-20

The nationwide lockdown due to pandemic has affected the inspection, certification and dispatch of materials planned during March,20 and resulted in decline in sales for the year and increase in inventory levels.

Financial Year 2020-21

The production activities were totally halted for first 45 days in first quarter of FY 21. However, post resumption and by following social distancing and sanitization, company has ramped up fast to reach to pre-covid level of operations from July,20 onwards. With improvement in supply chain and logistics, the company is fully geared up to execute pending orders so as to minimize the impact of disruptions as far possible.

6. Debt Obligations

With emphasis on collection of receivables, company has been able to meet all its debt obligations without opting for any moratorium as provided by RBI and is confident of maintaining same moving forward.

7. Deposits

During the year under review your Company has not accepted any deposits during the year, no deposits remained unpaid or unclaimed as at the end of the year and there was no default in repayment of deposits or payment of interest thereon during the year within the meaning of Section 73 of the Companies Act, 2013 and the Companies (Acceptance of Deposits) Rules 2014.

8. Subsidiary/Associate Company

As on March 31, 2020, the Company does not have any Subsidiary or Associate Company.

9. Change in the Nature of Business:

There is no change in the nature of the business of the Company during financial year ended March 31, 2020.

10. Directors

- 10.1 As per the Companies Act, 2013 the provisions in respect of retirement of directors by rotation will not be applicable to Independent Directors, in view of this, no independent director is considered to be retiring by rotation but all other directors except Managing Director as per AOA of the company, will be retiring by rotation accordingly, one third among all other directors namely Mr. Samir Gupta (DIN 00054308) and Mr. Abhishek Gupta (DIN 00054145), Directors are liable to retire by rotation, are retiring at the forthcoming Annual General Meeting and being eligible, offer themselves for reappointment.

10.2 Independent Directors

Mr. Pankaj Jain and Mr. Girish Mohan Ganeriwala, Independent Director holds the office for the term of five years ending on 26.09.2022. They are not liable to retire by rotation in terms of Section 149(13) of the Act.

The Independent Directors of the Company have declared that they meet the criteria of Independence in terms of Section 149(6) of the Companies Act, 2013 and Regulation 16(1) (b) of the Listing Regulations. In the opinion of the Board, they fulfill the conditions of independence as specified in the Act and the Rules made thereunder and are independent of the management.

10.3 Governance Guidelines:

The Board of the Company has adopted Governance Guidelines on Board Effectiveness. The Guidelines cover aspects related to composition and role of the Board, Chairman and Directors, Board diversity, definition of independent Director Term, retirement age and Committees of the Board. It also covers aspects relating to nomination, appointment, induction and development of Directors, Director Remuneration, Code of Conduct, Board Effectiveness Review and Mandates of Board Committees.

10.4 Procedure for Nomination and Appointment of Directors:

The Nomination Remuneration Committee is responsible for developing competency requirements for the Board based on the industry and strategy of the Company. The Board composition analysis reflects in-depth understanding of the Company, including its strategies, environment, operations, and financial condition and compliance requirements.

The Nomination Remuneration Committee conducts a gap analysis to refresh the Board on a periodic basis, including each time a Director's appointment or re-appointment is required. The Committee is also responsible for reviewing the profiles of potential candidate's vis-à-vis the required competencies and meeting potential candidates, prior to making recommendations of their nomination to the Board. At the time of appointment, specific requirements for the position, including expert knowledge expected, is communicated to the appointee.

10.5 Declaration and meeting of Independent Directors

The Independent Directors of the Company have declared that they meet the criteria of Independence in terms of Section 149(6) of the Companies Act, 2013 and that there is no change in their status of Independence. A separate meeting of Independent Directors in line with the statutory provisions was held on 28.06.2019, wherein all Independent Directors were present. The Independent Directors in the meeting:

- I. Reviewed the performance of non-independent Directors including Managing Director & CEO and the Board as a whole;
- II. Assess the quality, quantity and timeliness of the flow of information between the Company's management and the Board that is necessary for the Board to effectively and reasonably perform its duties.

10.6 Board Evaluation:

i) Performance Evaluation of the Independent Directors and Other Individual Directors:

The Company has framed a policy for Appointment of Directors and Senior Management and Evaluation of Directors' Performance ("Board Evaluation Policy"). The said policy sets out criteria for performance evaluation of Independent Directors, other Non- Executive Directors and the Executive Directors.

Pursuant to the provisions of the Act, the Board carries out the performance evaluation of all the Directors (including Independent Directors) on the basis of recommendation of the Nomination and Remuneration Committee and the criteria mentioned in the Board Evaluation Policy. The Board decided that the performance evaluation of Directors should be done by the entire Board of Directors excluding the Director being evaluated and unanimously agreed on the following assessment criteria for evaluation of Directors' performance:

- a. Attendance and active participation in the Meetings;
- b. Bringing one's own experience to bear on the items for discussion;
- c. Governance – i) Awareness ii) Observance; and
- d. Value addition to the business aspects of the Company.

ii) Performance Evaluation of Executive Director:

The performance of the Managing Director and/or CEO is evaluated on the basis of achievement of performance targets/ criteria given to him by the Board from time to time.

iii) Performance Evaluation by the Board of its own performance and its Committees:

The performance of the Board is evaluated by the Board in the overall context of by the Board of the Company's principle and values, philosophy and mission statement, strategic and business plans and demonstrating this through its action on important matters, the effectiveness of the Board and the respective Committees in providing guidance to the management of the Company

and keeping them informed, open communication, the constructive participation of members and prompt decision making, level of attendance in the Board meetings, constructive participation in the discussion on the Agenda items, monitoring cash flow, profitability, income & expenses, productivity & other financial indicators, so as to ensure that the Company achieves its planned results, effective discharge of the functions and roles of the Board etc. The performance of the Committees is evaluated by the members of the respective Committees on the basis of the Committee effectively performing the responsibility as outlined in its Charter, Committee meetings held at appropriate frequency, length of them meetings being appropriate, open communication & constructive participation of members and prompt decision-making etc.

iv) Meetings of the Board

The Board meets at regular intervals to discuss and decide on Company / business policy and strategy apart from other Board business. The Board / Committee Meetings are pre-scheduled and a tentative annual calendar of the Board and Committee Meetings is circulated to the Directors well in advance to facilitate them to plan their schedule and to ensure meaningful participation in the meetings. However, in case of a special and urgent business need, the Board's approval is taken by passing resolutions by circulation, as permitted by law, which is noted and confirmed in the subsequent Board meeting. During the year, 11 meetings of the Board of Directors were held on 08.04.2019, 22.05.2019, 30.07.2019, 10.08.2019, 26.08.2019, 30.09.2019, 07.10.2019, 15.11.2019, 30.11.2019, 27.12.2019 and 18.02.2020.

11. Committees of the Board of Directors

Your Company has duly constituted the Committees required under the Act read with applicable Rules made under.

The Board has constituted the following Committees:

- i) Audit Committee
- ii) Nomination and Remuneration Committee
- iii) Corporate Social Responsibility Committee

11.1 Audit Committee:

Pursuant to provisions of Section 177 of the Companies Act, 2013, the Company has constituted Audit Committee. As on 31st March, 2020, the Audit Committee comprised the following Directors:

- 1. Mrs. Rekha Gupta, Chairperson
- 2. Mr. Pankaj Jain, Member (Independent Director)
- 3. Mr. Girish Mohan Ganeriwala, Member (Independent Director)

The Company Secretary is the Secretary of the Committee.

a. Meetings of Audit Committee

Audit Committee met 4 (Four) times during the year ended on 31st March, 2020 on 02.05.2019, 30.07.2019, 01.10.2019 and on 03.02.2020 and the gap between two meetings was not more than one hundred twenty days.

The quorum for the Audit Committee meetings is either two members or one third of the members of the Audit Committee whichever is greater, but there should be a minimum of two independent members present.

b. Powers of Audit Committee

The powers of the Audit Committee include the following:

1. To investigate any activity within its terms of reference
2. To seek information on and from any employee.
3. To obtain outside legal or other professional advice.
4. To secure attendance of outsiders with relevant expertise, if it considers necessary.
5. To protect whistle blowers.
6. To consider other matters as referred by the Board.

c. Role of Audit Committee

The Role of the Audit Committee includes the following:

1. Oversight of our Company's financial reporting process and the disclosure of its financial information to ensure that the Financial Statement is correct, sufficient and credible.
2. Recommendation to the Board regarding fixation of audit fee to be paid to statutory auditors under the Companies Act and approval for payment with respect to any other services rendered by the statutory auditors.
3. Reviewing, with the management, the annual Financial statements and Auditors' Report thereon before submission to the Board for approval, with particular reference to:
 - i. Matters required to be included in the Director's Responsibility Statement to be included in the Board's report in terms of Clause (c) of Sub-section 3 of Section 134 of the Companies Act, 2013.
 - ii. Changes, if any, in accounting policies and practices and reasons for the same.
 - iii. Major accounting entries involving estimates based on the exercise of judgment by management.
 - iv. Significant adjustments made in the Financial Statements arising out of audit findings.
 - v. Compliance with requirements relating to Financial Statements.
 - vi. Disclosure of any Related Party Transactions.
 - vii. Qualifications in the draft Audit Report.
4. Reviewing/examine, with the management, the quarterly Financial Statements before submission to the Board for approval.
5. Reviewing, with the management, the statement of uses/ application of funds raised through an issue (public issue, rights issue, preferential issue, etc.), the statement of funds utilized for purposes other than those stated in the offer document/prospectus/notice and the report submitted by the monitoring agency monitoring the end use/ utilization of proceeds of a

public or rights issue & related matters and making appropriate recommendations to the Board to take up steps in this matter.

6. Reviewing, with the management, performance of statutory and internal auditors and adequacy of the internal control systems.
7. Reviewing the adequacy of internal audit function, if any, including the structure of the internal audit department, staffing and seniority of the official heading the department, reporting structure, coverage and frequency of internal audit.
8. Discussion with internal auditors and / or auditors any significant findings and follow up there on.
9. Reviewing the findings of any internal investigations by the internal auditors/auditors/agencies into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the Board.
10. Discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post-audit discussion to ascertain any area of concern.
11. To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non payment of declared dividends) and creditors.
12. To review / oversee the functioning of vigil mechanism / Whistle Blower mechanism of Company;
13. To review the follow up action on the audit observations of the Comptroller & Auditor General audit.
14. Provide an open avenue of communication between the independent auditor, internal auditor and the Board.
15. Approval or any subsequent modification of transactions of the Company with related parties;
16. Review all related party transactions in the Company. For this purpose, the Audit Committee may designate a member who shall be responsible for reviewing related party transactions;
17. Review with the independent auditor the co-ordination of audit efforts to assure completeness of coverage, reduction of redundant efforts, and the effective use of all audit resources.
18. Consider and review the following with the independent auditor and the management:
 - i. The adequacy of internal controls including computerized information system controls and security; and
 - ii. Related findings and recommendations of the independent auditor and internal auditor, together with the management responses.
19. Consider and review the following with the management, internal auditor and the independent auditor:
 - i. Significant findings during the year, including the status of previous audit recommendations; and

- ii. Any difficulties encountered during audit work including any restrictions on the scope of activities or access to required information.
- 20. Review and monitor the Auditor's independence and performance, and effectiveness of audit process.
- 21. Scrutiny of inter-corporate loans and investments.
- 22. Valuation of undertakings or assets of the Company, wherever it is necessary.
- 23. Evaluation of Internal Financial Controls and Risk Management Systems.
- 24. Carrying out any other function as is mentioned in the terms of reference of the Audit Committee under the Companies Act, 2013, as amended from time to time.

d. Review of information by Audit Committee

The Audit Committee shall mandatorily review the following information:

- 1. Management discussion and analysis of financial condition and results of operations.
- 2. Statement of significant related party transactions submitted by management.
- 3. Management letters/letters of internal control weaknesses issued by the statutory auditors.
- 4. Internal audit reports relating to internal control weaknesses.
- 5. The appointment, removal and terms of remuneration of the internal auditor.

All the recommendations of Audit Committee were accepted by the Board.

11.2 Nomination and Remuneration Committee

The Company had constituted Nomination and Remuneration Committee in line with the requirements of Section 178 of the Companies Act, 2013. The Nomination and Remuneration Committee has formulated the criteria for determining qualifications, positive attributes and independence of directors and recommends to the Board a policy, relating to the remuneration for the Directors, Key managerial Personnel and other employees. The brief terms of the policy framed by the Nomination and Remuneration Committee, in pursuant to the provisions of Section 178(4) of the Companies Act, 2013 and Rules made thereunder are as follows:

- a) The Committee shall ensure formulation of the criteria for determining qualifications, positive attributes and independence of a director and recommend to the Board a policy, relating to the remuneration of the directors, key managerial personnel and other employees.
- b) The committee shall ensure that the level and composition of remuneration is reasonable and sufficient to attract, retain and motivate directors of the quality required to run the Company successfully;
- c) The committee shall also ensure that the relationship of remuneration to performance is clear and meets appropriate performance benchmarks;
- d) The committee shall also ensure that the remuneration to directors, key managerial personnel and senior management involves a balance between fixed and incentive pay

reflecting short and long term performance objectives appropriate to the working of the Company and its goals.

The Key Objectives of the Committee are:

1. Formulation of the criteria for determining qualifications, positive attributes and independence of a director and recommend to the Board a policy, relating to the remuneration of the directors, key managerial personnel and other employees;
2. Formulation of criteria for evaluation of Independent Directors and the Board;
3. Devising a policy on Board diversity;
4. Identifying persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down, and recommend to the Board their appointment and removal. The Company shall disclose the remuneration policy and the evaluation criteria in its Annual Report.
5. Assessing and reviewing the performance of Senior/ Top Management Employees of the Company and recommend their remuneration package as per Policy of the Company after considering the employment scenario, remuneration package of the industry and remuneration package of the managerial talent of other industries.

During the financial year ended on 31st March, 2020 two meetings of the Nomination and Remuneration Committee were held on 02.05.2019 and on 30.07.2019. The composition of the Nomination and Remuneration Committee and the details of meetings attended by the Directors is as under:

	Name of Director	Category	Designation
1.	Mrs. Rekha Gupta,	Non-Executive Director	Chairperson
2.	Mr. Pankaj Jain	Non-Executive Independent Director	Member
3.	Mr. Girish Mohan Ganeriwala	Non-Executive Independent Director	Member

Remuneration Policy of the Company

The Company's remuneration policy is driven by the success and performance of the individual employees and the Company. Company's Compensation philosophy is to align Directors and compensation with our business objectives, so that compensation is used as a strategic tool that helps us recruit, motivate and retain highly talented individuals who are committed to our core values

We believe that our compensation programs are integral to achieving our goals. Through its compensation program, the Company endeavors to attract, retain, develop and motivate a high performance workforce. Individual performance pay is determined by business performance of the Company.

The Company pays remuneration by way of salary to its Managing Director, Whole Time Directors and other Directors. Increments are decided by the Compensation Committee within the

salary scale approved by the Board and Shareholders. Executive Directors are not entitled to sitting fees for attending meeting of directors.

11.3 Corporate Social Responsibility Committee

In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, the Board of Directors have constituted a Corporate Social Responsibility (CSR) Committee. A brief outline of the Company's CSR policy, including overview of projects or programs proposed to be undertaken and a reference to the weblink to the CSR policy and projects or programs.

In alignment with the "Vision" of the Company, Star Wire (India) Limited, through its CSR initiatives, will continue to enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth for the society and community, in fulfillment of its role as a Socially Responsible Corporate, with environmental concern.

The policy encompasses the Company's philosophy, its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large. The policy shall apply to all CSR initiatives and activities taken up by the Company, for the benefit of different segments of the society, specifically the old Age, deprived, under privileged and differently abled persons.

The composition of the CSR Committee is as under:-

1. Mrs. Rekha Gupta, Chairperson,
2. Mr. Pankaj Jain (member) and
3. Mr. Abhishek Gupta (member).

During the year ended on 31st March, 2020 the Committee met 4 time on 02.05.2019, 30.07.2019, 01.10.2019 and on 03.02.2020

The said Committee has been entrusted with the responsibility of:

- formulating and recommending to the Board, a Corporate Social Responsibility Policy (CSR Policy) indicating the activities to be undertaken by the Company,
- Monitoring the implementation of the framework of the CSR Policy and recommending the amount to be spent on CSR activities.
- Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time.

12. Particulars of Loans, Guarantees or Investments Under Section 186 of the Companies Act, 2013

Your company has not directly or indirectly:

- a) given any loan to any person or other body corporate other than usual advances.
- b) given any guarantee or provide security in connection with a loan to any other body corporate or person and

- c) acquired by way of subscription purchase or otherwise, the securities of any other body corporate.

Your company has not accepted deposits from public as envisaged under Sections 73 to 76 of Companies Act, 2013 read with Companies (Acceptance of Deposit) Rules, 2014.

13. Energy, Technology Absorption and Foreign Exchange

Information required under Section 134(3) (m) of the Act read with Rule 8(3) of the Companies (Accounts) Rules, 2014, with respect to conservation of energy, technology absorption and foreign exchange earnings/outgo is included in **Annexure A**.

14. Related Party Transactions

All transactions entered by the Company with Related Parties were in the Ordinary Course of Business and at Arm's Length pricing basis. The Audit Committee granted omnibus approval for the transactions (which are repetitive in nature) and the same was reviewed by the Audit Committee.

There were no materially significant transactions with Related Parties during the financial year 2019-20 which were in conflict with the interest of the Company. Suitable disclosures as required under IND AS-24 have been made in Note 32.9 of the Notes to the financial statements. Detail of Related Party Transactions has been given under Form AOC-2 attached herewith as **Annexure – B** to this Report.

15. Extract of Annual Return

An extract of Annual Return in Form MGT-9 as on March 31, 2020 is attached as **Annexure-C** to this Report.

16. Risk Management Policy

Your Company has a robust Risk Management policy. The Company through a Steering Committee oversees the Risk Management process including risk identification, impact assessment, effective implementation of the mitigation plans and risk reporting.

17. Internal Control System

A strong internal control system is pervasive in the Company. The Company has documented a robust and comprehensive internal control system for all the major processes to ensure reliability of financial reporting.

18. Internal Control over Financial Reporting

The Company has in place adequate internal financial controls commensurate with the size, scale and complexity of its operations.

During the year, such controls were tested and no reportable material weakness in the design or operations were observed. The Company has policies and procedures in place for ensuring proper and efficient conduct of its business, the safeguarding of 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.

The Company has a robust system for internal financial closure, certification mechanism for certifying adherence to various accounting policies, accounting hygiene and accuracy of provisions and other estimates.

19. Particulars of Employees and Related disclosures

Pursuant to Rules 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, a statement showing the names and other particulars of the employees drawing remuneration in excess of the limits set out in the said Rules are provided in the **Annexure –D** forming part of the Annual Report.

20. Auditors

20.1. Statutory Auditor

M/s PRYD & ASSOCIATES, Chartered Accountants, were appointed as Statutory Auditors of the Company having registration number **(011626N)** for the period of five years in the Annual General Meeting held on September 27, 2017 till the conclusion of Annual General Meeting for the Financial Year 2022 and the said appointment was subject to the ratification by members at every subsequent Annual General Meeting.

In accordance with the Companies Amendment Act, 2017, enforced on 7th May, 2018 by the Ministry of Corporate Affairs, the appointment of Statutory Auditors is not required to be ratified at every annual General Meeting.

The Report given by the Auditors on the financial Statement of the Company forms part of this Report. There has been no qualifications, reservation adverse remarks or disclaimers given by the by the Auditors in their Report.

20.2. Cost Auditor

Pursuant to Section 148 of the Companies Act, 2013 read with the Companies (Cost Records and Audit) Rules, 2014, as amended, the Cost Audit Records maintained by the Company is required to be audited. The Board of Directors had, on the recommendation of the Audit Committee, appointed **M/s. S. Chander & Associates**, (Regn. No: 100105) Cost Accountants, Delhi for conducting the cost audit of the Company for Financial Year 2020-21.

As required under the Companies Act, 2013, the remuneration payable to the Cost Auditors is required to be ratified by the members of the Company. Accordingly, resolution seeking ratification for remuneration to be paid to Cost Auditors is included at Item No.06 of the Notice convening Annual General Meeting.

20.3. Secretarial Auditor

Pursuant to provisions of Section 204 of the Companies Act, 2013 read with Rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules 2014, your Company has engaged the services of **M/s. R K & Associates**, Company Secretaries in Practice, Delhi to conduct the Secretarial Audit of the Company for the financial year ended March 31, 2020.

The Secretarial Audit Report (in Form MR-3) is attached as **Annexure- E** to this Report.

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

The Company is compliant with the Secretarial Standards issued by the Institute of Company Secretaries of India and approved by Central Government under Section 118(10) of the Companies Act, 2013.

18.4 Internal Auditor

The Board of Directors of your Company has appointed Ms. Kirti Gupta, Cost & Works Accountant as Internal Auditor pursuant to provisions of Section 138 of the Companies Act, 2013 to carry internal audit.

However, the said accounts were internally audited by Ms. Damini Mangla, who was appointed as an Internal Auditor after cessation of Ms. Kirti Gupta after closure of concerned Financial Year.

21. Corporate Social Responsibility (CSR) Initiatives:

As the members are aware that vocational training i.e. sewing centers for girls and computer training centers for all are already been opened by the company four years back and same are doing well. Total number of trainees undergoing training are 45, 25 students in sewing classes and 20 students in Computer classes as on date and total amount spent on this activity during the year is Rs.4,34,982.07

The Company has also donated funds of Rs. 10,94,900.00 to certain trusts for CSR activities falling under Sch. VII of the Companies Act, 2013.

Total Average net profit of the Company during the three immediately preceding financial years for CSR initiative comes around Rs.4650.88 Lacs for the Financial Year ended on 31.03.2020 and the amount required to be spent during the year is Rs.93.02 Lacs.

Annual Report on CSR Activities is attached as **Annexure-F**. The CSR policy is available on company's website. (web-link:<http://www.starwire.in/CSRPolicy.pdf>)

22. Material changes and commitments affecting the financial position of the Company

There were no material changes and commitments affecting the financial position of the Company between the end of financial year (March 31, 2020) and the date of the Report September, 21, 2020).

23. Vigil Mechanism/ Whistle Blower Policy

Pursuant to Section 177(9) of the Companies Act, 2013 read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 the Board of Directors had approved the Policy on Vigil Mechanism/ Whistle Blower. This Policy inter-alia provides a direct access to the Chairman of the Audit Committee.

Your Company hereby affirms that no Director/ employee has been denied access to the Chairman of the Audit Committee and that no complaints were received during the year.

24. Prevention of Sexual Harassment Policy:

The Company has zero tolerance for sexual harassment at workplace and has adopted a Policy on Prevention, Prohibition & Redressal of sexual harassment at workplace in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013 & the Rules there under for prevention and Redressal of Complaints of sexual harassment at workplace. Further Company is committed to providing equal opportunities without regard to their race, caste, sex, religion, color, nationality, disability etc. (permanent, temporary, contractual and trainees) as well as any women visiting the Company's premises or women service providers are covered under this policy. All employees are treated with dignity with a view to maintain a work environment free from Sexual harassment whether physical, verbal or psychological.

During Fiscal year 2020 there were no complaints received or pending for disposal.

25. Order by Court or Tribunal

There are no significant material orders passed by the Regulators or Courts or Tribunal which would impact the going concern status of the Company & its future operations.

26. Cautionary Statement

Statements in the Annual Report, particularly those which relate to Management Discussion and Analysis, describing the Company's objectives, projections, estimates and expectations, may constitute 'forward looking statements' within the meaning of applicable laws and regulations. Although the expectations are based on reasonable assumptions, the actual results might differ.

27. Directors' Responsibility Statement

Pursuant to the requirement under Section 134(3) (c) and 134(5) of the Companies Act, 2013, Directors of your Company state and confirm that:

1. In the preparation of the annual accounts for the FY 2019- 20, the applicable Ind-AS accounting standards have been followed and there are no material departures from the same;
2. 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 as at March 31, 2020 and of the profit of the Company for year ended on that date;
3. The Directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safe guarding the assets of the Company and for preventing and detecting fraud and other irregularities;
4. The Directors had prepared the annual accounts on a going concern basis;
- 5.
6. The Directors had laid down internal financial controls to be followed by the Company and that such internal financial controls are adequate and were operating effectively; and
7. 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.

28. Compliance with Secretarial Standard

The Company has complied with the secretarial standards issued by the Institute of Company Secretaries of India on Board Meetings (SS-1) and General Meetings (SS-2).

Acknowledgement

You Director place on record their appreciation their employees at all levels, who have contributed to the growth and performance of the Company.

Your Directors also thank the clients, vendors, bankers and Shareholder of the Company for their continued support.

Your Directors also thank the Central and State Governments and any other statutory authorities for their continued support.

Place: New Delhi
Date: 21.09.2020

For and on behalf of the Board of Directors



(Mohinder Kumar Gupta)
Managing Director
DIN-00054110



(Samir Gupta)
Whole Time Director
DIN-00054308

'Annexure A' to Directors' Report

Particulars of conservation of Energy, Technology absorption and Foreign Exchange

(A) Conservation of Energy

Your company is working very closely with Petroleum Conservation Research Association (PCRA), New Delhi to take various measures to control the energy consumptions in re-rolling furnaces, heat treatment furnaces, Mass flow system and PID controller are being put to bring down the energy consumption. Regular audits are being undertaken by PCRA and effective measures are being taken from time to time to conserve the energy.

The details of Power and fuel consumption:-

S. No.	Particulars	2019-20	2018-19
		Current Year	Previous Year
1.	Electricity:		
	(a) Purchased:		
	Units Purchased (KVAH)	91103323	90327862
	Total Cost (Rs)	63,70,18,213	69,26,58,525
	Rate/unit	6.99	7.67
	(b) Own Generation – Through generators:		
	Units Produced	2290067	1339805
	Units/litter of fuel oil	3.84	3.78
	Cost (Rs)/unit	9.48	10.52
	Purchased Fuels consumed:		
2.	Diesel:		
	Quantity (ltrs)	205014	243762
	Total Cost	1,34,30,589	1,65,78,493
	Average Rate per liter	65.51	68.01
3.	Furnace Oil:		
	Quantity (ltrs)	2428805	3867795
	Total Cost	8,48,19,099	14,18,19,560
	Average Rate per liter	34.92	36.67
4.	Gas (PNG):		
	Quantity (MMBTU)	217449.53	122501.23
	Total cost	220955353	137964739
	Average rate per MMBTU	1016.12	1126.23

(B) Consumption per unit of production

Particulars	Standards (If any)	2019-20	2018-19	2017-18
		Current Year	Previous Year	Previous Year
Iron & Steel Products	Not Specific	2412 Units per	2542 Units	2406 Units

		MT of Scrap Consumed	per MT of Scrap Consumed	per MT of Scrap Consumed
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Technology absorption, adaptation and innovation

1. The Company has been able to successfully absorbed technology transferred from DMRL & NMRL (DRDO Labs) for special material used by Indian Navy in ship building program and fruitful results of this technology absorption are benefitting the company by good order book from Navy Ship Builders.
2. The Company is working with ARDE, Pune for development of Air Drooping Bomb, which is in advance stage of manufacturing. This will benefit the Company as well as the Country as an Import substitution.
3. In case of imported technology (imported during the last 5 years): NIL

Foreign Exchange Earning and Outgo:

The Company has continued to maintain focus and avail of export opportunities based on economic considerations. During the year, the Company has exports (FOB value) worth **Rs.21751.80 Lakhs** against Rs.21614.96 Lakhs in the previous year. The total inflow in this year is **Rs.22737.90 Lakhs** against Rs.20089.50 Lakhs in the previous year, while total outflow in this year is **Rs.8487.61 Lakhs** against Rs.12319.36 Lakhs in the previous year.

'Annexure B' to Directors' Report

FORM NO. AOC-2

(Pursuant to clause (h) of sub-section (3) of Section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014) Form for disclosure of particulars of contracts/arrangements entered into by the Company with related parties referred to in sub-section (1) of Section 188 of the Companies Act, 2013 including certain arm's length transactions under third proviso thereto:

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

- a) Name(s) of the related party and nature of relationship: NIL
- b) Nature of contracts/arrangements/transactions: Unsecured loan from related parties: NIL
- c) Duration of the contracts / arrangements/transactions: NIL
- d) Salient terms of the contracts or arrangements or transactions including the value, if any: NIL
- e) Justification for entering into such contracts or arrangements or transactions: NIL
- f) Date(s) of approval by the Board: NIL
- g) Amount paid as advances, if any: NIL
- h) Date on which the special resolution was passed in general meeting as required under first proviso to Section 188: N.A

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

1. a) Name of the related party and nature of relationship:

Mr. S.R. Gupta, Mr. M.K. Gupta, Mrs. Rekha Gupta, Mr. Samir Gupta, Mrs. Mahima Gupta & Mr. Abhishek Gupta, Directors & their Relatives

- b) Nature of transaction: Financial Arrangement in the form of Unsecured Loan from related parties i.e. unsecured Loan
- c) Duration of transaction: coincidental with Bank Loan Agreements
- d) Salient terms of the transaction including the value, if any: unsecured loan is repayable on demand and carries interest @ 12% p.a., monetary value of the transaction is as following:

M.K.Gupta: Director Remuneration Rs.93,50,000/-
Interest on Unsecured Loan Rs.6,21,835/-

Samir Gupta: Director Remuneration Rs.85,00,000/-
Interest on Unsecured Loan Rs.37,31,012/-

Abhishek Gupta: Director Remuneration Rs.36,90,000/-

Interest on Unsecured Loan Rs.26,84,208/-

Sita Ram Gupta: Interest on Unsecured Loan Rs.2,81,831/-

Rekha Gupta: Interest on Unsecured Loan Rs.36,62,319/-
Director Sitting Fee Rs.10,000/-

Mahima Gupta Director Sitting Fee Rs.10,000/-
Interest on Unsecured Loan Rs.3,23,799/-

e) Date of approval by the Board, if any: 08.04.2019

f) Amount paid as advances, if any: N.A.

2. a) Name of the related party and nature of relationship: **Star Wire (India) Engineering Limited**

b) Nature of transaction: Machining of castings

c) Duration of transaction: Repetitive

d) Salient terms of the transaction including the value,
Rs. 7,17,49,913/- (Machining Charges)
Rs.5,42,243/- (Purchase of Goods)
Rs.496,33,290/- (Sale of Goods)
Rs.77,68,067/- (Interest on Advances)

e) Date of approval by the Board, if any: 08.04.2019

f) Amount paid as advances, if any: NIL.

3. a) Name of the related party and nature of relationship: **Abhishek Gupta**

b) Nature of transaction: leasing of immovable property

c) Duration of transaction: Repetitive

d) Salient terms of the transaction including the value,
If any: Annual Rent of Rs.9, 60,000/- for Registered Office of the Company

e) Date of approval by the Board, if any: reviewed and approved by the Board on 08.04.2019

f) Amount paid as advances, if any: NIL

4. a) Name of the related party and nature of relationship: **Sita Ram Mohinder Kumar Gupta HUF**

b) Nature of transaction: leasing of immovable property

c) Duration of transaction: Repetitive

d) Salient terms of the transaction including the value,
if any: Annual Rent of Rs.9,00,000/- for godown of the Company

4. Date of approval by the Board, if any: reviewed and approved by the Board on 08.04.2019

- f) Amount paid as advances, if any: NIL
5. a) Name of the related party and nature of relationship: **Supreme Commercial Enterprises Ltd.**
- b) Nature of transaction: Human Resource services
- c) Duration of transaction: Repetitive
- d) Salient terms of the transaction including the value, if any: Rs.354,36,112/- (Human Resource services) Rs.1,20,000/- (Rent for premises used for sheds/manufacturing facility of the Company)
- e) Date of approval by the Board, if any: reviewed and approved by the Board on 08.04.2019
- f) Amount paid as advances, if any: NIL
6. a) Name of the related party and nature of relationship: **Juhi Leasing & Finance Ltd.**
- b) Nature of transaction: Preferential Dividend on shares owned
- c) Duration of transaction: Repetitive subject to declaration of dividend
- d) Salient terms of the transaction including the value, if any: Rs.2,04,000/-
- e) Date of approval by the Board, if any: 08.04.2019
- f) Amount paid as advances, if any: NIL
7. a) Name of the related party and nature of relationship: **Saraswati Charitable Trust**
- b) Nature of transaction: Preferential Dividend on shares owned
- c) Duration of transaction: Repetitive subject to declaration of dividend
- d) Salient terms of the transaction including the value, if any: Rs.1,08,000/-
- e) Date of approval by the Board, if any: 08.04.2019
- f) Amount paid as advances, if any: NIL
8. a) Name of the related party and nature of relationship: **Shree Radha Krishna Charitable Trust**
- b) Nature of transaction: Preferential Dividend on shares owned
- c) Duration of transaction: Repetitive subject to declaration of dividend
- d) Salient terms of the transaction including the value, if any: Rs.1,86,000/-
- e) Date of approval by the Board, if any: 08.04.2019
- f) Amount paid as advances, if any: NIL

9. a) Name of the related party and nature of relationship: **Brijeshwari Dharmarth Sansthan**
b) Nature of transaction: Preferential Dividend on shares owned
c) Duration of transaction: Repetitive subject to declaration of dividend
d) Salient terms of the transaction including the value, if any: Rs.2,20,000/-
e) Date of approval by the Board, if any: 08.04.2019
f) Amount paid as advances, if any: NIL
10. a) Name of the related party and nature of relationship: **Mahawar Charitable Trust**
b) Nature of transaction: Preferential Dividend on shares owned
c) Duration of transaction: Repetitive subject to declaration of dividend
d) Salient terms of the transaction including the value, if any: Rs.1,74,400/-
e) Date of approval by the Board, if any: 08.04.2019
f) Amount paid as advances, if any: NIL
11. a) Name of the related party and nature of relationship: **Interglobal Steels Private Limited**
b) Nature of transaction: Preferential Dividend on shares owned
c) Duration of transaction: Repetitive subject to declaration of dividend
d) Salient terms of the transaction including the value, if any: Rs.53,699/-
e) Date of approval by the Board, if any: 08.04.2019
f) Amount paid as advances, if any: NIL
12. a) Name of the related party and nature of relationship: **Kuber Dharmarth Sansthan**
b) Nature of transaction: Preferential Dividend on shares owned
c) Duration of transaction: Repetitive subject to declaration of dividend
d) Salient terms of the transaction including the value, if any: Rs.9800/-
e) Date of approval by the Board, if any: 08.04.2019
f) Amount paid as advances, if any: NIL
13. a) Name of the related party and nature of relationship: **Mahawar Dharmarth Sansthan**
b) Nature of transaction: Preferential Dividend on shares owned
c) Duration of transaction: Repetitive subject to declaration of dividend

e) Salient terms of the transaction including the value, if any: Rs.1,14,000/-

f) Date of approval by the Board, if any: 08.04.2019

g) Amount paid as advances, if any: NIL

14. a) Name of the related party and nature of relationship: **Supersigma Alloys & Forggings Private Limited**

b) Nature of transaction: Purchase

c) Duration of transaction: Repetitive

d) Salient terms of the transaction including the value, if any: Rs.474,61,718/-(Purchase of Goods)

e) Date of approval by the Board, if any: 08.04.2019

f) Amount paid as advances, if any: NIL

15. a) Name of the related party and nature of relationship: **Nipin Steel Private Limited**

b) Nature of transaction: Interest on Unsecured Loan

c) Duration of transaction: Repetitive

d) Salient terms of the transaction including the value, if any: Rs.32,868/- (Interest on Unsecured Loan)

e) Date of approval by the Board, if any: 08.04.2019

f) Amount paid as advances, if any: NIL

16. a) Name of the related party and nature of relationship: **Surendra Brothers Engineers Private Limited**

b) Nature of transaction: leasing of immovable property

c) Duration of transaction: Repetitive

d) Salient terms of the transaction including the value, if any: Annual Rent of Rs.96,000/- for business purpose of the Company

e) Date of approval by the Board, if any: reviewed and approved by the Board on 08.04.2019

f) Amount paid as advances, if any: NIL

17. a) Name of the related party and nature of relationship: **Sun Source Leafin Private Limited**

b) Nature of transaction: Interest on Unsecured Loan

c) Duration of transaction: Repetitive

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- d) Salient terms of the transaction including the value, if any: Rs.7,43,914/- (Interest on Unsecured Loan)
- e) Date of approval by the Board, if any: 08.04.2019
- f) Amount paid as advances, if any: NIL

For and on behalf of the Board of Directors



(Mohinder Kumar Gupta)
Managing Director
DIN-00054110
Place: New Delhi
Date: 21.09.2020



(Samir Gupta)
Whole Time Director
DIN-00054308
Place: New Delhi
Date: 21.09.2020

'Annexure C' to Directors' Report

Extract of Annual Return

FORM NO. MGT 9

As on financial year ended on 31.03.2020

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

I. REGISTRATION & OTHER DETAILS:

1.	CIN	U27109DL1963PLC117600
2.	Registration Date	04/07/1963
3.	Name of the Company	M/s Star Wire (India) Limited
4.	Category/Sub-category of the Company	Public Company/Limited By Shares
5.	Address of the Registered office & contact details	35, Link Road, Lajpat Nagar-III, 2 nd Floor, New Delhi-110024
6.	Whether listed company	No
7.	Name, Address & contact details of the Registrar & Transfer Agent, if any.	Indus Portfolio Private Limited, G-65, Bali Nagar, New Delhi-110015, Phone No. 011-47671214/17

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY (All the business activities contributing 10 % or more of the total turnover of the company shall be stated)

S. No.	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Manufacturing of Metal & Metal Products	C7	98%

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES –

Sl. No.	Name And Address of The Company	CIN/GLN	Holding/ Subsidiary /Associate	% of shares held	Applicable Section
	N.A	N.A	N.A		N.A

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VI. A). SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)
Category-wise Share Holding

[illegible]

STAR WIRE (INDIA) LIMITED
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ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
c) Others (specify)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Non Resident Indians	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Overseas Corporate Bodies	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Foreign Nationals	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Clearing Members	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Trusts	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Foreign Bodies - D R	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Sub-total (B)(2):-	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Total Public Shareholding B)=(B)(1)+ (B)(2)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
C. Shares held by Custodian for GDRs & ADRs	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Grand Total (A+B+C)	17,38,22,500	10,52,25,000	27,90,47,500	100.00	17,38,22,500	10,52,25,000	27,90,47,500	100.00	0.00

* Shares under dispute got retransferred to respective original shareholders on 23rd April, 2020 through order of Hon'ble High Court , Delhi.

B) Shareholding of Promoter-

SN	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1	Mohinder Kumar Gupta	4,20,30,000	15.06	0.00	4,20,30,000	15.06	0.00	0.00
2	Samir Gupta	2,68,63,125	9.63	0.00	2,68,63,125	9.63	0.00	0.00
3	Abhishek Gupta	1,58,55,000	5.68	0.00	1,58,55,000	5.68	0.00	0.00
4	Rekha Gupta	66,12,700	2.37	0.00	66,12,700	2.37	0.00	0.00
5	Shares Under Dispute	2,45,89,375	8.81	0.00	2,45,89,375	8.81	0.00	0.00
6	Minal Gupta	5,000	0.00	0.00	5,000	0.00	0.00	0.00
7.	Juhi Leasing & Finance	10,50,70,000	37.65	0.00	10,50,70,000	37.65	0.00	0.00

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	Ltd.							
8.	Hollysea Finvest Pvt. Ltd.	66,12,500	2.37	0.00	66,12,500	2.37	0.00	0.00
9.	Supersigma Alloys & Forgings Private Limited	1,12,90,000	4.05	0.00	1,12,90,000	4.05	0.00	0.00
10.	Star Wire (India) Biomass Private Limited	60,35,000	2.16	0.00	60,35,000	2.16	0.00	0.00
11.	Star Wire (India) Electricity Private Limited	12,15,000	0.44	0.00	12,15,000	0.44	0.00	0.00
12.	Ensol International LLP	36,150	0.01	0.00	36,150	0.01	0.00	0.00
13.	Padmanabh Steel & Trading LLP	1350000	0.48	0.00	1350000	0.48	0.00	0.00
14.	SJ Tea & Traders LLP	1592000	0.57	0.00	1592000	0.57	0.00	0.00
15.	Polylink Vinimay LLP	1350000	0.48	0.00	1350000	0.48	0.00	0.00
16.	Cornflower Vinimay LLP	1250000	0.45	0.00	1250000	0.45	0.00	0.00
17.	Interglobal Steels Private Limited	4100000	1.47	0.00	4100000	1.47	0.00	0.00
18.	Mumet (India) Private Limited	7748000	2.78	0.00	7748000	2.78	0.00	0.00
19.	Abhinandan Trafin Private Limited	10012500	3.59	0.00	10012500	3.59	0.00	0.00
20.	Nipin Steels Private Limited	5431150	1.95	0.00	5431150	1.95	0.00	0.00
	Total	27,90,47,500	100.00	0.00	27,90,47,500	100.00	0.00	0.00

*Interconnected undertaking

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C) Change in Promoters' Shareholding (please specify, if there is no change)

SN	Particulars	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
	At the beginning of the year	27,90,47,500	100.00	27,90,47,500	100.00
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment /transfer / bonus/ sweat equity etc.)	-	-	-	-
	At the end of the year	27,90,47,500	100.00	27,90,47,500	100.00

*Interconnected undertaking

D) Shareholding Pattern of top ten Shareholders: (Other than Directors, Promoters and Holders of GDRs and ADRs):

SN	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	At the beginning of the year	Nil	Nil	Nil	Nil
	At the end of the year	Nil	Nil	Nil	Nil

E) Shareholding of Directors and Key Managerial Personnel:

SN	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
	At the beginning of the year				
	Mohinder Kumar Gupta	4,20,30,000	15.06	4,20,30,000	15.06
	Samir Gupta	2,68,63,125	9.63	2,68,63,125	9.63
	Abhishek Gupta	1,58,55,000	5.68	1,58,55,000	5.68
	Rekha Gupta	66,12,700	2.37	66,12,700	2.37
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):				

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	At the end of the year				
	Mohinder Kumar Gupta	4,20,30,000	15.06	4,20,30,000	15.06
	Samir Gupta	2,68,63,125	9.63	2,68,63,125	9.63
	Abhishek Gupta	1,58,55,000	5.68	1,58,55,000	5.68
	Rekha Gupta	66,12,700	2.37	66,12,700	2.37

V) **INDEBTEDNESS** -Indebtedness of the Company including interest outstanding/accrued but not due for payment.

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	367,50,65,151	8,10,89,857	-	3,75,61,55,008
ii) Interest due but not paid	-	96,48,458	-	96,48,458
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	3,67,50,65,151	9,07,38,315	-	3,76,58,03,466
Change in Indebtedness during the financial year				
* Addition	37,18,50,017	283,97,222	-	40,02,47,239
* Reduction	48,75,87,643	31,38,835	-	49,07,26,478
Net Change	(11,57,37,626)	252,58,387	-	(904,79,239)
Indebtedness at the end of the financial year				
i) Principal Amount	3,55,93,27,525	10,39,14,916	-	3,66,32,42,441
ii) Interest due but not paid	-	1,20,81,786	-	1,20,81,786
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	3,55,93,27,525	11,59,96,702	-	3,67,53,24,227

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VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL-

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

SN	Particulars of Remuneration	Name of MD/WTD/ Manager				Total Amount
		Mohinder Kumar Gupta	Samir Gupta	Abhishek Gupta	---	
1	Gross salary					
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	66,00,000 P.A	63,00,000 P.A	20,40,000 P.A.		1,49,40,000 P.A.
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	9,90,000 P.A.				9,90,000 P.A.
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961					
2	Stock Option	-	-	-	-	-
3	Sweat Equity	-	-	-	-	-
4	Commission - as % of profit - others, specify...	27,50,000	22,00,000	16,50,000	-	66,00,000
5	Others, please specify					
	Total (A)	1,03,40,000	85,00,000	36,90,000		2,25,30,000
	Ceiling as per the Act	As per Section II of Schedule V of the Companies Act, 2013	As per Section II of Schedule V of the Companies Act, 2013	As per Section II of Schedule V of the Companies Act, 2013		

B. Remuneration to other directors

SN.	Particulars of Remuneration	Name of Directors		Total Amount
1	Independent Directors			
	Fee for attending board committee meetings			
	Commission			
	Others, please specify			
	Total (1)			
2	Other Non-Executive Directors			
	Fee for attending board committee meetings	Mrs. Rekha Gupta 10000/-	Mrs. Mahima Gupta 10000/-	20000/-

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	Commission	-	-	-
	Others, please specify	-	-	-
	Total (2)	10000/-	10000/-	20000/-
	Total (B)=(1+2)	10000/-	10000/-	20000/-
	Total Managerial Remuneration	-	-	2,25,50,000/-
	Overall Ceiling as per the Act			

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD

SN	Particulars of Remuneration	Key Managerial Personnel				Total
		CEO	CS	CFO**	COO	
1	Gross salary					
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	1,71,41,918.00	25,74,114.00	47,99,925.00	90,49,470.00	3,35,65,427.00
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-		600	-	600.00
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	-	-	-	-	-
2	Stock Option	-	-	-	-	-
3	Sweat Equity	-	-	-	-	-
4	Commission	-	-	-	-	-
	- as % of profit	-	-	-	-	-
	others, specify...					
5	Others, please specify	-	-	-	-	-
	Total	1,71,41,918.00	25,74,114.00	48,00,525.00	90,49,470.00	3,35.66,027.00

** Mr R.P.Bansal worked as CFO From 01-04-2019 to 09-05-2019, who left untimely for the heavenly abode. Mr B.K.Mishra appointed as CFO from 30-07-2019 of the Company. Above remuneration includes amount paid to both during the Financial Year 2019-20.

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.

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Compounding	N.A.	N.A.	N.A.	N.A.	N.A.
B. DIRECTORS Mr. Mohinder Kumar Gupta (Managing Director)					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.
Compounding	N.A.	N.A.	N.A.	N.A.	N.A.
C. OTHER OFFICERS IN DEFAULT					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.
Compounding	N.A.	N.A.	N.A.	N.A.	N.A.

Annexure D' to Directors' Report

Disclosure pursuant to Rule 5 (2) of Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014

Dr. S.K. Goel (CEO)*

Designation	Remuneration Received	Nature of employment	Qualification & Experience	Date of commencement of employment	Age/ D.O.B	Last employment	% of equity shares held	Whether such employee is relative of any Director or manager
Executive Director	1,71,41,918.00	Permanent	B.E., M.E., Ph.D (Met.)	01-01-1991	62 years/ (30-04-1958)	7 years with M/s U.P.Steel, Muzaffarnagar	Nil	No
			Exp. - 39 Years			2 years with M/s Perfect Engineering Products (P) Ltd.		

Mr. S.S. Viridi (COO)

Designation	Remuneration Received	Nature of employment	Qualification & Experience	Date of commencement of employment	Age/ DOB	Last employment	% of equity shares held	Whether such employee is relative of any Director or manager
Chief Operating Officer	90,49,470.00	Permanent	B.Tech. (Met.), M.B.A	12-08-2013		10 years in Jindal stainless Steel	Nil	No
			Exp. - 36 Years			3 years in Star Wire		

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						3 years in Dansteel Engg		
						1 year in Star Wire 1 year in Steel Strip 1 year in W.M. Forge 7 years in Oswal Steel 3 year in H.M.T 1 year in Escorts Ltd		

* With heavy heart it is being informed that Dr. S.K. Goel, CEO of the Company left untimely for heavenly abode on 22/08/2020 .



R K & Associates
(Company Secretaries)

Flat No.-6A, LGE, Khasra No. 117/1
Gali No.-1, Rajpur Khurd Extn. Colo
Near Ramchander Mkt, New Delhi-
Mob: 9999301705, 98712200
Email : csrakeshkumar@gmail.co
cs.rkassociates@gmail.co

Ref.

'Annexure E'

Date

FORM No. MR-3
SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2020

(Pursuant to Section 204(1) of the Companies Act, 2013 and Rule 9 of the Companies
(Appointment and Remuneration of Managerial Personnel) Rules, 2014

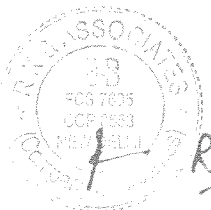
To,
STAR WIRE (INDIA) LIMITED
35, LINK ROAD, 2ND FLOOR,
LAJPAT NAGAR-III NEW DELHI-110024

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **STAR WIRE (INDIA) LIMITED** CIN: **U27109DL1963PLC117600** (hereinafter called the Company). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the company's books, papers, minute books, forms and returns filed and other records maintained by the company and also the information provided by the company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on **31st March, 2020**, complied with statutory provisions listed hereunder and also that the company has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter.

1. I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March, 2020 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made there under;
- (ii) The Securities Contracts (Regulation) Act, 1956 (SCRA) and the rules made there under;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI Act):-



Rakesh

- a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 **(Not applicable to the company during the audit period);**
- b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 **(Not applicable to the company during the audit period);**
- c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
- d) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 **(Not applicable to the company during the audit period);**
- e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with clients;
- g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **(Not applicable to the company during the audit period);** and
- h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 **(Not applicable to the company during the audit period);**

(vi) The Other Laws applicable specifically to the Company are:

- a) E-waste (Management & Handling) Rules, 2011.
- b) Other Labour Laws & Social Security Laws.
- c) Environmental Laws
- d) The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

2. I have also examined compliance with the applicable clauses of the Secretarial Standards issued by the Institute of Company Secretaries of India.

3. During the period under review the company has complied with the provisions of the Acts, Rules, Regulations, Guidelines mentioned above.

4. I further report that:

- (a) Board is having the required balance of Rotational, Non-Rotational, Independent and Women Director and the composition of Board is as per provisions of the Act on or before 31/03/2020.



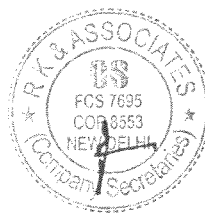
Paul

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

Majority decision is carried through unanimously, and therefore, dissenting members' views are not required to be captured and recorded as part of the minutes.

5. I further report that there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.
6. I further report that during the audit period there has not been any such activity having a major bearing on the Company's affairs in pursuance of the above referred laws rules, regulations, guidelines etc.

This report be read with our letter of even date which is annexed as **Annexure-'A'** and forms an integral part of this report.



For R K & ASSOCIATES
(Company Secretaries)

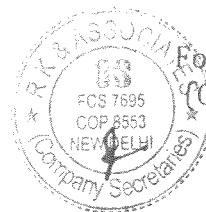
Rakesh

CS Rakesh Kumar
(M. No.: FCS 7695, CoP No.: 8553)
UDIN: F007695B000815909

Annexure "A"

To,
The Members of
STAR WIRE (INDIA) LIMITED
35, LINK ROAD, 2ND FLOOR,
LAJPAT NAGAR-III NEW DELHI-110024

1. Maintenance of secretarial records is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and processes as are appropriate to obtain reasonable assurance about the correctness of the contents of secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the process and practices, I followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and books of accounts of the Company.
4. Wherever required, I have obtained the management representation about the compliance of laws, rules and regulations and happening of events, etc.
5. The compliance of the provisions of corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of procedures on test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.
7. During the course of my examination of the books and records of the Company, that has been carried out in accordance with generally accepted practices in India, I have neither come across any instance of fraud on or by the Company, nor the Company has noticed and reported any such case during the year and accordingly the Company has not informed me of any such case.



For R K & ASSOCIATES
(Company Secretaries)

Rmk.

(CS Rakesh Kumar)
(M. No.: FCS 7695, CoP. No.: 8553)

'Annexure F' to Directors' Report

ANNUAL REPORT ON CORPORATE SOCIAL RESPONSIBILITIES (CSR) ACTIVITIES

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

The Company's CSR policy has been uploaded on the website of the Company under the web-link: <http://www.starwire.in/CSRPolicy.pdf>

- 2. Composition of the CSR Committee**

The composition of the CSR Committee is as under:

Mrs. Rekha Gupta, Chairperson

Mr. Pankaj Jain, Member

Mr. Abhishek Gupta, Member

Mrs. Rekha Sharma, Secretary

The Committee met 4 (four Times) during the year under review.

- 3. Average net profit of the Company for the last three financial years**

Average net profit: Rs.46,50,87,640/-

- 4. Prescribed CSR expenditure (2% of the average net profit of the last three financial years)**

The Company during the financial year 2019-20 is required to spend Rs.93,01,753/- towards CSR.

Particulars	Amount
Average net profit for last three financial years	46,50,87,640
Prescribed CSR expenditure	2% of Average net profit for last three financial years
Amount CSR to be spent for financial year	93,01,753
Amount CSR spent for financial year	15,29,882.07
Amount spent in local area	15,29,882.07
Amount unspent CSR	158,38,971.35 **

**

Particulars	Amount
Opening Balance	80,67,100.42
(+) Provision for the F.Y 2019-20	93,01,753.00
(-) Expenditure made during F.Y 2019-20	15,29,882.07
Closing Amount to be spent	158,38,971.35

STAR WIRE (INDIA) LIMITED

Annual Report 2019-20

5. Details of CSR spent during the financial year:

Total amount spent for the year: Rs.1529882.07/-

Amount unspent, if any: Rs.158,38,971.35 /-

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

S.NO	CSR Project or activity identified	Sector in which the project is covered	Amount Spent on the Project or programme	Cumulative Expenditure upto the reporting period	Amount spent directly or through implementing Agency
1	Old Age Home/Dharmshala	Covered under item (iii) in schedule VII, Promoting Gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens.	NIL	Amount of Rs. 1,93,60,000/ spent by way of donation of a piece of land for setting up Old Age Home/ Dharmshala	Through a Implementing Agency
2	Enhancement of Vocation skills among woman & children	<p>Covered under item (1), eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water:;</p> <p>(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects; (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups: promoting gender</p>	<p>Rs. 10,94,900/- (Indirectly)</p> <p>Rs. 434982.07/- (Directly)</p>	Rs. 5470508.47	Directly and through Implementing Agencies

STAR WIRE (INDIA) LIMITED
Annual Report 2019-20

		equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;			
			Rs. 15,29,882.07	Rs. 2,48,30,508.47	

6. Reasons for not spending the prescribed CSR expenditures:

The company is already engaged in the activities covered under the provisions of CSR directly as well as indirectly as in the past. To be specific the company has incurred Rs. 4,34,982.07/- during the year on the CSR activities directly towards enhancement of vocational skills for inhabitants residing near manufacturing facilities in the following manner-

- Computer Training center for boys
- Sewing Training center for girls in village

Further the company has also incurred Rs.10,94,900.00/- on the CSR activities indirectly by way of donating funds to the recognized charitable trust as per details below:-

- ASSOCIATION FOR THE WELFARE OF HANDICAPPED (Regd.)
- Shirdi Sai Baba Temple Society
- Educational -cum-Vocational Association for the Disabled (Regd.)
- Prayas Social Welfare Society (Regd.)
- NATIONAL ASSOCIATION FOR BLIND
- FIA CHARITABLE SOCIETY
- Navchetna Trust
- Sewa Bharti

Furthermore, as informed company is in the process of setting up an Old Age Home/Dharamshala in the Village- Chhainsa, a piece of land owned by the company has already been donated for the said purpose. The construction work could not be started because necessary permissions/approvals have not yet been granted by the concerned departments/Govt. bodies.

Construction work will be started as soon as the permissions are granted, and the fund lying unutilized under CSR will be utilized.

7. Responsibility Statement :

It is hereby affirmed that the implementation and monitoring of CSR Policy is in compliance with CSR objectives and Policy of the Company.

Place: New Delhi

Date: 21.09.2020



(Mohinder Kumar Gupta)
Managing Director
DIN-00054110



(Rekha Gupta)
Chairman CSR Committee
DIN-00054073

PRYD & ASSOCIATES
Chartered Accountants

4831, Govind Lane, 1st Floor
24 Ansari Road, Darya Ganj
New Delhi-110002
PHONE: (011)23258183

P M Mittal
B.Com, F C A

INDEPENDENT AUDITORS' REPORT

To the Members of **Star Wire (India) Limited**

REPORT ON THE FINANCIAL STATEMENTS

Opinion

We have audited the accompanying financial statements of **Star Wire (India) Limited** ("the Company"), which comprise the Balance Sheet as at March 31, 2020, the Profit and Loss Statement (including other comprehensive income), the Cash Flow Statement and the statement of change in Equity for the year then ended, and notes to the standalone financial statements, and a summary of significant accounting policies and other explanatory information.

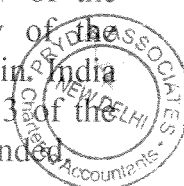
In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the Companies Act, 2013 ("Act") in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at 31 March 2020, and profit and other comprehensive income, changes in equity and its cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the 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 thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

MANAGEMENT'S RESPONSIBILITY FOR THE FINANCIAL STATEMENTS

The Company's management and 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, cash flows and change in equity of the Company in accordance with the accounting principles generally accepted in India including the Indian Accounting Standards (Ind AS) specified under Section 133 of the Act, read with the Companies (Indian Accounting Standards) Rules, 2015, as amended.



This responsibility also includes maintenance of adequate accounting records in accordance with the 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 control 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 standalone financial statements, management and Board of Directors are 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 is also responsible for overseeing the Company's financial reporting process.

AUDITORS' RESPONSIBILITY FOR THE AUDIT OF THE STANDALONE FINANCIAL STATEMENTS

Our objectives are to obtain reasonable assurance about whether the standalone financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an 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 standalone 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 standalone financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls with reference to financial statements in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.



- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the standalone financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

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

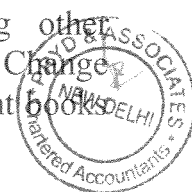
We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

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 standalone financial statements of the current period and are therefore the key audit matters. 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 paragraphs 3 and 4 of the Order, to the extent applicable.
2. As required by Section 143(3) of the Act, we report that:
 - a. We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose 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 Profit and Loss Statement (including other comprehensive income), the Cash Flow Statement and Statement of Change in Equity dealt with by this Report are in agreement with the relevant books of account;



STAR WIRE (INDIA) LIMITED

- d. In our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Companies (Indian Accounting Standards) Rules, 2015, as amended;
 - e. On the basis of the written representations received from the directors as on March 31, 2020, and taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2020, from being appointed as a director in terms of Section 164(2) of the Act;
 - f. With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B" to this report.
3. 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) Rule, 2014, as amended, in our opinion and to the best of our information and according to the explanations given to us:
- (i) The Company has disclosed the impact of pending litigation as at March 31, 2020 on its financial position in its financial statements as referred to in Note 32 to the financial statements;
 - (ii) The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses; and
 - (iii) There was no fund which required to be transferred, to the Investor Education and Protection Fund by the Company.
4. With respect to the matter to be included in the Auditor's Report under section 197(16):
- In our opinion and according to the information and explanations given to us, the remuneration paid by the Company to its directors during the current year is in accordance with the provisions of section 197 of the Act. The remuneration paid to any director is not in excess of the limit laid down under section 197 of the Act. The Ministry of Corporate Affairs has not prescribed other details under section 197(16) which are required to be commented upon by us.

Place: New Delhi
Dated: 21/09/2020

For PRYD & Associates
Chartered Accountants

FRN: 11626N

(P.M. Mittal)

Membership Number: 094667
Partner



“ANNEXURE A” TO INDEPENDENT AUDITORS’ REPORT

The Annexure referred to in our Independent Auditors’ Report to the members of the Company on the financial statements for the year ended 31st March 2020, we report that:

1. In respect of its Fixed Assets:
 - a) The Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets.
 - b) As explained to us, all the fixed assets have been physically verified by the management in a phased periodical manner, which in our opinion is reasonable, having regard to the size of the Company and nature of its assets. No material discrepancies were noticed on such physical verification.
 - c) As per the information and explanations provided to us, title deeds of immovable properties included in Property, Plant and Equipment are held in the name of the Company.
2. In our opinion, the inventories have been physically verified during the year by the Management at reasonable intervals and as explained to us no material discrepancies were noticed on physical verification.
3. As informed, the Company has not granted any loans, secured or unsecured, to companies, firms or other parties covered in the register maintained under section 189 of the Act. Accordingly clauses 3(iii) (a & b) of the Companies (Auditor’s Report) Order, 2016 are not applicable to the Company.
4. In our opinion and according to the information & the explanations given to us, the Company has not granted any loans, made investments and provided guarantees and securities under section 185 and 186 of the Companies Act, 2013 during the year.
5. According to the information and explanations given to us, the Company has not accepted any deposits within the meaning of Sections 73 to 76 of the Act and the Companies (Acceptance of Deposits) Rules, 2014 (as amended) from the public. Therefore, the provisions of Clause (v) of paragraph 3 of the Order are not applicable to the Company.
6. The Company has maintained proper cost records as specified by the Central Government under Section 148(1) of the Companies Act, 2013 related to the manufacturing activities, and we are of the opinion that *prima facie* the prescribed cost records have been made and maintained.
7. In respect of statutory dues:
 - 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 accounts in respect of undisputed statutory dues including Provident Fund, Employees’ State Insurance, Income-tax, Goods and Service Tax, duty of custom, Value added tax, Cess and other material statutory dues have been regularly deposited during the year by the company with the appropriate authorities.



STAR WIRE (INDIA) LIMITED

According to the information and explanations given to us, no undisputed amount payable in respect of aforesaid dues were in arrears, as at March 31, 2020 for a period of more than six months from the date they became payable.

- b) According to the information & explanations given to us there are certain disputed statutory dues which have not been deposited on account of disputed matters pending before appropriate authorities are as under:

Sr No.	Name of the statute	Nature of the Dues	Amount (Rs. in Lacs)	Period to which the amount relates	Forum where dispute is pending
1.	Haryana VAT Act	Local Area Development Tax (LADT)	66.84 (66.84)	Various years from 2004-05 to 2007-08	Hon'ble Supreme Court
2.	Income Tax Act, 1961	Demand on additions & Interest	69.02 (69.02)	various years from 2002-03 to 2008-09	Assstt. / CIT, CIT(A), ITAT
3.	Central Excise Act, 1944	Excise Duty	31.09 (31.09)	various years from 1988-89 to 2014-15	With various appellate authorities & Hon'ble Supreme Court
4.	Custom Act, 1962	Custom duty against Advance License	177.00 (177.00)	2006-07	Dy Commissioner

Total Rs 343.95 Lacs (Rs 343.95 Lacs)

- c) According to the information & explanations given to us there are no amounts which are required to be transferred to the investor education and protection fund in accordance with the relevant provisions of Section 125 of the Companies Act, 2013 and rules thereunder.
8. Based on our verification and according to the information & explanations given by the management, the company has not defaulted in repayment of dues to its banks.
9. In our opinion, the term loans have been applied for the purpose for which the loans were raised.
10. 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 have neither come across any instance of fraud on or by the Company, noticed or reported during the year, nor have we been informed of such case by the Management.

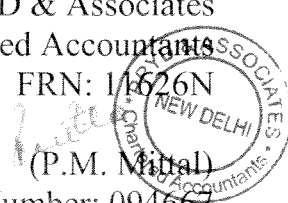


STAR WIRE (INDIA) LIMITED

11. In our opinion and according to the information and explanations given to us, the Company has paid / provided managerial remuneration in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Companies Act, 2013.
12. The Company is not a Nidhi Company and hence reporting under clause (xii) of Paragraph 3 of the Order is not applicable.
13. In our opinion and according to the information and explanations given to us the Company's transactions with its related party are in compliance with Sections 177 and 188 of the Companies Act, 2013, where applicable, and details of related party transactions have been disclosed in the financial statements, as required by the applicable accounting standards.
14. During the year the Company has not made preferential allotment or private placement of shares or fully or partly convertible debentures and hence reporting under clause (xiv) of Paragraph 3 of the Order is not applicable to the Company.
15. In our opinion and according to the information and explanations given to us, during the year, the Company has not entered into any non-cash transactions with its directors or persons connected with him as referred to Section 192 of the Companies Act, 2013 and hence reporting under clause (xv) of Paragraph 3 of the Order is not applicable to the Company.
16. In our opinion and according to information and explanations provided to us, the Company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934

Place: New Delhi
Dated: 21/09/2020

For PRYD & Associates
Chartered Accountants
FRN: 11626N
(P.M. Mittal)
Membership Number: 094667
Partner



“ANNEXURE B” TO INDEPENDENT AUDITORS’ REPORT

The Annexure B referred to in our Independent Auditors’ Report to the members of the Company on the financial statements for the year ended 31st March 2020, we report that:

REPORT ON THE INTERNAL FINANCIAL CONTROLS OVER FINANCIAL REPORTING UNDER CLAUSE (i) OF SUB-SECTION 3 OF SECTION 143 OF THE COMPANIES ACT, 2013 (“THE ACT”)

We have audited the internal financial controls over financial reporting of **Star Wire (India) Limited** (“the Company”) as of March 31, 2020 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 (the “Guidance Note”) issued by the Institute of Chartered Accountants of India. These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, 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 and the Standards on Auditing prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

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



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

MEANING OF INTERNAL FINANCIAL CONTROLS OVER FINANCIAL REPORTING

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use or disposition of the company's assets that could have a material effect on the financial statements.

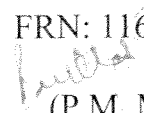
INHERENT LIMITATIONS OF INTERNAL FINANCIAL CONTROLS OVER FINANCIAL REPORTING

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, to the best of our information and according to the explanations given to us, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2020, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

Place: New Delhi
Dated: 21/09/2020

For PRYD & Associates
Chartered Accountants
FRN: 11626N

(P.M. Mittal)
Membership Number: 094667
Partner

STAR WIRE (INDIA) LIMITED
BALANCE SHEET AS AT 31 MAR 2020
(Rs in Lakhs)

Particulars	Notes	As at 31st March, 2020	As at 31st March, 2019
ASSETS			
Non-current assets			
Property, Plant and Equipment	1	46427.85	37947.60
Capital Work-in-Progress	1	2487.23	9747.21
Intangible assets under development	1	335.06	182.31
Financial Assets			
(i) Investments	2	130.04	144.12
(ii) Loans	3	1068.55	757.71
(iii) Others	4	111.29	87.71
Other non-current assets	5	172.70	400.11
Total Non-Current Assets		50732.72	49266.78
Current assets			
Inventories	6	17869.26	16283.28
Financial Assets			
(i) Trade receivables	7	19080.99	19339.43
(ii) Cash and cash equivalents	8	149.57	128.57
(iii) Bank balances other than (ii) above	9	354.41	237.45
(iv) Loans	10	47.15	51.82
(v) Others	11	943.63	610.18
Other current assets	12	1291.15	1672.80
Total Current Assets		39736.16	38323.53
Total Assets		90468.88	87590.30
EQUITY AND LIABILITIES			
Equity			
Equity Share capital	13	2790.48	2790.48
Other Equity	14	37473.98	33347.25
Total Equity		40264.46	36137.72
Liabilities			
Non-current liabilities			
Financial Liabilities			
(i) Borrowings	15	16054.78	16497.06
Provisions	16	732.90	642.52
Deferred tax liabilities (Net)	17	4367.56	5496.98
Other non-current liabilities	18	791.19	796.70
Total Non-Current Liabilities		21946.43	23433.27
Current liabilities			
Financial Liabilities			
(i) Borrowings	19	17619.52	19066.64
(ii) Trade payables	20	4596.76	4197.67
(iii) Other financial liabilities	21	4097.68	4126.94
Other current liabilities	22	1541.31	241.50
Provisions	23	402.72	386.55
Total Current Liabilities		28258.00	28019.31
Total Liabilities		50204.43	51452.58
Total Equity and Liabilities		90468.88	87590.30

Significant Accounting Policies

See accompanying Notes to the Financial Statements

1 to 32

As per our Report of even date:

For and on behalf of the Board of Directors

For PRYD & Associates

Chartered Accountants

Registration No.: 041626N



(CA P. M. Mittal)

Partner

Membership No.: 094667

Place: New Delhi

Date: September 21, 2020

(Binod Kumar Mishra)
Chief Finance Officer

(Rekha Sharma)
Sr. DGM Legal & Company Secretary
M No: FCS 6428

(Mohinder Kumar Gupta)
Managing Director
DIN - 00054110

(Samir Gupta)
Whole Time Director
DIN - 00054308

STAR WIRE (INDIA) LIMITED
STATEMENT OF PROFIT & LOSS FOR THE YEAR ENDED 31 MAR, 2020
(Rs in Lakhs)

Particulars	Notes	Current Year 2019-20	Previous Year 2018-19
INCOME			
I. Revenue from operations	24	56170.84	61281.55
II. Operating Income	25.a	1092.60	881.96
III Non Operating Income	25.b	217.36	94.20
IV Total Revenue (I+II+III)		57480.80	62257.71
V Expenses			
Cost of material consumed	26	19884.74	21410.07
Purchases of Stock-in-Trade	27	0.00	0.82
Change in inventories of finished goods, work-in-progress and Stock-in-Trade	28	(1812.42)	(522.19)
Employee benefits expense	29	4803.36	4614.53
Financial Costs	30	2758.08	2423.85
Depreciation and amortization expense		1711.17	1572.53
Other expenses			
- Manufacturing expenses	31.a	23178.90	24771.07
- Administrative Expenses	31.b	2012.18	2224.17
- Selling & Distribution Expenses	31.c	1171.23	735.60
VI Total expenses		53707.23	57230.44
VII Profit/ (Loss) before exceptional Items and tax (IV-VI)		3773.57	5027.27
VIII Exceptional items		0.00	0.00
IX Profit / (Loss) before extraordinary items and tax (VII+VIII)		3773.57	5027.27
X Extraordinary Items		0.00	0.00
XI Profit /(Loss) before tax (IX+X)		3773.57	5027.27
XII Tax expense:			
- Current Tax	17	525.31	1089.38
- Deferred Tax	17	(1109.77)	747.01
- Income Tax Expenses of Previous F.Y.		79.84	0.00
XIII Profit / (Loss) for the year (XI-XII)		4278.19	3190.88
XIV Other Comprehensive Income			
Items that will not be reclassified to Statement of Profit and Loss		(78.10)	18.69
Income tax relating to items that will not be reclassified to Statement of Profit and Loss		19.66	(6.53)
Items that will be reclassified to Statement of Profit and Loss		0.00	0.00
Income tax relating to items that will be reclassified to Statement of Profit and Loss		0.00	0.00
XV Total Comprehensive Income for the Year		4219.75	3203.04
Earning Per Equity Share of face value of ₹ 1 each:			
- Basic:		1.53	1.14
- Diluted:		1.53	1.14

Significant Accounting Policies

See accompanying Notes to the Financial Statements

1 to 32

As per our Report of even date:

For and on behalf of the Board of Directors

For PRYD & Associates

Chartered Accountants

Registration No.: 011626N

(CA P. M. Mittal)

Partner

Membership No.: 094667

Place: New Delhi

Date: September 21, 2020

(Binod Kumar Mishra)
Chief Finance Officer

(Rekha Sharma)
Sr. DGM Legal & Company Secretary
M No: FCS 6428

(Mohinder Kumar Gupta)
Managing Director
DIN - 00054110

(Samir Gupta)
Whole Time Director
DIN - 00054308

STAR WIRE (INDIA) LIMITED
CASH FLOW STATEMENT FOR THE YEAR ENDED 31st MARCH, 2020

(Rs in Lakhs)

Particulars	Current Year 2019-20	Previous Year 2018-19
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Cash Flow Statement:

A Cash flow from operating activities:		
Net Profit Before Tax as per Statement of Profit and Loss	3773.57	5027.27
Adjusted for:		
(Profit) / Loss on Sale / Discard of Property, Plant and Equipment (Net)	1.36	1.84
Depreciation	1711.17	1572.53
Provisions for CSR	(93.02)	(80.85)
Interest income	(182.92)	(51.10)
Finance Costs	2758.08	2423.85
Operating profit before working capital changes	7968.24	8893.54
Adjusted for:		
(Increase) / decrease in Trade and Other Receivable	258.44	(474.70)
Increase/ (decrease) in other financial liabilities	(406.11)	251.49
Increase/ (decrease) in other liabilities	1294.29	354.30
Increase/ (decrease) in provisions	42.54	(6.98)
(Increase) / decrease in inventories	(1585.98)	(881.97)
Decrease/ (increase) in loans	(306.18)	(265.74)
Decrease/ (increase) in other current financial assets	(263.64)	220.76
Decrease/ (increase) in other current assets	381.65	(1295.68)
(Increase) / decrease in Other Non Current Assets	0.59	3.77
Decrease/ (increase) in other non-current financial assets	(23.58)	42.78
Increase / (decrease) in Trade and other Payables	399.09	(949.83)
Cash generated from operations	7759.37	5891.73
Income tax paid	674.97	1043.15
Net cash flow from / (used in) operating activities (A):	7084.40	4848.58
B Cash flow from investing activities:		
Purchase of fixed assets	(3439.27)	(12280.75)
Capital advance/Capital creditors (net)	(380.94)	1129.75
Proceeds from sale of fixed assets	355.08	19.61
(Profit) / Loss on Sale / Discard of Property, Plant and Equipment (Net)	(1.36)	(1.84)
Bank balance other than cash & cash equivalents	(116.96)	48.49
Interest income	182.92	51.10
Net cash from / (used in) investing activities (B):	(3400.52)	(11033.64)
C Cash flow from financing activities:		
Proceeds from long-term borrowings (net)	542.33	6992.84
Proceeds from short-term borrowings (net)	(1447.12)	1394.26
Proceeds/Payment Loan (Assets)-Non Current	-	0.00
Borrowing-Current (Net)	-	0.00
Interest paid	(2758.08)	(2423.85)
Net cash from / (used in) financing activities (C):	(3662.87)	5963.25
Net increase / (decrease) in cash and cash equivalents (A+B+C)	21.01	(221.81)
Cash and cash equivalents at the beginning of the year	128.57	350.38
Cash and cash equivalents at the end of the year*	149.57	128.57
* Comprises:		
Cash on hand	24.59	20.93
Balances with banks		
(i) In current accounts	114.87	9.77
(ii) In EEFC accounts	10.11	97.87
	149.57	128.57

Notes:

These earmarked account balances with banks can be utilised only for the specific identified purposes.

See accompanying notes to the financial statements

As per our Report of even date:

For and on behalf of the Board of Directors

For PRYD & Associates

Chartered Accountants
Registration No. 1011626N

(CA P. M. Mittal)
Partner
Membership No.: 094667
Place: New Delhi
Date: September 21, 2020

(Binod Kumar Mishra)
Chief Finance Officer

(Rekha Sharma)
Sr. DGM Legal & Company Secretary
M No: FCS 6428

(Mohinder Kumar Gupta)
Managing Director
DIN - 00054110

(Samir Gupta)
Whole Time Director
DIN - 00054308

Notes to the financial statements for the year ended 31st March, 2020:**A Corporate information**

Star Wire (India) Limited (SWIL), a mini steel plant is engaged in manufacturing of castings, forging and rolled products from alloy steels, super alloy steel, high grade stainless steel and special steels which find application in diversified engineering fields like automobiles, aerospace, super critical power plants etc. SWIL originally incorporated in 1963 was taken over by the present management in 1981.

Name: Star Wire (India) Limited (SWIL)

Date of Incorporation : July 4, 1963

Corporate Identity Number (CIN) issued by MCA: U27109DL1963PLC117600

Constitution: Limited Company

Industry: Engineering / Mini Steel Plant

Registered & Corporate Office:-

Registered Office – 35, Link Road, 2nd Floor, Lajpat Nagar-III,
New Delhi-110024

Project sites**Plant I:**

21/4, Mile Stone, Mathura Road, Ballabgarh,
Faridabad, (Haryana)

Plant II:

Village Chhainsa, Ballabgarh, Faridabad, (Haryana)

B Significant accounting policies:**B.1 Basis of accounting and preparation of financial statements**

The financial statements are prepared on accrual basis under the historical cost convention, except for certain Fixed Assets which are carried at revalued amounts and certain financial assets and liabilities that are measured at fair value. The financial statements are presented in Indian rupees (₹), rounded off to the nearest rupees in lakhs.

The financial statements of the Company have been prepared to comply with the Indian Accounting standards ('Ind AS'), including the rules notified under the relevant provisions of the Companies Act, 2013.

B.2 Summary of Significant Accounting Policies**(a) Property, Plant and Equipment**

Property, Plant and Equipment are stated at cost net of recoverable taxes, trade discounts and rebates and include amounts added on revaluation, less accumulated depreciation and impairment loss, if any. Such cost includes purchase price, borrowing cost and any cost directly attributable to bringing the asset to its working condition for its intended use, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the assets.

Subsequent expenditures related to an item of Property, Plant and Equipment are added to its book value only if they increase the future economic benefits from the existing asset beyond its previously assessed standard of performance.

Property, plant and equipment which are not ready for their intended use are disclosed under Capital Work-in-Progress.

Gains or losses arising on retirement or disposal of property, plant and equipment are recognised in the Statement of Profit and Loss.

Depreciation on Property, Plant and Equipment is provided on Straight Line Method (SLM). Depreciation is provided based on useful life of the assets as prescribed in Schedule II to the Companies Act, 2013 except in respect of the following assets, where useful life is different than those prescribed in Schedule II:

Particular	Depreciation
Property, Plant and Equipment	Over its useful life considered as 30 years as technically assessed
Iron & Steel Industries - Rolling Mill Rolls	Over its useful life considered as one year as technically assessed

The residual values, useful lives and methods of depreciation of Property, Plant and Equipment are reviewed at each financial year end and adjusted prospectively, if appropriate. For new projects, for direct expenses and direct overheads including interest on Borrowed funds for the acquisition of Assets are capitalized till the assets are ready for intended use.

(b) Intangible Assets

Separately purchased intangible assets are initially measured at cost. Intangible assets acquired in a business combination are recognised at fair value at the acquisition date. Subsequently, intangible assets are carried at cost less any accumulated amortisation and accumulated impairment losses, if any. Finite-life intangible assets are amortised on a straight-line basis over the period of their expected useful lives.

Intangible assets which are not ready for their intended use are disclosed as 'Intangible assets under development'.

A summary of amortisation / depletion policies applied to the Company's Intangible Assets to the extent of depreciable amount is as follows:

Particular	Amortisation / Depletion
Computer Software	Over a period of 5 years
Others	Over the period of agreement of right to use

The amortisation period and the amortisation method for Intangible Assets with a finite useful life are reviewed at each reporting date.

(c) Research and Development Expenses:

Company has not incurred any expense under this head during this Financial Year. However, as a matter of policy Revenue expenditure on research and development is charged to the Profit and Loss Statement under the natural head of account in the year in which it is incurred and capital expenditure on research and development is accounted for as the normal capital expenditure.

(d) Finance Cost:

Borrowing costs include exchange differences arising from foreign currency borrowings to the extent they are regarded as an adjustment to the interest cost. Borrowing costs that are attributable to the acquisition or construction of qualifying assets are capitalised as part of the cost of such assets. A qualifying asset is one that necessarily takes substantial period of time to get ready for its intended use. All other borrowing costs are charged to the Profit and Loss Statement in the period in which they are incurred.



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Notes to the financial statements for the year ended 31st March, 2020:

(e) Inventories:

Finished and semi-finished products produced and purchased by the Company are carried at lower of cost or net realizable value. Work-in-progress is carried at cost. Cost has been ascertained under retail method i.e. selling price less Gross profit because the company is engaged in the business as manufacturer of tailored items as per orders received. The range of these tailored items is very wide in terms of quality, value and also quantity. To be very specific the value of item each in the range of ~ Rs. 50/- per Kg to ~ Rs. 3000/- per Kg. In view of this the company has opted to value the closing stock applying Retail method being only appropriate method on the given facts and circumstances.

Raw materials & Components are carried at lower of cost and net realizable value.

Stores and spare parts are carried at cost. Necessary provision is made and charged to revenue in case of identified obsolete and non-moving items.

Cost of raw materials, Components, stores and spares, trading and other products are determined on FIFO method.

(f) Employee Benefits:

Short-term employee benefits are recognised as an expense at the undiscounted amount in the Profit and Loss Statement of the year in which the related service is rendered.

Post employment and other long term employee benefits are recognised as an expense in the Profit and Loss Statement for the year in which the employee has rendered services. The expense is recognised at the present value of the amounts payable determined using actuarial valuation techniques. Actuarial gains and losses in respect of post employment and other long term benefits are charged to the Profit and Loss Statement. The Company pays gratuity to the employees who have completed five years of service with the Company at the time of resignation/superannuation. The gratuity is paid @15 days salary for every completed year of service as per the Payment of Gratuity Act 1972.

The provisions towards accrued leave and post-retirement benefits to employees / legal heirs of the deceased employees under the Employees' Family Benefit Scheme, are computed at the time of payment on actual basis, based on Company's Policies. Thus IND-AS-19 has been complied with.

(g) Tax Expenses:

The tax expense for the period comprises of current tax and deferred income tax. Tax is recognised in Statement of Profit & Loss.

i) **Current Tax:** Current tax assets and liabilities are measured at the amount expected to be recovered from or paid to the Income Tax authorities, based on tax rates and laws that are enacted at the Balance sheet date.

ii) **Deferred Tax:** Deferred tax is recognised on temporary differences between the carrying amounts of assets and liabilities in the Financial Statements and the corresponding tax bases used in the computation of taxable profit.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period. The carrying amount of Deferred tax liabilities and assets are reviewed at the end of each reporting period.

(h) Foreign Currency Transactions:

Transactions denominated in foreign currencies are recorded at the exchange rate prevailing on the date of the transaction or that approximates the actual rate at the date of the settlement of the transaction.

Monetary assets & liabilities denominated in foreign currencies at the year end are reported at the same rates. Items which are covered by forward exchange contracts are also reported at the same rates and the premium paid on forward contracts is recognised over the life of the contract. Non-monetary items are carried at cost. Management is of the view that the adjustment on account of differences in exchange rates at the year end is very nominal and will not affect the basic information reported in this statement.

Any income or expense on account of exchange difference either on settlement or on translation is recognised in the Profit and Loss Statement, except in case of long term liabilities, where they relate to acquisition of Fixed Assets, in which case they are adjusted to the carrying cost of such assets.

(i) Revenue Recognition:

Revenue from sale of goods is recognised when the significant risks and rewards of ownership have been transferred to the buyer, recovery of the consideration is probable, the associated cost can be estimated reliably, there is no continuing effective control or managerial involvement with the goods, and the amount of revenue can be measured reliably.

Revenue from rendering of services is recognised when the performance of agreed contractual task has been completed.

Revenue from operations is measured at the fair value of the consideration received or receivable, taking into account contractually defined terms of payment and excluding taxes or duties collected on behalf of the government.

Interest Income from a Financial Assets is recognised using effective interest rate method.

(j) Financial Instruments:

(a) Financial Assets:

All Financial Assets are recognized at fair value. Transaction costs that are directly attributable to the acquisition or issue of Financial Assets, which are not at Fair Value Through Profit or Loss (FVTPL), are adjusted to the fair value on initial recognition. Purchase and sale of Financial Assets are recognised using trade date accounting.

Investments in unquoted & quoted equity

Non Current investments in equity shares, quoted & unquoted, are stated at market & book value respectively.

(b) Financial Liabilities:

All Financial Liabilities are recognized at fair value and in case of borrowings, net of directly attributable cost. Fees of recurring nature are directly recognised in the Statement of Profit and Loss as finance cost. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

(k) Derivative Financial Instruments

The Company uses derivative financial instruments presently forwards & options to mitigate the risk of changes in exchange rates. Such derivative financial instruments are initially recognised at fair value on the date on which a derivative contract is entered into.

Any gains or losses on the close of the transaction are taken directly to Statement of Profit and Loss.

Financial Assets and Financial Liabilities are offset and the net amount is presented in the balance sheet.

(l) Earnings per Share:

The earnings considered in ascertaining the Company's Earnings per Share (EPS) comprise the net profit after tax. The number of shares used in computing basic EPS is the weighted average number of shares outstanding during the year.



Notes to the financial statements for the year ended 31st March, 2020:**(m) Provisions & Contingent Liabilities:**

Provisions are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation.

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

(n) Impairment of Non-Financial Assets - Property, Plant and Equipment and Intangible Assets

The Company assesses at each reporting date as to whether there is any indication that any Property, Plant and Equipment and Intangible Assets or group of Assets, called Cash Generating Units (CGU) may be impaired. If any such indication exists, the recoverable amount of an asset or CGU is estimated to determine the extent of impairment, if any. When it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the CGU to which the asset belongs.

(o) Use of Estimates:

The estimates and judgments used in the preparation of the financial statements are continuously evaluated by the Company and are based on historical experience and various other assumptions and factors (including expectations of future events) that the Company believes to be reasonable under the existing circumstances. Differences between actual results and estimates are recognised in the period in which the results are known/ materialised.

The said estimates are based on the facts and events, that existed as at the reporting date, or that occurred after that date but provide additional evidence about conditions existing as at the reporting date.

(p) Government Grants:

Government grants are not recognised until there is reasonable assurance that the Company will comply with the conditions attaching to them and that the grants will be received.

Government grants are recognised in profit or loss on a systematic basis over the periods in which the Company recognises as expenses the related costs for which the grants are intended to compensate.

Government grants relating to the purchase of property, plant and equipment are included in non-current liabilities as deferred income and are credited to Profit and Loss on a straight-line basis over the expected lives of related assets and presented within other income.

(q) Classification of Assets and Liabilities:

Schedule III to the Companies Act, 2013 requires assets and liabilities to be classified as either Current or Non-current.

I. An asset shall be classified as current when it satisfies any of the following criteria:

- (i) It is expected to be realised in, or is intended for sale or consumption in, the Company's normal operating cycle;
- (ii) It is held primarily for the purpose of being traded;
- (iii) It is expected to be realized within twelve months after the reporting date; or
- (iv) It is cash or cash equivalent unless it is restricted from being exchanged or used to settle a liability for at least twelve months after the reporting date.

All assets other than current assets shall be classified as non-current.

II. A liability shall be classified as current when it satisfies any of the following criteria:

- (i) It is expected to be settled in the Company's normal operating cycle;
- (ii) It is held primarily for the purpose of being traded;
- (iii) It is due to be settled within twelve months after the reporting date; or
- (iv) The Company does not have an unconditional right to defer settlement of the liability for at least twelve months after the reporting date.

All liabilities other than current liabilities shall be classified as non-current.

C Critical Accounting Judgments And Key Sources Of Estimation Uncertainty

The preparation of the Company's Financial Statements requires management to make judgement, estimates and assumptions that affect the reported amount of revenue, expenses, assets and liabilities and the accompanying disclosures. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of assets or liabilities affected in next financial years.

(a) Depreciation / Amortisation and useful lives of Property Plant and Equipment / Intangible Assets:

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

(b) Recoverability of Trade Receivables:

Judgements are required in assessing the recoverability of overdue trade receivables and determining whether a provision against those receivables is required. Factors considered include the credit rating of the counterparty, the amount and timing of anticipated future payments and any possible actions that can be taken to mitigate the risk of non-payment.

(c) Provisions:

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

(d) Impairment of Non-Financial Assets:

The Company assesses at each reporting date whether there is an indication that an asset may be impaired. If any indication exists, the Company estimates the asset's recoverable amount. An asset's recoverable amount is the higher of an asset's or Cash Generating Units (CGU's) fair value less costs of disposal and its value in use. It is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or a groups of assets. Where the carrying amount of an asset or CGU exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount.

In assessing value in use, the estimated future cash flows are discounted to their present value using pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. In determining fair value less costs of disposal, recent market transactions are taken into account, if no such transactions can be identified, an appropriate valuation model is used.

(e) Impairment of Financial Assets:

The impairment provisions for Financial Assets are based on assumptions about risk of default and expected cash loss rates. The Company uses judgement in making these assumptions and selecting the inputs to the impairment calculation, based on Company's past history, existing market conditions as well as forward looking estimates at the end of each reporting period.



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Notes to the Financial Statements for the year ended 31st March, 2020

Note- 1: PROPERTY, PLANT AND EQUIPMENT, CAPITAL WORK-IN-PROGRESS, INTANGIBLE ASSETS AND INTANGIBLE ASSETS UNDER DEVELOPMENT												(Rs in Lakhs)
Assets	Rate of Depreciation	Gross Block				Depreciation / Amortisation and Depletion				Net Block		
		As at 01.04.2019	Additions / Adjustments	Deduction / Adjustments	As at 31.03.2020	As at 01.04.2019	For the year	Adjustments / (deductions)	As at 31.03.2020	As at 31.03.2020	As at 31.03.2019	
1	2	3	4	5	6	7	8	9	10	11	12	
Property, Plant and Equipment	-	3406.59	0.00	0.00	3406.59	0.00	0.00	0.00	0.00	3406.59	3406.59	
	1.58%	10.75	0.00	0.00	10.75	0.61	0.18	0.00	0.80	9.95	10.14	
	3.17%	8328.92	12.20	0.00	8341.12	722.54	298.84	0.00	1021.38	7319.74	7606.38	
	95.00%	2.00	0.00	0.00	2.00	2.00	0.00	0.00	2.00	0.00	0.00	
	3.17%	28617.45	9936.62	0.00	38554.07	2570.25	1067.34	0.00	3637.59	34916.48	26047.20	
	9.50%	161.11	11.32	0.00	172.43	54.42	21.04	0.00	75.47	96.96	106.69	
	19.00%	166.03	36.35	0.00	202.38	68.45	32.84	0.00	101.28	101.09	97.58	
	31.67%	201.63	27.02	0.00	228.65	116.77	46.23	0.00	163.00	65.65	84.86	
	4.75%	3.20	0.00	0.00	3.20	0.00	0.00	0.00	0.00	3.20	3.20	
	47.50%	9.14	0.00	0.00	9.14	0.00	0.00	0.00	0.00	9.14	9.14	
	4.75%	9.05	0.00	0.00	9.05	2.01	0.67	0.00	2.68	6.37	7.04	
	95.00%	636.72	169.05	0.00	805.77	445.44	177.01	0.00	622.45	183.32	191.28	
	9.50%	88.77	5.20	0.00	93.97	30.24	11.10	0.00	41.34	52.63	58.53	
	11.88%	418.60	22.60	37.87	403.33	124.65	50.66	8.83	166.48	236.85	293.95	
	9.50%	0.17	0.08	0.00	0.25	0.06	0.02	0.00	0.08	0.17	0.11	
	11.88%	39.23	0.00	0.00	39.23	14.30	5.22	0.00	19.52	19.71	24.93	
	Total (A)		42099.35	10220.44	37.87	52281.92	4151.74	1711.17	8.83	5854.07	46427.85	37947.60
Intangible Assets												
Intangible Assets	20.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total (B)		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total (A) + (B)		42099.35	10220.44	37.87	52281.92	4151.74	1711.17	8.83	5854.07	46427.85	37947.60	
Capital Work-in-Progress	-	9747.21		7259.98	2487.23	0.00	0.00	0.00	0.00	2487.23	9747.21	
Intangible assets under development	-	182.31	152.75	0.00	335.06	0.00	0.00	0.00	0.00	335.06	182.31	



Notes to the Financial Statements for the year ended 31st March, 2020

(Rs in Lakhs)

Particulars	As at 31st March, 2020	As at 31st March, 2019
Note - 2: Investments - Non-current		
INVESTMENTS, AT FVTOCI		
- In Fully Paid Equity Shares:		
<i>Quoted:</i>		
24500 Shares of ₹ 2/- each in Supreme Commercial Enterprises Ltd, Delhi	64.89	64.43
500 Shares of ₹ 10/- each in Auto Pins (I) Ltd, Delhi	0.04	0.04
<i>Unquoted:</i>		
30000 Shares of ₹ 2/- each in Eagle International Ltd, Delhi	3.53	3.46
24000 Shares of ₹ 2/- each in Juhi Leasing & Finance Ltd, Delhi	2.44	2.44
72000 Shares of ₹ 10/- each at a premium of Rs 90/- in Star Wire (I) Engineering Ltd, Delhi	59.15	73.76
4400 Shares of ₹ 10/- each in Star Wire (I) Engineering Ltd, Delhi		
	130.04	144.12
Note - 3: Non-Current Loans (Unsecured, considered good)		
Security and other deposits	1064.09	751.48
Loan to Employees	4.46	6.22
	1068.55	757.71
Note - 4: Other Non-Current Financial Assets (Unsecured, considered good)		
Bank Deposit with more than 12 months maturity	111.29	87.71
	111.29	87.71
Note - 5: Other non-current assets (Unsecured, considered good)		
Capital advances to other than related parties	172.70	399.52
Balances with government authorities		
CENVAT credit receivable	0.00	0.59
	172.70	400.11
Note - 6: Inventories		
Raw materials	3179.56	3733.89
Work-in-progress	2649.32	1253.05
Finished goods (Including Goods lying in godowns outside India)	9996.83	9578.36
Stock-in-trade (acquired for trading)		
- At Delhi Office	0.00	2.32
Stores and spares	2043.56	1715.67
	17869.26	16283.28



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STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended 31st March, 2020

	(Rs in Lakhs)	
	As at	As at
Particulars	31st March, 2020	31st March, 2019
Note - 7: Trade receivables (Unsecured and Considered Good)		
Outstanding for a period exceeding six months	2507.28	1854.92
Others	16573.71	17484.51
	<u>19080.99</u>	<u>19339.43</u>
Note: Trade receivables include debts due from:		
Private companies in which any director is a director or member	695.43	1399.59
	<u>695.43</u>	<u>1399.59</u>
Note - 8: Cash and cash equivalents		
(i) Cash & Bank balances:		
Cash on hand	24.59	20.93
Balances with banks		
(i) In current accounts	114.87	9.77
(ii) In EEFC accounts	10.11	97.87
	<u>149.57</u>	<u>128.57</u>
Note - 9: Bank balances other than Note - 8 above		
In earmarked accounts		
(i) In fixed deposit accounts	354.41	237.45
	<u>354.41</u>	<u>237.45</u>
(i) The balances are denominated and held in Indian rupees.		
(ii) Earmarked balances with bank represents balances held for unpaid dividends and margin money against issue of bank guarantees & letter of credits.		
Note - 10: Loans - Current (Unsecured and Considered Good)		
Loans and advances to employees	47.15	51.82
	<u>47.15</u>	<u>51.82</u>
Note - 11: Other Financial Assets - Current		
Balances with government authorities		
(i) Goods & Service Tax receivable	300.32	0.00
(ii) VAT credit receivable	6.06	14.27
(iii) Duty Draw Back credit receivable	130.10	158.58
(iv) Advance income tax (net of provisions)	507.14	437.33
	<u>943.63</u>	<u>610.18</u>
Advance Income Tax (Net of Provision)		
At start of year	437.33	483.55
Charge for the year - Current Tax	525.31	1089.38
Tax paid (Net) during the year	595.13	1043.15
At end of year	<u>507.14</u>	<u>437.33</u>
Note - 12: Other current assets (Unsecured and Considered Good)		
Interest accrued but not received	0.00	1.07
Prepaid expenses	157.88	154.65
Advances to Suppliers		
To related parties	716.30	615.00
To other than related parties	416.96	902.09
	<u>1291.15</u>	<u>1672.80</u>



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STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended 31st March, 2020

(Rs in Lakhs)

Particulars	As at 31st March, 2020	As at 31st March, 2019
Note - 13: Share Capital		
AUTHORISED:		
29,00,00,000 Equity Shares of ₹ 1/- each	2900.00	2900.00
(29,00,00,000) Equity Shares of ₹ 1/- each		
60,00,000 4% Non Cumulative Redeemable Preference Share of ₹ 10/- Each*	600.00	600.00
(60,00,000) 4% Non Cumulative Redeemable Preference Share of ₹ 10/- Each*		
	3500.00	3500.00
ISSUED, SUBSCRIBED & PAID UP:		
279047500 Equity Shares of ₹ 1/- each fully paid up	2790.48	2790.48
(279047500) Equity Shares of ₹ 1/- each fully paid up		
	2790.48	2790.48

(i) Details of shares held by each shareholder holding more than 5% shares:

Class of shares / Name of shareholder	As at 31 March, 2020		As at 31 March, 2019	
	Number of shares held	% held	Number of shares held	% held
Equity shares with voting rights				
Mohinder Kumar Gupta	42030000	15.06%	42030000	15.06%
Juhi Leasing & Finance Limited	105070000	37.65%	105070000	37.65%
Samir Gupta	26863125	9.63%	26863125	9.63%
Abhishek Gupta	15855000	5.68%	15855000	5.68%
Shares under dispute between two individual Share holders	24589375	8.81%	24589375	8.81%
Total	214407500	76.84%	214407500	76.84%

(ii) The reconciliation of the number of shares outstanding is set out below :

Particulars	As at 31 March, 2020	As at 31 March, 2019
	No. of Shares	No. of Shares
Equity Shares at the beginning of the year	279047500	279047500
Addition / Reduction during the year	0	0
Equity Shares at the end of the year	279047500	279047500

(iii) The rights, powers and preferences relating to share capital and the qualifications, limitations and restrictions thereof are contained in the Memorandum and Articles of Association of the Company. The principal rights are as below:

Ordinary Shares of Re 1 each

(a) In respect of every Ordinary Share (whether fully paid or partly paid), voting right shall be in the same proportion as the capital paid up on such Ordinary Share bears to the total paid up Ordinary Capital of the Company.

(b) The dividend proposed, if any, by the Board of Directors is subject to the approval of the shareholders in the ensuing Annual General Meeting, except in case of interim dividend.

(c) In the event of liquidation, the shareholders of Ordinary Shares are eligible to receive the remaining assets of the Company after distribution of all preferential amounts, in proportion to their shareholding.

Note - 14: Other Equity

Capital reserve:			
As per last Balance Sheet	50.00		50.00
General Reserves:			
As per last Balance Sheet	475.83		475.83
Revaluation Reserves:			
As per last Balance Sheet	617.42		617.42
Securities premium reserve:			
As per last Balance Sheet	7224.88		7224.88
Retained Earnings:			
As per last Balance Sheet	24993.11	21883.09	
Add: Profit for the year	4278.19	3190.88	
Less: Appropriations			
Transfer to Provisions for CSR	93.02	80.85	
Closing balance	29178.29		24993.11
Other Comprehensive Income (OCI):			
As per last Balance Sheet	(13.99)	(26.15)	
Add: Movement in OCI (Net) during the year	(58.44)	12.16	
	(72.43)		(13.99)
Total	37473.98		33347.25



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STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended 31st March, 2020

Particulars	(Rs in Lakhs)	
	As at 31st March, 2020	As at 31st March, 2019
Note - 15: Borrowings		
(a) Secured		
(i) Term Loans: @		
- HDFC Bank Limited	3532.14	5204.18
- Axis Bank Limited	6069.45	7211.92
- Federal Bank	188.50	0.00
- Kotak Mahindra Bank Limited	4750.67	2808.87
	14540.76	15224.97
(ii) Vehicle Loans: #		
- Hdfc Bank Ltd A/c Auto Loan	0.00	10.66
	0.00	10.66
(b) Unsecured		
(i) From related parties:		
Corporate Loans:		
- M/s Nipin Steel Pvt Limited	3.03	2.73
- M/s Sun Source Leafin Pvt Limited	63.77	58.72
Other than Corporate Loans:		
- Shri Abhishek Gupta	263.39	191.23
- Shri Mohinder Kumar Gupta	70.64	35.04
- Shri Samir Gupta	361.21	267.63
- Smt. Rekha Gupta	346.99	301.53
- Smt. Mahima Gupta	29.82	26.91
- Shri Sita Ram Gupta	21.12	23.59
	1159.97	907.38
(ii) 4% Non Cumulative Redeemable Preference Share of ₹ 10/- Each*	254.05	254.05
4% Non Cumulative Redeemable Preference Share of ₹ 10/- Each**	100.00	100.00
	354.05	354.05
	16054.78	16497.06

Note:@

1.Term Loan from Federal Bank amounting to Rs. 56 crore sanctioned during the year is secured by first charge on land at Tehsil Chhainsa, Faridabad admeasuring 21.62 acre & first pari-passu charges on entire movable assets of company, and by second pari-passu charge of current assets both present and future.

2.Term Loans from other banks are secured by first charge by way of an equitable mortgage of immovable properties, both present and future, situated at Vill Chhainsa, Faridabad admeasuring 32.756 Acres, and by a first charge by way of hypothecation of all the Company's movables including machinery, machinery spares, tools and accessories, present and future, and by second pari passu charge by way of hypothecation of present and future stock of raw materials, goods in process, finished and manufactured goods together with components, spares and Book-Debts / Receivables. Term Loans are also secured by the guarantees of Shri M K Gupta, Shri Samir Gupta and Shri Abhishek Gupta Directors of the Company.

Vehicle Loans are secured by hypothecation of specific vehicles purchased.

* The permission of NCLT has been obtained regarding re-issue of Preference Shares on same terms & conditions for 10 years i.e. the same will be redeemed not later than Aug,2030

** These Preference shares are to be redeemed on or before 10th February, 2029.

Maturity Profile of secured Term Loans are as set out below :

	Maturity Profile		Non-Current	Current
	Above 5 years	1-5 years	Total	1 year
HDFC Bank Limited	0.00	3532.14	3532.14	1714.00
Federal Bank	0.00	188.50	188.50	0.00
Axis Bank Limited	1109.45	4960.00	6069.45	1500.00
Kotak Mahindra Prime Limited	1417.34	3333.33	4750.67	208.33
Total	2526.79	12013.97	14540.76	3422.33

Note - 16: Provisions - Non-Current

Provision for employee benefits:		
Gratuity	732.90	642.52
	732.90	642.52



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Notes to the Financial Statements for the year ended 31st March, 2020

(Rs in Lakhs)

Particulars	As at 31st March, 2020	As at 31st March, 2019
-------------	---------------------------	---------------------------

Note - 17: Income Tax**A. Income Tax Expenses / (Benefits)**

The Company is subject to income tax in India on the basis of financial statements. As per Section 115BAA of Income Tax Act, the Company is liable to pay income tax at the rate of 25.168 %

Companies can claim for tax exemptions/deductions under specific section subject to fulfilment of prescribed conditions as may be applicable.

Business loss can be carried forward for a maximum period of eight assessment years immediately succeeding the assessment year to which the loss pertains. Unabsorbed depreciation can be carried forward for an indefinite period.

The reconciliation of estimated income tax to income tax expense is as below:

Profit/(loss) before tax	3773.57	5027.27
Applicable Tax Rate	25.168%	34.944%
Computed Tax Expense	949.73	1756.73
Tax effect of:		
(i) Expenses disallowed	3.66	4.80
(ii) Tax on income at different rates	0.00	0.00
(iii) Excess / (Short) provision made during the year	0.00	0.00
(iv) (Excess) / Short provision made during the previous year	0.00	7.45
(v) Additional allowances net of MAT Credit	0.00	21.36
(vi) Effect of change in Tax Rate	(1537.85)	46.05
Current Tax Provision	(584.45)	1836.39
Effective Tax Rate	-15%	37%

B. Deferred Tax Liability (Net)

The movement on the deferred tax account is as follows:

At the start of the year	5496.98	4743.44
Charge/(credit) to Statement of Profit and Loss	(1129.42)	753.54
At the end of year	4367.56	5496.98

Component of Deferred tax liabilities / (asset)

As at 1st April, 2019	Charge/ (credit) to Statement of Profit and Loss	As at 31st March, 2020
5803.99	(1204.51)	4599.48
(307.00)	75.09	(231.92)
5496.98	-1129.42	4367.56

Deferred tax liabilities / (asset) in relation to:

Property, Plant and Equipment and Intangible Asset	
Provisions	
Total	

Note - 18: Other non-current Liabilities

(a) Advances from customers	0.00	88.18
(b) Government Grant (EPCG)	791.19	708.53
	791.19	796.70



Notes to the Financial Statements for the year ended 31st March, 2020

Particulars	(Rs in Lakhs)	
	As at 31st March, 2020	As at 31st March, 2019
Note - 19: Borrowings		
Loans repayable on demand		
From Banks (Secured)		
Working Capital Loans #		
- State Bank of India:	6527.99	8402.80
- HDFC Bank Limited:	6695.76	6923.52
- Kotak Mahindra Bank Limited	487.55	160.38
- Yes Bank	1035.29	1480.52
- Axis Bank	1955.18	1738.03
Other loans and advances (Unsecured)		
Foreign Currency Loans - Buyers Credit		
- Axis Bank Ltd:	645.56	0.00
- HDFC Bank Limited:	272.19	361.39
	17619.52	19066.64
Details of security for the secured short-term borrowings:		
Working Capital Loans are secured by first pari-passu charge by way of hypothecation of Company's stocks and book-debts, present and future and by a second charge on all the movable properties of the company including plant and machinery spares, tools and accessories and other movables both present and future and by a second charge on all the immovable properties situated at Vill. Chhainsa, Faridabad, admeasuring 32.756 Acres. The Working Capital Loans are also secured by the guarantees of Shri M K Gupta, Shri Samir Gupta and Shri Abhishek Gupta Directors of the Company.		
Working Capital Loans from State Bank of India is further secured by extension of charge by way of equitable mortgage of immovable properties, both present and future, situated at Ballabgarh, Faridabad.		
Note - 20: Trade payables		
(a) Creditors for supplies and services	4322.51	3998.83
(b) Creditors for accrued wages and salaries	274.25	198.84
	4596.76	4197.67
Note - 21: Other Financial liabilities - Current		
Current maturities of long-term debt	3432.99	2448.38
Due to Employees	47.15	44.92
Expenses payable	12.68	204.79
Creditors for Capital Expenditure	347.19	954.95
Statutory remittances (Contributions to PF and ESIC,		
Withholding Taxes, GST, VAT etc.)	177.98	388.55
Trade / security deposits received	79.69	85.35
	4097.68	4126.94
Note - 22: Other current liabilities		
Advances from customers	1541.31	241.50
	1541.31	241.50
Note - 23: Provisions - Current		
Provision for employee benefits:		
Provision for gratuity	244.33	305.88
Provisions for CSR	158.39	80.67
	402.72	386.55

STAR WIRE (INDIA) LIMITED**Notes to the Financial Statements for the Year ended 31st Mar, 2020**

		(Rs in Lakhs)	
		Current Year	Previous Year
Particulars		2019-20	2018-19
Note - 24: Revenue from operations			
Indigenous Sales		40513.38	46497.62
Export Sales		23165.52	23667.20
		63678.90	70164.82
Less: GST Recovered		7508.06	8883.27
Total A		56170.84	61281.55
Note - 25a: Operating income			
Testing Charges Received		294.87	223.68
Export Incentive		797.73	658.28
Total B		1092.60	881.96
Note - 25b: Non-operating income			
Interest Received		182.92	51.10
Other Income		19.10	30.10
Government Grant (EPCG)		15.34	12.99
Total C		217.36	94.20
Note - 26: Cost of materials consumed			
Opening stock		3733.89	3046.73
Add: Purchases		18529.95	21343.03
Add: Freight		800.46	754.20
Less: Closing stock		3179.56	3733.89
Cost of material consumed		19884.74	21410.07
Note - 27: Purchase of traded goods			
Traded Goods		0.00	0.82
		0.00	0.82
Note - 28: Changes in inventories of finished goods, work-in-progress and stock-in-trade			
Inventories at the end of the year:			
Finished goods		9996.83	9578.36
Work-in-progress		2649.32	1253.05
Stock-in-trade		0.00	2.32
Inventories at the beginning of the year:			
Finished goods		9578.36	8396.39
Work-in-progress		1253.05	1912.26
Stock-in-trade		2.32	2.88
Net (increase) / decrease		(1812.42)	(522.19)



STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the Year ended 31st Mar, 2020

(Rs in Lakhs)

Particulars	Current Year 2019-20	Previous Year 2018-19
Note - 29: Employee benefits expense		
- Salaries and wages		
Salaries	1877.69	1861.73
Wages	387.41	325.72
House Rent Allowance	482.77	491.12
Conveyance Allowance	184.22	183.35
Special Allowance	194.40	194.72
Good Work Award	135.47	158.05
Production Bonus	57.37	57.18
Stipend	74.71	29.08
Leave Encashment	94.60	77.72
Leave Travel Concession	73.39	75.59
Bonus	356.33	316.84
Notice Pay	2.25	0.00
Recruitment Expenses	3.28	3.58
Security Charges	136.37	123.83
Uniform Expenses	29.74	19.69
Discounting value of interest free loans to employees	1.21	1.04
- Contributions to provident and other funds		
Deposit Link Insurance Fund Charges (Staff)	2.64	2.47
ESI Contribution	20.47	31.25
PF Administrative Charges	12.58	13.04
PF Contribution	247.42	233.72
- Staff welfare expenses		
Labour Welfare	19.07	22.40
Medical Expenses	138.42	130.35
Contribution towards Labour Welfare Fund	0.00	1.48
Staff Welfare	99.83	94.25
Welfare Fund	7.59	4.15
- Employees' Retirement Benefits		
Provision for Gratuity	149.16	136.70
Retrenchment Compensation	6.43	10.92
Retirement Benefits	8.57	14.56
	4803.36	4614.53
Note - 30: Finance costs		
- Interest on borrowings	2475.06	2264.84
- Dividend on Redeemable Preference Shares & Taxes thereon	12.90	12.23
- Interest on Delayed / deferred payment of Govt dues	0.05	0.09
- Interest on Unsecured Loans	120.82	96.64
- Other borrowing costs (Bank Charges)	149.25	50.05
	2758.08	2423.85
Note - 31: Other expenses		
31. a - Manufacturing Expenses		
Consumption of stores and spare parts	11561.12	11869.20
Contract Charges	5045.79	4780.31
Conversion & Stitching Charges	149.88	176.82
Increase / (decrease) of GST on inventory #	(1280.28)	168.74
Machining Charges	893.18	400.26
Pattern & Drawing Charges	155.24	207.28
Power and fuel	6587.20	7067.53
Testing Charges	66.77	100.92
	23178.90	24771.07

GST shown under Manufacturing Expenses represents the difference between GST on opening and closing stock of finished goods respectively.



STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the Year ended 31st Mar, 2020

(Rs in Lakhs)

Particulars	Current Year	Previous Year
	2019-20	2018-19
31.b - Administrative Expenses		
Audit Exp. (NABL)	0.13	0.95
Audit Fee (ISO-9002) & Others	6.08	8.22
Books & Periodicals	0.72	0.86
Charity & Donation	0.91	0.70
Directors Remuneration**	215.60	222.75
Directors Travelling Expenses	7.93	5.42
Electricity & Water Charges	23.36	24.17
Foreign Tours & Travelling Expenses	22.09	32.23
Foreign Tours & Travelling Expenses (Directors)	28.99	33.17
General & Miscellaneous Expenses	1.64	73.40
Insurance Charges	199.08	109.09
Keyman Insurance Policy	5.00	5.00
Loss on Sale of Vehicle	1.36	1.84
Meeting & Conference Expenses	0.02	0.81
Audit Expenses @	12.77	13.39
Postage & Telegram Expenses	8.79	6.88
Printing & Stationery	26.75	26.73
Professional & Consultancy Charges	324.19	256.98
Rent	85.03	77.76
Rates & Taxes	18.15	22.77
Repair & Maintenance - Civil	424.66	537.64
Repairs and maintenance - Electrical	18.36	20.58
Repair & Maintenance - General	30.43	43.55
Repairs and maintenance - Machinery	244.92	329.44
Repair & Maintenance - Vehicles	66.28	82.25
Subscription & Membership Fees	9.81	13.16
Telephone Expenses	20.20	20.71
Travelling & Conveyance	208.94	253.71
	2012.18	2224.17
** Remuneration paid / payable to Directors:		
Managerial remuneration paid or payable during the period which is much less than the prescribed under Companies Act, is as under:-		
Salary	215.40	222.60
Directors' Sitting Fees	0.20	0.15
	215.60	222.75
@ Payments to the auditors comprises (net of GST input credit, where applicable):		
(a) Auditors - Statutory Audit		
Statutory Audit Fees	2.50	2.50
Reimbursement of expenses	0.60	1.18
	3.10	3.68
(b) Cost Auditors		
Audit Fees	1.50	1.50
Reimbursement of expenses	1.17	1.21
	2.67	2.71
(c) Others		
Tax Audit Fees	7.00	7.00
	12.77	13.39
31.c - Selling & Distribution Expenses		
Advertisement & Publicity Expenses	16.79	16.45
Commission & Brokerage	100.90	29.16
Entertainment & Sales Promotion Expenses	33.21	31.61
Rent (S&D)	87.01	0.00
Freight and forwarding	842.79	618.70
Custom Duty Paid On Overseas Sales	45.25	0.00
Bad & Doubtful Debts written off	31.83	0.00
Tender Fees	0.70	0.86
Trade Fare & Exhibition Expenses	12.75	38.82
	1171.23	735.60
	26362.31	27730.83



STAR WIRE (INDIA) LIMITED
Notes to the Financial Statements for the year ended 31st March, 2020

Particulars	As at 31st March, 2020	As at 31st March, 2019
Note - 32: Additional information to the financial statements		
1 Contingent liabilities and commitments (to the extent not provided for)		
(i) Contingent liabilities	344	344
(a) Claims against the Company / disputed liabilities not acknowledged as debt #		
(b) Guarantees	6796	3711
- Inland		
(ii) Commitments		
(a) Estimated amount of contracts remaining to be executed on capital account and not provided for	102	1118
- Tangible assets	0	79
- Intangible assets	0	0
(b) Uncalled liability on shares and other investments partly paid		
(c) Other commitments (specify nature)	485	194
- Bills drawn on customers and discounted with banks at close of the year.	0	1477
- Letter of Credit outstanding	614	1744
- Undertaking to fulfill the export obligations (EPCG)		

Claim against the Company not acknowledged as debt

The company has not deposited Local Area Development Tax (LADT) from 2004-05 to 2007-08 imposed by Haryana State Government as it was held by the Hon'ble Supreme Court of India vide its order dated 30.10.2008 detail as under:

"There will be no recovery of tax till further orders of this Court, subject to each and every assessee in this group of cases giving an undertaking to the State and to this Court that, in the event of their ultimately losing the matter, they shall pay the amount due with interest at the rate that may be fixed by this Court at the time of final hearing of the matters."

Demand Orders of Custom & Central Excise Authorities disputed by the Company

Demand of addition Income Tax & interest pending with various appellate Authorities, disputed by the Company

	2019-20	2018-19
1 Euro = Rs	83.20	77.66
1 USD = Rs	75.475	69.18
1 AED = Rs	20.56	18.845
1 CNY = Rs	10.655	10.295

b Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances), as certified by the management.

2 Details on derivatives instruments and unhedged foreign currency exposures

I. The following derivative positions are open as at 31 March, 2020:

(a) Forward exchange contracts and options [being derivative instruments], which are not intended for trading or speculative purposes but for hedge purposes to establish the amount of reporting currency required or available at the settlement date of certain payables and receivables.

Outstanding forward exchange contracts entered into by the Company:

Currency	Buy / Sell	As at 31st March, 2020		As at 31st March, 2019	
		Cross currency	Amount (₹)	Cross currency	Amount (₹)
₹	Sell	₹ 85,84,668	₹ 7,142	₹ 97,12,072	₹ 7,542
\$	Sell	\$94,50,875	₹ 7,133	\$15,84,818	₹ 1,096
AED	Sell	AED 0	₹ 0	AED 0	₹ 0
\$	Buy	\$0	₹ 0	\$0	₹ 0
Total			₹ 14,275		₹ 8,638

II. The year-end foreign currency exposures that have not been hedged by a derivative instrument or otherwise are given below. The unhedged exposures are naturally hedged by future foreign currency earnings and earnings linked to foreign currency.

A. Buyers Credit:

As at 31st March, 2020		As at 31st March, 2019	
Receivable/ (Payable)	Receivable/ (Payable) in Foreign currency (indicate amount with currency)	Receivable/ (Payable)	Receivable/ (Payable) in Foreign currency (indicate amount with currency)
INR		INR	
918	\$12,71,251.42	361	\$5,17,481.85
0	₹ 0.00	0	₹ 0.00
918		361	0.00

B. Packing Credit in Foreign Currency (PCFC):

As at 31st March, 2020		As at 31st March, 2019	
Receivable/ (Payable)	Receivable/ (Payable) in Foreign currency (indicate amount with currency)	Receivable/ (Payable)	Receivable/ (Payable) in Foreign currency (indicate amount with currency)
INR		INR	
499	\$6,90,009.55	157	\$2,19,644.83
1033	₹ 11,98,729.55	168	₹ 2,07,494.00
1531		325	

Note: The management is of the view that the provision as desired in this Ind-AS is having a very nominal effect on our books of accounts & moreover, the same is already taken in accounts as & when the same accrues. Furthermore, the transactions involved are for a very small period i.e. with in the range of 3 months to 6 months and on this ground also the provision is not affecting the financial results of the company.

The financial effect i.e. gain / (loss) arising out of such deviation:

Particulars	As at 31st March, 2020	As at 31st March, 2019
Derivative-Forward Exchange Forward Contract	(355)	743
PCFC	13	12
Buyers' Credit	(42)	3
Export Trade Receivables	414	(79)
Import Trade Payables	3	27
Foreign Currency Loan	(133)	0
Total	(100)	707



STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended 31st March, 2020

Particulars		As at 31st March, 2020	As at 31st March, 2019
3	Disclosures required under Section 22 of the Micro, Small and Medium Enterprises Development Act, 2006		
	(i) Principal amount due and remaining unpaid to any supplier as at the end of the accounting year	Nil	Nil
	(ii) Interest due thereon remaining unpaid to any supplier as at the end of the accounting year	Nil	Nil
	(iii) The amount of interest paid along with the amounts of the payment made to the supplier beyond the appointed day		
	(iv) The amount of interest due and payable for the year	Nil	Nil
	(v) The amount of interest accrued and remaining unpaid at the end of the accounting year	Nil	Nil
	(vi) The amount of further interest due and payable even in the succeeding year, until such date when the interest dues as above are actually paid	Nil	Nil
	Micro, Small & Medium Enterprises have been ascertained on the basis claims furnished by the suppliers in this regard. This has been relied upon by the auditors.		
4	Employee benefit plans (Ind AS 19)		
a.	Defined contribution plans	247	234
	The Company makes Provident Fund contributions to defined contribution plans for qualifying employees. Under the Schemes, the Company is required to contribute a specified percentage of the payroll costs to fund the benefits. The Company recognised the amount for Provident Fund contributions in the Statement of Profit and Loss. The contributions payable to these plans by the Company are at rates specified in the rules of the schemes.		
b.	Defined benefit plans (Gratuity)		
i.	Reconciliation of opening and closing balances of Defined Benefit Obligation	1031	965
	Defined Benefit obligation at beginning of the year	77	88
	Current Service Cost	73	68
	Interest Cost	64	(16)
	Actuarial (gain) / loss	0	0
	Past Service Cost including Curtailment Gains/ Loss	(120)	(74)
	Benefits paid	1124	1031
	Defined Benefit obligation at year end		
ii.	Expenses recognised during the year		
	In Income Statement	77	88
	Current Service Cost	73	88
	Interest Cost	0	0
	Past Service Cost including Curtailment Gains/ Loss	0	0
	Expected return on Plan assets	149	137
	Net Cost		
	In Other Comprehensive Income	64	(16)
	Actuarial (gain) / loss	0	0
	Expected return on Plan assets	64	(16)
	Net (income)/ Expense For the period Recognised in OCI		
iii.	Actuarial assumptions:		
	Discount rate (per annum)	6.80%	7.65%
	Salary escalation (Per Annum)	5.50%	5.50%
	Attrition (Per Annum)	2.00%	2.00%
	Mortality tables	IALM (2006-08)	IALM (2006-08)
5	Operating Segment reporting (Ind AS 108)		
	The Company is engaged in manufacture and sale (both domestic and export) of Special Steel Products, which constitutes single business segment. As per management's perspective, the risks and returns from its sales do not materially vary geographically. Accordingly there are no other business / geographical segments to be reported under Ind AS 108 issued by the Institute of Chartered Accountants of India.		
6	Earning Per Equity Share (of Re. 1/- each) (Ind AS 33)		
	Net Profit after tax as per Statement of Profit and Loss attributable to Equity Shareholders	4265	3179
	Weighted Average number of equity shares used as denominator for calculating EPS	279047500	279047500
	Basic Earnings per share	1.53	1.14
	Diluted Earnings per share	1.53	1.14
	Face Value per equity share	1.00	1.00
7	Confirmation		
	The company has requested for confirmations of balances from its creditors and debtors, which has been confirmed by majority of creditors and debtors. Provisions, wherever considered necessary, have been made.		
	In the opinion of the management the investment, current / non current assets are realizable at a value, at par as stated, in the ordinary course of business and provisions for all known and determined liabilities are adequate and not in excess of the amount stated.		
8	Details of borrowing costs capitalised (Ind AS 23)		
	Borrowing costs capitalised during the year	587	310
	- as fixed assets / capital work-in-progress	587	310
9	Related party disclosures (Ind AS 24)		
	As per Ind AS 24, the disclosures of transactions with the related parties are given below:		
	(i) List of related parties where control exists and related parties with whom transactions have taken place:		
Sr. No.	Name of the Related Party	Relationship	
1	Mr. Mohinder Kumar Gupta	Key Management Personnel	
2	Mr. Samir Gupta		
3	Mr. Abhishek Gupta		
4	Ms. Mahima Gupta		
5	Ms. Rekha Gupta	Relative of key Management Personnel	
6	Mr. Sita Ram Gupta		
7	M/s Sita Ram Mohinder Kumar		
8	M/s Supreme Comm. Enterprises Ltd		
9	M/s Eagle International Limited	Enterprises / associates over which Management Personnel and their relatives are able to exercise significant influence	
10	M/s Interglobal Steels P Limited		
11	M/s Supersigma Alloy & Forgings Pvt Limited		
12	M/s Abhi Trading Company		
13	M/s Juhli leasing & Finance Limited		
14	M/s Star Wire Elect P Limited		
15	M/s Star Wire (I) Biomass P Limited		
16	M/s Star Wire (I) Engineering Limited		
17	Saraswati charitable Trust		
18	Shree Radha Krishna Charitable Trust		
19	Brijeshwari Dharmath Sansthan		
20	Mahawar charitable Trust		
21	Kuber Dharmarth Sansthan		
22	Mahawar Dharmarth Sansthan		
23	M/s Nipin Steel Private Limited		
24	M/s Achinandan Trafir Private Limited		
25	M/s Cornflower Vinimay LLP		
26	M/s Ensol International LLP		
27	M/s Hollysea Finvest Pvt Ltd		
28	M/s Mumet (India) Pvt Ltd		
29	M/s Padmanabh Steel & Trading LLP		
30	M/s Polylink Vinimay LLP		
31	M/s Sun Source Leafin Private Limited		
32	M/s Surendra Brothers Engineers Private Limited		
33	M/s S. J. Tea & Traders Limited Liability Partnership		



STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended 31st March, 2020

Particulars	As at 31st March, 2020	As at 31st March, 2019
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(ii) Transactions during the year with related parties:

Sr.No	Nature of Transactions (Excluding reimbursements)	Key Management Personnel	Relative of key Management Personnel-	Enterprises / Associates over which Management Personnel and their relatives are able to exercise significant influence
1	Purchase of goods			480
2	Sale of goods			(1343)
3	Interest Received			496
3	Managerial Remuneration	215 (223)		(3194)
4	Dividend Payment			78
5	Contract Charges / Machining Charges			0
6	Rent	10 (10)		11
7	Interest Paid	110 (87)	3 (3)	(10)
8	Directors Meeting Fees	0		1072
9	Payables	0		(588)
10	Unsecured Loans	1072 (822)	21 (24)	11
11	Investments			(61)
13	Bank / Corporate Guarantees			130
12	Receivables			(144)
13	Loans & Advances Given			0
				695
				(1400)
				716
				(615)

10 Impairment of the Assets (Ind AS 36)

In line with the requirements of Indian Accounting Standard – 36 on "Impairment of Assets" issued by the Institute of Chartered Accountants of India, the company reviews the carrying amount of its fixed assets on each balance sheet date for the purpose of ascertaining impairment, if any, by considering assets of entire one plant as Cash Generating Unit (CGU). On such review as at 31st March 2019, wherever there was indication of impairment, the net realizable value thereof was assessed by the Management and the same was more than the carrying amount. On further review as at 31st March 2020, these valuations of the assets continue to be higher than the book value and accordingly, no provision is required to be made in the accounts.

11 Value of imports calculated on CIF basis:

 Raw Material & Stores
Capital goods
Software

7050	9421
399	2872
0	0
7449	12293

12 Expenditure in foreign currency:

 Travelling
Commission & Brokerage
Professional and consultation fees
Interest
Subscription
Freight Outward
Contract Charges
Testing Charges
Trade Fair & Exhibition Expenditure
Machining Charges Paid A/c (Out of India)
Rent Charges

20	83
87	18
78	17
0	0
0	3
141	105
0	278
5	7
0	8
0	1
75	0
406	519

13 Details of consumption of imported and indigenous items:
Imported

Raw Material and Stores & Spares

Total

7429	8801
7429	8801

Indigenous

Raw Material and Stores & Spares

Total

24017	24478
24017	24478

14 Earnings in foreign exchange:

Export of goods calculated on FOB basis

21752	21615
21752	21615

15 Fair value measurement

The fair value of the financial assets and liabilities are included at the amount that would be received to sell an asset and paid to transfer a liability in an orderly transaction between market participants.

The following methods and assumptions were used to estimate the fair values:

Trade receivables, cash and cash equivalents, other bank balances, short term loans, other current financial assets, current borrowings, trade payables and other current financial liabilities approximate their carrying amounts largely due to the short-term maturities of these instruments.



STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended 31st March, 2020

Particulars	As at 31st March, 2020	As at 31st March, 2019
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The Company uses the following hierarchy for determining and disclosing the fair value of financial instruments by valuation techniques:

The following is the basis for categorising the financial instruments measured at fair value into Level 1 to Level 3:

Level 1: This level includes financial assets that are measured by reference to quoted prices (unadjusted) in active markets for identical assets or liabilities;

Level 2: This level includes financial assets and liabilities, measured using inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (i.e., as prices) or indirectly (i.e., derived from prices); and

Level 3: This level includes financial assets and liabilities measured using inputs that are not based on observable market data (unobservable inputs). Fair values are determined in whole or in part, using a valuation model based on assumptions that are neither supported by prices from observable current market transactions in the same instrument nor are they based on available market data.

Particulars	Carrying amount	As at 31st March, 2020		
		Level of input used in		
		Level 1	Level 2	Level 3
Financial Assets				
At Amortised cost				
Trade receivable	19,081	-	-	19,081
Cash & cash equivalents	150	-	-	150
Bank balances other than cash & cash equivalents	354	-	-	354
Loan	1,116	-	-	1,116
Other financial assets	1,055	-	-	1,055
At FVTOCI				
Investment	130	-	-	130
Financial Liabilities				
At Amortised cost				
Borrowing	33,674	-	-	33,674
Trade payables	4,597	-	-	4,597
Other financial liabilities	4,098	-	-	4,098

Particulars	Carrying amount	As at 31st March, 2019		
		Level of input used in		
		Level 1	Level 2	Level 3
Financial Assets				
At Amortised cost				
Trade receivable	19,339	-	-	19,339
Cash & cash equivalents	129	-	-	129
Bank balances other than cash & cash equivalents	237	-	-	237
Loan	810	-	-	810
Other financial assets	698	-	-	698
At FVTOCI				
Investment	144	-	-	144
Financial Liabilities				
At Amortised cost				
Borrowing	35,564	-	-	35,564
Trade payables	4,198	-	-	4,198
Other financial liabilities	4,127	-	-	4,127

16 Financial Risk Management

The Company's management monitors and manages the financial risks relating to the operations of the Company. These risks include credit risk, liquidity risk and market risk (including currency risk, interest rate risk and other price risk).

Credit risk

Credit risk refers to the risk that a counterparty will default on its contractual obligations resulting in financial loss to the Company.

Financial instruments that are subject to concentrations of credit risk, principally consist of balance with banks, investments in debt instruments/bonds, trade receivables, loans and advances. None of the financial instruments of the Company result in material concentrations of credit risks.

The age analysis of trade receivables as of the balance sheet date have been considered from the due date and disclosed in below table.

Particulars	As at March 31, 2020	As at March 31, 2019
Up to 6 month	16,574	17,485
More than 6 month	2,507	1,855

Liquidity risk

The Company manages liquidity risk by maintaining adequate reserves, banking facilities and reserve borrowing facilities, by continuously monitoring forecast and actual cash flows, and by matching the maturity profiles of financial assets and liabilities.

The surplus funds with the Company and operational cash flows will be sufficient to dispose the financial liabilities within the maturity period.

Maturity profile of financial liabilities

Particulars	As at March 31, 2020			
	0-1 year	1-5 year	Beyond 5 year	Total
Borrowing (including current maturity of long term borrowing)	22,567	12,014	2,527	37,107
Trade Payable	4,597	-	-	4,597
Other current liabilities	1,841	-	-	1,841

Particulars	As at March 31, 2019			
	0-1 year	1-5 year	Beyond 5 year	Total
Borrowing (including current maturity of long term borrowing)	22,767	12,710	2,515	38,012
Trade Payable	4,198	-	-	4,198
Other current liabilities	242	-	-	242

Market risk

Market risk is the risk of any loss in future earnings, in realisable fair values or in future cash flows that may result from a change in the price of a financial instrument. The Company's activities expose it primarily to the financial risks of changes in foreign currency exchange rates and interest rates risk/liquidity risk which impact returns on investments. Market risk exposures are measured using sensitivity analysis.

Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Company's exposure to the risk of changes in market interest rates relates primarily to the debt obligations with floating interest rates. The Company manages its interest rate risk by having a balanced portfolio of fixed and variable rate loans and borrowings.

Exposure to interest rate risk

Particulars	As at March 31, 2020	As at March 31, 2019
Total Borrowings	37,107	38,012
% of Borrowings out of above bearing variable rate of interest	47.48%	50.16%

Interest Rate sensitivity:

A change of 100 bps in interest rates would have following Impact on profit before tax

Particulars	As at March 31, 2020	As at March 31, 2019
100 bp increase would decrease the profit before tax by	176	191
100 bp decrease would increase the profit before tax by	176	191

STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended 31st March, 2020

Particulars	As at 31st March, 2020	As at 31st March, 2019
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Foreign currency risk management

The Company undertakes transactions denominated in foreign currencies; consequently, exposures to exchange rate fluctuations arise. The carrying amounts of the Company's foreign currency denominated monetary assets and monetary liabilities at the end of the reporting period are as follows:

Particulars	As at March 31, 2020		As at March 31, 2019	
	Foreign currency monetary assets	Foreign currency monetary liabilities	Foreign currency monetary assets	Foreign currency monetary liabilities
USD	24,91,140	86,731	27,47,155	10,05,052
EURO	36,76,082	32,80,943	45,05,985	4,78,424
AED	50,20,763	-	28,20,826	-
CNY	-	-	-	5,40,000

Foreign currency sensitivity

The following table details the Company's sensitivity to a 1% increase and decrease in INR against the relevant foreign currencies. 1% is the sensitivity rate used when reporting foreign currency risk internally to key management personnel and represents management's assessment of the reasonably possible change in foreign exchange rates. The sensitivity analysis includes only outstanding foreign currency denominated monetary items. A positive number below indicates an increase in profit or equity where INR strengthens 1% against the relevant currency. For a 1% weakening of INR against the relevant currency, there would be a comparable impact on the profit or equity, and the balances below would be negative.

Particulars	As at March 31, 2020		As at March 31, 2019	
	1% Increase	1% Decrease	1% Increase	1% Decrease
Foreign currency monetary assets				
USD	19	(19)	19	(19)
EURO	31	(31)	35	(35)
AED	10	(10)	5	(5)
CNY	-	-	-	-
Foreign currency monetary liabilities				
USD	(1)	1	(7)	7
EURO	(27)	27	(4)	4
AED	-	-	-	-
CNY	-	-	(1)	1
Impact on profit or loss as at the end of reporting year				

In management's opinion, the sensitivity analysis is unrepresentative of the inherent foreign exchange risk because the exposure at the end of the reporting period does not reflect the exposure during the year.

The figures for the corresponding previous year have been regrouped / reclassified wherever necessary, to make them comparable.
As per our report of even date

For PRYD & Associates
Chartered Accountants
Registration No.: 011626N

(CA P. M. Mittal)
Partner
Membership No.: 094667
Place: New Delhi
Date: September 21, 2020

(Binod Kumar Mishra)
Chief Finance Officer

(Rekha Sharma)
Sr. DGM Legal & Company Secretary
M No: FCS 6428

For and on behalf of the Board of Directors

(Mohinder Kumar Gupta)
Managing Director
DIN - 00054110

(Samir Gupta)
Whole Time Director
DIN - 00054308