

STAR WIRE (INDIA) LIMITED

Annual Report 2021-22

DIRECTORS' REPORT

The Members
Star Wire (India) Limited,

Dear Members,

Your directors are pleased to present their 59th Annual Board's Report on the performance and achievements of your company together with the Audited Financial Statements for the financial year ended 31st March, 2022

1. Financial Highlights

Revenues from operations & Operating Income for the year ended March 31, 2022 stood at Rs.83956.54/- lakhs, significantly up by approximately 43% ,as compared to Rs. 58760.46/- lakhs in FY 21 in spite of impact of lockdown during first quarter of the year. The revenue growth is on account of improved volume offtake and better average selling prices.

Export sales during the year under review were Rs. 38934 lacs as compared to Rs.23092 lacs in previous year. Exports comprised of 49% of total revenue of company during FY22 as against 41% in FY 21.

Profit before Finance cost, depreciation, exceptional items and tax (PBDITA) during the year FY 22 is Rs.15800 lacs from Rs.12157 Lacs in previous year. The company has been able to sustain its margins inspite of withdrawl of MSME export benefit scheme to steel sector which impacted the margins by approximately Rs.700 lacs

Net profit for the year stood at Rs.11426 Lacs as against Rs.8673 lacs- a jump of 32% over FY 21.

Your Company is continuously engaged in up-gradation and modernization of Plant & Machineries so as to achieve the process improvement and manufacture the quality products with optimized cost.

1.1. Your Company achieved the following results during FY 2021-22:

Particulars	(Rs. In Lakhs)	
	Current Year	Previous Year
Profit before depreciation, Interest and Tax	15864.52	12740.15
Less: Interest*	2301.88	2040.43
Depreciation	2137.04	2026.31
Profit before tax	11425.60	8673.41
Less: Current Tax	2555.64	1726.94
Deferred Tax	413.69	447.30
Income Tax expense of earlier years	131.32	00.00
Profit after tax	8324.95	6499.17
Add: Balance b/f from previous year	35677.46	29178.29

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Total	44002.41	35677.46
Less: Appropriations:		
Proposed Dividend on:		
Preference Shares **	0.00	0.00
Equity Shares	0.00	0.00
Dividend Distribution Tax	0.00	0.00
Profit carried forward to Balance Sheet	44002.41	35677.46

**The Interest Amount includes Rs.14.16 lacs/- towards Dividend on Redeemable Preference Shares & Taxes thereon.*

- ❖ *The dedicated diagnostic laboratory of the company which performs testing like Chemical, Mechanical & Metallurgical Testing of Steel and Alloys of Aluminium, Copper, Zinc, Lead, Tin, Nickel, Titanium etc along with various Non Destructive Testing (NDT) like Ultrasonic Testing (UT), Radiography, Dye Penetrations (DP) Test, MPI etc., Failure Analysis and Corrosion Test of Metals & Alloys has also performed reasonably well during the year clocking receipts of INR 361.34 lacs as against INR 330.85 lacs for FY2020-21 in-spite of pandemic effect. The figures in table above are inclusive of such incomes from diagnostic center.*

2. Future Outlook & Expansion:

- 2.1. Your company is continuously working upon to evolve the best production techniques and processes so as to improve production efficiency and optimize cost by efficient utilization of resources.
- 2.2. The R & D team of your company is further working upon to develop high exotic grades of steel in valve steel segment in line with the requirement of OEM customers due to switch to hybrid and semi hybrid IC Engines. The company aims to tap the burgeoning demand in valve steel segment with expansion of its existing manufacturing set up. It is quite confident of achieving significant volume growth as well as realization in Valve steel segment with said initiatives.
- 2.3. Your company expects to receive further benefits during upcoming year on account of the investments in cost saving and capacity expansions as completed in earlier years. This should further contribute to sustain/ increase the operational margin for next financial year onwards and strengthen our competitive positioning
- 2.4. **The project for supply and installation of Vacuum Induction Machine(VIM) has been completed and will help company** to produce super-alloys/titanium based material for Defense, Aerospace and Automotive sectors.
- 2.5. The project for shifting of foundry operations to Plant-II with addition of modern equipment will provide larger space to cast larger dia castings and reduce the costs. The project is likely to be taken up in FY 22-23.
- 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 push to self reliance and local production which is most likely will favorably impact the operations of company.
- 2.9. Your Company would also wish to increase the hot working capacity and capability by installing the 1060mm 2 Hi Reversing Mill which was purchased from Tata Corus, U.K. An increase in hot working capacity & capability will give a direct boost to the Company's Turnover as most of the special products/ future products require hot working of large section Ingots/ blooms, and the Management now realizes that lack of such facilities is a major constraint in achieving a quantum jump in sales.

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 1 % Dividend on Non-Cumulative Redeemable Preference Shares, Series-I and 4% Dividend on Non-Cumulative Redeemable Preference Shares, Series-II 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. Preference Share Capital:

During the financial year, the company made Variation in terms and conditions of 2540500 4% Non-Cumulative Redeemable Preference Shares, Series-I, reducing rate of Dividend from 4% to 1% w.e.f. 01.04.2021.

5. Credit Rating:

Credit rating of company has been upgraded during year at CRISIL "A+" with stable outlook.

6. Impact of Business due to COVID-19

Financial Year 2021-22

The production activities were affected during first quarter of FY 22. However, post resumption and by following social distancing and sanitization, company has ramped up fast to reach to pre-covid level of operations and achieved the best ever financial performance in terms of improved EBIDTA, PBT and PAT.

7. Debt Obligations

With emphasis on collection of receivables and better working capital management, company has been able to meet all its debt obligations as per schedule.

8. 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.

9. Subsidiary/Associate Company

As on March 31, 2022, the Company does not have any Subsidiary or Associate Company.

10. 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, 2022.

11. 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 Mrs. Rekha Gupta (DIN 00054073) and Mrs. Mahima Gupta (DIN 02237504), 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 hold the office for the term of five years ending on 29.03.2027 and 30.05.2027 respectively.

During the year, Mrs. Sugandha Saigal (DIN: 08648443) was appointed as an Independent Director of the company w.e.f 26th April, 2021 and has been resigned on 18th January, 2022.

Mr. Sunil Kumar Roy, has been appointed as an Independent Director of the Company by the Board for consecutive 5 years with effect from 27.08.2022, his appointment forms part of the Notice of the Annual General Meeting and the resolution is recommended for your approval for regularizing his appointment as a Director (Under Section 161 of Companies Act, 2013) and his appointment as an Independent Director.

Profile and terms and conditions for his appointment as an Independent Director is available for inspection at the Registered Office of the Company.

The Company has received declaration from the Independent Director that he meets the criteria of independence as prescribed under Section 149(6) of the Companies Act, 2013.

They are not liable to retire by rotation in terms of Section 149(13) of the Act.

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 28.07.2021, 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. The Company on a regular basis, makes detailed presentation to the entire Board including Independent Directors on the Company's operations and business plans, strategy, global and domestic business environment. Such presentations are made by the senior management, so that the Independent Directors can have direct interaction with them. The Board members are provided with necessary documents / brochures, reports and internal policies to enable them to familiarize with the Company's procedures and practices.
- III. 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 07.06.2021, 21.07.2021, 24.08.2021, 28.08.2021, 23.09.2021, 20.10.2021, 11.11.2021, 24.11.2021, 20.01.2022, 21.02.2022 and on 08.03.22.

12. 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, 2022, 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, 2022 on 12.05.2021, 20.07.2021, 02.11.2021 and on 28.02.2022 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:

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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 nonpayment 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, 2022 two meetings of the Nomination and Remuneration Committee were held on 12.05.2021 and on 15.01.2022. 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, 2022 the Committee met 4 time on 12.05.2021, 20.07.2021, 02.11.2021 and on 28.02.2022.

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.

13. 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.

14. 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**.

15. 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 2021-22 which were in conflict with the interest of the Company. Suitable disclosures as required under IND AS-24 have been made in Note 33.9 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.

16. Extract of Annual Return

An extract of Annual Return in Form MGT-9 as on March 31, 2022 is available on company's website. (web-link: <http://www.starwire.in/assets/docs/AnnualReturn.pdf>)

17. 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.

18. 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.

19. 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.

20. 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 –C** forming part of the Annual Report.

21. Auditors**21.1. Statutory Auditor**

M/s PRYD & ASSOCIATES, Chartered Accountants will complete their present term on conclusion of the ensuing Annual General Meeting. The Auditors' Report does not contain any

qualification, reservation, adverse remark or disclaimer. The Notes on financial statement referred to in the Auditors' Report are self explanatory and do not call for any further comments.

The Board has recommended the appointment of M/s. P.D. Mittal & Co., Chartered Accountants, as Auditors of the Company, for a period from the conclusion of fifty-ninth Annual General Meeting till the conclusion of Sixtieth (60th) Annual General Meeting of the Company. M/s. P.D. Mittal & Co., Chartered Accountants, have confirmed their eligibility and qualification required under the Act for holding the office as Auditors of the Company

21.2. 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 2022-23.

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.

21.3. 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. Saurabh Agrawal & Co. Company Secretaries in Practice, Delhi to conduct the Secretarial Audit of the Company for the financial year ended March 31, 2022.

The Secretarial Audit Report (in Form MR-3) is attached as **Annexure- D** 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 SCV & Co. LLP, Chartered Accountants, as Internal Auditor pursuant to provisions of Section 138 of the Companies Act, 2013 to carry internal audit.

22. Corporate Social Responsibility (CSR) Initiatives:

The Company has been carrying out various Corporate Social Responsibility (CSR) activities in the areas of primary education, vocational training, health, eradication of hunger, etc. These activities are carried out in terms of Section 135 read with Schedule

VII of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014.

The Annual Report on CSR Activities undertaken by the Company is annexed herewith as **Annexure E**. The CSR Policy is available on the web-link: <http://www.starwire.in/CSRPolicy.pdf>

23. 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, 2022) and the date of the Report August 27, 2022).

24. 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.

25. 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 2022 there were no complaints received or pending for disposal.

26. 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.

27. Details of application made or proceeding pending under insolvency and bankruptcy code, 2016:

During the year under review, there were no application made or proceeding pending in the name of the Company under IBC, 2016

28. Details of difference between valuation amount on valuation and one time settlement (OTS) while availing loan from banks and financial institutions.

During the year under review, there were no one time settlement of loans taken from banks and financial institutions.

29. 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.

30. 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 2021-22, 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, 2022 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. 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
6. 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.

31. 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.

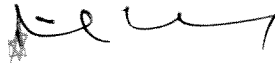
STAR WIRE (INDIA) LIMITED

Annual Report 2021-22

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

Place: New Delhi
Date: 27.08.2022

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	2021-22	2020-21
		Current Year	Previous Year
1.	Electricity:		
	(a) Purchased:		
	Units Purchased (KVAH)	106815958	84739372
	Total Cost (Rs)	84,00,15,057	62,01,58,915
	Rate/unit	7.86	7.32
	(b) Own Generation – Through generators:		
	Units Produced	2383602	3902411
	Units/litter of fuel oil	3.86	3.93
	Cost (Rs)/unit	11.81	9.17
	Purchased Fuels consumed:		
2.	Diesel:		
	Quantity (ltrs)	24947	31153
	Total Cost	21,55,482	22,61,951
	Average Rate per liter	86.40	72.61
3.	Furnace Oil:		
	Quantity (ltrs)	593098	961127
	Total Cost	26003594	3,35,16,833
	Average Rate per liter	43.84	34.87
4.	Gas (PNG):		
	Quantity (MMBTU)	314073.25	266766.31
	Total cost	40,54,54,910	23,90,17,963
	Average rate per MMBTU	1290.96	895.98
5	Solar Power		
	Quantity (KWH)	403856	
	Total Cost	15,33,103	
	Average Rate per KWH	3.80	

STAR WIRE (INDIA) LIMITED

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(B) Consumption per unit of production

Particulars	Standards (If any)	2021-22	2020-21	2019-20
		Current Year	Previous Year	Previous Year
Iron & Steel Products	Not Specific	2374 Units per MT of Scrap Consumed	2453 Units per MT of Scrap Consumed	2412 Units per MT of Scrap Consumed

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
4. Your Company is engaged in Research & Development activities and incurred Rs. 161,26,586/- towards Capital expenditure and Rs. 516,96,525/- towards Revenue expenditure during the year.

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.38934.11 Lakhs** against Rs.23092.42 Lakhs in the previous year. The total inflow in this year is **Rs. Rs.36485.95 Lakhs** against Rs.21568.46 Lakhs in the previous year, while total outflow in this year is **Rs. 14418.19 Lakhs** against Rs.8199.75 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 @ 8.35% p.a. for first half & 7.75% p.a. for second half, monetary value of the transaction is as following:

M.K.Gupta: Director Remuneration Rs.134,50,000/-
Interest on Unsecured Loan Rs.6,11,406/-

Samir Gupta: Director Remuneration Rs.112,25,000/-
Interest on Unsecured Loan Rs.40,51,286/-

Abhishek Gupta: Director Remuneration Rs.60,15,000/-
Interest on Unsecured Loan Rs.28,00,983/-

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Rekha Gupta: Interest on Unsecured Loan Rs.29,61,566/-
Director Sitting Fee Rs.11,000/-

Mahima Gupta Director Sitting Fee Rs.11,000/-
Interest on Unsecured Loan Rs.3,42,669/-

e) Date of approval by the Board, if any: 07.06.2021

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. 6,27,35,704/- (Machining Charges)
Rs.5,12,77,900/- (Sale of Goods)
Rs.60,96,785/- (Interest on Advances)
Rs.7,46,932/- (Purchase of Goods)
Rs.4,95,000/- (Job Work Charges Received)

e) Date of approval by the Board, if any: 07.06.2021

f) Amount paid as advances, if any: 8,34,40,113/-

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 : 07.06.2021

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

e) Date of approval by the Board, if any: reviewed and approved by the Board on : 07.06.2021

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.334,89,177/- (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 : 07.06.2021
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: : 07.06.2021
- 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: : 07.06.2021
- 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/-
- f) Date of approval by the Board, if any: 07.06.2021
- 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: 07.06.2021
 - 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: 07.06.2021
 - 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.4,00,000/-
 - e) Date of approval by the Board, if any: 07.06.2021
 - 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: : 07.06.2021
 - 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
 - g) Salient terms of the transaction including the value, if any: Rs.1,14,000/-
 - h) Date of approval by the Board, if any: 07.06.2021

- i) 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.520,95,000/-(Purchase of Goods)
- e) Date of approval by the Board, if any: 07.06.2021
- 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.26,204/- (Interest on Unsecured Loan)
- e) Date of approval by the Board, if any: 07.06.2021
- 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 : 07.06.2021
- 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
- d) Salient terms of the transaction including the value, if any: Rs.3,42,530/- (Interest on Unsecured Loan)

STAR WIRE (INDIA) LIMITED
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e) Date of approval by the Board, if any: 07.06.2021

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: 27.08.2022



(Samir Gupta)
Whole Time Director
DIN-00054308
Place: New Delhi
Date: 27.08.2022

STAR WIRE (INDIA) LIMITED

Annual Report 2021-22

Annexure C' to Directors' Report

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

Mr. S.S. Virdi (COO & CEO)*

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	96,13,487.00	Permanent	B.Tech. (Met.), M.B.A	12-08-2013		10 years in Jindal stainless Steel	Nil	No
			Exp. – 38 Years			3 years in Star Wire		
						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		



Saurabh Agrawal & Co.
Company Secretaries

FORM MR-3
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED 31ST March 2022

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

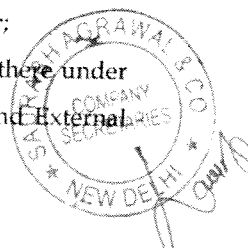
To,
The Members,
STAR WIRE (INDIA) LIMITED
(CIN: U27109HR1963PLC105338)
21/4, Mathura Road Ballabgarh,
Faridabad, Haryana-121004

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

Based on our verification of the Company 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, we hereby report that in our opinion, the company has, during the audit period covering the financial year ended on 31st March, 2022 generally 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:

We 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, 2022 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made there under;
- (ii) The Securities Contract (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 the Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;

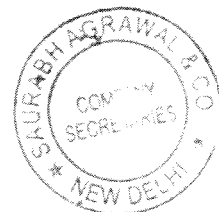


(v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI Act):-

- 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; **(Not applicable to the Company during the audit period)**
- 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; **(Not applicable to the Company during the audit period)**
- f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; **(Not applicable to the Company during the audit period)**
- 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 company has complied with other Laws as applicable to the Industry as per the undertaking given by the company:

1. Factories Act, 1948
2. Industrial Disputes Act, 1947
3. The Payment of Wages Act, 1936
4. The Minimum Wages Act, 1948
5. Employees' State Insurance Act, 1948
6. The Employees' Provident Funds and Miscellaneous Provisions Act, 1952
7. The Payment of Gratuity Act, 1972
8. The Contract Labour (Regulation & Abolition) Act, 1970
9. The Maternity Benefit Act, 1961
10. The Child Labour (Prohibition & Regulation) Act, 1986
11. The Industrial Employment (Standing Order) Act, 1946
12. The Employees' Compensation Act, 1923
13. Equal Remuneration Act, 1976
14. Water (Prevention and Control of Pollution) Act, 1974
15. The Air (Prevention and Control of Pollution) Act, 1981



[Handwritten signature]

16. Environment (Protection) Act, 1986
17. Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008
18. Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2003
19. The Industries (Development & Regulations) Act, 1951
20. The Legal Metrology Act, 2009
21. Workmen's Compensation Act, 1923
22. Indian Contract Act, 1872
23. Employment Exchanges (Compulsory Notification of Vacancies) Act, 1959

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

- (i) Secretarial Standards issued by the Institute of Company Secretaries of India;
- (ii) ~~The listing Agreements entered into by the Company with Stock Exchange(s), if applicable;~~

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

In respect of other laws specifically applicable to the company, we have relied on information/data provided by the Company during the course of audit and reporting is limited to that extent.

We further report that

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non- Executive Directors and Independent Directors.

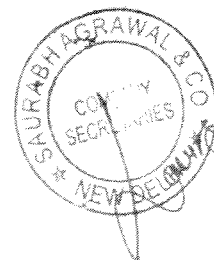
During the year, Mrs. Sugandha Saigal (DIN: 08648443) was appointed as an Independent Director of the company w.e.f 26th April, 2021 and has been resigned on 18th January, 2022.

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 while the dissenting members' views were not required to be captured and as recorded as part of the minutes, as there were no such instance.

We 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.

We further report that during the audit period the following event has occurred which had a major bearing on the Company's Affair in pursuance of the laws, rules, regulations, guidelines, standards, etc.




- During the financial year, the company made Variation in terms and conditions of 4% Non-Cumulative Redeemable Preference Shares by reducing rate of Dividend from 4% to 1% for Series-I w.e.f 01/04/2021

Place: New Delhi

Date of UDIN: 01/09/2022

UDIN:F005430D000887740

Signature: 

Saurabh Agrawal

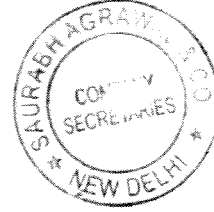
Saurabh Agrawal & Co.

Company Secretaries

FCS No.: 5430

C.P. No.: 4868

Date of Signing: 27/08/2022



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

'ANNEXURE A'

To,

The Members,

STAR WIRE (INDIA) LIMITED

(CIN: U27109HR1963PLC105338)

21/4, Mathura Road Ballabgarh,

Faridabad, Haryana-121004

Our Secretarial Audit Report for the financial year 31st March, 2022 is to be read along with this letter.

➤ **Management Responsibility**

1. It is the responsibility of the management of the Company to maintain secretarial records, devise proper systems to ensure compliance with the provisions of all applicable laws and regulations and to ensure that the systems are adequate and operate effectively;

➤ **Auditor's Responsibility**

2. Our responsibility is to express an opinion on these secretarial records, standards and procedures followed by the Company with respect to secretarial compliances;
3. We believe that audit evidence and information obtained from the Company's management is adequate and appropriate for us to provide a basis for our opinion;
4. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion;
5. Wherever required we have obtained the management's representation about the Compliance of laws, rules and regulations and happening of events etc;

➤ **Disclaimer**

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. We have not verified the correctness and appropriations of financial records and books of accounts of the Company.

Place: New Delhi

Date of UDIN: 01/09/2022

UDIN:F005430D000887740

Signature:

Saurabh Agrawal

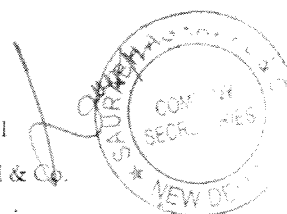
Saurabh Agrawal & Co.

Company Secretaries

FCS No.: 5430

C.P. No.: 4868

Date of Signing: 27/08/2022



'Annexure E' 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.**

Areas of social development that would include (i) eradicating hunger, poverty and malnutrition, promoting health care and sanitation and Corporate Social Responsibility (CSR) Policy of the Company emphasize initiatives in specific making available safe drinking water, (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 centers and such other facilities for senior citizens, etc. CSR policy is available on company's website. (web-link:<http://www.starwire.in/CSRPolicy.pdf>)

2. **Details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social responsibility Policy) Rules, 2014, if applicable (attach the report). (N.A.)**

3. **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

Mr. Mohinder Kumar Gupta, M.D.

Mrs. Rekha Sharma, Secretary

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

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

Average net profit: Rs.57,18,00,285/-

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

The Company during the financial year 2021-22 is required to spend Rs.114,36,006/- towards CSR.

STAR WIRE (INDIA) LIMITED

Annual Report 2021-22

Particulars	Amount
Average net profit for last three financial years	57,18,00,285
Prescribed CSR expenditure	2% of Average net profit for last three financial years
Amount CSR to be spent for financial year	114,36,006
Amount CSR spent for financial year	71,66,286.00
Amount spent in local area	71,66,286.00
Amount unspent CSR	280,27,896.17 **

**

Particulars	Amount
Opening Balance	237,58,176.35
(+) Provision for the F.Y 2021-22	114,36,006.00
(+) Reversal of P.Y Expenses	0.00
(-) Expenditure made during F.Y 2021-22	71,66,286.00
Closing Amount to be spent	280,27,896.35

6. Details of CSR spent during the financial year:

Total amount spent for the year: Rs.71,66,286.00/-

Amount unspent, if any: Rs.280,27,896.35 /-

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 Vocational skills among women and children Promoting Health care	(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood	Rs. 3,14,696/- (Directly) 12,08,744/- Directly during pandemic) Rs. 36,00,000/-	Rs. 1,37,46,591.47	Directly and through Implementing Agencies

Annual Report 2021-22

Rechnung

- a) Date of creation or acquisition of the capital asset(s) : Not Applicable
- b) Amount of CSR spent for creation or acquisition of capital asset : Not Applicable
- c) Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc. : Not Applicable
- d) Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset) : Not Applicable

8. 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 through institutions as in the past. To be specific, the company has incurred Rs. 3,14,696.00/- 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, during corona Pandemic company spent Rs. 12,08,744.00/- for distribution of free food items and medicine.

Further the company has also taken up a Project for setting up certain Medical Facilities to be in reach of public at large by donating funds of Rs. 36,00,000/- (During the year) to Shri Jai Pal Sharma Trust and further committed to support the said trust for development of medical facilities.

The amount of Rs. 20,42,846/- has been donated to various trust carrying on activities falling under Schedule VII of the Companies Act.

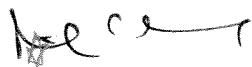
The Company could not spend the funds earmarked for CSR activities as the Project for setting up of old age home has not made much headway due to non- issue of required permission from the concerned departments/Govt. bodies to the Trust. Moreover, the company has identified few trusts engaged in promotion of education to support them in their activities and ensure utilization of unspent amount in line with laid down CSR objectives.

9. 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: 27.08.2022



(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, 2022, 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.

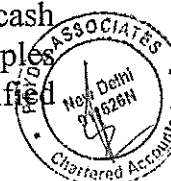
In our opinion and to the best of our information and according to the explanations given to us, the aforesaid Standalone Financial Statements give the information required by the Companies Act, 2013, as amended ("the Act") in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at 31 March 2022, 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 including other comprehensive income, 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 the design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the Standalone 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 for the financial year ended March 31, 2022 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, 2020 ("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

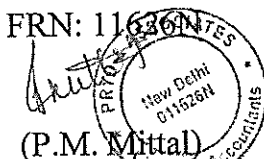


- c. The Balance Sheet, the Profit and Loss Statement (including other comprehensive income), the Cash Flow Statement and Statement of Change in Equity dealt with by this Report are in agreement with the relevant books of account;
- d. In our opinion, the aforesaid Standalone Financial Statements comply 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, 2022, and taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2022, from being appointed as a director in terms of Section 164(2) of the Act;
- f. With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B" 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, 2022 on its financial position in its Standalone Financial Statements as referred to in Note 33 to the Standalone Financial Statements;
- (ii) The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long term contracts including derivative contracts ; 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: 27-08-2022

UDIN-22094667ARMA56895

For PRYD & Associates
Chartered Accountants

FRN: 116369N

(P.M. Mittal)

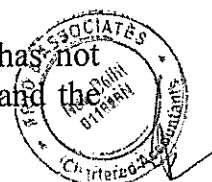
Membership Number: 094667
Partner

“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 2022, we report that:

1. In respect of its Property, Plant and Equipment:
 - a) (A) The Company has maintained proper records showing full particulars, including quantitative details and situation of Property, Plant and Equipment.
(B) The Company has maintained proper records showing full particulars of Intangible assets.
 - b) As explained to us, all the Property, Plant and Equipment have been physically verified by the management in a phased periodical manner, which in our opinion is reasonable, having regard to the size of the Company and nature of its fixed 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.
 - d) The Company has not revalued its Property, Plant and Equipment (including Right of Use assets) or intangible assets or both during the year.
 - e) There are no proceedings initiated or are pending against the Company for holding any benami property under Benami Transactions (Prohibition) Act, 1988 and rules made thereunder.
2. (a) 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.

(b) As disclosed in Note no 19 to the standalone financial statements, the Company has been sanctioned working capital limits in excess of Rs 5 Crore’s in the aggregate from banks during the year on the basis of security of current assets of the Company. The quarterly returns/ statements filed by the Company with such banks are in agreement with the books of accounts of the Company.
3. As informed, the Company has not made any investment in, provided any guarantee or security or 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 & c) of the Companies (Auditor’s Report) Order, 2020 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, 2020 (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:

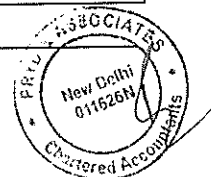
a) According to the information and explanations given to us and on the basis of our examination of the records of the Company, amounts deducted / accrued in the books of accounts in respect of undisputed statutory dues including Provident Fund, Employees' State Insurance, Income-tax, Goods and Service 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.

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, 2022 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)	896.44 (896.44)	Various years from 2004-05 to 2017-18	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	Asstt. / CIT, CIT(A), ITAT
3.	Central Excise Act, 1944	Excise Duty	08.23 (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	192.13 (177.00)	2006-07	Dy Commissioner

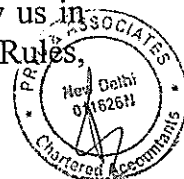
Total Rs 1165.82 Lacs (Rs 1188.68 Lacs)



- 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. The Company has not surrendered or disclosed any transaction, previously unrecorded in the books of account, in the tax assessments under the Income Tax Act, 1961 and income during the year. Accordingly, the requirement to report on clause 3 (viii) of the Order is not applicable to the Company.
9. (a) 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.
(b) The Company has not been declared willful defaulter by any bank or financial institution or Government or any Government authority.
(c) In our opinion, the term loans have been applied for the purpose for which the loans were raised.
(d) On an overall examination of the standalone financial statements of the Company, no funds raised on short-term basis have been used for long-term purposes by the Company.
(e) On an overall examination of the standalone financial statements of the Company, the Company has not taken any funds from any entity or persons on account of or to meet the obligations of its subsidiaries, associates or joint ventures.
(f) The Company has not raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies. Hence, the requirement to report on clause 3 (ix) (f) of the order is not applicable to the Company.
10. (a) During the year the Company has not raised any money by way of initial public offer or further public offer (including debt instruments) hence reporting under clause (x) (a) of Paragraph 3 of the Order is not applicable to the Company

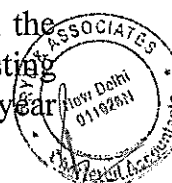
(b) During the year the Company has not made preferential allotment or private placement of shares or fully or partly convertible debentures and hence reporting under clause (x) (b) of Paragraph 3 of the Order is not applicable to the Company
11. (a) Based upon the audit procedures performed for the 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.

(b) During the year, no report under sub-section (12) of section 143 of the Companies Act, 2013 has been filed by cost auditor/ secretarial auditor or by us in Form ADT-4 as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government.



(c) During the year the Company has not received any whistle-blower complaint.

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. (a) The Company has an internal audit system commensurate with the size and nature of its business.
(b) The internal audit reports of the Company issued till the date of the audit report, for the period under audit have been considered by us.
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. (a) 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.
(b) The Company has not conducted any non-Banking Financial or Housing Finance activities during the year.
(c) The Company is not a Core Investment Company as defined in the regulations made by Reserve Bank of India. Accordingly, the requirement to report on clause 3 (xvi) (c) of the Order is not applicable to the Company.
(d) As represented by the management, the Group does not have more than One Core Investment Company (CIC) as part of the Group as per the definition of Group contained in the Core Investment Companies (Reserve Bank) Directions, 2016.
17. The Company has not incurred cash losses in the current year and in immediately preceding financial year.
18. There has been no resignation of the Statutory auditors during the year and accordingly requirement to report on Clause 3 (xviii) of the order is not applicable to the Company.
19. On the basis of the financial ratios disclosed in the standalone financial statements, ageing and expected dates of realization of financial assets and payment of financial liabilities, other information accompanying the standalone financial statements, our knowledge of the Board of Directors and management plans and based on our examination of the evidence supporting the assumptions, nothing has come to our attention, which causes us to believe that any material uncertainty exists as on the date of the audit report that Company is not capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year.



from the balance sheet date. We, however, state that this is not an assurance as to the future viability of the Company. We further state that our reporting is based on the facts up to the date of the audit report and we neither give any guarantee nor any assurance that all liabilities falling due within a period of one year from the balance sheet date, will get discharged by the Company as and when they fall due.

20. (a) In respect of other than ongoing projects, there are no unspent amounts that are required to be transferred to a fund specified in Schedule VII of the Companies Act (the Act), in compliance with second proviso to sub section 5 of section 135 of the Act.
- (b) There are no unspent amounts in respect of ongoing projects, that are required to be transferred to a special account in compliance of provision of sub section (6) of section 135 of Companies Act.

Place: New Delhi
Dated: 27-08-2022

UDIN - 22094667ARMA56895

For PRYD & Associates
Chartered Accountants

FRN: 11626N

New Delhi
011626N
(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 2022, 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, 2022 in conjunction with our audit of the Standalone 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, 2022, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.


Place: New Delhi

Dated: 27-08-2022

UDIN- 22094667AR MASE6895

For PRYD & Associates
Chartered Accountants

FRN: 116261N


(P.M. Mittal)

Membership Number: 094667

Partner



Star Wire (India) Ltd

(Forging Ahead With A Steel Strong Vision)

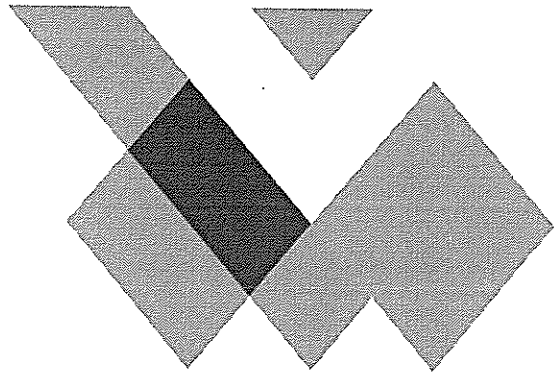
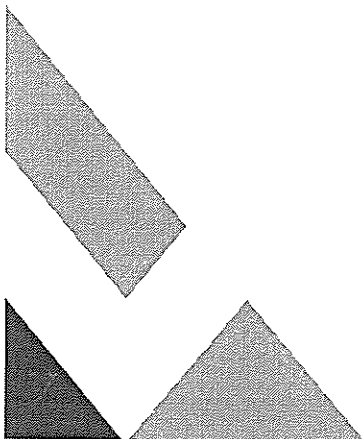
Financial Statements (F.Y.2021-22)

Internal Auditors:

S.C.Vasudeva & Co.
Chartered Accountants

Statutory Auditors:

PRYD & Associates
Chartered Accountants



STAR WIRE (INDIA) LIMITED
BALANCE SHEET AS AT 31st MARCH, 2022
(₹ in Lakhs)

Particulars	Notes	As at 31st March, 2022	As at 31st March, 2021
I - ASSETS			
(1)- Non-Current Assets			
(a) Property, Plant and Equipment	1	51,028.46	45,666.05
(b) Capital Work-in-Progress	1	3,484.35	4,071.10
(c) Financial Assets		-	-
(i) Investments	2	167.26	131.43
(ii) Loans	3	6.99	14.16
(iii) Other Financial Assets	4	1,149.24	1,156.70
(d) Other Non-Current Assets	5	718.26	1,266.44
Total Non-Current Assets		56,554.55	52,305.88
(2) - Current Assets			
(a) Inventories	6	35,519.26	22,835.76
(b) Financial Assets			
(i) Trade Receivables	7	25,636.75	21,121.94
(ii) Cash and Cash Equivalents	8	39.42	68.87
(iii) Bank Balances Other Than (ii) Above	9	653.26	556.29
(iv) Loans	10	19.82	41.30
(v) Other Financial Assets	11	2,329.84	3,020.14
(c) Other Current Assets	12	2,252.29	1,950.79
Total Current Assets		66,450.64	49,595.09
Total Assets		1,23,005.19	1,01,900.96
II - EQUITY AND LIABILITIES			
Equity			
(a) Equity Share Capital	13	2,790.48	2,790.48
(b) Other Equity	14	52,382.43	43,967.75
Total Equity		55,172.91	46,758.23
Liabilities			
(1)- Non-Current Liabilities			
(a) Financial Liabilities			
(i) Borrowings	15	16,168.25	15,324.33
(b) Provisions	16	927.73	814.91
(c) Deferred Tax Liabilities (Net)	17	5,256.91	4,813.04
(d) Other Non-Current Liabilities	18	790.04	764.79
Total Non-Current Liabilities		23,142.93	21,717.06
(2)- Current liabilities			
(a) Financial Liabilities			
(i) Borrowings	19	30,804.40	22,487.19
ii) Trade Payables			
Micro and Small Enterprises	20	239.97	-
Other than Micro and Small Enterprises		9,040.36	7,695.24
(iii) Other Financial Liabilities	21	2,035.19	1,183.31
(b) Other Current Liabilities	22	1,556.69	1,652.96
(c) Provisions	23	925.88	406.98
(d) Current Tax Liabilities (Net)	11	86.85	-
Total Current Liabilities		44,689.35	33,425.67
Total Liabilities		67,832.28	55,142.73
Total Equity and Liabilities		1,23,005.19	1,01,900.96

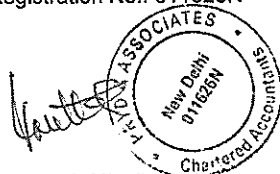
See accompanying Notes to the Financial Statements

As per our Report of even date:

1 to 34

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: 27th, August 2022

(Subash Singh Viridi)
Executive Director

(Binod Kumar Mishra)
Chief Finance Officer

(Rekha Sharma)
Jt. GM 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 CHANGES IN EQUITY FOR THE PERIOD ENDED 31st MARCH, 2022

(₹ in Lakhs)

A. Equity Share Capital

(1) Current Reporting Period

Balance at the beginning of the current reporting period	Changes in Equity Share Capital due to prior period errors	Restated balance at the beginning of the current reporting period	Changes in equity share capital during the current year	Balance at the end of the current reporting period
2790.48	0.00	0.00	0.00	2790.48

(2) Previous Reporting Period

Balance at the beginning of the previous reporting period	Changes in Equity Share Capital due to prior period errors	Restated balance at the beginning of the previous reporting period	Changes in equity share capital during the previous year	Balance at the end of the previous reporting period
2790.48	0.00	0.00	0.00	2790.48

B. Other Equity (Refer Note 14)

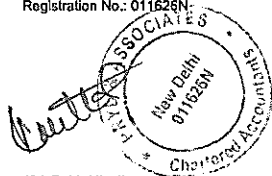
Particulars	Reserves and Surplus					Other Comprehensive Income	Money received against share warrants	Total
	Capital Reserve	Securities Premium	General Reserves	Retained Earnings	Revaluation Surplus			
Balance at the April, 1, 2020	50.00	7224.88	475.83	29178.29	617.42	-72.43	0.00	37473.98
Changes in accounting policy or prior period errors	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Restated balance at the April, 1, 2020	50.00	7224.88	475.83	29178.29	617.42	-72.43	0.00	37473.98
Profit/(Loss) for the year	0.00	0.00	0.00	6499.17	0.00	0.00	0.00	6499.17
Other Comprehensive Income/(-Expenses) for the year (Net of Tax)	0.00	0.00	0.00	0.00	0.00	-5.40	0.00	-5.40
Total Comprehensive Income	50.00	7224.88	475.83	35677.46	617.42	-77.83	0.00	43967.75
Dividends	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer to retained earnings	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Any other change	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Balance as at March, 31, 2021	50.00	7224.88	475.83	35677.46	617.42	-77.83	0.00	43967.75

Balance at the April, 1, 2021	50.00	7224.88	475.83	35677.46	617.42	-77.83	0.00	43967.75
Changes in accounting policy or prior period errors	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Restated balance at the April, 1, 2021	50.00	7224.88	475.83	35677.46	617.42	-77.83	0.00	43967.75
Profit/(Loss) for the year	0.00	0.00	0.00	8324.95	0.00	0.00	0.00	8324.95
Other Comprehensive Income/(-Expenses) for the year (Net of Tax)	0.00	0.00	0.00	0.00	0.00	89.72	0.00	89.72
Total Comprehensive Income for the current year	50.00	7224.88	475.83	44002.41	617.42	11.89	0.00	52382.43
Dividends	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Transfer to retained earnings	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Any other change	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Balance as at March, 31, 2022	50.00	7224.88	475.83	44002.41	617.42	11.89	0.00	52382.43

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.: 094567
Place: New Delhi
Date: 27th August 2022

(Subash Singh Viraj)
Executive Director

(Binod Kumar Mishra)
Chief Finance Officer

(Rekha Sharma)
Jt. GM Legal & Company Secretary
M No: FCS 6428

(Mohinder Kumar Gupta)
Managing Director

(Samir Gupta)
Whole Time Director
DIN - 00054308

STAR WIRE (INDIA) LIMITED
STATEMENT OF PROFIT & LOSS FOR THE PERIOD ENDED 31st MARCH, 2022

(₹ in Lakhs)

Particulars	Notes	For the Year ended March-22	For the Year ended March-21
I. Revenue From Operations	24	82,023.30	58,383.51
II Other Income	25	2,119.81	1,049.91
III Total Income (I+II)		84,143.11	59,433.42
IV Expenses			
Cost of Material Consumed	27	29,998.41	19,612.28
Purchases of Stock-In-Trade	28	1,435.67	-
Change In Inventories of Finished Goods, Work-In-Progress and Stock-in-Trade	29	(9,490.35)	(1,883.08)
Employee Benefits Expense	30	5,188.72	3,778.60
Financial Costs	31	2,301.88	2,040.43
Depreciation And Amortization Expense		2,137.04	2,026.31
Other Expenses:-			
(i) Manufacturing Expenses	32.a	34,673.49	21,746.65
(ii) Administrative Expenses	32.b	2,913.24	2,027.22
(iii) Selling & Distribution Expenses	32.c	3,559.42	1,411.60
Total Expenses (IV)		72,717.51	50,760.01
V Profit/ (Loss) before Exceptional Items and Tax (III-IV)		11,425.60	8,673.41
VI Exceptional Items		-	-
VII Profit/ (Loss) before Tax (V-VI)		11,425.60	8,673.41
VIII Tax Expense:			
(1) Current Tax	17	2,555.64	1,726.94
(2) Deferred Tax	17	413.69	447.30
(3) Income Tax Expenses of Previous F.Y.		131.32	-
		3,100.65	2,174.24
IX Profit / (Loss) for the Period from Continuing Operations (VII-VIII)		8,324.95	6,499.17
X Profit/(Loss) for the Period (IX+XII)		8,324.95	6,499.17
XI Other Comprehensive Income	26		
(i) Items that will not be reclassified to profit or loss		119.90	(7.21)
(ii) Income Tax relating to items that will not be reclassified to profit or loss		(30.18)	1.82
		89.72	(5.40)
XII Total Comprehensive Income for the Period (X+XI)		8,414.68	6,493.77
XIII Earnings per Equity Share (Face Value of Rs. 1 each)			
1) Basic (Rs.)		2.98	2.33
2) Diluted (Rs.)		2.98	2.33
XIV Earnings per Equity Share (for Discontinuing & Continuing operations)			
1) Basic (Rs.)		2.98	2.33
2) Diluted (Rs.)		2.98	2.33
-Weighted Average Number of Equity Shares		279047500	279047500

See accompanying Notes to the Financial Statements

1 to 34

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: 27th, August 2022

(Subash Singh Vadi)
Executive Director

(Binod Kumar Mishra)
Chief Finance Officer

(Rakha Sharma)
Jt.GM 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, 2022
(₹ in Lakhs)

Particulars	For the Year ended March-22	For the Year ended March-21
Cash Flow Statement:		
A Cash Flow from Operating Activities:		
Net Profit Before Tax as per Statement of Profit and Loss	11,425.60	8,673.41
Adjusted for:		
(Profit) / Loss on Sale / Discard of Property, Plant and Equipment (Net)	19.73	(413.43)
Depreciation	2,137.04	2,026.31
Interest Income	(127.57)	(121.94)
Finance Costs	2,301.88	2,040.43
Operating Profit before Working Capital Changes	15,756.69	12,204.77
Adjusted for:		
(Increase) / Decrease in Trade and Other Receivable	(4,514.81)	(2,040.96)
Increase/ (Decrease) in Other Financial Liabilities	516.68	388.04
Increase/ (Decrease) in other liabilities	(71.01)	85.25
Increase/ (Decrease) in Provisions	715.79	77.66
(Increase) / Decrease in Inventories	(12,683.50)	(4,966.50)
Decrease/ (Increase) in Loans	28.65	1,060.24
Decrease/ (Increase) in Other Current Financial Assets	706.14	(2,101.75)
Decrease/ (Increase) in Other Current Assets	(301.50)	(659.63)
(Increase) / Decrease in Other Non Current Assets	41.92	(49.83)
Decrease/ (Increase) in Other Non-Current Financial Assets	7.46	(1,045.41)
Increase / (Decrease) in Trade and Other Payables	1,585.09	3,098.48
Net Working Capital Changes	(13,969.09)	(6,154.42)
Cash Generated from Operations	1,787.60	6,050.35
Income Tax Paid	2,702.81	1,701.69
Net Cash Flow from / (Used in) Operating Activities (A):	(915.20)	4,348.66
B Cash Flow from Investing Activities:		
Purchase of Property, Plant and Equipment and Intangible Assets	(7,031.96)	(2,572.29)
Capital Advance/Capital Creditors (Net)	928.32	(913.33)
Proceeds from Sale of Property, Plant and Equipment and Intangible Assets	119.26	58.98
(Profit) / Loss on Sale / Discard of Property, Plant and Equipment (Net)	(19.73)	413.43
Bank balance other than Cash & Cash Equivalents	(96.97)	(201.88)
Interest Income	127.57	121.94
Net Cash Flow from / (Used in) Investing Activities (B):	(5,973.51)	(3,093.15)
C Cash Flow from Financing Activities:		
Proceeds from Long-Term borrowings (Net)	843.93	(4,163.44)
Proceeds from Short-Term borrowings (Net)	8,317.21	4,867.66
Interest Paid	(2,301.88)	(2,040.43)
Net Cash Flow from / (Used in) Financing Activities (C):	6,859.26	(1,336.21)
Net Increase / (Decrease) in Cash and Cash Equivalents (A+B+C)	(29.45)	(80.70)
Cash and Cash Equivalents at the beginning of the Year	68.87	149.57
Cash and Cash Equivalents at the end of the Year*	39.42	68.87
* Comprises:		
Cash on Hand	33.64	19.40
Balances with Banks		
(i) In Current Accounts	5.69	49.34
(ii) In EEFC Accounts	0.09	0.13
	39.42	68.87

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.: 011626N

(CA P. M. Mittal)
Partner
Membership No.: 094667
Place: New Delhi
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(Subash Singh Virori)
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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, 2022:**A Corporate information**

Star Wire (India) Limited, originally incorporated in 1963 was taken over by present management in 1981 under an auction conducted by Hon^{ble} Delhi High Court. It is engaged in the manufacturing of critical and cutting edge metallurgical components with applications in the aerospace, defense, automotive and power sectors. It is a leading Engineering company that is engaged in the manufacturing of Alloy Steels, Stainless Steel and Special Steels for diversified engineering application in shape of castings, forging and rolled products.

Name: Star Wire (India) Limited (SWIL)

Date of Incorporation : July 4, 1963

Corporate Identity Number (CIN) issued by MCA: U27109HR1963PLC105338

Constitution: Limited Company

Industry: Engineering / Mini Steel Plant

Registered & Corporate Office:-

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

Registered Office – 21/4, Mathura Road, Ballabgarh-121004, Faridabad, Haryana

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 have been prepared on the historical cost basis except for certain Fixed Assets which are carried at revalued amounts and certain financial assets and liabilities that are measured at fair value. The Company's Financial Statements are presented in Indian Rupees (₹), which is also its functional currency and all values are rounded to the nearest Lakhs except when otherwise indicated. 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, amended from time to time.

B.2 Summary of Significant Accounting Policies

(a)

Current and Non-Current Classification

The Company presents assets and liabilities in the Balance Sheet based on Current/ NonCurrent classification.

An asset is treated as Current when it is –

- Expected to be realised or intended to be sold or consumed in normal operating cycle;
- Held primarily for the purpose of trading;
- Expected to be realised within twelve months after the reporting period, or
- Cash or cash equivalent unless restricted from being exchanged or used to settle liability for at least twelve months after the reporting period.

All other assets are classified as non-current.

A liability is current when:

- It is expected to be settled in normal operating cycle;
 - It is held primarily for the purpose of trading;
 - It is due to be settled within twelve months after the reporting period, or
 - There is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period.
- The Company classifies all other liabilities as non-current.

Deferred Tax Assets and Liabilities are classified as Non-Current Assets and Liabilities.

(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 costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the entity and the cost can be measured reliably.

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

Gains or losses arising from derecognition of a Property, Plant and Equipment are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognised in the Statement of Profit and Loss when the asset is derecognised.

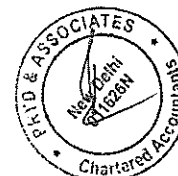
Depreciation on Property, Plant and Equipment is provided on Straight Line Method (SLM). Depreciation is provided based on useful life of the assets as prescribed in Schedule II to the Companies Act, 2013 except in respect of the following assets, where useful life is different than those prescribed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

Upon first-time adoption of Ind AS, the Company has elected to measure all its property, plant and equipment at the Previous GAAP carrying amount as its deemed cost on the date of transition to Ind AS i.e. April 01, 2016.

3



Notes to the financial statements for the year ended 31st March, 2022:

(b) Intangible Assets

Intangible Assets are stated at cost of acquisition net of recoverable taxes, trade discount and rebates less accumulated amortisation/depletion and impairment losses, if any. Such cost includes purchase price, borrowing costs, and any cost directly attributable to bringing the asset to its working condition for the intended use, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the Intangible Assets.

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.

Upon first-time adoption of Ind AS, the Company has elected to measure its intangible assets at the Previous GAAP carrying amount as its deemed cost on the date of transition to Ind AS i.e. April 01, 2016.

(c) Research and Development Expenses:

As a matter of policy, Revenue expenditure on research & 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 & development is accounted for as the normal expenditure.

(d) Cash and Cash Equivalents:

Cash and cash equivalents comprise of cash on hand, cash at banks, short-term deposits and short-term, highly liquid investments that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value.

(e) 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.

(f) Inventories:

Items of inventories are measured at lower of cost and net realisable value after providing for obsolescence, if any. Cost of inventories comprises of cost of purchase, cost of conversion and other costs including manufacturing overheads net of recoverable taxes incurred in bringing them to their respective present location and condition.

Cost of finished goods, work-in-progress, raw materials, stores and spares, packing materials, trading and other products are determined on 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 weighted average method.

(g) 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. Remeasurement gains and losses arising from adjustments and changes in actuarial assumptions are recognised in the period in which they occur in Other Comprehensive Income. 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 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.

(h) Tax Expenses:

The tax expenses for the period comprises of current tax and deferred income tax. Tax is recognised in Statement of Profit and Loss, except to

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.

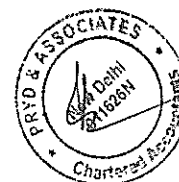
Deferred tax assets are recognised to the extent it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax losses can be utilised. Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have

(i) Foreign Currency Transactions:

Transactions in foreign currencies are recorded at the exchange rate prevailing on the date of transaction. Monetary assets and liabilities denominated in foreign currencies are translated at the functional currency closing rates of exchange at the reporting date. Exchange differences arising on settlement or translation of monetary items are recognised in Statement of Profit and Loss except to the extent of exchange differences which are regarded as an adjustment to interest costs on foreign currency borrowings that are directly attributable to the acquisition or construction of qualifying assets which are capitalised as cost of assets.

Non-monetary items that are measured in terms of historical cost in a foreign currency are recorded using the exchange rates at the date of the transaction. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was measured. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e. translation differences on items whose fair value gain or loss is recognised in

2



Notes to the financial statements for the year ended 31st March, 2022:

(j) 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.

(k) 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.

(l) Derivative Financial Instruments

The Company uses derivative financial instruments like 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 and are also subsequently measured at fair value as on reporting date. Any gains or losses on the re-measurement/ Settlement of the transaction on Derivatives are carried as Financial Assets when the fair value is positive and as Financial Liabilities when the fair value is negative.

(m) 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.

(n) 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.

(o) 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.

(p) 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.

(q) 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.

(r) 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

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.

B



Notes to the financial statements for the year ended 31st March, 2022:

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.

D First Time adoption of Ind AS

The Company has adopted Ind AS with effect from 1st April 2017 with comparatives being restated. On assessment of estimates and measurement of financial assets made under the Previous GAAP financial statements, the Company has concluded that there is no necessity to revise such estimates and measurement of financial assets under Ind AS, as there is no objective evidence of an error in those estimates and measurement of financial assets.

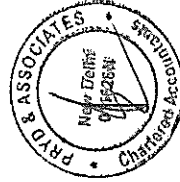
The figures for the previous period have been restated, regrouped and reclassified wherever required to comply with the requirement of Ind AS and Schedule III.

R



Notes to the Financial Statements for the year ended 31st March, 2022

Note- 1: PROPERTY, PLANT AND EQUIPMENT, CAPITAL WORK-IN-PROGRESS, INTANGIBLE ASSETS AND INTANGIBLE ASSETS UNDER DEVELOPMENT													
Assets	Gross Block							Depreciation / Amortisation and Depletion				Net Block	
	Rate of Depreciation /Amortization	Opening As at 01.04.2021	Additions / Adjustments	Deduction / Adjustments	Acquisitions through business combinations	Amount of change due to revaluation	Closing As at 31.03.2022	As at 01.04.2021	For the year	Adjustments / (deductions)	As at 31.03.2022	As at 31.03.2022	As at 31.03.2021
1	2	3	4	5	6	7	8	9	10	11	12	13	14
(a) Property, Plant and Equipment													
Land	-	3,405.38	-	-	-	-	3,405.38	-	-	-	-	3,405.38	3,405.38
Office Building	1.58%	10.75	-	-	-	-	10.75	0.98	0.18	-	1.16	9.59	9.77
Factory Building	3.17%	8,397.13	965.08	-	-	-	9,362.21	1,320.60	301.99	-	1,622.59	7,739.62	7,076.52
Temporary Building	95.00%	-	2.00	2.00	-	-	-	-	-	-	-	-	-
Plant & Machinery	3.17%	39,107.27	6,285.30	-	-	-	45,392.57	4,977.62	1,399.92	-	6,377.54	39,015.03	34,129.65
Electric Installation	9.50%	212.68	1.85	-	-	-	214.53	95.13	21.36	-	116.48	98.05	117.56
Office Equipment	19.00%	203.28	6.98	5.46	-	-	204.79	132.43	24.50	1.41	155.52	49.28	70.85
Computer & Software	31.67%	601.45	35.57	-	-	-	637.02	274.07	138.96	-	413.03	223.98	327.38
Gas Installation	4.75%	3.20	-	-	-	-	3.20	-	-	-	-	3.20	3.20
C I Mould	47.50%	9.14	10.92	-	-	-	20.06	-	1.07	-	1.07	18.99	9.14
Crane & Trolley	4.75%	9.05	-	-	-	-	9.05	3.35	0.67	-	4.02	5.03	5.70
Rolling Mill Rolls	95.00%	1,041.56	63.12	-	-	-	1,104.67	784.86	187.22	-	972.08	132.59	256.70
Furniture & Fixtures	9.50%	93.97	-	-	-	-	93.97	50.59	7.12	-	57.71	43.38	36.26
Vehicle	11.88%	384.98	200.21	111.80	-	-	473.38	188.77	48.82	46.29	191.30	282.08	196.21
Cycle	9.50%	0.25	-	-	-	-	0.25	0.11	0.03	-	0.14	0.11	0.14
Truck & Tanker	11.88%	39.23	-	-	-	-	39.23	24.74	5.22	-	29.96	9.27	14.49
Total (a)		53,519.31	7,571.02	119.26	-	-	60,971.06	7,853.25	2,137.04	47.70	9,942.60	51,028.46	45,666.05
(b) Capital Work-in-Progress		4,071.10	(586.75)	-	-	-	3,484.35	-	-	-	-	3,484.35	4,071.10
(c) Investment in Property		-	-	-	-	-	-	-	-	-	-	-	-
(d) Goodwill		-	-	-	-	-	-	-	-	-	-	-	-
(e) Other Intangible assets		-	-	-	-	-	-	-	-	-	-	-	-
(f) Intangible assets under development		-	-	-	-	-	-	-	-	-	-	-	-
(g) Biological Assets other than bearer plants		-	-	-	-	-	-	-	-	-	-	-	-
Total (a) to (g)		57,590.40	6,984.26	119.26	-	-	64,455.40	7,853.25	2,137.04	47.70	9,942.60	54,512.81	49,737.15



Notes to the Financial Statements for the period ended March 31st, 2022

Particulars	(₹ in Lakhs)	
	As at 31st March, 2022	As at 31st March, 2021
Note - 2: Investments - Non-Current		
INVESTMENTS, AT FVTOC		
- In Fully Paid Equity Shares:		
Quoted:		
24500 Shares of ₹ 2/- each in Supreme Commercial Enterprises Ltd, Delhi (FMV @ Rs.266.57 per share)	65.31	65.31
500 Shares of ₹ 10/- each in Auto Pins (I) Ltd, Delhi (FMV @ Rs.80 per share)	0.40	0.05
Unquoted:		
30000 Shares of ₹ 2/- each in Eagle International Ltd, Delhi (FMV @ Rs.23.67 per share)	7.10	3.59
24000 Shares of ₹ 2/- each in Juhi Leasing & Finance Ltd, Delhi (FMV @ Rs.10.02 per share)	2.40	2.44
72000 Shares of ₹ 10/- each at a premium of Rs 90/- in Star Wire (I) Engineering Ltd, Delhi (FMV @ Rs.120.478 per share)	86.74	56.58
4400 Shares of ₹ 10/- each in Star Wire (I) Engineering Ltd, Delhi (FMV @ Rs.120.478 per share)	5.30	3.46
	167.26	131.43
Note - 3: Non-Current Loans (Unsecured and Considered Good)		
Loans to Employees	6.99	14.16
	6.99	14.16
Note - 4: Other Non-Current Financial Assets (Unsecured and Considered Good)		
Bank Deposit with more than 12 months maturity	92.06	121.41
Security and Other Deposits	1,057.18	1,035.29
	1,149.24	1,156.70
Note - 5: Other Non-Current Assets (Unsecured and Considered Good)		
Capital Advances to other than Related Parties	710.34	1,216.60
Prepaid Expenses	7.91	49.83
	718.26	1,266.44
Note - 6: Inventories		
Raw Materials	8,223.89	5,878.07
Work-in-Progress	19,856.32	11,009.97
Good in-Transit	-	58.28
Finished goods (Including Goods Lying in Godowns Outside India)	4,163.26	3,519.26
Stores and Spares	3,275.79	2,370.19
	35,519.26	22,835.76



Particulars	(₹ in Lakhs)	
	As at 31st March, 2022	As at 31st March, 2021
Note - 7: Trade Receivables (Unsecured and Considered Good)		
Outstanding for a period exceeding six months	2,912.75	2,186.68
Others	22,724.00	18,935.26
	<u>25,636.75</u>	<u>21,121.94</u>
Note: Trade receivables include debts due from:		
Private companies in which any director is a director or member	<u>838.54</u>	<u>909.43</u>
	<u>838.54</u>	<u>909.43</u>

Trade Receivables ageing schedule						
Particulars	Outstanding for following periods from due date of payment					Total
	Less than 6 months	6 months -1 year	1-2 years	2-3 years	More than 3 years	
(i) Undisputed Trade Receivables –considered good	23,783.50	346.83	202.21	176.62	112.28	24,621.44
(ii) Undisputed Trade Receivables – which have significant increase in credit risk	-	-	-	-	-	-
(iii) Undisputed Trade Receivables – credit impaired	-	-	-	-	-	-
(iv) Disputed Trade Receivables– considered good	-	-	-	328.22	687.09	1,015.31
(v) Disputed Trade Receivables – which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade Receivables – credit impaired	-	-	-	-	-	-

Note - 8: Cash and Cash Equivalents**(i) Cash & Bank balances:**

Cash on Hand	33.64	19.40
Balances with Banks		
(i) In Current Accounts	5.69	49.34
(ii) In EEFC Accounts	0.09	0.13
	<u>39.42</u>	<u>68.87</u>

Note - 9: Bank balances other than Note - 8 above

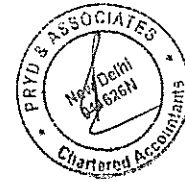
In Earmarked Accounts		
(i) In Fixed Deposit Accounts	451.67	397.90
(ii) Unpaid CSR Account	201.58	158.39
	<u>653.26</u>	<u>556.29</u>

(i) The balances are denominated and held in Indian rupees.

(ii) Earmarked balances with bank represents balances held for unpaid dividends, unpaid CSR and margin money against issue of bank guarantees & letter of credits.



Particulars	(₹ in Lakhs)	
	As at 31st March, 2022	As at 31st March, 2021
Note - 10: Loans - Current (Unsecured and Considered Good)		
Loans and Advances to Employees	19.82	41.30
	<u>19.82</u>	<u>41.30</u>
Note - 11: Other Financial Assets - Current		
Interest Accrued on Deposits	3.55	-
Balances with Government Authorities**		
(i) Goods & Service Tax Receivable	1,226.70	1,694.86
(ii) VAT Credit Receivable	5.23	6.06
(iii) Duty Draw Back Credit Receivable	299.34	763.55
(iv) Advance Income Tax (Net of Provisions) Paid in Respect of Earlier Years	410.89	481.89
(v) Derivative Forward Contract	384.13	-
	<u>2,329.84</u>	<u>2,946.36</u>
(vi) Advance Income Tax Paid (including TDS & TCS)	2,468.78	1,800.71
Less:- Income Tax Liability	2,555.64	1,726.94
Net Income Tax Refundable/ (Payable)	<u>(86.85)</u>	<u>73.77</u>
	<u>2,242.99</u>	<u>3,020.14</u>
** None of the above amount are disputed		
Advance Income Tax (Net of Provision)		
At Start of Year		
Charge for the Year - Current Tax	555.67	507.14
Tax Paid (Net) During the Year	2,555.64	1,726.94
At the End of Year	<u>2,324.01</u>	<u>1,775.46</u>
	<u>324.04</u>	<u>555.67</u>
Note - 12: Other Current Assets (Unsecured and Considered Good)		
Prepaid Expenses	26.81	26.07
Advances to Suppliers		
To Related Parties	834.40	779.41
To Other than Related Parties	1,391.08	1,145.31
	<u>2,252.29</u>	<u>1,950.79</u>



Particulars	As at 31st March, 2022	(₹ in Lakhs) As at 31st March, 2021
Note - 13: Share Capital		
(a) Authorized Share Capital:		
29,00,00,000 Equity Shares of ₹ 1/- each	2,900.00	2,900.00
(29,00,00,000) Equity Shares of ₹ 1/- each		
50,00,000 1% Non Cumulative Redeemable Preference Share of ₹ 10/- Each*	500.00	600.00
(0) 1% Non Cumulative Redeemable Preference Share of ₹ 10/- Each*		
10,00,000 4% Non Cumulative Redeemable Preference Share of ₹ 10/- Each*	100.00	
(60,00,000) 4% Non Cumulative Redeemable Preference Share of ₹ 10/- Each*		
	3,500.00	3,500.00
(b) Issued, Subscribed & Paid Up Capital:		
279047500 Equity Shares of ₹ 1/- each fully paid up	2,790.48	2,790.48
(279047500) Equity Shares of ₹ 1/- each fully paid up		
	2,790.48	2,790.48
(c) Par Value Per Share		
Equity Shares of ₹ 1/- each fully paid up		

(d) The Reconciliation of the number of Shares Outstanding is set out below :

Particulars	As at 31 March, 2022	As at 31 March, 2021
Equity Shares at the beginning of the year	No. of Shares	No. of Shares
Addition / Reduction during the year	27,90,47,500	27,90,47,500
Equity Shares at the end of the year	27,90,47,500	27,90,47,500

(e) 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

(i)- 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.

(ii)- 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.

(iii)- 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.

(f) Shares in respect of each class of Company held by Holding Company or its ultimate Holding Company Not Applicable

(g) Details of Shares Held by each Shareholder Holding more than 5% shares:

Class of shares / Name of shareholder	As at 31 March, 2022		As at 31 March, 2021	
	Number of shares held	% held	Number of shares held	% held
Equity Shares with Voting Rights				
Mohinder Kumar Gupta	4,20,30,000	15.06%	4,20,30,000	15.06%
Juhi Leasing & Finance Limited	10,50,70,000	37.65%	10,50,70,000	37.65%
Samir Gupta	2,65,18,125	9.50%	2,68,63,125	9.63%
Abhishek Gupta*	3,36,19,375	12.05%	3,36,19,375	12.05%
Total	20,72,37,500	74.27%	20,76,82,500	74.39%

(h) Shares Reserved for Issue under Options or Contracts or Commitments

Nil

(i) During the Last Preceding Five Years, no Shares has been allotted without payment being received in cash, no shares allotted by way of bonus shares and there has been no buy back of shares

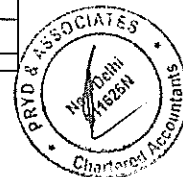
(j) Terms of any securities convertible into Equity Shares issued along with the earliest date of conversion

(k) Calls unpaid-Nil

(l) Forfeited Shares-Nil

(m) Promoters Share Holding

Shares held by Promoters at the end of the year				% Change during the year 21-22
S. No	Promoter name	No. of Shares**	% of total shares	
1	Mohinder Kumar Gupta	4,20,30,000	15.06%	0.00%
2	Minal Gupta	13,05,000	0.47%	0.00%
3	Samir Gupta	2,65,18,125	9.50%	-0.12%
4	Juhi Leasing & Finance Limited	10,50,70,000	37.65%	0.00%
5	Abhinandan Trafal Private Limited	1,00,12,500	3.59%	0.00%
6	Hollysea Finvest Private Limited	66,12,500	2.37%	0.00%
7	Supersigma Alloys & Forgings Private Limited	1,19,70,000	4.29%	0.24%
8	Nipin Steels Private Limited	54,31,150	1.95%	0.00%
9	Abhishek Gupta	2,47,37,000	8.86%	0.00%
10	Rekha Gupta	62,77,700	2.25%	-0.12%
11	Mumet India Private Limited	77,48,000	2.78%	0.00%
12	Padmanabh Steel & Trading LLP	13,50,000	0.48%	0.00%
13	SJ Tea & Traders LLP	15,92,000	0.57%	0.00%
14	Polylink Vinimay LLP	13,50,000	0.48%	0.00%
15	Cornflower Vinimay LLP	12,50,000	0.45%	0.00%
16	Amisha Gupta Partner Bhagwati Steel Syndicate	55,25,000	1.98%	0.00%
17	Ensol International LLP	36,150	0.01%	0.00%
18	Interglobal Steels Private Limited	41,00,000	1.47%	0.00%
19	Star Wire (India) Biomass Private Limited	60,35,000	2.16%	0.00%
20	Star Wire (India) Electricity Private Limited	12,15,000	0.44%	0.00%
21	Abhishek Gupta & Minal Gupta (Jointly)	88,82,375	3.18%	0.00%
	Total	27,90,47,500	100.00%	0.00%



Particulars	As at		As at	
	31st March, 2022		31st March, 2021	
Note - 14: Other Equity	As at	As at		
	31 March, 2022	31 March, 2021		
Capital Reserve		50.00		
General Reserves	50.00		50.00	
Revaluation Reserves	475.83		475.83	
Securities Premium Reserve	617.42		617.42	
Retained Earnings:	7,224.88		7,224.88	
As per last Balance Sheet	35,677.46	29,178.29		
Add: Profit for the year	8,324.95	6,499.17	35,677.46	
Less: Appropriations				
Transfer to Revaluation Reserve	-	-		
Transfer to Provisions for CSR	-	-		
Transfer to General Reserve	-	-		
Impact of Ind-AS	-	-		
Closing balance				
Other Comprehensive Income (OCI):				
As per last Balance Sheet	(77.83)	(72.43)		
Add: Movement in OCI (Net) during the year	89.72	(5.40)	(77.83)	
Total	52,382.43	43,967.75		

Note - 15: Borrowings**(a) Secured****(i) Term Loans: @**

- HDFC Bank Limited	2,213.56	2,294.11
- Axis Bank Limited	3,564.81	4,777.45
- Federal Bank Limited	5,377.21	2,659.02
- Kotak Mahindra Bank Limited	3,121.10	3,953.61
	14,276.68	13,684.19

(ii) Vehicle Loans:

- Hdfc Bank Ltd A/c Auto Loan	63.53	-
	63.53	-

(b) Unsecured**(i) From Related Parties:****Corporate Loans:**

- M/s Nipin Steel Pvt Limited	3.49	3.25
- M/s Sun Source Leafin Pvt Limited	38.88	47.08
Other than Corporate Loans:		
- Shri Abhishek Gupta	382.99	329.78
- Shri Mohinder Kumar Gupta	66.50	75.94
- Shri Samir Gupta	541.97	419.60
- Smt. Rekha Gupta	394.51	367.86
- Smt. Mahima Gupta	45.85	42.58
	1,473.99	1,286.08

(ii) 1% Non Cumulative Redeemable Preference Share of ₹ 10/- Each***4% Non Cumulative Redeemable Preference Share of ₹ 10/- Each****

	254.05	-
	109.00	354.05
	354.05	354.05
	16,168.25	15,324.33

Note:@

(i)-Term Loans from banks are secured by first charge by way of an equitable mortgage of immovable properties, both present and future, situated at village Chhainsa, Faridabad admeasuring 31.756 Acres, and 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 personal guarantees of Shri M K Gupta, Shri Samir Gupta and Shri Abhishek Gupta, Directors of the Company. Term Loan from Federal Bank is further secured by first charge on Land at Tehsil Ballabgarh, village Chhainsa, Faridabad admeasuring 21.62 Acres.

(ii)- During the year Company has initiated a new capex of Rs 10000 Lacs for project expansion and purchase of machineries and same has been financed by HDFC Bank in the ratio of 75:25. The said term loan of Rs 7500 Lacs as sanctioned by HDFC Bank vide it's letter no CAM012608210077 dated Nov-23, 2021 is at par with the existing term loans, however, the security creation in respect of the same is yet to be completed. The said term loan has 2 years of moratorium period and there after payable in 24 equal quarterly instalments

(iii)- The ongoing capex of Rs 7342 Lacs financed by Federal Bank has shootup by Rs 2088 Lacs due to addition of some new projects/machineries and such additional machinery are financed by Federal Bank by way of section of new term loan of Rs 1600 Lacs vide their letter no CID/FRD/SWL/02/21 dated September 21st, 2021. The security for the new loan is at par with the existing term loan of Federal Bank. The terms and conditions of new term loan of Rs 1600 Lacs are co-terminus with the existing term loan of Federal Bank and payable in 24 equal quarterly instalments.

(iv)- All the proceeds from term loans has been utilised for the purpose for which these are sanctioned.

* 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

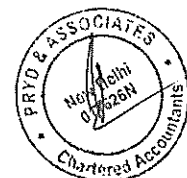
** These Preference shares are to be redeemed on or before 10th February, 2029.

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	2213.56	2213.56	1238.03
Federal Bank Limited	871.36	4505.84	5377.21	1200.00
Axis Bank Limited	0.00	3564.81	3564.81	1323.93
Kotak Mahindra Bank Limited	0.00	3121.10	3121.10	833.33
Total	871.36	13405.32	14276.68	4595.29

Note - 16: Provisions - Non-Current**Provision for Employee Benefits:**

Gratuity	799.85	814.91
Earned Leave	127.87	-
	927.73	814.91



Notes to the Financial Statements for the period ended March 31st, 2022

STAR WIRE (INDIA) LIMITED

Particulars	(₹ in Lakhs)	
	As at 31st March, 2022	As at 31st March, 2021

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 effective tax 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:

	As at 31 March, 2022	As at 31 March, 2021
Profit/(loss) Before Tax	11,425.60	8,673.41
Applicable Tax Rate	25.168%	25.168%
Computed Tax Expense	2,875.60	2,182.92
Tax effect of :		
(i) Expenses Disallowed	99.19	26.95
(ii) Tax on Income at Different Rates	-	(35.63)
(iii) Excess / (Short) Provision made During Last Financial Year	(5.46)	
Current Tax Provision	2,969.33	2,174.24
Effective Tax Rate	26%	25%

B. Deferred Tax Liability (Net)

The movement on the deferred tax account is as follows:

At the start of the year	4,813.04	4,367.56
Charge/(Credit) to Statement of Profit and Loss	413.69	447.30
Charge to Other Comprehensive Income	30.18	(1.82)
At the end of year	5,256.91	4,813.04

Component of Deferred Tax Liabilities / (Asset)

Deferred Tax Liabilities / (Asset) in relation to:

Property, Plant and Equipment and Intangible Asset

Provisions

Financial Assets and Others (Net)

Total

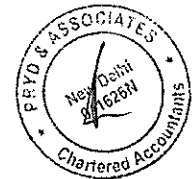
As at 31st March, 2021	Charge/ (Credit) to Statement of Profit and Loss	Other Comprehensive Income	As at 31st March, 2022
5,046.39	435.87	-	5,482.25
(247.73)	(22.18)	21.16	(248.75)
14.38	-	9.02	23.40
4,813.04	413.69	30.18	5,256.91

Note - 18: Other Non-Current Liabilities

Government Grant (EPCG)

790.04	764.79
790.04	764.79

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Notes to the Financial Statements for the period ended March 31st, 2022

Particulars	(₹ In Lakhs)	
	As at 31st March, 2022	As at 31st March, 2021
Note - 19: Borrowings		
Loans Repayable on Demand		
From Banks (Secured)		
Working Capital Loans #		
- State Bank of India	2,221.49	1,933.83
- HDFC Bank Limited	8,484.28	6,707.15
- Kotak Mahindra Bank Limited	812.57	369.98
- Yes Bank Limited	1,038.59	854.07
- Axis Bank Limited	2,218.93	1,857.67
- Citi Bank, N.A.	5,689.56	4,954.93
- Federal Bank Limited	724.16	415.57
Other Loans and Advances (Secured)		
Foreign Currency Loans - Buyers Credit		
- Axis Bank Limited	2,111.09	932.19
- HDFC Bank Limited	1,657.44	866.12
- Yes Bank:	1,097.81	-
Inland LC Bill Discounted		
- Axis Bank Limited	129.93	-
Current Maturities of Long-Term Debt		
From Banks (Secured)		
Term Loans #		
- HDFC Bank Limited	1,238.03	1,203.67
- Kotak Mahindra Bank Limited	833.33	833.33
- Axis Bank Limited	1,323.93	1,292.00
- Federal Bank Limited	1,200.00	266.67
Vehicle Loans		
- HDFC Bank Limited	23.25	-
	30,804.40	22,487.19

Details of Security for Working Capital Loans:

(i). 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 village Chhainsa, Faridabad, admeasuring 31.756 Acres. The Working Capital Loans are also secured by the personal guarantees of Shri M K Gupta, Shri Samir Gupta and Shri Abhishek Gupta Directors of the Company.

(ii) During the year, working capital lenders have revised their limits, thereby enhancing the overall fund based working capital limit to Rs 24000 Lacs from previous limit of Rs. 20500 Lacs and non fund based limits to Rs 13900 Lacs from previous limit of Rs 11500 Lacs, the security creation in respect of revised working capital limits is in process.

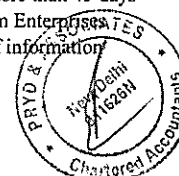
Note - 20: Trade payables

Creditors for Supplies and Services

9,280.33	7,695.24
9,280.33	7,695.24

Particulars	Outstanding for following periods from due date of payment				Total
	Less than 1 year	1-2 years	2-3 years	More than 3 years	
(i) MSME	239.97	-	-	-	239.97
(ii) Others	8,787.44	105.24	147.68	-	9,040.36
(iii) Disputed dues - MSME	-	-	-	-	-
(iv) Disputed dues - Others	-	-	-	-	-

There are no material dues owed by the SWIL to Micro and Small enterprises, which are outstanding for more than 45 days during the year and as at 31 March 2022. This information as required under the Micro, Small and Medium Enterprises Development Act, 2006 has been determined to the extent such parties have been identified on the basis of information available with the SWIL and has been relied upon by the auditors



Notes to the Financial Statements for the period ended March 31st, 2022

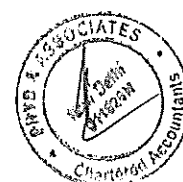
Particulars	(₹ in Lakhs)	
	As at 31st March, 2022	As at 31st March, 2021
Note - 21: Other Financial Liabilities - Current		
Interest accrued but not due on borrowings	13.12	-
Due to Employees	457.00	267.84
Expenses Payable	280.49	50.21
Creditors for Capital Expenditure	899.83	477.77
Statutory Remittances (Contributions to PF and ESIC, Withholding Taxes, GST, VAT etc.)	281.88	318.33
Trade / Security Deposits Received	102.87	69.16
	<u>2,035.19</u>	<u>1,183.31</u>
Note - 22: Other Current Liabilities		
Advances from Customers	1,556.69	1,652.96
	<u>1,556.69</u>	<u>1,652.96</u>
Note - 23: Provisions - Current		
Provision for Gratuity	188.49	169.39
Provisions for Bonus	364.20	-
Provisions for Medical Allowance	37.49	-
Provisions for Leave Travel Allowance	17.76	-
Provisions for Earned Leave	37.66	-
Provisions for CSR	280.28	237.58
	<u>925.88</u>	<u>406.98</u>

1



Notes to the Financial Statements for the period ended March 31st, 2022

		(₹ in Lakhs)	
Particulars	For the Year ended March-22	For the Year ended March-21	
Note - 24: Revenue from Operations			
(a) Sales of Goods (Including GST)			
(i) Indigenous Sales	47,353.74	39,713.66	
(ii) Export Sales	41,760.92	23,179.05	
	89,114.66	62,892.70	
Less: GST Recovered	9,936.80	6,123.13	
Total -(a)	79,177.86	56,769.57	
(b) Sales of Services			
Testing Charges	361.34	330.85	
Total -(b)	361.34	330.85	
(c) Other Operating Revenue :-			
(i) Income from sale of Unusable Material	541.57	158.71	
(ii) Trading Sales	1,479.78	-	
(iv) Export Incentive**	462.75	1,124.38	
Total -(c)	2,484.10	1,283.09	
Total (a)+(b)+(c)	82,023.30	58,383.51	
** MEIS scheme of duty drawback is now replaced with RoDTEP scheme and incentive of RoDTEP is not available for Iron & Steel Products, the income so considered on accrual basis during F.Y 2020-21 for the period Jan-21 to March-21 amounting to Rs.146.01 Lacs has been reversed during the year.			
Note - 25: Other income			
(a) Interest Received	127.57	121.94	
(b) Exchange Difference (Net)	1,933.24	376.94	
(c) Other Non-Operating Income :-			
(i) Profit on Sale of Property, Plant & Equipment	2.59	423.05	
(ii) Other Income	28.47	101.57	
(iii) Government Grant (EPCG)	27.95	26.40	
	2,119.81	1,049.91	
Note - 26: Other Comprehensive Income			
(A) Items that will not be Reclassified to Profit and Loss			
(i) Change in Revaluation Surplus	35.83	1.39	
(ii) Remeasurements of the defined benefit plans	84.07	(8.60)	
	119.90	(7.21)	
Note - 27: Cost of Materials Consumed			
Opening Stock	5,936.35	3,179.56	
Add: Purchases including Freight Inward Charges	32,285.95	22,369.06	
Less: Closing Stock	8,223.89	5,936.35	
Total	29,998.41	19,612.28	
Note - 28: Purchase of Traded Goods			
Traded Goods	1,435.67	-	
	1,435.67	-	
Note - 29: Changes in Inventories of Finished Goods, Work-In-Progress and Stock-In-Trade			
<u>Inventories at the end of the year:</u>			
Finished Goods	4,163.26	3,519.26	
Work-In-Progress	19,856.32	11,009.97	
<u>Inventories at the beginning of the year:</u>			
Finished Goods	3,519.26	9,996.83	
Work-In-Progress	11,009.97	2,649.32	
Net (Increase) / Decrease	(9,490.35)	(1,883.08)	



Notes to the Financial Statements for the period ended March 31st, 2022

(₹ in Lakhs)

Particulars	For the Year ended March-22	For the Year ended March-21
Note - 30: Employee Benefits Expense		
- Salaries and Wages		
Salaries, Wages and Other Allowances	3,659.02	2,812.01
Leave Encashment	230.50	80.02
Leave Travel Concession	89.10	46.30
Bonus	636.41	345.29
Recruitment Expenses	6.98	0.36
Discounting value of interest free loans to employees	1.85	0.71
Provision for Gratuity	143.12	144.86
Retrenchment Compensation	-	4.56
Retirement Benefits	-	6.08
- Contributions to Provident and Other Funds		
Deposit Link Insurance Fund Charges (Staff)	2.80	2.22
ESI Contribution	12.33	11.17
PF Administrative Charges	12.98	10.47
PF Contribution	263.46	212.24
- Staff Welfare Expenses		
Staff and Labour Welfare	119.19	93.78
Welfare Fund	8.23	6.79
Uniform Expenses	2.74	1.74
	5,188.72	3,778.60

Note - 31: Finance Costs

(a) Interest Expense on:		
- Interest on borrowings	1,972.78	1,827.89
- Dividend on Redeemable Preference Shares & Taxes thereon	14.16	14.16
- Interest on Unsecured Loans	111.37	99.39
(b) - Exchange differences regarded as an adjustment to borrowing costs	111.29	-
(c) - Other borrowing costs :		
(i) Interest on Delayed / deferred payment of Govt dues	0.17	2.60
(ii) Bank Charges	92.11	96.39
	2,301.88	2,040.43

Note - 32: Other Expenses**32. a - Manufacturing Expenses**

Consumption of Stores and Spare Parts	14,724.62	7,339.62
Contract Charges	6,098.57	4,430.53
Conversion & Stitching Charges	49.65	173.15
Machining Charges	720.34	713.78
Power and Fuel	12,751.62	8,949.56
Testing Charges	328.68	140.02
	34,673.49	21,746.65

The details of R&D Expenses included in the Natural Head of Accounts are as follows (Rs. In Lacs)

Particulars	For the Year ended 31st March, 2022	For the Year ended 31st March, 2021
Consumption of Materials	385.16	284.13
Conversion Cost	131.81	35.79
Total	516.97	319.92



Notes to the Financial Statements for the period ended March 31st,2022

(₹ in Lakhs)

Particulars	For the Year ended March-22	For the Year ended March-21
32.b - Administrative Expenses		
Charity & Donation	4.93	-
Directors Remuneration*	307.19	143.24
Directors Travelling Expenses	5.79	4.01
Electricity & Water Charges	26.54	24.63
Foreign Tours & Travelling Expenses	5.52	0.52
Foreign Tours & Travelling Expenses (Directors)	4.52	3.55
General & Miscellaneous Expenses	174.18	57.10
IT and Communication Expenses	163.78	164.17
Insurance Charges	260.77	245.29
Loss on Sale of Vehicle	22.32	9.62
Audit Expenses **	24.26	12.38
Postage & Telegram Expenses	9.59	7.36
Printing & Stationery	32.26	32.54
Professional & Consultancy Charges	443.01	363.59
Rent	23.40	92.37
Rates & Taxes	23.72	17.31
Repair & Maintenance - Civil	428.37	194.59
Repairs and Maintenance - Others	125.05	97.61
Repairs and Maintenance - Machinery	370.35	182.70
Security Charges	157.57	129.81
Travelling & Conveyance	185.75	154.84
Provision for CSR***	114.36	89.99
	2,913.24	2,027.22

*** 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	306.90	143.10
Directors' Sitting Fees	0.29	0.14
	307.19	143.24

**** Payments to the auditors comprises (net of GST input credit, where applicable):****(a) Auditors - Statutory Audit**

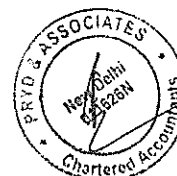
Statutory Audit Fees	5.00	2.50
Reimbursement of expenses	0.14	0.33
	5.14	2.83

(b) Cost Auditors

Audit Fees	3.00	1.50
Reimbursement of Expenses	2.12	1.05
	5.12	2.55

(c) Others

Tax Audit Fees	14.00	7.00
	24.26	12.38



Notes to the Financial Statements for the period ended March 31st,2022

(₹ in Lakhs)

Particulars	For the Year ended March-22	For the Year ended March-21
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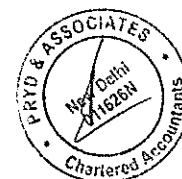
Corporate Social Responsibility (CSR)			
(i) Amount Required to be spent by the Company during the year,	114.36		89.99
(ii) Amount of expenditure incurred,	35.66		10.80
(iii) Shortfall at the end of the year,	78.70		79.19
(iv) Total of previous years shortfall,	201.58		158.39
(v) Reason for shortfall,	Projects under execution or not identified		Projects under execution or not identified
(vi) Nature of CSR activities,	Computer Training Center for boys, Sewing Training Center for Girls, Donation made to various charitable trust's		Computer Training Center for boys, Sewing Training Center for Girls, Donation made to various charitable trust's

*** Details of CSR Provision

Opening Balance	237.58	158.39
Add:- Provision made during the year	114.36	89.99
Less:- Expenses made during the year	71.66	10.80
Closing Balance (As shown in Note No 23 of Balance Sheet)	<u>280.28</u>	<u>237.58</u>

32.c - Selling & Distribution Expenses

Advertisement, Publicity & Sales Promotion Expenses	33.05	15.47
Commission & Brokerage	103.19	58.39
Rent (S&D)	90.21	93.35
Freight and Forwarding	3,152.23	1,196.66
Custom Duty Paid On Overseas Sales	142.68	46.66
Trade Fare & Exhibition Expenses (incudling Tender fees)	38.05	1.08
	<u>3,559.42</u>	<u>1,411.60</u>
	<u>41,146.14</u>	<u>25,185.48</u>

STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended March 31st, 2022

		(₹ in Lakhs)	
Particulars		As at 31st March, 2022	As at 31st March, 2021
Note - 33: Additional Information to the Financial Statements			
1 Contingent Liabilities and Commitments (to the extent not provided for)			
(i) Contingent Liabilities			
(a) Claims against the Company / disputed liabilities not acknowledged as debt #			
(b) Guarantees			
- Inland			
- Foreign			
(ii) Commitments			
(a) Estimated amount of Contracts remaining to be executed on Capital account and not provided for			
- Tangible assets			
- Intangible assets			
(b) Uncalled Liability on Shares and Other Investments Partly Paid			
(b) Other Commitments (specify nature)			
- Bills drawn on Customers and Discounted with Banks at close of the year.			
- Letter of Credit outstanding			
- 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 2017-18 imposed by Haryana State Government as it was held by the Hon'ble Supreme Court of India vide its order dated 30.10.2009 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			

2 Details on Derivatives Instruments and Unhedged Foreign Currency Exposures

I. The following derivative positions are open as at 31 March, 2022:

(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, 2022		As at 31st March, 2021	
		Cross currency	Amount (₹)	Cross currency	Amount (₹)
€	Sell	7350000	₹ 6,212	€ 77,00,000	₹ 6,645
\$	Sell	9250000	₹ 7,004	\$21,00,000	₹ 1,538
Total			₹ 13,216		₹ 8,183

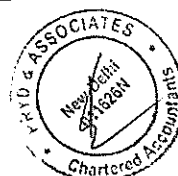
II. The year-end foreign currency exposures that have not been hedged by a derivative instrument or otherwise are given below. The unhedged exposures are naturally hedged by future foreign currency earnings and earnings linked to foreign currency.

A. Buyers Credit:

As at 31st March, 2022		As at 31st March, 2021	
Receivable/ (Payable)	Receivable/ (Payable) in Foreign currency	Receivable/ (Payable)	Receivable/ (Payable) in Foreign currency
INR	(indicate amount with currency)	INR	(indicate amount with currency)
4866	\$64,26,764	1798	\$24,31,116

B. Packing Credit in Foreign Currency (PCFC):

As at 31st March, 2022		As at 31st March, 2021	
Receivable/ (Payable)	Receivable/ (Payable) in Foreign currency	Receivable/ (Payable)	Receivable/ (Payable) in Foreign currency
INR	(Indicate amount with currency)	INR	(indicate amount with currency)
3,689	\$48,72,090	2557	\$34,41,614
4,739	\$56,07,593	5355	\$60,67,593
8,428		7912	



Notes to the Financial Statements for the year ended March 31st,2022



STAR WIRE (INDIA) LIMITED

Notes to the Financial Statements for the year ended March 31st, 2022

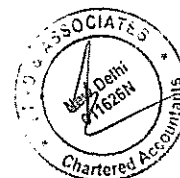
Particulars	As at		As at	
	31st March, 2022		31st March, 2021	
			₹ in Lakhs	
7 Confirmation				
<ul style="list-style-type: none"> The company has requested for confirmations of balances from its creditors and debtors, which has been confirmed by majority of creditors and debtors. Provisions, wherever 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				
- as fixed assets / capital work-in-progress			386	218
			<u>386</u>	<u>218</u>

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	Relative of key Management Personnel
5	Ms. Rekha Gupta	
6	Mr. Sita Ram Gupta	
7	M/s Sita Ram Mohinder Kumar	Enterprises / associates over which Management Personnel and their relatives are able to exercise significant influence
8	M/s Supreme Comm. Enterprises Ltd	
9	M/s Eagle International Limited	
10	M/s Interglobal Steels P Limited	
11	M/s Supersigma Alloy & Forgings Pvt Limited	
12	M/s Abhi Trading Company	
13	M/s Juhi 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 Dharmarth Sansthan	
20	Mahawar charitable Trust	
21	Kuber Dharmarth Sansthan	
22	Mahawar Dharmarth Sansthan	
23	M/s Nipin Steel Private Limited	
24	M/s Abhinandan Trafal 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	



Particulars					(₹ in Lakhs)
					As at 31st March, 2022
					As at 31st March, 2021
(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			528	
2	Sale of goods			(709)	
3	Interest Received			513	
3	Managerial Remuneration	307		(1054)	
4	Dividend Payment	(143)		61	
5	Contract Charges / Machining Charges			(68)	
6	Rent	10		14	
7	Interest Paid	(10)		(14)	
8	Directors Meeting Fees	(4)	0	962	
9	Job Work Charges Received	6	(1)	(938)	
10	Balance as at 31st March, 2022 Payables	0		11	
11	Unsecured Loans	1432	0	(11)	
12	Investments	(1236)	0	4	
13	Bank / Corporate Guarantees			(5)	
14	Receivables			5	
15	Loans & Advances Given			0	
				237	
				(216)	
				42	
				(50)	
				167	
				(131)	
				0	
				0	
				839	
				(909)	
				834	
				(779)	

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 2021, 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 2022, 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	16543	7875
Capital Goods	688	65
Software	0	0
	<u>17231</u>	<u>7940.47</u>

12 Expenditure in Foreign Currency:

Travelling	5	2
Commission & Brokerage	94	51
Professional and Consultation Fees	25	82
Freight Outward	181	153
Testing Charges	195	46
BG Charges (Foreign)	0	17
Rent Charges	90	93
	<u>589</u>	<u>443</u>

13 Details of Consumption of Imported and Indigenous Items:

Imported		
Raw Material and Stores & Spares	16264	7485
	<u>16264</u>	<u>7485</u>
Indigenous		
Raw Material and Stores & Spares	28459	19467
	<u>28459</u>	<u>19467</u>
	<u>28459</u>	<u>19467</u>

14 Earnings In Foreign Exchange:

Export of Goods calculated on FOB basis	38934	23092
	<u>38934</u>	<u>23092</u>



Particulars	(₹ In Lakhs)	
	As at 31st March, 2022	As at 31st March, 2021

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:

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	As at 31st March, 2022			
	Carrying Amount	Level of input used in		
		Level 1	Level 2	Level 3
Financial Assets				
At Amortised Cost				
Trade Receivable	25,637	-	-	25,637
Cash & Cash Equivalents	39	-	-	39
Bank Balances other than Cash & Cash Equivalents	653	-	-	653
Loans	27	-	-	27
Other Financial Assets	3,479	-	-	3,479
At FVTOCI				
Investment	167	-	-	167
Financial Liabilities				
At Amortised Cost				
Borrowing	46,973	-	-	46,973
Trade Payables	9,280	-	-	9,280
Other Financial Liabilities	2,035	-	-	2,035

Particulars	As at 31st March, 2021			
	Carrying Amount	Level of input used in		
		Level 1	Level 2	Level 3
Financial Assets				
At Amortised cost				
Trade Receivable	21,122	-	-	21,122
Cash & Cash Equivalents	69	-	-	69
Bank Balances other than Cash & Cash Equivalents	556	-	-	556
Loans	55	-	-	55
Other Financial Assets	4,177	-	-	4,177
At FVTOCI				
Investment	131	-	-	131
Financial Liabilities				
At Amortised Cost				
Borrowing	37,812	-	-	37,812
Trade Payables	7,695	-	-	7,695
Other Financial Liabilities	1,183	-	-	1,183



Particulars	As at	
	31st March, 2022	31st March, 2021

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, 2022	As at March 31, 2021
Up to 6 month	23,784	18,935
More than 6 month	1,853	2,187

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, 2022			
	0-1 year	1-5 year	Beyond 5 year	Total
Borrowing (Including current maturity of long term borrowing)	32,696	13,405	871	46,973
Trade Payable	9,027	253	-	9,280
Other Current Liabilities	1,557	-	-	30,804

Particulars	As at March 31, 2021			
	0-1 year	1-5 year	Beyond 5 year	Total
Borrowing (Including Current Maturity of Long Term Borrowing)	24,127	13,064	620	37,812
Trade Payable	7,695	-	-	7,695
Other Current Liabilities	1,653	-	-	1,653

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

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

Exposure to Interest Rate Risk

Particulars	As at March 31, 2022	As at March 31, 2021
Total Borrowings	46,973	37,812
% of Borrowings out of above bearing variable rate of interest	65.58%	59.47%

Interest Rate Sensitivity:

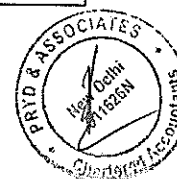
A change of 100 bps in interest rates would have following impact on profit before tax

Particulars	As at March 31, 2022	As at March 31, 2021
100 bp increase would decrease the profit before tax by	308	225
100 bp decrease would increase the profit before tax by	308	225

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, 2022		As at March 31, 2021	
	Foreign Currency Monetary Assets	Foreign Currency Monetary Liabilities	Foreign Currency Monetary Assets	Foreign Currency Monetary Liabilities
USD	72,74,876	1,28,39,857	35,01,489	8,94,879
EURO	80,94,805	77,56,480	60,13,400	27,20,445
AED	53,62,812	-	45,16,959	-
CNY	-	-	-	-



Particulars	(₹ In Lakhs)	
	As at 31st March, 2022	As at 31st March, 2021

Foreign Currency Sensitivity

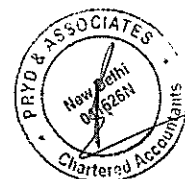
The following table details the Company's sensitivity to a 1% increase and decrease in INR against the relevant foreign currencies. 1% is the sensitivity rate used when reporting foreign currency risk internally to key management personnel and represents management's assessment of the reasonably possible 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, 2022		As at March 31, 2021	
	1% Increase	1% Decrease	1% Increase	1% Decrease
Foreign Currency Monetary Assets				
USD				
EURO	55	(55)	26	(26)
AED	68	(68)	52	(52)
CNY	11	(11)	9	(9)
Foreign Currency Monetary Liabilities				
USD				
EURO	(97)	97	(7)	7
AED	(66)	66	(23)	23
CNY				
Impact on Profit and 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.

17 Annexure 'O' on Quantitative Information for the year ended 31st March 2022 attached

3



Note No 34 (A) :- Additional Regulatory Information

(i) There is no immovable property the title deed of which is not held in the name of Company as on the Reporting Date.

(ii) There is no investment property held by Company as on the Reporting Date.

(iii) The Company has not revalued its Property, Plant and Equipment during current Reporting Period.

(iv) The Company has not revalued its intangible assets during current Reporting Period.

(v) The Company has not given any Loans or Advances in the nature of loans to its promoters, directors, KMPs and the related parties as on reporting date.

(vi) Capital-Work-in Progress (CWIP)-Ageing Schedule

CWIP	Amount in CWIP for a period of				Total*
	Less than 1 year	1-2 years	2-3 years	More than 3 years	
Projects in progress	645.02	186.76	10.08	2,642.49	3,484.35

(vii) There is no intangible assets held under development as on the reporting date.

(viii) There is no Benami property held by the Company as on reporting date and no proceeding has been initiated against the Company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (45 of 1988) and rules made thereunder

(ix) All the Quarterly returns or statements of current assets filed by Company with banks are in agreement with the books of accounts during the reporting period.

(x) Company has not been declared wilful defaulter by any bank, financial institution or other lender during the reporting period.

(xi) As per the information obtained by Company and as furnish by its customers, creditors or other's, the Company does not have any transactions with struck-off Company during the Reporting Period.

(xii) There is no charges or satisfaction yet to be registered with ROC beyond the statutory period as on Reporting Date.

(xiii) The Company has complied with the number of layers prescribed under clause (87) of section 2 of the Act read with the Companies (Restriction on number of Layers) Rules, 2017 during the Reporting Period.

(xiv) Separate sheet has been attached for Ratio analysis.

(xv) There are no scheme of Arrangements as approved by the Competent Authority in terms of sections 230 to 237 of the Companies Act, 2013 during the reporting period

(xvi) Utilisation of Borrowed funds and share premium:

(A) Company has not advanced or loaned or invested funds to any other person or entity including foreign entities or provided any guarantee/ security or the like to or on behalf of the ultimate beneficiaries during the reporting period.

(B) Company has not received any fund from any person or entity including foreign entities or provided any guarantee/ security or the like to or on behalf of the ultimate beneficiaries during the reporting period.



Notes to the Financial Statements for the year ended March 31st, 2022

Note No 34 (B) : Ratio Analysis:

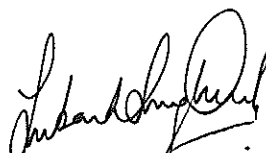
Particulars	Current Year 2021-22	Previous Year 2020-21	Formula	Change (In %)
(a) Current Ratio	1.49	1.48	(Current Assets)/ (Current Liabilities)	0.22%
(b) Debt-Equity Ratio	0.29	0.33	Total Debt/ Total Equity	-10.58%
(c) Debt Service Coverage Ratio	2.60	2.24	(PAT+Interest+Dep+Interest on TL+Deferred Tax Liability)/(Interest On TL+ Repayment of TL done)	15.81%
(d) Return on Equity Ratio	0.15	0.14	PAT/Total Equity	8.56%
(e) Inventory turnover ratio	9.13	9.07	(Cost of Material Consumed+Wages+Manufacturing Expenses)/((Op Stock+Closing Stock)/2)	0.66%
(f) Trade Receivables turnover ratio	3.39	2.82	<u>Value of Sales & Services (Excluding GST)</u> Average Trade Receivables	19.92%
(g) Trade payables turnover ratio	7.33	7.40	(Purchase of Raw Material & Stores+Manufacturing Exp)/ Avg Payable	-0.92%
(h) Net capital turnover ratio	1.49	1.25	(Net Sales)/(Total Equity)	19.06%
(i) Net profit ratio	9.89%	10.94%	Profit After Tax (after exceptional items)/ Value of Total Revenue	-9.52%
(j) Return on Capital employed	13.44%	12.67%	(PBT+Financial Cost)/ (Total Equity+Total Debt)	6.08%
(k) Return on investment	10.60%	9.72%	(Net Profit)/(Cost of Investment)	9.08%

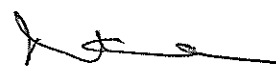
The figures for the corresponding previous year have been regrouped / reclassified wherever necessary, to make them comparable.

As per our report of even date:


For and on behalf of the Board of Directors

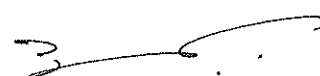
For PRYD & Associates
Chartered Accountants
Registration No.: 011626N

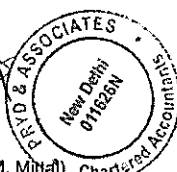

(Subash Singh Virdi)
Executive Director


(Mohinder Kumar Gupta)
Managing Director
DIN - 00054110


(Binod Kumar Mishra)
Chief Finance Officer


(Rekha Sharma)
Jt. GM Legal & Company Secreta
M No: FCS 6428


(Samir Gupta)
Whole Time Director
DIN - 00054308


(CA P. M. Mittal) Chartered Accountants
Partner
Membership No.: 094667
Place: New Delhi
Date: 27th, August 2022

Annexure '0'- QUANTITATIVE STATEMENT RELATING TO INVENTORIES FOR THE FINANCIAL YEAR-2021-22

Information pursuant to the provision of Schedule III of Companies Act, 2013 -Particulars in respect of goods manufactured

Sr.No.	Description	Installed Capacity of Furnace (MT)	Actual Production (MT)	Opening Stock		Turnover		Transfer		Closing Stock	
				Qty. (MT)	Amount	Qty. (MT)	Amount	Qty. (MT)	Amount	Qty. (MT)	Amount
1	Ingot & CCM Production	45000	40199.219	2394.892	1346.21	2878.805	2727.020	38347.964	27911.93	1367.342	2468.04
		(45000)	(31326.741)	2394.892	1346.21						
				(1941.242)	(972.82)	(2816.785)	(2166.16)	(28056.306)	(18677.68)	1367.342	2468.04
				(1941.242)	(972.82)					(2394.892)	(1346.21)
	Semi Rolled Product		34628.705	3235.005	2157.67					(2394.892)	(1346.21)
			(25885.191)	3235.005	2157.67			34804.031	23999.65	3059.679	4520.76
				(3231.469)	(1676.51)			(25881.655)	(17398.04)	3059.679	4520.76
				(3231.469)	(1676.51)					(3235.005)	(2157.67)
2	Rolled Products		24331.757	6820.436	8810.09	23068.165	70823.78			(3235.005)	(2157.67)
			(17799.665)	6820.436	8810.09					8084.028	14175.20
				(6403.290)	(7735.95)	(17382.519)	(49120.11)			(6820.436)	(8810.09)
				(6403.290)	(7735.95)					(6820.436)	(8810.09)
		Qty. in Nos.	5923 (241)	114 (47)	15.90 (4.825)	381 (174)	0 (79.53)			5656 (114)	263.38 (15.90)
3	Steel Casting	5000 (5000)	1249.875	1361.496	2199.36	1216.490	5627.06			1394.881	2591.98
			(915.310)	1361.496	2199.36					1394.881	2591.98
				(1440.106)	(2255.97)	(993.92)	(5607.01)			(1361.496)	(2199.36)
				(1440.106)	(2255.97)					(1361.496)	(2199.36)

** Figures in brackets () represent previous year i.e. Financial Year 2020-21

The figures for the corresponding previous year have been regrouped / reclassified wherever necessary, to make them comparable.

