

**ADVANCE STEEL TUBES LIMITED**  
**ANNUAL REPORT**  
**2021-2022**

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## **CORPORATE INFORMATION**

### **Board of Directors**

**Mr. Deoki Nandan Agarwal**

Managing Director

DIN: 00586794

**Mr. Lalit Agarwal**

Director

DIN:00109920

**Mr. Aashish Agarwal**

Director

DIN: 00026311

**Mrs. Parveen Gupta**

Independent Director

DIN: 00180678

**Mr. Naresh Chand Maheshwari**

Independent Director

DIN: 00218051

**Mr. Jay Vilas Dubey**

Independent Director

DIN:00150464

**Mr. Suyash Agarwal**

Director

DIN: 07520380

**Chief Financial Officer**

Mr. Vatsal Agarwal

CFO(KMP)

PAN: AMPPA6166N

**Company Secretary**

Parul Misra

Company Secretary

PAN: AOTPM3111M

**Auditors**

Singhal Shubahm & Co.

(Chartered Accountants)

FRN: 028622C

**Internal Auditors**

Jain S. & Associates

(Chartered Accountants)

FRN : 019665C

**Registrar & Share Transfer**

**Agents**

BEETAL FINANCIAL &  
COMPUTER SERVICES (P)  
LIMITED.

Beetal House, 3rd Floor, 99,

Madangir,

Behind Local Shopping Centre,

Near Dada Harsukhdas Mandir,

New Delhi-110 062

**Registered Office**

45/3, Industrial Area, Site-IV,

Sahibabad, Distt. Ghaziabad-

201010

Uttar Pradesh

**Corporate Office**

81, Functional Industrial Estate,

Patparganj, Delhi-110092

**E-Mail & Website**

**Company & investor**

**Grievances**

[info@advance.co.in](mailto:info@advance.co.in),

[www.advance.co.in](http://www.advance.co.in)

**ADVANCE STEEL TUBES LIMITED**

**CIN: L24231UP1978PLC004583**

**Regd. Off.: 45/3, INDUSTRIAL AREA, SITE-4, SAHIBABAD, GHAZIABAD, U.P.201010**

**E- Mail: info@advance.co.in, Contact: 011-43041400**

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**NOTICE TO THE MEMBERS**

Notice is hereby given that the 48<sup>th</sup> Annual General Meeting of the members of **ADVANCE STEEL TUBES LIMITED** will be held on Tuesday, the 27<sup>th</sup> day of September, 2022 at 12:30 P.M. at the Registered office of the Company at 45/3, Industrial Area, Site-IV, Sahibabad to transact the following business: -

**ORDINARY BUSINESS**

1. To receive, consider and adopt the audited Balance Sheet as at 31<sup>st</sup> March, 2022 and the Profit & Loss Account for the year ended on that date, Cash Flow Statement and the Report of Directors' and Auditors' thereon.
2. To appoint a Director in place of Shri Aashish Agarwal (DIN: 00026311) who retires by rotation and being eligible, offers himself for re-appointment.

**SPECIAL BUSINESS:**

3. **To consider and if thought fit, to pass with or without modification (s) the following resolution as Ordinary Resolution for ratification of Remuneration of Cost Auditors of the Company for the year 2021-2022:**

“**RESOLVED THAT** pursuant to provisions of Section 148(3) of the Companies Act, 2013 read with Companies (Cost Audit and Records) Rules, 2014 (including any statutory modification (s) of re-enactment thereof) (the act) and on the recommendation of the audit committee and approval by the Board of Directors at their meeting on 05<sup>th</sup> September, 2022 the consent of the members of the members of the Company be and is hereby accorded for ratification of the remuneration to the M/s Gopinathan Mohandas & Co. Cost Accountants as the Cost Auditors of the Company for the financial year 2022-2023 at a fee of Rs. 1,10,000/- (One lakh Ten Thousand only) all-inclusive for the audit of the cost accounting records for all the manufacturing facilities of the Company.”

By order of the Board  
For **Advance Steel Tubes Limited**

**Place: Sahibabad**  
Date: 05/09/2022

**Sd/-**  
**(Deoki Nandan Agarwal)**  
Managing Director  
DIN: 00586794

## NOTES

1. A member entitled to attend and vote is entitled to appoint a PROXY to attend and on Poll to vote instead of himself and such PROXY need not be a member of the company. PROXIES in order to be effective must be received at the Registered Office of the Company not less than 48 hours before the meeting.
2. Pursuant to the provisions of Section 105 of the companies Act, 2013, read with the applicable rules thereon a person can act as a proxy on behalf of members not exceeding fifty and holding in aggregate not more than 10 percent of the total share capital of the company carrying voting rights, may appoint a single person as proxy who shall not act as a proxy for any other member.
3. Corporate members intending to send their authorized representatives to attend the meeting are requested to send the company a certified copy of the board resolution authorizing their representative to attend and vote on their behalf at the meeting.
4. The register of members and Share Transfer Books will remain closed from 23<sup>rd</sup> September, 2022 to 27<sup>th</sup> September, 2022 (both days inclusive) for the purpose of the Annual General Meeting. Pursuant to the requirement of listing Agreement of Stock Exchanges on Corporate Governance, the information about the directors, proposed to be appointed at the AGM is given in Annexure to the Notice.
5. An explanatory Statement pursuant to Section 102 of the Companies Act, 2013 in respect of all the special businesses specified above is annexed hereto.
6. All documents referred to in the Notice and accompanying explanatory Statement as well as the Annual Report are open for inspection at the registered office of the company during the normal business hour up to the date of AGM.
7. Members desiring any information about accounts or otherwise, are requested to write to the company at least 10 days in advance of the Annual General Meeting to facilitate compliance thereof.
8. Members are requested to mention their Folio Number in all their correspondence with the Company in order to facilitate response to their queries promptly.
9. Members holding shares in physical form are requested to intimate changes in their registered address in Block Letters with PIN Code of the Post Office, Email-ID, Bank particulars and Permanent Account Number (PAN) to the Company's Registrar and the Share Transfer Agent and in case of members holding their shares in electronic form, this information should be given to their depository participant immediately.
10. Members / Proxies are requested to kindly take note of the following:
  - i. Copies of Annual Report will not be distributed at the venue of the meeting.

- ii. In all correspondences with the Company and / or the R & T Agent, Folio No. must be quoted.
11. Members who are holding shares in identical order of names in more than one folio are requested to write to the Company enclosing their share certificate to enable the Company to consolidate their holdings in one folio.
12. Beetal Financial & Computer Services (P) Limited is the Registrar and Share Transfer Agent of the company. All investor related to communication may be addressed to the following address:

**BEETAL FINANCIAL & COMPUTER SERVICES (P) LIMITED.**  
Beetal House, 3<sup>rd</sup> Floor, 99, Madangir,  
Behind Local Shopping Centre, Near Dada Harsukhdas Mandir,  
New Delhi-110 062
13. The Ministry of Corporate Affairs (MCA) has come out with Circular No. 17/2011 dated 21/04/2011 & 18/2011 dated 29/04/2011 propagation “Green Initiative” encouraging Corporate to serve documents through electronic mode. In order to above, those shareholders, who want the Annual Report in electronic mode, are requested to send their e-mail address.
14. The Securities and Exchange Board of India (SEBI) has mandated to submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in electronic form are, therefore requested to submit their PAN to their Depository Participants with whom they are maintaining their demat account. Members holding their shares in physical form can submit their PAN to the company and / or its Registrars & Share Transfer Agents.
15. The Notice of AGM and Annual Report for the Financial Year 2021-2022, is available on the website of the Company at [www.advance.co.in](http://www.advance.co.in)
16. Members are requested to note that, dividends if not encashed for period of seven years from the date of transfer to Unpaid Dividend account of the Company, are liable to be transferred to the Investor Education and Protection Fund (“IEPF”). The shares in respect of such unclaimed dividends for 7 consecutive years are also liable to be transferred to the demat account of the IEPF Authority. In view of this, members/claimants are requested to claim their unpaid/unclaimed dividends. The members, whose unclaimed dividends/shares have been transferred to IEPF, may claim the same by making an application to the IEPF Authority, in Form No IEPF-5 as available on [www.iepf.gov.in](http://www.iepf.gov.in).
17. Members are requested to intimate changes if any, about their name, postal address, e-mail address, telephone/mobile number, PAN, Power of Attorney registration, Bank Mandate details etc., to their Depository Participants (DP) in case the shares are held in electronic form and to the registrar in case the shares are held in physical form, in prescribed form ISR-1, quoting their folio number and enclosing the self-attested supporting document. Further, members may note that SEBI has mandated the submission of Pan by every participant in the Securities Market.
18. As per the provisions of section 72 of the Act, the facility for making a nomination is available for the members in respect of shares held by them. Members who have not yet registered their nominations are requested to register the same by submitting Form No. SH-13. If a member desires to cancel the earlier nomination and record a fresh nomination, he may submit the same in Form SH-14. Members who are

either not desiring to register nomination or would want to opt-out, are requested to fill and submit Form No. ISR-3. The said forms can be downloaded from the RTA's website. Members are requested to submit the said form to their DP in case the shares are held in electronic form and to the RTA in case the shares are held in physical form, quoting their folio no.

19. The format of the Register of Members prescribed by the MCA under the Act requires the Company/ Registrars and Share Transfer Agents to record additional details of Members, including their PAN details, e-mail address, bank details for payment of dividends, etc. Form No. ISR-1 for capturing additional details is available on the Company's website. Members holding shares in physical form are requested to submit the filled-in Form No. ISR- 1 to the RTA in physical mode. Members holding shares in electronic form are requested to submit the details to their respective DP only and not to the Company or RTA.
20. Members holding shares in physical form, in identical order of names, in more than one folio are requested to send to the Company or RTA, the details of such folios together with the share certificates and self-attested copies of the PAN card of the holders for consolidating their holdings in one folio. A consolidated share certificate will be issued to such Members after making requisite changes. The consolidation will be processed in demat form.
21. To prevent fraudulent transactions, Members are advised to exercise due diligence and notify the Company of any change in address or demise of any Member as soon as possible. Members are also advised to not leave their Demat account(s) dormant for long. Periodic statement of holdings should be obtained from the concerned Depository Participant and holdings should be verified from time to time.
22. Mr. Yashwant Gupta, Practicing Company Secretary (Membership No. ACS 15154 & CP No.15119) has been appointed as the Scrutinizer by the Board for providing a facility to the Members of the Company to scrutinize the remote e-Voting process before the AGM as well as remote e-Voting during the AGM, fairly and transparently.
23. The Scrutinizer will submit his report to the Chairman or any other person authorized by the Chairman, after the completion of the scrutiny of the e-voting (votes cast during the AGM and votes cast through remote e-voting), not later than 48 hours from the conclusion of the AGM. The result declared along with the Scrutinizer's report shall be communicated to the stock exchanges on which the Company's shares are listed, NSDL, and RTA, and will also be displayed on the Company's website at [www.advance.co.in](http://www.advance.co.in).

By order of the Board  
For **Advance Steel Tubes Limited**

**Place: Sahibabad**  
Date: 05<sup>th</sup> September, 2022

**Sd/-**  
**(Deoki Nandan Agarwal)**  
Managing Director  
DIN: 00586794

**BRIEF RESUME OF DIRECTOR SEEKING RE-APPOINTMENT AT THE 38<sup>TH</sup> ANNUAL GENERAL MEETING IN TERMS OF REGULATION 36(3) OF LISTING REGULATIONS AND SECRETARIAL STANDARD-2**

<b>Name of Director</b>	<b>Aashish Agarwal</b>
<b>DIN</b>	00026311
<b>Date of Appointment</b>	17/08/2015
<b>Qualification</b>	He is graduate in commerce.
<b>Brief Profile, Experience and expertise in Specific functional area</b>	Mr. Aashish Agarwal is a part of executive team of the Company and he makes the right choices to seize the future while driving profitable and sustainable growth. He has a wide experience of working in the manufacturing and trading industry for more than Twenty-Five years now.
<b>Directorship in other public Limited Companies/ resignation in the last three years</b>	NIL
<b>Chairman/member of the Committee in which he is a director in listed entities</b>	NIL
<b>Shareholding of Director of the Company</b>	30450
<b>Relationship with other Directors, Managers, and other Key Managerial Personnel of the Company</b>	Son of Mr. Daulta Ram Agarwal, Director of the Company

**Note 1:** For other details such as number of meetings of the board attended during the year, remuneration drawn and relationship with other Directors, Manager and Key Managerial Personnel in respect of above Directors, please refer Corporate Governance Report which is part of this Annual Report.



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

**ITEM NO 3:**

Section 148 (3) of the Companies Act, 2013 read with rule 14(a) of the Companies (Audit and Auditors) Rules, 2014 (including any statutory modification(s) or re-enactment thereof)(“the act”), requires the Board to appoint an individual, who is a Cost Accountant in practice or a firm of Cost Accountants in Practice, as Cost Auditor, on the recommendations of the Audit Committee which shall also recommend remuneration for such Cost Auditor and such remuneration shall be considered and approved by the Board of Directors and ratified subsequently by the members.

The Board of Directors at their meeting held on 05/09/2022 on recommendation of Audit Committee approved the appointment of M/s Gopinathan Mohandas & Co. Cost Accountants, as the Cost Auditors of the Company for the financial year 2022-2023 at a fees of Rs. 1,10,000/- (One lakh Ten Thousand Only) plus out of pocket expenses and service tax as applicable for conducting the audit of the cost accounting records of the manufacturing facilities of the Company.

The resolution contained in Item No. 3 of the accompanying Notice, accordingly seek members’ approval for ratification of remuneration of Cost Auditors of the Company for the Financial year 2022-2023.

None of the Directors/Key managerial personnel of the Company/ their relatives are, in any way, concerned or interested financially or otherwise in the ordinary resolution set out at Item No.3 of the Notice.

The Board recommends this resolution for your approval.

By order of the Board  
For **Advance Steel Tubes Limited**

**Place: Sahibabad**  
Date: 05<sup>th</sup> September, 2022

**Sd/-**  
**(Deoki Nandan Agarwal)**  
Managing Director  
DIN: 00586794

## Attendance Slip of Annual General Meeting

### ATTENDANCE SLIP

**48<sup>th</sup> Annual General Meeting, 27<sup>th</sup> September, 2022, 12:30 A.M.**

Regd. Folio No. \_\_\_\_\_/DP ID \_\_\_\_\_ Client ID/Ben. A/C \_\_\_\_\_ No. of shares held \_\_\_\_\_

I certify that I am a registered shareholder/proxy for the registered Shareholder of the Company and hereby record my presence at the (No. of Meeting) Annual General Meeting of the Company on 27<sup>th</sup> Day of September, 2022 at 12:30 PM. at 45/3, Industrial Estate, Site- IV, Sahibabad, Ghaziabad- 201010

\_\_\_\_\_

\_\_\_\_\_

Member's/Proxy's name in Block Letters

Member's/Proxy's Signature

Note: Please fill this attendance slip and hand it over at the entrance of the hall.

Form No.

**MGT-11**

**Proxy form**

**[Pursuant to section 105(6) of the Companies Act, 2013 and rule 19(3) of the Companies  
(Management and Administration) Rules, 2014]**

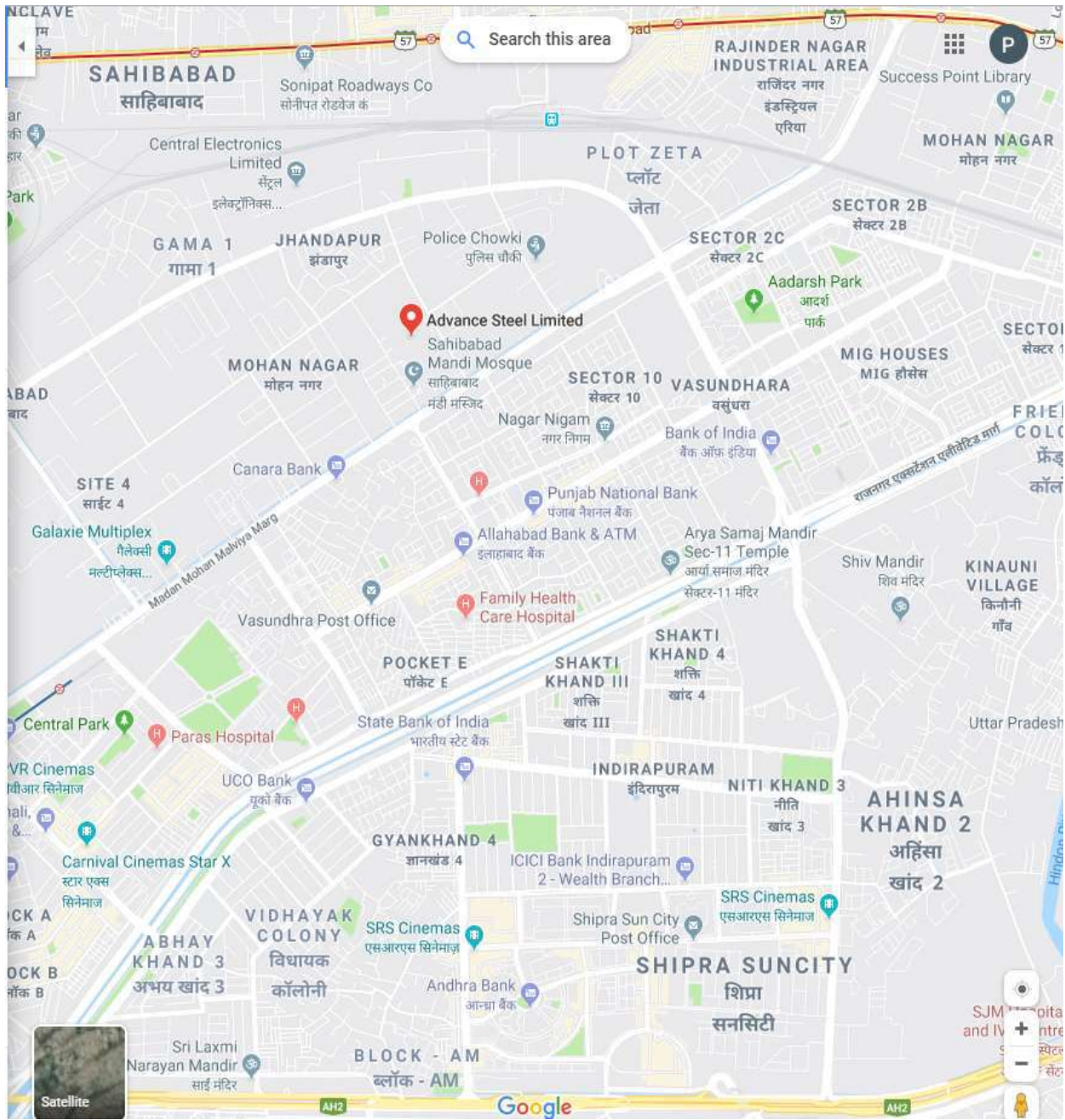
Name of the Member(s)		
Registered Address		
E-mail Id	Folio No /Client ID	DP ID

I/We, being the member(s) of \_\_\_\_\_ shares of the above named company. Hereby appoint

Name :	E-mail Id:
Address:	
Signature , or failing him	
Name :	E-mail Id:
Address:	
Signature , or failing him	
Name :	E-mail Id:
Address:	
Signature , or failing him	

**as my/ our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the 48<sup>th</sup> Annual General Meeting of the company, to be held on the 27<sup>th</sup> Day of September, 2022 at 12:30 P.M. at Uttar Pradesh and at any adjournment thereof**

Signature:  
Member  
Folio No.



**THE INSTRUCTIONS FOR MEMBERS FOR REMOTE E-VOTING ARE AS UNDER: -**

The remote e-voting period begins on 24<sup>th</sup> September, 2022 at 10:00 A.M. and ends on 26<sup>th</sup> September, 2022 at 05:00 P.M. The remote e-voting module shall be disabled by NSDL for voting thereafter. The Members, whose names appear in the Register of Members / Beneficial Owners as on the record date (cut-off date) i.e. 20<sup>th</sup> September, 2022 may cast their vote electronically. The voting right of shareholders shall be in proportion to their share in the paid-up equity share capital of the Company as on the cut-off date, being 20/09/2022.

**How do I vote electronically using NSDL e-Voting system?**

*The way to vote electronically on NSDL e-Voting system consists of “Two Steps” which are mentioned below:*

**Step 1: Access to NSDL e-Voting system**

**A) Login method for e-Voting for Individual shareholders holding securities in demat mode**

In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Login method for Individual shareholders holding securities in demat mode is given below:

<b>Type of shareholders</b>	<b>Login Method</b>
Individual Shareholders holding securities in demat mode with NSDL.	<ol style="list-style-type: none"><li data-bbox="565 1178 1458 1808">1. Existing <b>IDeAS</b> user can visit the e-Services website of NSDL Viz. <a href="https://eservices.nsd.com">https://eservices.nsd.com</a> either on a Personal Computer or on a mobile. On the e-Services home page click on the “<b>Beneficial Owner</b>” icon under “<b>Login</b>” which is available under ‘<b>IDeAS</b>’ section , this will prompt you to enter your existing User ID and Password. After successful authentication, you will be able to see e-Voting services under Value added services. Click on “<b>Access to e-Voting</b>” under e-Voting services and you will be able to see e-Voting page. Click on company name or <b>e-Voting service provider i.e. NSDL</b> and you will be re-directed to e-Voting website of NSDL for casting your vote during the remote e-Voting period If you are not registered for IDeAS e-Services, option to register is available at <a href="https://eservices.nsd.com">https://eservices.nsd.com</a>. Select “<b>Register Online for IDeAS Portal</b>” or click at <a href="https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp">https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp</a></li><li data-bbox="565 1818 1458 1896">2. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <a href="https://www.evoting.nsd.com/">https://www.evoting.nsd.com/</a> either on a</li></ol>

Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon “Login” which is available under ‘Shareholder/Member’ section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or **e-Voting service provider i.e. NSDL** and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period.

- Shareholders/Members can also download NSDL Mobile App “**NSDL Speede**” facility by scanning the QR code mentioned below for seamless voting experience.

**NSDL Mobile App is available on**



Individual Shareholders holding securities in demat mode with CDSL

- Existing users who have opted for Easi / Easiest, they can login through their user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are <https://web.cdslindia.com/myeasi/home/login> or [www.cdslindia.com](http://www.cdslindia.com) and click on New System Myeasi.
- After successful login of Easi/Easiest the user will be also able to see the E Voting Menu. The Menu will have links of **e-Voting service provider i.e. NSDL**. Click on **NSDL** to cast your vote.
- If the user is not registered for Easi/Easiest, option to register is available at <https://web.cdslindia.com/myeasi/Registration/EasiRegistration>
- Alternatively, the user can directly access e-Voting page by providing demat Account Number and PAN No. from a link in [www.cdslindia.com](http://www.cdslindia.com) home page. The system will authenticate the user by sending OTP on registered Mobile & Email as recorded

	in the demat Account. After successful authentication, user will be provided links for the respective ESP i.e. <b>NSDL</b> where the e-Voting is in progress.
Individual Shareholders (holding securities in demat mode) login through their depository participants	You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. upon logging in, you will be able to see e-Voting option. Click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period

Important note: Members who are unable to retrieve User ID/ Password are advised to use Forget User ID and Forget Password option available at abovementioned website.

Helpdesk for Individual Shareholders holding securities in demat mode for any technical issues related to login through Depository i.e. NSDL and CDSL.

<b>Login type</b>	<b>Helpdesk details</b>
Individual Shareholders holding securities in demat mode with NSDL	Members facing any technical issue in login can contact NSDL helpdesk by sending a request at <a href="mailto:evoting@nsdl.co.in">evoting@nsdl.co.in</a> or call at toll free no.: 1800 1020 990 and 1800 22 44 30
Individual Shareholders holding securities in demat mode with CDSL	Members facing any technical issue in login can contact CDSL helpdesk by sending a request at <a href="mailto:helpdesk.evoting@cdslindia.com">helpdesk.evoting@cdslindia.com</a> or contact at 022-23058738 or 022-23058542-43

**B) Login Method for e-Voting for shareholders other than Individual shareholders holding securities in demat mode and shareholders holding securities in physical mode.**

**How to Log-in to NSDL e-Voting website?**

1. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <https://www.evoting.nsdl.com/> either on a Personal Computer or on a mobile.
2. Once the home page of e-Voting system is launched, click on the icon “Login” which is available under ‘Shareholder/Member’ section.
3. A new screen will open. You will have to enter your User ID, your Password/OTP and a Verification Code as shown on the screen.

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

4. Your User ID details are given below :

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

5. Password details for shareholders other than Individual shareholders are given below:
  - a) If you are already registered for e-Voting, then you can use your existing password to login and cast your vote.



- b) If you are using NSDL e-Voting system for the first time, you will need to retrieve the 'initial password' which was communicated to you. Once you retrieve your 'initial password', you need to enter the 'initial password' and the system will force you to change your password.
- c) How to retrieve your 'initial password'?
  - (i) If your email ID is registered in your demat account or with the company, your 'initial password' is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a .pdf file. Open the .pdf file. The password to open the .pdf file is your 8-digit client ID for NSDL account, last 8 digits of client ID for CDSL account or folio number for shares held in physical form. The .pdf file contains your 'User ID' and your 'initial password'.
  - (ii) If your email ID is not registered, please follow steps mentioned below in **process for those shareholders whose email ids are not registered.**
6. If you are unable to retrieve or have not received the "Initial password" or have forgotten your password:
  - a) Click on "[Forgot User Details/Password?](#)"(If you are holding shares in your demat account with NSDL or CDSL) option available on [www.evoting.nsdl.com](http://www.evoting.nsdl.com).
  - b) [Physical User Reset Password?](#)" (If you are holding shares in physical mode) option available on [www.evoting.nsdl.com](http://www.evoting.nsdl.com).
  - c) If you are still unable to get the password by aforesaid two options, you can send a request at [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in) mentioning your demat account number/folio number, your PAN, your name and your registered address etc.
  - d) Members can also use the OTP (One Time Password) based login for casting the votes on the e-Voting system of NSDL.
7. After entering your password, tick on Agree to "Terms and Conditions" by selecting on the check box.
8. Now, you will have to click on "Login" button.
9. After you click on the "Login" button, Home page of e-Voting will open.

## **Step 2: Cast your vote electronically on NSDL e-Voting system.**

### **How to cast your vote electronically on NSDL e-Voting system?**

1. After successful login at Step 1, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle is in active status.
2. Select "EVEN" of company for which you wish to cast your vote during the remote e-Voting period.
3. Now you are ready for e-Voting as the Voting page opens.

4. Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on “Submit” and also “Confirm” when prompted.
5. Upon confirmation, the message “Vote cast successfully” will be displayed.
6. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.
7. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

### **General Guidelines for shareholders**

1. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail to **esguptayash@gmail.com** with a copy marked to [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in). Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) can also upload their Board Resolution / Power of Attorney / Authority Letter etc. by clicking on "Upload Board Resolution / Authority Letter" displayed under "e-Voting" tab in their login.
2. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the “[Forgot User Details/Password?](#)” or “[Physical User Reset Password?](#)” option available on [www.evoting.nsdl.com](http://www.evoting.nsdl.com) to reset the password.
3. In case of any queries, you may refer the Frequently Asked Questions (FAQs) for Shareholders and e-voting user manual for Shareholders available at the download section of [www.evoting.nsdl.com](http://www.evoting.nsdl.com) or call on toll free no.: 1800 1020 990 and 1800 22 44 30 or send a request to Mr. Narendra Dev, Assistant Manager at [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in)

### **Process for those shareholders whose email ids are not registered with the depositories for procuring user id and password and registration of e mail ids for e-voting for the resolutions set out in this notice:**

1. In case shares are held in physical mode please provide Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self-attested scanned copy of PAN card), AADHAR (self-attested scanned copy of Aadhar Card) by email to [info@advance.co.in](mailto:info@advance.co.in)

2. In case shares are held in demat mode, please provide DPID-CLID (16 digit DPID + CLID or 16 digit beneficiary ID), Name, client master or copy of Consolidated Account statement, PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) to [info@advance.co.in](mailto:info@advance.co.in). If you are an Individual shareholders holding securities in demat mode, you are requested to refer to the login method explained at **step 1 (A)** i.e. Login method for e-Voting for Individual shareholders holding securities in demat mode.
3. Alternatively shareholder/members may send a request to [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in) for procuring user id and password for e-voting by providing above mentioned documents.
4. In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are required to update their mobile number and email ID correctly in their demat account in order to access e-Voting facility.

## DIRECTORS' REPORT

### TO THE MEMBERS OF ADVANCE STEEL TUBES LIMITED

The Directors have pleasure to present their 48<sup>th</sup> Annual Report on the business and operations of the Company together with the Audited Financial Statements for the year ended 31<sup>st</sup> March 2022.

#### FINANCIAL RESULTS

Particulars	Year ended 31 <sup>st</sup> March 2022 (Rs)	Year ended 31 <sup>st</sup> March 2021 (Rs)
Total Revenue from operations	1,047,193,042	774,656,933
Other income	95,318,764	48,828,792
Total Revenue	1,142,511,806	823,485,725
Profit Before Tax and Extraordinary Items	62,751,261	54,235,716
Less: Exceptional/Extraordinary Items- Provision for CSR	1,180,273	824,700
Profit after Extraordinary Items but before tax	61,570,988	53,411,016
Current Year Tax	20,046,811	12,263,582
MAT Credit Entitlement	-	-
Deferred Tax	(3,302,869)	-
Current Tax Expense relating to prior years	(4,336,914)	1,571,639
Net Profit After Tax	12,407,028	39,575,795
Dividends	-	-
Interim Dividend	-	-
Final Dividend (Proposed)	-	-
Tax on Dividend	-	-
Tax on Dividend for Earlier Year	-	-
Transferred to General Reserve		39,000,000
Balance Carried Forward to Balance Sheet		881,936,248
EPS( Basic)	66	53
(Diluted)	66	53

## **DIVIDEND**

Your Directors have not recommended any dividend to the Shareholders of the Company and decided to plough back the profits of the company.

## **TRANSFER TO THE INVESTOR EDUCATION AND PROTECTION FUND**

In terms of Section 125 of the Companies Act, 2013, no unclaimed dividend relating to the Financial Year 2021-2022 is due for remittance onto the Investor Education and Protection Fund established by the Central Government.

## **RESERVES**

During the year under review, the Board proposes to carry Rs. 4,90,00,000/- to be transferred to General Reserve out of the net profits of the Company for the financial year 2021-2022.

## **OPERATING & FINANCIAL PERFORMANCE**

Total Revenue for financial year 2021-2022 stood at Rs. 1,142,511,806/-. Profit & Loss for the period stood at Rs. 12,407,028/-. The Market conditions in the year were challenging.

## **MANAGEMENT DISCUSSION AND ANALYSIS REPORT**

The Management Discussion and Analysis Report as required under Regulation 34 read with Schedule V of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations, 2015") is annexed herewith as **Annexure A**. Certain Statements in the said report may be forward-looking. Many factors may affect the actual results, which could be different from what the Directors envisage in terms of the future performance and outlook.

## **MEETINGS OF BOARD**

During the year under review Board met 9 times. The details of the Board Meetings with regard to their dates and attendance of each of the Director thereat have been provided in the Corporate Governance Report and the maximum gap between any two meetings did not exceed 120 days as stipulated under Section 173(1) of Companies Act, 2013.

## **REMUNERATION POLICY**

The Board on the recommendation of the Nomination & Remuneration committee has framed a policy for selection and appointment of Directors, Senior Management and to fix their remuneration. The Company's remuneration policy is available on the Company's website at [www.advance.co.in](http://www.advance.co.in) and forms part of Directors report as **Annexure B**.

## **DIRECTORS' RESPONSIBILITY STATEMENT**

The Directors' Responsibility Statement referred to in clause (c) of sub-section (3) of Section 134 of the Companies Act, 2013, shall state that—

- a) in the preparation of the annual accounts for financial year ended 31st March, 2022, the applicable accounting standards have been followed and there are no material departures from the same;
- b) the Directors have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give true and fair view of the state of affairs of the Company at the end of the financial year and profit or loss of the Company for that year;
- c) the Directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company for preventing and detecting fraud and other irregularities;
- d) the Directors have prepared the annual accounts for the financial year ended 31st March, 2022 on a going concern basis.
- e) 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.
- f) the directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such system was adequate and operating effectively.

#### **DECLARATION BY INDEPENDENT DIRECTORS**

The Independent Directors have submitted their disclosure to the Board that they fulfill all the requirements as to qualify their appointment as an Independent Director under the provisions of Section 149 of the Companies Act, 2013 as well as Regulation 25 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The Board confirms that all the Independent Directors meets the criteria provided under Section 149 of the Companies Act, 2013 as well as Regulation 25 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### **STATEMENT ON DECLARATION BY INDEPENDENT DIRECTORS**

The Board of Directors declare that the Independent Directors Mr. Naresh Chand Maheshwari and Mr. Jay Vilas Dubey and Mrs. Parveen Gupta:

- a) in the opinion of the Board, are persons of integrity and possesses relevant expertise and experience.
- b) (i) are /were not a promoter of the Company or its holding, subsidiary or associate Company;  
(ii) are / were not related to promoters or directors in the company, its holding, subsidiary or associate Company;
- c) Have/had not any pecuniary relationship with its holding, subsidiary, or associate Company or their promoters or directors, during the two immediately preceding financial year or during the current financial year;
- d) None of their relatives has / had pecuniary relationship or transaction with the Company, its holding, subsidiary or associate Company or their promoters, or directors, amounting to two percent or more of its gross turnover of total income or fifty lakh rupees or such higher amount as may be prescribed,

whichever is lower, during the two immediately preceding financial years or during the current financial year;

- e) neither themselves nor any of their relatives-
- (i) Hold / has held the position of key managerial personnel or is/are or has been employee of the Company or its holding, subsidiary or associate Company in any or the three financial years immediately preceding the year in which he is proposed to be appointed as Independent Director;
- (ii) Is/ are or has been an employee or propriety or a partner, in any of the three financial years immediately preceding the financial year in which he is proposed to be appointed of-
- (A) A firm of Auditors of Company Secretaries in Practice or Cost Auditors or the Company or its holding, subsidiary or associate Company; or
- (B) Any legal or consulting firm that has or had any transaction with the Company or its holding, subsidiary or associate Company amounting to ten percent or more of the gross turnover of such firm;
- (iii) Holds together with their relative two percent or more of the voting power of the Company; or
- (iv) Is/are a Chief Executive Officer or Director, by whatever name called, of any non-profit organization that receives twenty-five percent or more of its receipts from the Company, any of its promoters, directors or its holding, subsidiary or associate Company or that holds two percent or more of the total voting power of the company; or
- (v) Are possessing such other qualification as may be prescribed.

## **CORPORATE GOVERNANCE**

The Report on Corporate Governance as stipulated under Regulation 34 read with Schedule V of the SEBI Listing Regulations, 2015 forms part of this Annual Report as **Annexure-C**.

The requisite certificate from M/s. Yashwant Gupta & Associates, Practicing Company Secretaries confirming compliance with the conditions of Corporate Governance as stipulated under the aforesaid Schedule V is annexed to the Report on Corporate Governance.

## **PERFORMANCE EVALUTION**

Pursuant to the provisions of the Act and the SEBI Listing Regulations, 2015, the Board has carried out the annual performance evaluation of the Directors individually as well as evaluation of the working of the Board and of the Committees of the Board, by way of individual and collective feedback from Directors.

The following were the Evaluation Criteria:

### **(a) For Independent Directors:**

- Knowledge and Skills
- Professional Conduct
- Duties, Role and functions
- Fulfillment of the Independence Criteria and independence from the management

### **(b) For Non-Executive Directors:**

- Knowledge and Skills
- Professional conduct
- Duties, Role and functions

**(c) For Executive Directors:**

- Performance as Team Leader/Member
- Evaluating Business Opportunity and analysis of Risk Reward Scenarios
- Set Key Goals and Achievements
- Professional Conduct and Integrity
- Sharing of Information with the Board

The Directors expressed their satisfaction with the evaluation process.

**CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION & FOREIGN EXCHANGE**

The information pertaining to conservation of energy, technology absorption, foreign exchange earnings and outgo, as required under Companies Act, 2013, read with Companies (Accounts) Rules, 2014 is given as per **Annexure - D** and forms part of Board's Report.

**MATERIAL CHANGES AND COMMITMENTS, IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY WHICH HAVE OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR OF THE COMPANY TO WHICH THE FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT**

There are no Material changes occurred subsequent to the close of the financial year of the Company to which the balance sheet relates and the date of the report like settlement of tax liabilities, operation of patent rights, depression in market value of investments, institution of cases by or against the company, sale or purchase of capital assets or destruction of any assets etc.

- (i) There is no Disposal of substantial part of the Undertaking;
- (ii) No Change has been taken place in the Capital Structure;
- (iii) No serious breakdown has happened in the Financial Year;
- (iv) There is no Alteration in wage structure arising out of trade union negotiations;
- (v) There is no Material change occur concerning purchase of raw materials and sale of products etc.

**SUBSIDIARY/ JOINT VENTURE/ ASSOCIATES**

The Company had no subsidiary or associate Company during the financial year. In accordance with Section 129(3) of the Companies Act, 2013, the Company is not required to prepare a consolidated financial Statement as a part of the Annual Report. In accordance with third proviso of Section 136(1) of the Companies Act, 2013, the annual report of the Company, containing therein its standalone financial statement has been placed on the website of the Company [www.advance.co.in](http://www.advance.co.in)

**SHARE CAPITAL**

The paid up share capital of the Company as on March 31, 2022 was Rs. 74,00,000/-. During the year under review the Company has not issued and shares or any convertible instruments.



## STATUTORY AND LEGAL MATTERS

There has been no significant and/or material order(s) passed by any regulators/Courts/Tribunals impacting the going concern status and the Company's Operations in future.

## RISK MANAGEMENT POLICY IMPLEMENTATION

In today's economic environment, risk management is a very important part of business. The main aim of risk management is to identify, monitor and take precautionary measures in respect of the events that may pose risks for the business. To our company's risk management is embedded in the business processes. Your Company has identified the following risks:-

1. **Human Resource Risk** :- Your Company's ability to deliver value is always dependent on its ability to attract, retain and nurture talent, attrition and non-availability of the required talent resource can affect the overall performance of the Company.- mitigation plans: By continuously benchmarking of the best HR practices across the industry and carrying out necessary improvements to attract and retain the best talent.
2. **Competition Risk** :- Your Company is always exposed to Competition risk from Asian Countries. The increase in competition can create pressure on margins, market share etc., Mitigation Plans:- By continuous efforts to enhance the brand image of the Company by focusing on R&D, quality, Cost, timely delivery and customer service. By introducing new product range commensurate with demands your Company plans to mitigate the risks so involved.
3. **Compliance Risk**: - Any default can attract penal provisions, Mitigation Plans:- By regularly monitoring and reviewing of changes in regulatory framework. By monitoring of compliance Management tools and regular internal audit.

## WHISTLE BLOWER POLICY

Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations and in order to maintain these standards. The Company encourages its employees who have genuine concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. The Company has a strong and effective Whistle Blower policy which aims to deter and detect actual or suspected misconduct.

This mechanism also provides for adequate safeguards against victimization of employees who avail the mechanism. Any employee may report such incident without fear to the vigilance officer or alternatively to the Chairman of the Audit Committee.

The Audit Committee is empowered to monitor the functioning of the mechanism. It reviews the status of complaints received under this policy. The Committee has, in its report, affirmed that no personnel have been denied access to the audit committee. The details of the whistle blower policy is posted on the website of the Company and can be accessed at [www.advance.co.in](http://www.advance.co.in).

## **CORPORATE SOCIAL RESPONSIBILITY**

The Company has already developed the CSR Policy which has been approved by the Board for spending of the CSR amount kept aside for the purpose under the relevant rules under Companies Act, 2013.

The policy is available on the website of the Company at [www.advance.co.in](http://www.advance.co.in). Prescribed CSR Expenditure (2% of the average net profits of Last Three Financial years) was Rs. 11,80,273/- for the F.Y. 2018-2019, 2019-2020 and 2020-2021. The amount of Rs. 5,19,727/- stood outstanding from the previous year's budgeted CSR Amount. The CSR Committee approved the entire amount of CSR of this year and the previous year i.e. Rs. 17,00,000/- to be spent through the recommended organization or agency.

The annual report on CSR (CSR activities pursuant to Section 135 is annexed to the Board's Report as **Annexure -E**.

## **DIRECTORS**

The Board consists of executive and Non-Executive Directors including Independent Directors who have wide and varied experience in different disciplines of corporate functioning.

In accordance with the provisions of the Companies Act, 2013 Mr. Aashish Agarwal, Director (00026311) of the Company retires by rotation and being eligible offers himself for re-appointment.

## **KEY MANAGERIAL PERSONNEL**

Mr. Vatsal Agarwal is the CFO of the Company. Mrs. Parul Misra is the Company Secretary and Compliance Officer and KMP under Section 203 of the Companies Act, 2013. Mr. Deoki Nandan Agarwal is the Managing Director of the company.

## **EXTRACTS OF ANNUAL RETURN AND OTHER DISCLOSURES UNDER SECTION 92 (3) OF THE COMPANIES ACT, 2013 AND COMPANIES (APPOINTMENT AND REMUNERATION) RULES, 2014**

The extract of Annual Return in Form No. MGT-9 Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & Administration) Rules, 2014 as '**Annexure- F**' and Particulars of Contracts or arrangements with related parties referred to Sub-section (1) of Section 188 of the Companies Act, 2013 in 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 as '**Annexure- H**' duly certified by the Practicing Company Secretary is annexed hereto and forms part of this report.

## **PARTICULARS OF EMPLOYEES EMPLOYED THROUGHOUT THE FINANCIAL YEAR AND IN RECEIPT OF REMUNERATION NOT LESS THAN RS. Rs.1,02,00,000/- P.A. OR RS. 8,50,000/- PER MONTH.**

There is no such employee in the Company who is in receipt of remuneration of more than Rs.1,02,00,000/- p.a. or Rs. 8,50,000/- per month.

## DISCLOSURE OF DIRECTORS REMUNERATION

The disclosure as required to be given for Directors Remuneration provided under Section 197(12) read with rule 5 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 are given as following:

Name of Directors	Ratio of remuneration of each Director to the median remuneration of the employees	Percentage Increase in Remuneration of Each Director/CFO/CEO/Secretary	Percentage Increase in the Median Remuneration of Employees in the Financial Year	The explanation on the relationship between avg. increase in remuneration and Company Performance	Average percentile increase already made in the salaries of employees other than the managerial personnel in the last financial year and its comparison with the percentile increase in the managerial remuneration and justification thereof	Comparison of each remuneration of KMP against the performance of the company
Shri Deoki Nandan Agarwal	6.28	No Increment	10%	There was no increment in the salary of MD and is commensurate with the company's profit and approved by shareholders and board	No Increase in Managerial Remuneration have been made during the last Financial Year	The Performance of the company is progressive and the remuneration of KMP are under the prescribed limits and feasible to the Company Performance

## AUDITORS AND THEIR REPORT

In compliance with the provisions of Companies (Audit and Auditors) Rules, 2014, appointment of M/s Singhal Shubahm & Co., Chartered Accountants having FRN 028622C were appointed as the Statutory Auditors of the Company to hold the office till the conclusion of 51st AGM.

Comments of the Auditors in their report and the notes forming part of the accounts, are self-explanatory and need no comments.

## SECRETARIAL AUDIT AND THE APPOINTMENT OF SECRETARIAL AUDITORS

The Company has appointed M/s Yashwant Gupta & Associates, Company Secretaries to hold office of the Secretarial Auditors and to conduct the Secretarial Audit and the Secretarial Audit Report as **Annexure - G** is being attached with the Directors' Report and is self-explanatory and needs no comments.

## **COST AUDITORS AND THEIR REPORT**

Comments of the Cost Auditors in their report are self-explanatory and needs no comments.

M/s Gopinathan Mohandas & Co., the Company's Cost Auditors was appointed for the year 2021-2022 and has already obtained approval of the Central Government. The Company has received a certificate from the Cost Auditors to the effect that their re-appointment is in accordance with Section 141 of the Companies Act, 2013.

## **INTERNAL AUDITOR**

The Board of Directors appointed M/s. Jain S & Associates, Chartered Accountants as Internal Auditors of the Company for the financial year 2021-2022.

## **PROVISIONS FOR SEXUAL HARRASEMENT**

The provisions of the sexual harassment of the women at the work place (Prevention, Prohibition and Redressal) Act, 2013 is not attracted on the Company. However, the Company has a voluntary policy towards prevention of sexual harassment of Women employees of the Company and has set up a mechanism for registering a prompt disposal of complaints received from all permanent and temporary employees and staffs.

## **CAUTIONARY NOTE**

The statements forming part of the Directors' Report may contain certain forward looking remarks within the meaning of applicable securities laws and regulations. Many factors could cause the actual results, performances, achievements that may be expressed or implied by such forward looking statements.

## **APPLICATION MADE OR ANY PROCEEDING PENDING UNDER THE INSOLVENCY AND BANKRUPTCY CODE, 2016 DURING THE YEAR**

No application to the IBC or no matter is pending under the IBC, 2016 for the period under review.

## **GENERAL**

Your Directors state that no disclosure or reporting is required in respect of the following items as there were no transactions on these items during the year under review:

1. Details relating to deposits covered under Chapter V of the Act.
2. Issue of equity shares with differential rights as to dividend, voting or otherwise.
3. Issue of shares (including sweat equity shares) to employees of the Company under any scheme save and except ESOS referred to in this Report.
4. Neither the Managing Director nor the Whole-time Directors of the Company receive any remuneration or commission from any of its subsidiaries.
5. No significant or material orders were passed by the Regulators or Courts or Tribunals which impact the going concern status and Company's operations in future.

6. Your Directors further state that during the year under review, there were no cases filed pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

#### **ACKNOWLEDGEMENT**

Your Directors would like to express their sincere appreciation for the assistance and co-operation received from the financial institutions, banks, Government authorities, customers, vendors and members during the year under review. Your Directors also wish to place on record their deep sense of appreciation for the committed services by the Company's executives, staff and workers.

**For and on Behalf of the Board**

**Place:** Sahibabad

**Date:** 05/09/2022

**Sd/-**

**Deeki Nandan Agarwal**

Managing Director

DIN: 00586794

**sd/-**

**Lalit Agarwal**

Director

DIN: 00109920

## **ANNEXURES TO THE DIRECTORS' REPORT**

### **Annexure- A**

## **MANAGEMENT DISCUSSION AND ANALYSIS REPORT**

### **INDUSTRY TREND AND DEVELOPMENT**

The year under review saw a sharp deceleration in global growth with sluggish trade and poor investments affecting in varying degrees the developed world, particularly the Euro area, the emerging markets, and the developing economies. Global trade in goods stayed constricted for most part of 2021, and manufacturing activities slowed down markedly, while services stayed moderate. Close to 90% of the advanced economies and 60% of EMDEs suffered in the downturn. The financial markets, too, remained troubled for most of 2021. Such a scenario dragged the global economic growth down to an estimated 2.4% last year – the slowest rate of expansion since the 2008 financial crisis.

### **OPPORTUNITIES AND THREATS**

The overall steel pipe demand is estimated to grow at the rate of 6% in 2022 the consumption growth may go beyond 6% if investment is made in the infrastructure segments, with the gradual reduction in the fiscal deficit and consumer price index. The company's continued focus on cost reduction, its trust on increasing the sale of its products and various other customer excellence initiatives should help in presenting improved performances.

### **OUTLOOK**

The Company is operating with focused efforts on cost control, reduction in cycle times, economies of scale, improvement on operational efficiency and efficient Working Capital Management Program. This has helped the Company in controlling costs and also to be competitive. Timely delivery has reaffirmed the self-dependable image created by the Company in the market.

### **RISK AND CONCERN**

Financial charges in the form of interest is a massive matter of concerns for our Company as we are paying a substantial part of our profit in the form of our financial cost. Company is utilizing numerous bank facilities and consequently our financial cost is on the higher side. Serious efforts are required to bring it down. The prices of raw material and its volatility always have an impact. Inflation element also affects the Company in adverse manner as it is major factor responsible for hike in cost of elements of production viz. power & fuel, employees etc.

### **INTERNAL CONTROL SYSTEM**

The Company has proper and adequate system of internal control to ensure that all assets are safeguarded and protected against loss from unauthorized use or disposition and that transaction are authorized, recorded and reported correctly. The company has effective system in place for achieving efficiency in operations, optimum and affective utilization of resources, monitoring thereof and compliance with applicable laws.

## **HUMAN RESOURCE DEVELOPMENT**

The Company continues to give priority to its human assets. The Company provides a fair and equitable work environment to all its employees. The Company is working continuously to create and nurture an atmosphere which is highly motivated and result oriented.

## **FINANCIAL PERFORMANCE**

The financial performance of the Company for the year under review is discussed in detail in the Director's Report.

## **CAUTIONARY STATEMENT**

Statements made in this Management Discussion and analysis describing the Company's current position and expectations for the future may be "forward looking statements" within the meaning of the applicable laws and regulations. Actual results may differ substantially or materially from those expressed or implied. Important developments that could affect the Company's operations include the downtrend in the industry global domestic or both, significant changes in political or economic environment in India.

**Place:** Sahibabad

**Date:** 05/09/2022

**For and on Behalf of the Board**

**Sd/-**

**Deoki Nandan Agarwal**

Managing Director

DIN: 00586794

**sd/-**

**Lalit Agarwal**

Director

DIN: 00109920

## Annexure-B

# NOMINATION & REMUNERATION POLICY OF ADVANCE STEEL TUBES LIMITED

### Introduction

The Company considers human resources as its invaluable assets. This policy on Nomination & Remuneration of Directors, Key Managerial Personnel (KMP) and other employees has been formulated in terms of the provisions of the Companies Act, 2013 and the listing agreement in order to equitable remuneration to Directors, Key Managerial Personnel (KMP) and employees of the Company and to harmonize the aspirations of human resources consistent with the goals of the Company.

### Objective

The key objectives of the Committee would be:

- (a) To guide the board in relation to appointment and removal of Directors, Key Managerial Personnel and senior management.
- (b) To evaluate the performance of the members of the Board and provide necessary report to the Board for further evaluation.
- (c) To recommend to the Board on Remuneration payable to the Directors, Key Managerial Personnel and senior management.

### Definitions

- **“Board”** means Board of Directors of the Company.
- **“Company”** means Advance Steel Tubes Limited.
- **“Independent Director”** means a director referred to in Section 149 (6) of the Companies Act, 2013.
- **“Key Managerial Personnel”** means
  - (i) CEO or the Manager or the Managing Director of the Company
  - (ii) Company Secretary
  - (iii) Whole- Time Director
  - (iv) CFO
  - (v) Such other officer as may be prescribed
- **“Nomination & Remuneration Committee”** shall mean a Committee of the Board of Directors of the company, constituted in accordance with the provision of Section 178 of the Companies Act, 2013 and the Listing Agreement.
- **“Policy or this Policy”** means Nomination & Remuneration Policy.
- **“Remuneration”** means any money or its equivalent given or passed to any person for services rendered by him and includes perquisites as defined under the Income- Tax Act, 1961.
- **“Senior Management”** mean personnel of the Company who are the members of its core management team excluding Board of Directors. This would include all members of management one level below the executive directors, including all the functional heads.



## **POLICY FOR APPOINTMENT OF DIRECTORS, KMPs, AND SENIOR MANAGEMENT**

### **Appointment Criteria and qualification**

1. The committee shall identify and ascertain the integrity, qualification, expertise and experience of the person for appointment as Director, KMP or at Senior Management level recommend to the Board his/her appointment.
2. A person should possess adequate qualification, expertise and experience for the position he/she is considered for appointment. The committee has discretion to decide whether qualification, expertise and experience possessed by a person are sufficient/satisfactory for the concerned position.

### **Term/Tenure**

1. Managing Director/Whole- Time Director/Manager (Managerial personnel):- The Company shall appoint or reappoint any person as its Managerial Person for a term not exceeding five years at a time. No re-appointment shall be made earlier than one year before the expiry of the term.
2. An Independent Director shall hold office for a term up to five consecutive years on the board of the Company and will be eligible for re-appointment on passing of special resolution by the Company and such appointment in the board's Report. No independent Director shall hold office for more than two consecutive terms, but such Independent Director shall be eligible for appointment after expiry of three years of ceasing to become an Independent Director.
3. A whole- Time KMP of the company shall not hold office in more than one Company except in its subsidiary company at the same time.

### **Evaluation:**

The Committee shall carry out evaluation of performance of every Director, KMP and senior management at regular interval.

## **POLICY REALTING TO REMUNERATION FOR DIRECTORS, KMPs AND OTHER EMPLOYEES**

### **General**

1. The remuneration/compensation/commission etc. to Directors will be determined by the Committee and recommended to the Board for approval.
2. The remuneration & commission paid to the Managing Director shall be in accordance with the provisions of the Companies Act, 2013 and the rules made thereunder.

## Annexure-C

### **REPORT OF THE DIRECTORS ON CORPORATE GOVERNANCE**

In accordance with Regulation 34(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'SEBI LISTING REGULATIONS') read with the disclosure requirements relating to the corporate governance report contained in schedule V of the SEBI Listing Regulations which came into force from December 1, 2015 and clause 49 of the erstwhile Listing Agreement entered into with the Stock Exchange in India, the details of Compliance by the Company with the Norms on Corporate Governance are as under

#### **COMPANY'S PHILOSOPHY**

The Company aims at not only its own growth but also maximization of the benefits to the shareholders, employees, customers, government and also the general public at large. For this purpose, the Company continuously strives to improve its level of overall efficiency through good corporate governance, which envisages transparency, professionalism and accountability in all its operations. We at Advance Steel Tubes Limited, are committed to good corporate governance and its adherence to the best practices of true spirits at all times. Our corporate governance philosophy rests on five basic tenets viz., Board's Accountability, Value Creation, Strategic Guidance' Transparency and equitable treatment to all stakeholders.

#### **ETHICS POLICY**

We strive to conduct our business and strengthen our relationships in a manner that is dignified, distinctive and responsible. Therefore, we have adopted various codes and policies to carry out our duties in ethical manner. Some of these codes and policies are:

- Code of Board of Directors and Board Committees
- Code of Business Conduct and Ethics for Directors/Management Personnel
- Code of Conduct for prohibition of Insider Trading

#### **BOARD OF DIRECTORS**

##### **Composition of Board and Category of Directors**

As on 31<sup>st</sup> March, 2022 the Company's Board consists of Seven Directors having considerable professional experience in their respective fields. Out of them three are Independent Directors, three Non-Executive Directors and the Chairman and Managing Director is promoter and Executive Director of the Company.

The Composition of Board is in conformity with Section 149 of the Companies Act, 2013 and Regulation 17 of SEBI Listing Regulations.

The attendance and number of other directorships and committee membership of each director is given below:

Name of the Director	Category	No. of outside Directorships held in Indian Public Companies	No. Of outside Committee Positions held in Audit/Stakeholders Relationship Committee		No. Of Board Meetings Financial Year 2021-2022		Details of Directorships held in other Companies (as on March 31, 2022)	Attended Last AGM held on 30 <sup>th</sup> September, 2021
			Member	Chairman	Held	Attended		
Shri Deoki Nandan Agarwal	Managing Director	2	2	Nil	09	09	-	Yes
Shri Aashish Agarwal	Non-Executive	2	1	Nil	09	09	-	Yes
Shri Daulat Ram Agarwal	Non-Executive Director	2	Nil	Nil	09	09	Marda Commercial & Holdings Limited	Yes
Shri Lalit Agarwal	Non-Executive Director	4	2	1	09	09	Marda Commercial & Holdings Limited Sophia Exports Limited	Yes
Shri Naresh Chand Maheshwari	Non-Executive Independent Director	2	2	Nil	04	04	-	Yes
Shri Jay Vilas Dubey	Non-Executive Independent Director	1	2	2	04	04	-	Yes
Smt. Parveen Gupta	Non-Executive Independent Woman Director	3	1	0	04	04	Sophia Exports Limited Insecticides (India) Limited Prakash Pipes Limited	Yes

None of the Directors on the board is a member of more than ten committees and chairman of more than five committees across all companies in which they are directors.

### **Shareholding of Non – Executive Director (s) and relationship between directors**

As per the declaration made to the company by all the directors about their shareholding, Mr. Lalit Agarwal, Director of the company is holding 53140 No. of shares in the Company. Mr. Lalit Agarwal nephew of Mr, Deoki Nandan Agarwal, Managing Director of the Company and father of Mr. Suyash Agarwal who holds 26700 shares being another non-executive director of the Company. Mr. Daulat Ram Agarwal being non- executive Director holds 40000 shares is the brother of Mr. Deoki Nandan Agarwal, Managing Director of the Company and is the father of Mr. Aashish Agarwal who holds 30450 share who is another non-executive Director of the Company.

### **Board Meetings**

A calendar of Board and committee meetings is agreed and circulated in advance to the Directors. Additional meetings are held, when necessary. During the year ended March 31, 2022 Board met 9 times on 18/05/2021, 16/07/2021, 30/07/2021, 14/08/2021, 06/09/2021, 21/10/2021, 14/11/2021, 14/02/2022 and 31/03/2022 and the maximum gap between any two meetings did not exceed 120 days as stipulated under Section 173(1) of Companies Act, 2013.

### **Board Agenda**

Agenda of the Board Meeting and notes on agendas are circulated to the Directors as far as possible well in advance of each Board Meeting. At the Board Meeting elaborate presentations are made to the Board. The Members discuss each agenda items freely in detail.

### **Information Placed before the Board**

Necessary information as required under the Companies Act, 2013 and the SEBI(LODR) Regulations as applicable have been placed before and reviewed by the Board from time to time. The Board also periodically reviews compliance by the Company with the applicable laws/ statutory requirements concerning the business and affairs of the Company.

### **Separate Meeting of Independent Directors**

During the year 2021-2022, as per the requirement of Schedule IV of the Companies Act, 2013 and the Listing Agreement/ Listing Regulations, one separate meeting of Independent Directors was held on 14/08/2021 without the presence of the Non-Independent Directors and the members of the management. The meeting was conduct in an informal manner to enable the Independent Directors to Discuss and review the performance of non-independent directors and the Board as a whole.

The Board of Directors have formulated the familiarization program for Independent Directors for understanding of their roles, rights, responsibilities in the Company, nature of the industry in which the Company Operates, business Model of the company. The Company has also adopted a structured programme for orientation and training of Independent Directors at their joining and on time to time basis so as to enable them to understand the Company's Operations, business industry and environment. The Familiarization program is available on Company's website at [www.advance.co.in](http://www.advance.co.in).

## Codes and Policies

The Board has adopted all applicable codes and policies as per the requirement of the Companies Act, 2013 SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Listing Regulations. The requisite codes and policies are posted on the Company's website.

The Board has laid down the code of conduct for all Board members and senior management of the company. All Board Members and senior management, that includes Company's executives who report directly to the Chairman and executive Directors, have affirmed their compliance with the said code.

## COMMITTEES AT BOARD LEVEL

The Board has constituted various Committees of Directors for smooth and efficient conduct of business. The minutes of the meetings of Committees of Directors are placed in the succeeding meeting for the Board to take note of the same.

### (A) AUDIT COMMITTEE

The terms of reference of the Audit Committee are as per the guidelines set out in the Listing Regulation with the stock exchange read with section 177 of the Companies Act, 2013.

During the year under review, 4 meetings were held on 16/07/2021, 14/08/2021, 14/11/2021, 14/02/2022. The Composition of Committee and attendance at its meeting is given below:

The Audit Committee of the company currently consists of three Directors headed by a Non-Executive Independent Director Shri Jay Vilas Dubey as Chairman. The details of composition, attendance, at the meetings of the Audit Committee are as follows:-

Name of the Directors	Designation	Category	No. of meetings during the tenure of the Director	
			Held	Attended
Shri Jay Vilas Dubey	Chairman	Non-Executive, Independent	4	4
Shri Naresh Chand Maheshwari	Member	Non-Executive, Independent	4	4
Shri Deoki Nandan Agarwal	Member	Executive	4	4
Smt. Parveen Gupta	Member	Non-Executive, Independent	4	4

### The Functions of the Committee include:

1. Oversight of the Company's financial reporting process and disclosure of its financial information to ensure that the financial statement is sufficient and credible.
2. Review of the Company's financial and accounting policies and practices.

3. Report of the Board with such recommendations as the Audit Committee may consider appropriate.
4. Review with the management the quarterly financial statements before submission to the Board for approval.
5. To review with the management, the annual financial statements before submission to the Board for approval with reference to:
  - a) Matters required to be included in Directors Responsibility statement to be included in Board's Report in terms of clause (c) of sub-section (3) of Section 134 of the Companies Act, 2013.
  - b) Change in accounting policies and practices and reasons thereof.
  - c) Major accounting entries involving estimates based on exercise of judgments by management.
  - d) Significant adjustments made in the financial statements arising out of audit findings.
  - e) Compliances with listing and other legal requirements relating to financial statements.
  - f) Disclosure of any related party transactions.
  - g) Qualifications in draft audit report.

## **(B) SHAREHOLDERS/INVESTORS GRIEVANCE COMMITTEE**

### **Terms of Reference**

The investors grievance committee focuses on Shareholder's grievances and strengthening of investor relations. It looks into various investor complaints like transfer of shares, non-receipt of annual reports and other such issues.

### **Composition and Attendance**

The Investor Grievance Committee comprises of three Directors Shri Jay Vilas Dubey, Shri Naresh Chand Maheshwari and Shri Deoki Nandan Agarwal. Out of whom Shri Jay Vilas Dubey and Shri Naresh Chand Maheshwari are non-executive directors. During the year under review there was no meeting held since the company has not received any investor grievance.

## **(C) Corporate Social Responsibility Committee**

The Corporate Social Responsibility Committee has been formed in compliance with the provisions of Companies Act, 2013 for discharging the duties of the corporate towards the society in whole.

The committee held one meeting during the year under review on 14/02/2022.

The Composition and attendance of the Committee meeting is given below:

### **Composition and Attendance**

Name of the Directors	Designation	Category	No. of meetings during the tenure of the Director	
			Held	Attended
Shri Jay Vilas Dubey	Chairman	Non-Executive, Independent	1	1
Shri Naresh Chand Maheshwari	Member	Non-Executive, Independent	1	1
Shri Deoki Nandan Agarwal	Member	Executive	1	1

### **(C) NOMINATION AND REMUNERATION COMMITTEE**

As on 31<sup>st</sup> March, 2022 the nomination & Remuneration Committee comprised of three Directors out of which two are independent Directors.

The Committee held one meeting during the year under review on 14/08/2021.

The Composition of the Committee and attendance at its meeting is given below:

Name of the Directors	Designation	Category	No. of meetings during the tenure of the Director	
			Held	Attended
Shri Jay Vilas Dubey	Chairman	Non-Executive, Independent	1	1
Shri Naresh Chand Maheshwari	Member	Non-Executive, Independent	1	1
Shri Deoki Nandan Agarwal	Member	Executive	1	1

### **(D) RISK MANAGEMENT COMMITTEE**

As on 31<sup>st</sup> March, 2022 the Risk Management Committee comprised of three Directors out of which two are independent Directors.

The Committee held two meeting during the year under review on 14/08/2021 and 14/02/2022.

The Composition of the Committee and attendance at its meeting is given below:

Name of the Directors	Designation	Category	No. of meetings during the tenure of the Director	
			Held	Attended
Shri Jay Vilas Dubey	Chairman	Non-Executive, Independent	2	2
Shri Naresh Chand Maheshwari	Member	Non-Executive, Independent	2	2
Shri Deoki Nandan Agarwal	Member	Executive	2	2

### **Independent Directors:**

The Independent Directors of the Company are Non-Executive Directors as defined under Regulation 16(1) (b) of the SEBI Listing Regulations read with Section 149(6) of the Companies Act, 2013. The maximum tenure of Independent Directors is two terms of five years each. The Company has received necessary declaration from each Independent Directors as prescribed under Section 149(7) of the Companies Act, 2013 and Rule 6(3) of The Companies (Appointment and Qualifications of Directors) Rules, 2014 that he/she meets the criteria of independence and has included their names in Independent Director (ID)

Databank as per aforesaid provisions.

Based on the confirmations / disclosures received from the Independent Directors, the Board is of the opinion that both the existing Independent Directors and those who are proposed to be re-appointed at the Annual General Meeting fulfill the criteria or conditions specified under the Companies Act, 2013 and SEBI Listing Regulations and are independent from the management.

**SKILLS/EXPERTISE/COMPETENCIES OF THE BOARD OF DIRECTORS:**

In compliance with SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018 (“SEBI Amendment Regulations, 2018), the Board has identified the skills/expertise/ competencies in the context of the Company’s business for it to function effectively which are as follows:

- 1) Business experience
- 2) Industry knowledge
- 3) Professional Skill and Qualification
- 4) Behavioral Competencies including integrity and high ethical standard

Further the Board of Directors has identified the aforementioned skills/expertise/competencies possessed by each member of the Board in compliance with the said regulations.

In the table below, the specific areas of focus or expertise of individual Board members have been highlighted. However, the absence of a mark against a member’s name does not necessarily mean the member does not possess the corresponding skills/expertise/competencies.

Name of Director	Business Experience	Industry Knowledge	Professional Skill & Qualification	Behavioral Competencies including integrity and high ethical standard
Aashish Agarwal	√	√		√
Lalit Agarwal	√	√		√
Jay Vilas Dubey		√	√	√
Parveen Gupta		√	√	√
Naresh Chand Maheshwari		√	√	√
Deoki Nandan Agarwal	√	√	√	√
Daulat Ram Agarwal	√	√		√
Suyash Agarwal		√		√

**GENERAL BODY MEETINGS:**

Details of the last three Annual General Meetings of the Company are as under: -

Financial Year	Day & Date	Time	Venue	Special Resolutions Passed
2018-2019	Monday, September 30, 2019	11.00 A.M.	45/3, Industrial Area, Site- IV, Sahibabad, U.P.	-



2019-2020	Wednesday, September 30, 2020	11.00 A.M.	45/3, Industrial Area, Site- IV, Sahibabad, U.P.	3
2020-2021	Thursday, September 30,2021	11:00 A.M.	45/3, Industrial Area, Site- IV, Sahibabad, U.P.	2

## **SUBSIDIARY COMPANIES**

The company has no subsidiary during the financial year.

## **OTHER DISCLOSURES**

### **Related Party Transactions**

- (a) The Company has adopted a policy on dealing with related party transactions and the same is disclosed at the Company's website at [www.advance.co.in](http://www.advance.co.in).

There are no significant transactions with related parties, which may have a potential conflict with the interests of the Company.

- (b) Details of non-compliance by the company, penalties and strictures imposed on the Company by the stock exchanges or SEBI or any statutory authority, or any matter related to capital markets, during the last three years.
- (c) During the year under review there was no cases on non-compliance by the Company and no penalties/strictures were imposed on the Company by any statutory authority on any matter.
- (d) The Company has adopted a Whistle Blower Policy and has established the necessary Vigil Mechanism as defined under Regulation 22 of SEBI Listing Regulations for directors and employees to report concerns about unethical behavior. No person has been denied access to the Chairman of the audit committee. The said policy has been also put up on the Website of the Company at the Company's Website.

### **Accounting Treatment in Preparation of Financial Statements**

The Company followed the guidelines as laid down in the Accounting Standards, prescribed by the Institute of Chartered Accountants of India, for the preparation of the Financial Statements and there is no deviation from it in general.

### **Compliance with the Corporate Governance Framework:**

The Board of Directors periodically reviewed the compliance of all applicable laws and steps taken by the Company to rectify instances of non-compliance, if any. The Board Members are qualified for their positions and have a clear understanding of their role in corporate governance and are not subject to undue influence from management or outside concerns. The Company periodically submits a quarterly compliance report on corporate governance in the format as specified under Regulation 27 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015.

As on March 31, 2020, the Company is in compliance with the requirements stipulated under Regulation 17 to 27 and clauses (b) to (i) of sub-regulation (2) of Regulation 46 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as applicable, with regard to

Corporate Governance. **Certificate of Compliance with the Corporate Governance** Requirement is appended as **Annexure** of this Corporate Governance Report.

**Place:** Sahibabad

**Date:** 05/09/2022

**For and on Behalf of the Board**

**Sd/-**

**Deoki Nandan Agarwal**

Managing Director

DIN: 00586794

**sd/-**

**Lalit Agarwal**

Director

DIN: 00109920

**ANNEXURE TO THE REPORT ON CORPORATE GOVERNANCE**

**CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS**(Pursuant to Regulation 34(3) and Schedule V Para C clause (10) (i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,  
The Members  
Advance Steel Tubes Limited  
45/3, Industrial Area, Site-IV, Sahibabad  
Ghaziabad-201020 (U.P.)

I have examined the relevant registers, records, forms, returns and disclosures received from the Directors of Advance Steel Tubes Limited having CIN : L24231UP1978PLC004583 and having registered office at 45/3, Industrial Area, Site-IV, Sahibabad Ghaziabad-201020 (U.P.) (hereinafter referred to as the Company'), produced before me by the Company for the purpose of issuing this Certificate, in accordance with Regulation 34(3) read with Schedule V Para-C Sub clause 10(i) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In my opinion and to the best of my information and according to the verifications (including Directors Identification Number (DIN) status at the portal [www.mca.gov.in](http://www.mca.gov.in)) as considered necessary and explanations furnished to me by the Company & its officers, I hereby certify that none of the Directors on the Board of the Company as stated below for the Financial Year ending on 31st March, 2022 have been debarred or disqualified from being appointed or continuing as Directors of companies by the Securities and Exchange Board of India, Ministry of Corporate Affairs, or any such other Statutory Authority.

<b>DIN</b>	<b>Full Name</b>	<b>Designation</b>	<b>Date of Appointment</b>
00109920	LALIT AGARWAL	Director	14/11/1987
00180678	PARVEEN GUPTA	Independent Director	01/08/2015
00218051	NARESH CHAND MAHESHWARI	Independent Director	03/11/2011
00150464	JAY VILAS DUBEY	Independent Director	03/11/2011
00586794	DEOKI NANDAN AGARWAL	Managing Director	12/03/1979
00026311	AASHISH AGARWAL	Director	17/08/2015
00586956	DAULAT RAM AGARWAL	Director	29/09/1980
07520380	SUYASH AGARWAL	Director	26/05/2016

Date: 02/09/2022  
Place: Delhi

**For Yashwant Gupta & Associates**  
Practising Company Secretaries

Sd/-  
Yashawant Kumar Gupta  
(Proprietor)  
M.NO. – 15154  
C.P. No. 15119  
UDIN: A015154D000894054

**ANNEXURE TO THE REPORT ON CORPORATE GOVERNANCE  
CERTIFICATE ON CORPORATE GOVERNANCE**

To,

The Members

**ADVANCE STEEL TUBES LIMITED**

45/3 INDUSTRIAL AREASITE IV SAHIBA BAD GHAZIABAD UTTAR PRADESH UP 201020.

1. The Corporate Governance Report prepared by **ADVANCE STEEL TUBES LIMITED**

(—the Company), contains details as stipulated in regulations 17 to 27 and clauses (b) to (i) of regulation 46(2) and para C and D of Schedule V of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (—the Listing Regulations) (applicable criteria ‘) with respect to Corporate Governance for the year ended March 31, 2022. This certificate is required by the Company for annual submission to the Stock exchange and to be sent to the Shareholders of the Company.

**MANAGEMENT’S RESPONSIBILITY**

2. The preparation of the Corporate Governance Report is the responsibility of the Management of the Company including the preparation and maintenance of all relevant supporting records and documents. This responsibility also includes the design, implementation and maintenance of internal control relevant to the preparation and presentation of the Corporate Governance Report.

3. The Management along with the Board of Directors are also responsible for ensuring that the company complies with the conditions of Corporate Governance as stipulated in the Listing Regulations, issued by the Securities and Exchange Board of India.

**SECRETARIAL AUDITOR’S RESPONSIBILITY**

4. Our responsibility is to provide a reasonable assurance in the form of an opinion whether the Company has complied with the condition of Corporate Governance, as stipulated in the Listing Regulation.

5. The procedures selected depend on the secretarial auditor ‘s judgment, including the assessment of the risks associated in compliance of the Corporate Governance Report with the applicable criteria. The procedures include but not limited to verification of secretarial records and financial information of the Company and obtained necessary representations and declarations from directors including independent directors of the Company.

6. The procedures also include examining evidence supporting the particulars in the Corporate Governance Report on a test basis. Further, our scope of work under this report did not involve us performing audit tests for the purposes of expressing an opinion on the fairness or accuracy of any of the financial information or the financial statements of the Company taken as a whole.

**OPINION**

6. Based on the procedures performed by us as referred in paragraph 5 and 6 above and according to the information and explanations given to us, we are of the opinion that the Company has complied with the conditions of Corporate Governance as stipulated in the Listing Regulations, as applicable for the year ended March 31, 2022, referred to in paragraph 1 above.

**OTHER MATTERS AND RESTRICTION ON USE**

8. This Certificate is neither an assurance as to the future viability of the Company nor the efficiency or effectiveness with which the management has conducted the affairs of the Company.

9. This Certificate is addressed to and provided to the members of the Company solely for the purpose of enabling it to comply with its obligations under the Listing Regulations and should not be used by any other person or for any other purpose. Accordingly, we do not accept or assume any liability or any duty of care or for any other purpose or to any other party to whom it is shown or into whose hands it may come without our prior consent in writing. We have no responsibility to update this Certificate for events and circumstances occurring after the date of this Certificate.

**For Yashwant Gupta & Associates**  
Practising Company Secretaries

Sd/-

Yashwant Kumar Gupta  
(Proprietor)  
M.NO. – 15154  
C.P. No. 15119

UDIN: A015154D000741858

**Date: 04-08-2022**

**Place: Delhi**

## Annexure- D

### CONSERVATION OF ENERGY, TECHNOLOGY, ABSORPTION & FOREIGN EXCHANGE

Information as required under Companies Act, 2013 is given as under:

#### A. Conservation of Energy

POWER & FUEL CONSUMPTION	CURRENT YEAR	PREVIOUS YEAR
1) Electricity (Purchased) Units	25,02,731	21,83,745
Total Amount	2,32,54,845	2,02,47,347
Rate Per Unit	9.29	9.27
2) Electricity (Generated) Units	-	-
3) Furnace Oil Consumed in KG		-
Total Amount		
Rate Per Liter		
4) HSD Consumed in Ltr.	12000	10,000
Total Amount	10,05,239	8,50,191
Rate Per Liter	83.77	85.62
5) Gas	1,73,780	1,33,265
Total Amount	90,42,072	60,76,098
Rate per litre/Kg	52.03	45.59

#### B. Consumption per unit of production

It is not feasible to maintain product category-wise energy consumption data, since we manufacture a large range of formulations and having different energy requirements.

#### C. Energy Conservation Measures

- Improvisation and continuous monitoring of Power factor and replacement of weak capacitors, periodic checking of capacitors
- Alternative energy sources like Gas & steam have been used in place of electricity.
- Provision of storage tanks with electricity heaters to utilize the same instead of steam and use of DG set with smaller capacity for limited use at night or on weekly off/holiday.
- The Company has endeavored to optimize the use of energy resources and taken adequate steps to avoid wastage & use latest production technology & equipment's.

#### D. Technology Absorption

Disclosure of particulars with respect to technology absorption: -

**1. Specific areas in which R&D carried out by the Company**

- a. Quality upgradation
- b. Developing wide range of products
- c. Productivity enhancement
- d. Quality control management

**2. Benefits derived as a result of the Above R&D**

- a. Increase in productivity and utilization.
- b. Repeat orders from customers due to consistency in quality

**3. Future Plan of Action**

- a. Cost- efficiency in manufacturing operations through better methods and techniques of production
- b. Increase range of products
- c. Developing of new markets

**4. Expenditure in R&D**

Specific expenditure of recurring or capital nature is not involved.

**E. FOREIGN EXCHANGE EARNINGS AND OUTGO**

a) Activities relating to exports, initiatives taken to increase exports, development of new export markets for products and services and export plans.

b) Information in respect of Foreign exchange earnings and outgo is:

	Current Year	Previous year
Earning (in Rs.)	62,50,797	66,18,617
Outgo (in Rs.)	1,82,098	2,76,247

**For Advance Steel Tubes Limited**

**Date: 05.09.2022**

**Place: Sahibabad**

**sd/-**  
**(Deoki Nandan Agarwal)**  
Managing Director  
DIN: 00586794

**sd/-**  
**(Vatsal Agarwal)**  
CFO  
PAN: AMPPA6166N

## ANNEXURE – E

### ANNUAL REPORT ON CORPORATE SOCIAL RESPONSIBILITY (CSR) ACTIVITIES (Pursuant to Section 135 of the Companies Act, 2013)

#### BRIEF OUTLINE OF THE CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

The Board of Directors adopted the CSR Policy in the previous year. The policy focus initiatives are Education, Health, Livelihoods and Rural and Urban Infrastructure. Besides, it also undertakes intervention in the areas of Disaster relief, environment and ethnicity aimed at improving the quality of life of the communities.

#### COMPOSITION OF CSR COMMITTEE OF THE BOARD

The CSR Committee of the Board comprises of Mr. Jay Vilas Dubey (Chairman), Mr. Naresh Chand Maheshwari and Shri Deoki Nandan Agarwal & Mrs. Praveen Gupta as members. All the members of the Committee are eminent personalities from academic and industrial field. The members with the vast experience and multi-functional expertise, provide macro policy level inputs to the CSR Committee and guide Company's approach towards CSR.

#### FINANCIAL DETAILS

Prescribed CSR Expenditure (2% of the average net profits of Last Three Financial years) was Rs. 11,80,273/- for the F.Y. 2018-2019, 2019-2020 and 2020-2021. The amount of Rs. 5,19,727/- stood outstanding from the previous year's budgeted CSR Amount. The CSR Committee approved the entire amount of CSR of this year and the previous year i.e. Rs. 17,00,000/- to be spent through the recommended organization i.e. "Mata Krishnawanti Memorial Education Society (Regd.)". The entity has registered itself for undertaking CSR Activities and has filed CSR-1 accordingly.

#### REPORT ON CSR ACTIVITIES

S.No.	CSR Project or Activity Identified	Sector in which the project is covered	Projects or Programs Local Area or other/ specify the State & District where Project or Program is undertaken	Amount Outlay (budget) Project or program wise	Amount spent on the projects or programs Subheads: (1) Direct Expenditure (2) Overheads (Rs)	Cumulative Expenditure upto the reporting period (Rs)	Amount Spent : Direct to Mata Krishnawanti Memorial Education Society (Regd.) (Rs)
		Education	-	11,80,273	NIL	17,00,000	17,00,000
	Sub Total		-	-	-		
	Overhead		-	-	-	-	-
	Total CSR	NIL	NIL	11,80,273	NIL	17,00,000	17,00,000



## DECLARATION ON COMPLIANCE WITH CODE OF CONDUCT

I declare that the Company has received affirmation of Compliance with the “Code of Conduct for Directors and Senior Executives” laid down by the Board of Directors, from all the Directors and senior management personnel of the Company, to whom the same is applicable, for the Financial Year ended 31<sup>st</sup> March, 2021.

**For Advance Steel Tubes Limited**

**Date: 05/09/2022**

**Place: Sahibabad**

Sd/-

**(Deoki Nandan Agarwal)**

Managing Director

DIN: 00586794

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## CEO/CFO CERTIFICATION

We, Deoki Nandan Agarwal, Managing Director and Vatsal Agarwal, Chief Financial Officer of Advance Steel Tubes Limited to the best of our knowledge and belief certify that:

1. We have reviewed the financial statements and the cash flow statements for the financial year ended 31<sup>st</sup> March, 2022 and that to the best of our knowledge and belief:
  - i. These statements do not contain any materially untrue statement or omit any material fact or contain statements that might be misleading.
  - ii. These statements together present a true and fair view of the company’s affairs and are in compliance with existing accounting standards applicable laws and regulations.
2. There are, to the best of our knowledge and belief, no transactions entered into by the Company during the year which are fraudulent, illegal or violation of the Company’s code of conduct;
3. We accept responsibility for establishing and maintaining internal controls for financial reporting and that we have evaluated the effectiveness of internal control systems of the Company pertaining to financial reporting and we have disclosed to the auditors and audit committee, wherever applicable;
  - i. Deficiencies in the design or operation of such internal controls, if any, which come to our notice and steps have been taken/proposed to be taken to rectify these deficiencies;
  - ii. Significant changes in internal control over financial reporting during the year;
  - iii. Significant changes in accounting policies during the year and that the same have been disclosed in the notes to the financial statements;
  - iv. Instances of significant fraud of which they have become aware and the involvement therein, if any, of the management or an employee having significant role in the Company’s internal Control System over financial reporting.

**For Advance Steel Tubes Limited**

**Date: 05.09.2022**

**Place: Sahibabad**

sd/-

**Deoki Nandan Agarwal**

(Managing Director)

DIN: 00586794

sd/-

**Vatsal Agarwal**

(CFO)

PAN: AMPPA6166N

**Annexure-F**

**FORM NO. MGT 9  
EXTRACT OF ANNUAL RETURN  
As on financial year ended on 31.03.2022**

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

**I. REGISTRATION & OTHER DETAILS:**

1.	CIN	L24231UP1978PLC004583
2.	Registration Date	23/03/1978
3.	Name of the Company	Advance Steel Tubes Limited
4.	Category/Sub-category of the Company	Company Limited by Shares/ Indian Non- Government Company
5.	Address of the Registered office & contact details	45/3,Industrial Area, Site-IV, Sahibabad, Ghaziabad, U.P. 201020 011-43041400, E-mail: ino@advance.co.in
6.	Whether listed company	Listed
7.	Name, Address & contact details of the Registrar & Transfer Agent, if any.	N.A.

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

S. No.	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Black and GI Pipes	2431	67.83
2	Structure	2431	8.05
3	Poles	2431	13.77
4	Others	-	10.35

**III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES -**

All the business activities contributing 10 % or more of the total turnover of the company shall be stated:-	Name and Description of main products / services	NIC Code of the Product/ service	% to total turnover of the company

There is no business activity of Holding, Subsidiary and associate Company, contributing more than 10 % to total turnover of the Advance Steel Tubes Limited.



<b>2. Non-Institutions</b>									
a) Bodies Corp.	-	35000	35000	4.73	-	35000	35000	4.73	Nil
i) Indian	-	-	-	-	-	-	-	-	-
ii) Overseas	-	-	-	-	-	-	-	-	-
b) Individuals	-	-	-	-	-	-	-	-	-
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	-	94650	94650	12.79	-	94650	94650	12.79	Nil
ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	-	55750	55750	7.53	-	55750	55750	7.53	Nil
c) Others (specify)	-	-	-	-	-	-	-	-	-
Non Resident Indians	-	-	-	-	-	-	-	-	-
Overseas Corporate Bodies	-	-	-	-	-	-	-	-	-
Foreign Nationals	-	-	-	-	-	-	-	-	-
Clearing Members	-	-	-	-	-	-	-	-	-
Trusts	-	-	-	-	-	-	-	-	-
Foreign Bodies - D R	-	-	-	-	-	-	-	-	-
<b>Sub-total (B)(2):-</b>	-	185400	185400	25.05	-	185400	185400	25.05	Nil
Total Public Shareholding (B)=(B)(1)+(B)(2)	-	185400	185400	25.05	-	185400	185400	25.05	Nil
<b>C. Shares held by Custodian for GDRs &amp; ADRs</b>	-	-	-	-	-	-	-	-	-
<b>Grand Total (A+B+C)</b>	554600	185400	740000	100	554600	185400	740000	100	Nil

B) Shareholding of Promoter-

S. No.	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1.	Aashish Agarwal	30450	4.11	Nil	30450	4.11	Nil	Nil
2.	Daulat Ram Agarwal	40000	5.41	Nil	40000	5.41	Nil	Nil
3.	Lalit Agarwal	53140	7.18	Nil	53140	7.18	Nil	Nil
4.	Deoki Nandan Agarwal	72050	9.74	Nil	72050	9.74	Nil	Nil
5.	Shyama Devi Agarwal	13200	1.78	Nil	13200	1.78	Nil	Nil
6.	Lalit Agarwal (HUF)	40250	5.44	Nil	40250	5.44	Nil	Nil
7.	Suyash Agarwal	26700	3.61	Nil	26700	3.61	Nil	Nil
8.	Vatsal Agarwal	38650	5.22	Nil	38650	5.22	Nil	Nil
9.	Shalini Agarwal	5000	0.68	Nil	5000	0.68	Nil	Nil
10.	Romil Agarwal	36600	4.95	Nil	36600	4.95	Nil	Nil
11.	Laxmi Devi Agarwal	31200	4.22	Nil	31200	4.22	Nil	Nil
12.	D.N. Agarwal (HUF)	41500	5.61	Nil	41500	5.61	Nil	Nil
13.	Daulat Ram Agarwal (HUF)	32500	4.39	Nil	32500	4.39	Nil	Nil
14.	Shashi Agarwal	66550	8.99	Nil	66550	8.99	Nil	Nil
15.	Suchita Agarwal	26800	3.62	Nil	26800	3.62	Nil	Nil

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

SN	Particulars	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	At the beginning of the year	554600	74.95	554600	74.95

	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment /transfer / bonus/ sweat equity etc.):	No Change	No Change	No Change	No Change
	At the end of the year	554600	74.95	554600	74.95

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

SN	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	At the beginning of the year	130300	17.60	130300	17.60
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc):				
	At the end of the year	130300	17.60	130300	17.60

**E) Shareholding of Directors and Key Managerial Personnel:**

SN	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	At the beginning of the year	261000	35.27	261000	35.27
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	No Change	No Change	No Change	No Change
	At the end of the year	261000	35.27	261000	35.27

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

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Indebtedness at the beginning of the financial year</b>				
i) Principal Amount	7,21,97,649	5,41,62,500	-	12,63,60,149
ii) Interest due but not paid			-	
iii) Interest accrued but not due	-		-	-
<b>Total (i+ii+iii)</b>	7,21,97,649	5,41,62,500	-	12,63,60,149
<b>Change in Indebtedness during the financial year</b>				
* Addition			-	
* Reduction	2,47,29,916	5,41,62,500	-	7,88,92,416
<b>Net Change</b>	2,47,29,916	5,41,62,500	-	7,88,92,416
<b>Indebtedness at the end of the financial year</b>				
i) Principal Amount	4,74,67,733	-	-	4,74,67,733
ii) Interest due but not paid	1,54,681	-	-	1,54,681
iii) Interest accrued but not due	-	-	-	-
<b>Total (i+ii+iii)</b>	4,76,22,414		-	4,76,22,414

## VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL-

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

SN.	Particulars of Remuneration	Name of MD/WTD/ Manager	Total Amount
		Deoki Nandan Agarwal (Managing Director)	
1	Gross salary	29,97,200	29,97,200
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	-	-
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	-	-
2	Stock Option	-	-
3	Sweat Equity	-	-
4	Commission- as % of profit - others, specify...	-	-
5	Others, please specify	-	-
	<b>Total (A)</b>	29,97,200	29,97,200
	Ceiling as per the Act	-	-

**B. Remuneration to other directors**

SN.	Particulars of Remuneration	Name of Directors			Total Amount
1	Independent Directors	Naresh Chand Maheshwari	Jay Vilas Dubey	Parveen Gupta	
	Fee for attending board /committee meetings	10,000	10,000	10,000	30,000
	Commission	-	-	-	-
	Others, please specify	-	-	-	-
	Total (1)	10,000	10,000	10,000	30,000
2	Other Non-Executive Directors				
	Fee for attending board committee meetings	-	-	-	-
	Commission	-	-	-	-
	Others, please specify	-	-	-	-
	Total (2)	-	-	-	-
	Total (B)=(1+2)	10,000	10,000	10,000	30,000

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

SN	Particulars of Remuneration	Key Managerial Personnel		
		CS	CFO	Total
1	Gross salary	7,80,000	6,00,000	13,80,000
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	-	-	-
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	-	-	-
2	Stock Option	-	-	-
3	Sweat Equity	-	-	-
		-	-	-
4	Commission	-	-	-
	- as % of profit	-	-	-
	others, specify...	-	-	-
5	Others, please specify	-	-	-
	Total	7,80,000	6,00,000	13,80,000



**VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:**

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
<b>A. COMPANY</b>					
Penalty	-	-	-	-	-
Punishment	-	-	-	-	-
Compounding	-	-	-	-	-
<b>B. DIRECTORS</b>					
Penalty	-	-	-	-	-
Punishment	-	-	-	-	-
Compounding	-	-	-	-	-
<b>C. OTHER OFFICERS IN DEFAULT</b>					
Penalty	-	-	-	-	-
Punishment	-	-	-	-	-
Compounding	-	-	-	-	-

Place: Sahibabad

Date: 05/09/2022

For and on Behalf of the Board

Sd/-  
**Deoki Nandan Agarwal**  
Managing Director  
DIN: 00586794

sd/-  
**Lalit Agarwal**  
Director  
DIN: 00109920

Annexure - G



**YASHWANT GUPTA & ASSOCIATES**

**Company Secretaries**

Form No. MR-3

SECRETARIAL AUDIT REPORT FOR THE FINANCIAL YEAR ENDED 31.03.2022

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

To,

The Members,

**Advance Steel Tubes Limited**

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Advance Steel Tubes Limited** (hereinafter called the company). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the **Advance Steel Tubes Limited's** books, papers, minute books, forms and returns filed and other records maintained by the company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the company has, during the audit period covering the financial year ended on March 31, 2022 complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by **Advance Steel Tubes Limited** ("the Company") for the financial year ended on March 31, 2022, to the provisions of:

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

- (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992;
- (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
- (d) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;
- (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents)

Regulations, 1993 regarding the Companies Act and dealing with client;  
(g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; and  
(h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998;

(vi) RBI guidelines prescribed to Import /Export by the Company

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

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India.
- (ii) The Listing Agreements entered into by the Company with Calcutta Stock Exchange Limited;

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

**I/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. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Adequate notice is given to all directors to schedule the Board Meetings, 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 are captured and recorded as part of the minutes.

**I further report that**

There are adequate systems and processes in the company commensurate with the size and operations of the company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

I further report that during the audit period the company has not undergone any event/action having a major bearing on the company's affair in pursuance of the above referred laws, rules, regulations, guidelines, standards, etc.

Place: New Delhi

Signature:

Sd/-

Date: 23.05.2022

Yashwant Gupta & Associates

M No.: 15154, C P No.:15119

UDIN: A015154D000367770

**Annexure-H**  
**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: Not Applicable as no such transactions has been taken place.**

(a) Name(s) of the related party and nature of relationship: N.A.

(b) Nature of contracts/arrangements/transactions: Nil

(c) Duration of the contracts / arrangements/transactions: N.A.

(d) Salient terms of the contracts or arrangements or transactions including the value, if any: N.A.

(e) Justification for entering into such contracts or arrangements or transactions

(f) Date(s) of approval by the Board: N.A.

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

(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 arrangement or transactions at arm's length basis:**

(a) Name(s) of the related party

Company's related parties are disclosed below:

- Advance (Ispat) India Limited
- Tirupati Structural Limited
- Advance Enterprises Private Limited
- Marda Commercial & Holdings Limited
- Sophia Exports Limited
- ADV Drilling Products PLC
- TSL Piping Solutions Private Limited

- Pir Panchal Constructions Private Limited
- Advance Stimul Consortium

(b) Nature of contracts/arrangements/transactions: Loans & Advances

(c) Duration of the contracts / arrangements/transactions:

(d) Salient terms of the contracts or arrangements or transactions including the value, if any:

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

(f) Amount paid as advances, if any:

**Place:** Sahibabad

**Date:** 05/09/2022

**For and on Behalf of the Board**

**Sd/-**

**Deoki Nandan Agarwal**

Managing Director

DIN: 00586794

**sd/-**

**Lalit Agarwal**

Director

DIN: 00109920





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## **INDEPENDENT AUDITORS' REPORT**

**TO THE MEMBERS OF ADVANCE STEEL TUBES LIMITED**

**Report on the Audit of the Standalone Financial Statements**

### **Opinion**

We have audited the accompanying Standalone Ind AS financial statements of Advance Steel Tubes Limited ("the Company"), which comprise the Balance Sheet as at 31/03/2022, the Statement of Profit and Loss (including Other Comprehensive Income), the cash flow statement and the statement of Changes in Equity ended on that date, and a summary of the significant accounting policies and other explanatory information (hereinafter referred to as the "standalone financial statements").

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the Companies Act, 2013 (the "Act") in the manner so required and give a true and fair view in conformity with the Indian Accounting Standards prescribed under section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended, ("Ind AS") and other accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2022, the profit and total comprehensive income, changes in equity and its cash flows for the year ended on that date.

### **Basis for Opinion**

We conducted our audit of the standalone financial statements in accordance with the Standards on Auditing ("SA"s) specified under section 143(10) of the Act. Our responsibilities under those Standards 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 ("ICAI") 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 made thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ICAI's Code of Ethics. We believe that the audit evidences obtained by us is sufficient and appropriate to provide a basis for our audit opinion on the standalone financial statements.

## Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the standalone financial statements of the current period. These matters were addressed in the context of our audit of the standalone financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. We have determined the matters described below to be the key audit matters to be communicated in our report.

Sr. No.	Key Audit Matter	Auditor's Response
1	<p data-bbox="276 472 836 546"><b>Impairment of Financial Asset: Trade Receivables or Advances to Suppliers</b></p> <p data-bbox="276 577 836 735">Accounting for Cost of Inventory applying IND AS 2 Inventories in the light of past uncertainty resulting from the covid-19 pandemic is done on the basis of :</p> <ul data-bbox="316 777 836 1176" style="list-style-type: none"><li data-bbox="316 777 836 850">• Risk of isolation (probability of Stock isolation)</li><li data-bbox="316 861 836 934">• Loss causes on account of Scrape &amp; Change in pricing of steel</li><li data-bbox="316 976 836 1176">• Lying of Idle inventory including scrape and stock for Job Work may tend to change in cost of inventory, which in turn would impact valuation &amp; results.</li></ul> <p data-bbox="267 1249 568 1291"><b>Refer Note no. 8 &amp; 10</b></p>	<p data-bbox="868 472 1242 514"><b>Principal Audit Procedure</b></p> <p data-bbox="868 577 1461 661">Our procedure related to verifying the inventory included the following:</p> <p data-bbox="868 693 1461 808">Physical verification was conducted by the management in presence of Auditor, however lying scrape cannot be identified.</p> <p data-bbox="868 840 1461 955">It was observed while conducting the audit intensively that defective material was included in final stock which got rectified.</p> <p data-bbox="868 987 1461 1165">Based upon the above procedures, suggestion was given to management and those who charged with governance (Audit committee here) for incorporating proper verification of idle heap of scrape.</p>

## Emphasis of Matters

We draw attention to the following matters in the Notes to the financial statements:

- a) Note 32(1)(B) to the financial statements which, describes the uncertainty related to the outcome of demands raised against the Company by the VAT / Sales Tax / Excise Duty / Service Tax / Income Tax Department which stands provided for.
- b) Note 32(1)(c) in the financial statement which, describes the uncertainty related to the UPPTCL against EPC Project through PNC Infratech Limited & A2Z Maintenance &



Engineering Services Ltd. has retained Rs.6,72,10,242/- from time to time payments against any forcible penalties for which extension of time has applied. The Company is expecting extension of time and no penalties are likely to be levied hence no provision has been made for the same.

- c) Note No. 32(7) to the financial statement which describes Jammu & Haridwar Units's operations have been come to an end further the leasehold Land for Plant has been sold on 15 July'2020 for which the contract was entered before the balance sheet date. Further, Haridwar Unit is also sold out as on  
However Few Assets were moved to Sahibabad Unit, standing in books of account.
- d) Note No. 32(12) to the financial statement which describes Account Confirmation in respect of certain accounts of Debtors have not been received and they are subject to confirmations. The management is of the opinion that adjustment, if any arising out of such reconciliation would not have material effect on the financial statement of the current year. Further the financial statement which describes Advance include claims receivables of Rs.71,17,205/- as on balance Sheet date for which there is no confirmation available.
- e) Note No. 32(14) to the financial statement which describes Advance include Rs.30,00,000/- to M/s Yamuna Industries to purchase RCC Cement Poles & Slab factory in Yamuna Nagar hence the business could not be operationalized thus stands closed. The amount is recoverable only on disposal of Assets.
- f) GST credit of Rs.2,16,000 regarding Rent paid for Corporate office at 81, Patpargunj Industrial Area, New Delhi – 110092, Delhi was taken and utilized.
- g) A material amount of Rs.1,32,96,733 was paid to D-Oromia Water Mineral and Energy Bureau in USD-180705.80 claimed by their bank toward LC- extension against order received during F.Y.2016- 17.

Our opinion is not modified in respect of these matters.

### **Other Matters**

The financial statements and the other financial information include the Company's investment of Rs.1700.57 Lakhs, liabilities of Rs. 1254.87 Lakhs, expenditure of Rs.1364.48 Lakhs and Net Profit of Rs. 286.50 Lakhs in regards to Pir Panchal Construction (P) Ltd. – JV and assets of Rs.278.93 Lakhs, liabilities of Rs.276.53 Lakhs & expenditure of Rs.3.67 Lakhs and Net Loss of Rs.3.67 Lakhs in regards to Advance Stimul Consortium and the elements making up the Cash Flow

Statement and related disclosures (Refer Note No. 21) in respect of an Unincorporated Joint Venture which is based on Provisional Financial Statements from the respective operators and certified by the management.

Our opinion is not modified in respect of these matters.

### **Information Other than the Financial Statements and Auditor's Report Thereon**

The Company's Board of Directors is responsible for the other information. The other information comprises the information included in the Management Discussion and Analysis, Board's Report including Annexures to Board's Report, Business Responsibility Report, Corporate Governance and Shareholder's Information, but does not include the standalone financial statements and our auditor's report thereon.

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

In connection with our audit of the standalone financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the standalone financial statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information; we are required to report that fact. We have nothing to report in this regard.

### **Management's Responsibility for the Financial Statements**

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these standalone financial statements that give a true and fair view of the financial position, financial performance, including other comprehensive income, changes in equity and cash flows of the Company in accordance with the Ind AS and other accounting principles generally accepted in India. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the 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 is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to

going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

The Board of Directors are responsible for overseeing the Company's financial reporting process.

### **Auditor's Responsibility for the Audit of 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 auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these 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 financial control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the 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.

Materiality is the magnitude of misstatements in the standalone financial statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the standalone financial statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the standalone financial statements.

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the standalone financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's 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 Section 143 (3) of the Act, we report that:

- (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
- (b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
- (c) The Balance Sheet, the statement of Profit and Loss (including other comprehensive income), and the cash flow statement and the statement of Changes in Equity dealt with by this report are in agreement with the books of account.
- (d) In our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.
- (e) On the basis of the written representations received from the directors as on 31<sup>st</sup> March, 2020 taken on record by the Board of Directors, none of the directors is disqualified as on 31<sup>st</sup> March, 2020 from being appointed as a director in terms of Section 164 (2) of the Act.
- (f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate report in "**Annexure A**".

(g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended:

In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Company to its directors during the year is in accordance with the provisions of section 197 of the Act.

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

- i. The Company has disclosed the impact of pending litigations on its financial position in its financial statements - Refer Note 32(1)(B) to the financial statements.
- ii. The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses.
- iii. There were no amounts which required to be transferred, to the Investors Education and Protection Funds by the Company, However in compliance to the companies act 2013, the company is required to open a separate account called "Unpaid Dividend Account" in the bank and to transfer unpaid dividend to "Unpaid Dividend Account" An amount of unclaimed dividend of Rs 41,000 is standing in the books of account as on 31st March 2022.

2. As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government in terms of Section 143(11) of the Act, we give in "Annexure B" a statement on the matters specified in paragraphs 3 and 4 of the Order.

For **Singhal Shubham and Company**  
Chartered Accountants  
Firm Regd. No.: 028622C

Sd/-

Date : **30/05/2022**  
Place: **Hapur**

**Shubham Singhal**  
Membership No.444873  
UDIN: 22444873ANTDJY7526

## **ANNEXURE "A" TO THE INDEPENDENT AUDITOR'S REPORT**

**(Referred to in paragraph 1(f) under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of Advance Steel Tubes Limited of even date)**

### **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 ADVANCE STEEL TUBES LIMITED (the "Company") as of March 31, 2022 in conjunction with our audit of the standalone Ind AS financial statements of the Company for the year ended on that date.

#### **Management's Responsibility for Internal Financial Controls**

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

#### **Auditor's Responsibility**

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting of the Company based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (the "Guidance Note") issued by the ICAI 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 except Budgetary control & Inventory Control, 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 criteria for internal financial control over financial reporting established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the ICAI.

For Singhal Shubham and Company  
Chartered Accountants  
Firm Regd. No.: 028622C

Date : 30/05/2022  
Place: Hapur

Sd/-  
Shubham Singhal  
Membership No.444873  
UDIN: 22444873ANTDJY7526

**ANNEXURE 'B' TO THE INDEPENDENT AUDITOR'S REPORT of even date on the Financial Statements of Advance Steel Tubes Limited FOR THE YEAR ENDED 31 March 2022**

(Referred to in paragraph 2 under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of Advance Steel Tubes Limited of even date)

**Report on Other Legal and Regulatory Requirements**

As required by the Companies (Auditors' Report) Order, 2020 ("the Order") issued by the Central Government of India in terms of sub section (11) of section 143 of the Companies Act, 2013. We give the statements on the matters specified in paragraphs 3 and 4 of the order, to the extent applicable as under.

i.

(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 no intangible assets.

The Management during the year has a programme for physical verification of Property, Plant and Equipment but the same was not followed during the year. Accordingly, we are unable to comment on whether there are any material discrepancies and if they have been properly dealt with in the books of account.

(b) According to the information and explanations given to us, the title deeds of immovable properties (other than properties where the company is the lessee and the lease agreements are duly executed in favour of the lessee), are held in the name of the Company, Except below.

Sr. No.	Description of Property	Gross carrying value	Held in Name of	Whether promoter, director or their relative or employee	Period held – Indicate range, where appropriate	Reason for not being held in name of company (also indicate if in dispute)
1	BUILDING		LALIT AGARWAL	PROMOTER	1994	AS DEAL WAS MADE BY MR. LALIT AND BENEFICIARY OWNER IS COMPANY ONLY



(c) According to the information and explanations given to us, the Company has not revalued its property, plant and Equipment (including Right of Use assets) and its intangible assets. Accordingly, the requirements under paragraph 3(i)(d) of the Order are not applicable to the Company.

(d) According to the information and explanations given to us, no proceeding has been initiated or pending against the Company for holding benami property under the Benami Transactions (Prohibition) Act, 1988 and rules made thereunder. Accordingly, the provisions stated in paragraph 3(i) (e) of the Order are not applicable to the Company.

ii The inventory has been physically verified by the management during the year. In our opinion, the frequency of verification is reasonable. However, the coverage of such physical verification of inventories was limited to certain items such as Goods received for Job Work and did not include Scrape. The discrepancies noticed on the physical verification of inventory as compared to book records, to the extent carried out, were not material.

The Company has been sanctioned working capital limits in excess of Rs. 5 crores in aggregate from Banks/financial institutions on the basis of security of current assets. Quarterly returns / statements filed with such Banks/ financial institutions are in agreement with the books of account.

(a) According to the information explanation provided to us, the Company has provided loans or provided advances in the nature of loans, or given guarantee, or provided security to any other entity.

(A) The details of such loans or advances and guarantees or security to subsidiaries, Joint Ventures and Associates are as follows:

	Guarantees	Security	Loans	Advances
<b>Aggregate amount granted/provided during the year</b>				
- Subsidiaries - Joint Ventures - Associates				
<b>Balance Outstanding as at balance sheet date in respect of above cases</b>				
- Subsidiaries - Joint Ventures - Associates				

(b) According to the information and explanations given to us and based on the audit procedures performed by us, we are of the opinion that the terms and conditions in relation to investments made, guarantees provided, securities given and / or grant of all loans and advances in the nature of loans and guarantees are not prejudicial to the interest of the Company.

(c) In case of the loans and advances in the nature of loan, schedule of repayment of principal and payment of interest have not been stipulated. In the absence of stipulation of repayment terms are unable to comment on the regularity of repayment of principal and payment of interest.

(c) There are no amounts overdue for more than ninety days in respect of the loan granted to Company/ Firm/ LLP/ Other Parties<sup>3</sup>.

(d) According to the information explanation provided to us, the loan or advance in the nature of loan granted has not fallen due during the year. Hence, the requirements under paragraph 3(iii) (e) of the Order are not applicable to the Company.

OR

According to the information explanation provided to us, the loan or advance in the nature of loan granted has fallen due during the year. The same has been renewed or extended and/or fresh loans are granted to settle the overdue of existing loans given to existing parties The details of the same are as follows:

Name of the Parties	Aggregate amount of overdue of existing loans renewed or extended or settled by fresh loans	Percentage* of the aggregate to the total loans or advances in the nature of loans granted during the year

(e) According to the information explanation provided to us, the Company has granted loans/advances in the nature of loans repayable on demand or without specifying any terms or period of repayment. The details of the same are as follows:

(f)

	All Parties	Promoters	Related Parties

Aggregate amount of loans/ advances in nature of loans - Repayable on demand (A) - Agreement does not specify any terms or period of repayment (B)			
Total (A+B)			
Percentage of loans/ advances in nature of loans to the total loans			

- ii. In our opinion and according to the information and explanations given to us, the Company has not either directly or indirectly, granted any loan to any of its directors or to any other person in whom the director is interested, in accordance with the provisions of section 185 of the Act and the Company has not made investments through more than two layers of investment companies in accordance with the provisions of section 186 of the Act. Accordingly, provisions stated in paragraph 3(iv) of the Order are not applicable to the Company.
- iv. In our opinion and according to the information and explanations given to us, the Company has not accepted any deposits from the public within the meaning of Sections 73, 74, 75 and 76 of the Act and the rules framed there under.

Pursuant to the rules made by the Central Government of India, the Company is required to maintain cost records as specified under Section 148(1) of the Act in respect of its products. We have broadly reviewed the same, and are of the opinion that, prima facie, except in the case of [mention the product], the prescribed accounts and records have been made and maintained. We have not, however, made a detailed examination of the records with a view to determine whether they are accurate or complete.

vii.

- (a) According to the information and explanations given to us and the records of the Company examined by us, in our opinion, undisputed statutory dues including goods and service tax, provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess have been regularly deposited by the company with appropriate authorities in all cases during the year.
- (b) According to the information and explanation given to us and examination of records of the Company, the outstanding dues of income-tax, goods and service tax, customs duty, cess and any other statutory dues on account of any dispute, are as follows:

Sl. No.	Name of Statute	Nature of Dues	Amount (in Lakh)	Period to which the amount relates (FY)	Forum where Dispute is pending	Remarks
1.	Income Tax Act	TDS	3.51	2010-11	Commissioner of Income Tax (ITAT)-Delhi	The company has preferred an appeal and Paid Rs. One lakh and not provided for in the view of prospect to get relief.
2.	Income Tax Act	TDS	5.88	2011-12	Commissioner of Income Tax (ITAT)-Delhi	The company has preferred an appeal and Paid Rs. One lakh and not provided for in the view of prospect to get relief.
3.	Income Tax Act	TDS	4.64	2012-13	Commissioner of Income Tax (ITAT)-Delhi	The company has preferred an appeal and Paid Rs. One lakh and not provided for in the view of prospect to get relief.
4.	Income Tax Act	TDS	4.24	2013-14	Commissioner of Income Tax (ITAT)-Delhi	The company has preferred an appeal and Paid Rs. One lakh and not provided for in the view of prospect to get relief.

- viii. According to the information and explanations given to us, there are no transactions which are not accounted in the books of account which have been surrendered or disclosed as income during the year in Tax Assessment of the Company. Also, there are no previously unrecorded income which has been now recorded in the books of account. Hence, the provision stated in paragraph 3(viii) of the Order is not applicable to the Company.
- ix.
- In our opinion and according to the information and explanations given to us, the Company has not defaulted in repayment of loans or borrowings or in payment of interest thereon to any lender.
  - According to the information and explanations given to us and on the basis of our audit procedures, we report that the company has not been declared wilful defaulter by any bank or financial institution or government or any government authority.
  - In our opinion and according to the information explanation provided to us, money raised by way of term loans during the year have been applied for the purpose for which they were raised.
  - According to the information and explanations given to us, and the procedures performed by us, and on an overall examination of the standalone<sup>1</sup> financial statements of the company, we report that no funds raised on short-term basis have been used for long-term purposes by the company.
  - According to the information explanation given to us and on an overall examination of the standalone<sup>1</sup> financial statements of the Company, we report that the company has not taken any funds from an any entity or person on account of or to meet the obligations of its associates or joint ventures.
  - According to the information and explanations given to us and procedures performed by us, we report that the Company has not raised loans during the year on the pledge of securities held in its securities, joint ventures or associate companies.

- x.
- (a) The Company did not raise any money by way of initial public offer or further public offer (including debt instruments) during the year. Accordingly, the provisions stated in paragraph 3 (x)(a) of the Order are not applicable to the Company.
  - (b) According to the information and explanations given to us and based on our examination of the records of the Company, the Company has not made any preferential allotment or private placement of shares or fully, partly or optionally convertible debentures during the year. Accordingly, the provisions stated in paragraph 3 (x)(b) of the Order are not applicable to the Company.
- xi.
- (a) During the course of our audit, examination of the books and records of the Company, carried out in accordance with the generally accepted auditing practices in India, and according to the information and explanations given to us, we have neither come across any instance of fraud by the Company nor on the Company.
  - (b) We have not come across of any instance of fraud by the Company or on the Company during the course of audit of the standalone<sup>1</sup> financial statement for the year ended March 31, 2022, accordingly the provisions stated in paragraph (xi)(b) of the Order is not applicable to the Company.
  - (c) As represented to us by the management, there are no whistle-blower complaints received by the Company during the year. Accordingly, the provisions stated in paragraph (xi)(c) of the Order is not applicable to company.
- xii.
- (a) In our opinion and according to the information and explanations given to us, the Company is not a Nidhi Company. Accordingly, the provisions stated in paragraph 3(xii) (a) to (c) of the Order are not applicable to the Company.
- xiii. According to the information and explanations given to us and based on our examination of the records of the Company, transactions with the related parties are in compliance with sections 177 and 188 of the Act where applicable and details of such transactions have been disclosed in the standalone<sup>1</sup> financial statements as required by the applicable accounting standards.
- xiv.
- (a) In our opinion and based on our examination, the Company has an internal audit system commensurate with the size and nature of its business.
  - (b) We have considered internal audit reports issued by internal auditors during our audit.
- xv. According to the information and explanations given to us, in our opinion during the year the Company has not entered into non-cash transactions with directors or persons connected with its directors and hence, provisions of section 192 of the Act are not applicable to company. Accordingly, the provisions stated in paragraph 3(xv) of the Order are not applicable to the Company.
- xvi.
- (a) In our opinion, the Company is not required to be registered under section 45 IA of the Reserve Bank of India Act, 1934 and accordingly, the provisions stated in paragraph clause 3 (xvi)(a) of the Order are not applicable to the Company.
  - (b) In our opinion, the Company has not conducted any Non-Banking Financial or Housing Finance activities without any valid Certificate of Registration from Reserve Bank of India. Hence, the reporting under paragraph clause 3 (xvi)(b) of the Order are not applicable to the Company
  - (c) The Company is not a Core Investment Company (CIC) as defined in the regulations made by Reserve Bank of India. Hence, the reporting under paragraph clause 3 (xvi)(c) of the Order are not applicable to the Company.

(d) The Company does not have any CIC as part of its group. Hence the provisions stated in paragraph clause 3 (xvi) (d) of the order are not applicable to the company

- xvii. Based on the overall review of standalone<sup>1</sup> financial statements, the Company has not incurred cash losses in the current financial year and in the immediately preceding financial year. Hence, the provisions stated in paragraph clause 3 (xvii) of the Order are not applicable to the Company.
- xviii. There has been no resignation of the statutory auditors during the year. Hence, the provisions stated in paragraph clause 3 (xviii) of the Order are not applicable to the Company.
- xix. According to the information and explanations given to us and based on our examination of financial ratios, ageing and expected date of realisation of financial assets and payment of liabilities, other information accompanying the standalone<sup>1</sup> financial statements, our knowledge of the Board of Directors and management plans, we are of the opinion that no material uncertainty exists as on the date of audit report and the Company is 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.
- xx. According to the information and explanations given to us, the provisions of section 135 of the Act are applicable to the Company. The Company has made the required contributions during the year and there are no unspent amounts which are required to be transferred to the special account as on the date of our audit report. Accordingly, the provisions of paragraph (xx)(a) to (b) of the Order are not applicable to the Company.

There is no ongoing projects.

- xxi. The reporting under clause 3(xxi) of the Order is not applicable in respect of audit of standalone financial statements. Accordingly, no comment in respect of the said clause has been included in the report.

For **Singhal Shubham and Company**  
Chartered Accountants  
Firm Regd. No.: 028622C

Date : **30/05/2022**  
Place: **Hapur**

Sd/-  
**Shubham Singhal**  
Membership No.444873  
UDIN: 22444873ANTDJY7526

Particulars		Note No.	As at 31st March, 2022	As at 31 March, 2021
<b>A</b>	<b>ASSETS</b>			
1	<b>Non-current assets</b>			
	(a) Property, Plant & Equipment	3	1510,51,404	1872,89,553
	(b) Capital work-in-progress	3	33,04,000	33,04,000
	(c) Financial Assets		-	-
	(i) Investments	4	763,00,949	827,99,863
	(ii) Loans	4	523,52,641	709,46,065
	(iii) Other Financial Assets	4	2837,55,598	1964,32,666
	(d) Non Current Tax Assets	5	83,33,884	73,00,154
	(e) Other Non Current Assets	6	49,55,830	52,49,597
	<b>Total Non Current Assets</b>		<b>5800,54,306</b>	<b>5533,21,898</b>
2	<b>Current assets</b>			
	(a) Inventories	7	1521,31,893	1516,98,252
	(b) Financial Assets			
	(i) Trade receivables - Billed	8	2537,71,356	3296,60,669
	(ii) Cash and cash equivalents	9	2,43,613	1,55,157
	(iii) Bank Balance other than (ii) above	9	10,93,294	15,25,635
	(iv) Other Financial Assets	10	510,13,940	553,74,684
	(c) Other Current Assets	11	8,12,489	9,53,451
	(d) Income Tax Assets	12	180,32,444	115,35,274
	<b>Total Current Assets</b>		<b>4770,99,031</b>	<b>5509,03,122</b>
	<b>TOTAL ASSETS</b>		<b>10571,53,337</b>	<b>11042,25,020</b>
<b>B</b>	<b>EQUITY AND LIABILITIES</b>			
	<b>EQUITY</b>			
	(a) Equity Share Capital	13	74,00,000	74,00,000
	(b) Other Equity	14	887,02,396	8895,38,436
	<b>TOTAL EQUITY</b>		<b>9461,02,396</b>	<b>8969,38,436</b>
	<b>LIABILITIES</b>			
2	<b>Non Current Liabilities</b>			
	(a) Financial Liabilities			
	(i) Borrowings	15	-	3,39,153
	(ii) Other Financial Liabilities			250,08,250
	(b) Provisions	16	31,43,291	32,36,546
	(c) Deferred tax liabilities (net)	17	60,93,242	104,30,156
	<b>Total Non Current Liabilities</b>		<b>92,36,533</b>	<b>390,14,105</b>
3	<b>Current liabilities</b>			
	(a) Financial Liabilities			
	(i) Borrowings	18	474,67,733	1260,20,996
	(ii) Trade payables	19	134,60,763	119,30,614
	(iii) Other Financial Liabilities	20	3,38,745	14,71,178
	(b) Other Current Liabilities	21	163,18,433	129,55,589
	(c) Provisions	22	41,81,953	36,39,520
	(d) Current Tax Liabilities	22	200,46,811	122,63,582
	<b>Total Current Liabilities</b>		<b>1018,14,408</b>	<b>1682,72,479</b>
	<b>TOTAL EQUITY &amp; LIABILITIES</b>		<b>10571,53,337</b>	<b>11042,25,020</b>
	Summary of significant accounting policies	1, 2		

The accompanying notes form an integral part of these standalone financial statements 32

As per our report of even date attached

For Singhal Shubham & Co.

Chartered Accountants

Firm No. 028622C

Singhal Shubham & Co.

Proprietor M. No. 444873

2-1/414, New Shivpur

Hapur (UP)

(UDIN-22444873ANFDJY7536)

D. N. Agarwal  
(Managing Director)  
DIN: 00586794  
B-16, Swasthya Vihar, Delhi

P. Mishra  
(Company Secretary)  
M. No: A1601E

A-725, Gaur Ganga Avenue,  
Ghaziabad, Ghaziabad (UP)

For and on behalf of the Board of Directors

Lalit Agarwal  
(Director)

DIN: 00109320

B-16, Swasthya Vihar, Delhi

Vatsal Agarwal  
(C.F.O.)

B-16 Swasthya Vihar, Delhi

Place: Ghaziabad

Date: 30.03.2022



**ADVANCE STEEL TUBES LIMITED**

TTC

ADVANCE

**PROFIT & LOSS STATEMENT FOR THE YEAR ENDED 31st MARCH, 2022**

CIN : L24231UP1978PLC004583

Particulars	Note No.	Figures	
		YEAR ENDED 31.03.2022	YEAR ENDED 31.03.2021
<b>I REVENUE</b>			
(1) Revenue from Operations (Gross)	23	9531,42,286	6896,26,179
Add : Services		940,50,756	850,30,754
Total Revenue from Operations (Gross)		10471,93,042	7746,56,933
(2) Other income	24	953,18,764	404,65,814
<b>Total Revenue</b>		<b>11425,11,806</b>	<b>8151,22,747</b>
<b>II EXPENSES</b>			
(a) Cost of Material Consumed	25	7978,31,589	5612,07,991
(b) Purchases of Stock-in-Trade	26	530,38,139	95,82,216
(c) Changes in Inventories of finished goods	27	(65,46,846)	161,13,979
Work-in-progress and stock-in-trade			
(d) Employee Benefits Expenses	28	707,11,608	615,67,145
(e) Finance Costs (Including Bank Charges)	29	86,13,917	233,23,085
(f) Depreciation and Amortization Expenses	3	115,80,457	123,77,036
(g) Other Expenses	30	1445,31,681	767,15,579
<b>Total Expenses</b>		<b>10797,60,545</b>	<b>7608,87,031</b>
III Profit before exceptional & extraordinary items and tax (I - II)		627,51,261	542,35,716
IV Exceptional/Extraordinary Items		-	-
-Provision for CSR		11,80,273	8,24,700
V Profit before Tax (III - IV)		615,70,988	534,11,016
VI Tax Expense:			
a) Current year Tax		200,46,811	122,63,582
b) MAT Credit Entitlement / Adjustment		-	-
c) Current tax expense relating to prior years		(33,02,869)	-
d) Deferred tax		(43,36,914)	15,71,639
<b>Total VI</b>		<b>124,07,028</b>	<b>138,35,221</b>
VII Profit/(Loss) for the period (V-VI)		491,63,960	395,75,795
Opening Balance in Profit & Loss Account		-	-
Other Comprehensive Income		-	-
Amount available for appropriations		491,63,960	395,75,795
VIII Earning per Equity Share :	31		
(i) Basic		66	53
(ii) Diluted		66	53
Summary of significant accounting policies	1 &		

The accompanying notes form an integral part of these standalone financial statements 32

As per our report of even date attached

For and on behalf of the Board of Directors

For Singhal Shubham & Co.

Chartered Accountants

Firm No. 028622C

Singhal Shubham & Co.

Proprietor M. No. 444873

2-1/414, New Shivpuri

Hapur (UP)

(UDIN- 22444873ANTDJY7526)

D. N. Agarwal  
(Managing Director)

DIN: 00586794

B-16, Swasthya Vihar, Delhi

Parul Mishra  
(Company Secretary)

M. No.: A16018

A-725, Gaur Green Avenue,  
Vaishali, Ghaziabad (UP)

Lalit Agarwal  
(Director)

DIN: 00109920

B-16, Swasthya Vihar, Delhi

Vatsal Agarwal  
(C.F.O.)

B-16, Swasthya Vihar, Delhi

Place : Sahibabad

Date : 30.05.2022





# Advance Steel Tubes Limited

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ADVANCE

## CASH FLOW STATEMENT

FOR THE YEAR ENDED 31<sup>st</sup> MARCH 2022

CIN : L24231UP1978PLC004583

	YEAR ENDED 31.03.2022	YEAR ENDED 31.03.2021
<b>A. CASH FLOW FROM OPERATING ACTIVITIES</b>		
Net Profit Before Tax	615,70,988	534,11,016
<b>Adjustments For:</b>		
Depreciation and amortisation expenses	115,80,457	123,77,036
Interest Income	(199,75,430)	(195,50,884)
Financial Cost (Interest On Borrowing)	67,17,980	82,95,321
Loss/(Profit) from Investment	64,98,914	(83,62,978)
Loss/(Profit) on sale of Property, Plant and Equipment (net)	(722,26,171)	(185,07,428)
Provision for employee benefit (Gratuity & Leave)	(93,255)	(12,45,569)
<b>Operating Profit before working capital changes</b>	<b>(59,26,520)</b>	<b>264,16,514</b>
<b>Adjustments For</b>		
(Increase)/Decrease in Trade & Other Receivable	917,47,308	(580,30,724)
(Increase)/Decrease in other Financial Assets	(868,90,591)	(201,35,410)
(Increase)/Decrease Inventories	(4,33,641)	291,92,197
Increase/(Decrease) in Trade Payable & Other Financial Liabilities	(189,60,801)	84,84,966
<b>Cash Generated From Operation</b>	<b>(204,64,222)</b>	<b>(140,72,457)</b>
Net Income Tax Paid/refund	(122,63,582)	(110,86,955)
<b>Cash Flow Before Extraordinary Item</b>	<b>(327,27,804)</b>	<b>(251,59,412)</b>
Prior Period Adjustment	33,02,869	-
<b>Net Cash From Operating Activities</b>	<b>(294,24,935)</b>	<b>(251,59,412)</b>
<b>B. CASH FLOW FROM INVESTING ACTIVITIES</b>		
Capital Expenditure on Property, Plant and equipments including	(38,31,018)	(48,15,500)
Capital Advance	-	-
Sale of Property, Plant and Equipment	1000,03,779	213,39,999
Purchase of Investments	-	-
Assets Discarded	1,08,029	-
Sale of Investments	-	-
Interest Received	199,75,430	195,50,884
<b>Net Cash Used In Investing Activities</b>	<b>1162,56,220</b>	<b>360,75,383</b>
<b>C. CASH FLOW FROM FINANCING ACTIVITIES</b>		
Proceed From Long Term borrowing	-	-
Proceed From Short Term borrowing	-	-
Repayment of long term borrowing	(541,62,500)	41,62,500
Repayment of short term borrowing	(14,71,586)	(361,98,798)
Proceed From Cash Credits	(243,90,763)	296,88,505
Interest and Financial Charges paid	(67,17,983)	(82,95,321)
Dividend Paid	-	(1,80,706)
<b>Net Cash Flow From Financing Activities</b>	<b>(867,42,829)</b>	<b>(108,23,814)</b>
Net Increase in Cash & Cash Equivalents	88,456	92,157
Cash and Cash Equivalents (Opening Balance)	1,55,157	63,000
<b>Cash and Cash Equivalents (Closing Balance)</b>	<b>2,43,613</b>	<b>1,55,157</b>

In terms of our report attached.

For Singhal Shubham & Co.

Chartered Accountants

Firm No. 028622/C

Singhal Shubham & Co.

Proprietor M. No. 444872

2-1/514, New Shivpur

Hapur (UP)

(UDIN- 2244875AN1D1Y7526)

D. N. Agarwal

(Managing Director)

DIN: 00586794

B-16, Swasthya Vihar, Delhi

For and on behalf of the Board of Directors

Vatsal Agarwal

(C.F.O.)

B-16, Swasthya Vihar, Delhi

Lalit Agarwal

(Director)

DIN: 00109920

B-16, Swasthya Vihar, Delhi

P. Mona

Parul Mishra

(Company Secretary)

M. No.: A16018

A-725, Gaur Green Avenue,  
Vaishali, Ghaziabad (UP)

Place: Sahibabad

Date: 30.05.2022



ADVANCE STEEL TUBES LIMITED

ADVANCE

PROFIT & LOSS STATEMENT FOR THE YEAR ENDED 31st MARCH, 2022

CIN : L24231UP1978PLC004583

a. Equity share capital

	No. of Shares	(Rs)
Balance as at 1 April 2020	7,40,000	74,00,000
Changes in equity share capital during 2020-21		-
Balance as at the 31 March 2021	7,40,000	74,00,000
Changes in equity share capital during 2021-22		-
Balance as at the 31 March 2022	7,40,000	74,00,000

b. Other equity

	Reserves and surplus			Items of OCI	Total
	General Reserve	Capital Reserve	Security Premium	Other items of OCI	
Balance at 01 April 2020	8448,37,641	1,25,000	50,00,000	0	8499,62,641
Total income for the year ended 31 March 2021					
Changes during the year	395,75,795			-	395,75,795
Total income	395,75,795	-	-	-	395,75,795
Transactions with owners, recorded directly in equity	-			-	-
Balance at 01 April 2021	8844,13,436	1,25,000	50,00,000	0	8895,38,436
Total income for the year ended 31 March 2022					
Changes during the year	491,63,960	-	-	-	491,63,960
Total income	491,63,960	-	-	-	491,63,960
Transactions with owners, recorded directly in equity	-				
Balance at 31 March 2022	9335,77,396	1,25,000	50,00,000	-	9387,02,396

Summary of significant accounting policies. (Note 1 & 2)

The accompanying notes form an integral part of these standalone financial statements. 32

As per our report of even date attached

For Singhal Shubham & Co.

Chartered Accountants

Firm No. 028622C

Shubham Singhal  
Proprietor M. No. 444873

2-1/414, New Shivpuri

Hapur (UP)

(UDIN- 22144873ANTD)Y7526)

Place: Sahibabad

Date: 30-05-2022



D. N. Agarwal  
(Managing Director)  
DIN: 00586794  
B-16, Swasthya Vihar, Delhi

P. Mishra  
Parul Mishra  
(Company Secretary)  
M. No.: A16018  
A-725, Gaur Green Avenue,  
Vaishali, Ghaziabad (UP)

For and on behalf of the Board of Directors

Lalit Agarwal  
(Director)  
DIN: 00109920  
B-16, Swasthya Vihar, Delhi

Vatsal Agarwal  
(C.F.O.)  
B-16, Swasthya Vihar, Delhi

**ADVANCE STEEL TUBES LIMITED**

ADVANCE

Notes to Financial Statements for the Year ended 31st March 2022

(All Amounts in INR)

CIN : L24231UP1978PLC004583

Notes No. 3 : Property, Plant and Equipments)

The changes in the carrying value for the year ended 31 March 2022

	Leasehold Land	Buildings	Plant and equipment	Office equipment	Computers and networking equipment	Furniture and fixtures	Vehicles	Total
Gross block as at 1 April 2021	188,16,652	1365,24,569	1592,22,805	38,77,401	37,12,010	34,35,074	195,44,482	3451,32,993
Additions			36,32,080	44,688	73,750		80,500	38,31,018
Disposals	91,22,624	219,81,503	289,13,880	3,63,646	4,62,682	3,95,499	3,23,593	615,63,427
Gross block as at 31 March 2022	94,94,028	1145,43,066	1339,41,005	35,58,443	33,23,078	30,39,575	193,01,389	2874,00,584
Accumulated depreciation as at 1 April 2021	8,34,792	29,31,196	1042,66,691	34,37,368	34,54,019	31,63,493	133,55,881	1578,43,440
Depreciation	2,46,085	24,73,961	66,35,428	97,569	52,813	30,249	20,44,250	115,80,456
Disposals/other adjustments	4,23,953	112,69,728	199,26,214	3,45,464	4,39,547	3,78,640	2,91,170	330,74,716
Accumulated depreciation as at 31-03-2022	6,56,924	205,35,429	909,75,905	31,89,473	30,67,285	28,15,202	151,08,962	1363,49,180
Net block as at 31 March 2022	90,37,104	940,07,637	429,65,100	3,68,970	2,55,793	2,24,373	41,92,427	1510,51,404
Net block as at 31 March 2021	179,81,860	1071,93,373	549,56,114	4,40,033	2,57,991	2,71,581	61,88,601	1872,89,553
The changes in the carrying value for the year ended 31 March 2021 *								

	Leasehold Land	Buildings	Plant and equipment	Office equipment	Computers and networking equipment	Furniture and fixtures	Vehicles	Total
Gross block as at 1 April 2020	188,16,652	1377,95,684	1621,60,978	37,87,714	36,42,425	34,35,074	206,08,846	3515,60,134
Additions			13,52,228	89,687	69,585			15,11,500
Disposals	188,16,652	12,71,115	42,90,401				10,64,364	66,25,880
Gross block as at 31 March 2021		1365,24,569	1592,22,805	38,77,401	37,12,010	34,35,074	195,44,482	3451,32,993
Accumulated depreciation as at 1 April 2020	5,56,528	270,90,478	1007,81,334	33,49,998	33,72,729	31,09,456	123,11,951	1505,72,474
Depreciation	2,78,264	26,69,461	71,45,156	87,370	81,290	54,037	20,55,076	123,70,654
Disposals/other adjustments		4,28,743	36,59,799				10,11,146	
Accumulated depreciation as at 31-03-2021	8,34,792	293,31,196	1042,66,691	34,37,368	34,54,019	31,63,493	133,55,881	1578,43,440
Net block as at 31 March 2021	179,81,860	1071,93,373	549,56,114	4,40,033	2,57,991	2,71,581	61,88,601	1872,89,553
Net block as at 1 April 2020	182,60,124	1107,05,206	613,79,644	4,37,716	2,69,696	3,25,618	82,96,895	2009,87,660
(b) Capital work-in-progress *								

Particulars	Amount in CMTF for a period of			
	Less than 1 year	1-2 years	2-3 years	More than 3 years
As at 31 March 2022				Total
Projects in progress		33,04,000		33,04,000
As at 31 March 2021	33,04,000			33,04,000
Projects in progress	33,04,000			33,04,000



**ADVANCE STEEL TUBES LIMITED**

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ADVANCE

NOTES ON IND AS FINANCIAL STATEMENTS

CIN : L24231UP1978PLC004583

Particulars	Figures as at 31.03.2022	Figures as at 31.03.2021
<b>Note No. 4: Non Current Investments</b>		
<b>Investments measured at cost</b>		
(a) Investment in Share TSL Piping Solution (P) Ltd. (400 Share @ 10/-each)	4000	4000
	4000	4000
<b>Investments measured at FVTPL</b>		
1) Investment in partnership firm		
(b) Investment in AOP/Firm (Pir Panchal Construction - JV)	76097572	82556478
(c) Investment in AOP/Firm (Advance Stimul Consortium)	199377	239385
	76296949	82795863
<b>Additional Information</b>		
<b>Name of the Joint Venture</b>	<b>Share in Profit</b>	<b>Share in Profit</b>
Pir Panchal Construction Pvt. Ltd.	25%	25%
Advance Stimul - Consortium	50%	50%
Aggregate value of unquoted non-current investments	76300949	82799863
<b>2) Loans &amp; Advances to related Party</b>		
Secured, Considered Good	-	-
Unsecured, Considered Good	523,52,641	709,46,065
Doubtful	-	-
	523,52,641	709,46,065
<b>3) Other Financial Assets</b>		
(a) In Fixed Deposit	2837,55,598	1964,32,666
	2837,55,598	1964,32,666
<b>Note No. 5: Non Current Tax Assets</b>		
(a) Income-Tax (Paid under Protest and Refundable)	83,33,884	73,00,154
	83,33,884	7300154
<b>Note No. 6: Other Non Current Assets</b>		
(b) Loans & Advances (Unsecured, Considered Good) Security Deposits	49,55,830	52,49,597
	49,55,830	52,49,597
<b>Note No. 7: Inventories</b> (As taken, valued and certified by the Management)		
(a) Raw Material*	878,03,488	937,36,214
(b) Finished Goods*	489,98,391	408,32,427
(c) Stores & Spares*	66,07,483	67,87,962
(d) Scrap	87,22,531	103,41,649
(e) Trading Purchase	-	-
	1521,31,893	1516,98,252
<b>Additional Information</b>		
* Raw Materials and Finished Goods are valued at lower of cost or market value.		
*Semi finished ,Packing materials and Stores and Spares are valued at cost.		



**ADVANCE STEEL TUBES LIMITED**

NOTES ON IND AS FINANCIAL STATEMENTS

CIN : L24231UP1978PLC004553

Figures

ADVANCE

Particulars

Figures as at  
31.03.2022

Figures as at  
31.03.2021

**Note No. 8: Trade receivables**

(a) Outstanding for a period exceeding six months

Secured, Considered Good  
Unsecured, Considered Good  
Doubtful

498,68,250	1223,68,010
314,32,803	312,25,834
813,01,053	1535,93,844
314,32,803	312,25,834
498,68,250	1223,68,010

Less: Provision for Doubtful Advances

(b) Outstanding for a period less than six months

Secured, Considered Good  
Unsecured, Considered Good  
Doubtful

2,039,03,108	2072,92,659
2,039,03,108	2072,92,659
2,537,71,358	3,296,60,669

Total (a+b)

37,72,018	149,63,755
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**Additional Information**

Trade receivable include those Company/Firm in which any director is a member/director

	Outstanding as at 31 March 2022 from the due date of payment						Total
	Less than 6 months	6 months - 1 year	01 to 02 years	02 to 03 years	More than 3 years	Total	
<b>Trade receivables - current</b>							
Not Due							
Undisputed - considered good	2039,03,108	353,77,760	52,83,592	90,06,898	NIL	2537,71,358	
Undisputed - credit impaired	-	-	1,174	22,38,488	284,82,569	307,22,231	
Disputed - credit impaired	-	-	-	-	7,10,572	7,10,572	
Impairment allowance for bad and doubtful debts	-	-	-	-	-	314,32,803	
Unbilled receivables	-	-	-	-	-	NIL	
						2547,20,448	
<b>Trade receivables - current</b>							
Not Due							
Undisputed - considered good*	2072,92,659	155,15,937	490,28,262	578,23,811	NIL	3,296,60,669	
Undisputed - credit impaired	-	-	14,885	153,78,367	151,21,810	305,15,262	
Disputed - credit impaired	-	-	-	-	7,10,572	7,10,572	
Impairment allowance for bad and doubtful debts	-	-	-	-	-	312,25,834	
Unbilled receivables	-	-	-	-	-	NIL	
						3,296,60,669	



**ADVANCE STEEL TUBES LIMITED**

NOTES ON IND AS FINANCIAL STATEMENTS

CIN : L24231UP1978PLC004583

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Particulars	Figures as at 31.03.2022	Figures as at 31.03.2021
<b>Note No. 9:</b>		
1) <b>Cash and Cash Equivalents</b>		
(a) Cash in Hand	2,43,613	1,55,157
	<u>2,43,613</u>	<u>1,55,157</u>
2) <b>Bank Balance</b>		
(a) - in Current Account	10,93,294	15,25,635
	<u>10,93,294</u>	<u>15,25,635</u>
<b>Note No. 10: Other Financial Assets</b>		
(a) <b>Loans &amp; Advances (Unsecured, Considered Good)</b>		
(i) Considered Good	125,22,193	80,99,066
(ii) Doubtful	29,66,199	29,66,199
	<u>154,88,392</u>	<u>110,65,265</u>
Less: Provision for Doubtful Debts	29,66,199	29,66,199
	<u>125,22,193</u>	<u>80,99,066</u>
(iii) Employees	8,20,006	8,72,742
(iv) Security/Earnest Money	25,10,185	19,35,318
(v) Other Advances*	36,15,879	126,71,103
(b) <b>Others:</b>		
(i) - Deposit as Margin	226,63,981	225,42,365
(ii) Balance with Revenue Authority	88,81,696	92,54,090
	<u>510,13,940</u>	<u>553,74,684</u>
*Other advances mainly rebate on purchases of raw material.		
<b>Note No. 11: Other Current Assets</b>		
(a) Export Incentives Receivables	7,03,034	8,54,635
(b) Prepaid Expenses	1,09,455	98,816
	<u>8,12,489</u>	<u>9,53,451</u>
<b>Note No. 12: Current Tax Assets</b>		
(a) Advance Income Tax (including TDS)	180,32,444	115,35,274
	<u>180,32,444</u>	<u>115,35,274</u>
<b>Notes No. 13: Share capital</b>		
The Company has only one class of		
	31 March 2022	31 March 2021
<u>Authorized</u>		
50,00,000 (previous year 50,00,000) equity shares of Rs. 10 each	500,00,000	500,00,000
<u>Issued, subscribed and paid up</u>		
740000 (previous year 740000) equity shares of Rs. 10 each fully paid	74,00,000	74,00,000
Total:	<u>74,00,000</u>	<u>74,00,000</u>
(a) Reconciliation of shares outstanding at the beginning and	31 March 2022	31 March 2021
	Number of shares	Amount
Outstanding at the beginning of the year	7,40,000	74,00,000
Add: Issued during the year	-	-
Outstanding at the end of the year	<u>7,40,000</u>	<u>74,00,000</u>
(b) Rights, preferences and restrictions attached to shares		
The company has only one class of equity shares having par value of Rs. 10 per share. Each shareholder is entitled to one vote per share held. The company declares and pays dividends in Indian rupees. The dividend proposed by the Board of Directors is subject to the approval of the shareholders in the ensuing Annual General Meeting. In the event of liquidation of the company, the holders of equity shares will be entitled to receive remaining assets of the company, after distribution of all preferential amounts. The distribution will be in proportion to the number of equity shares held by the shareholders.		



**ADVANCE STEEL TUBES LIMITED**

NOTES ON IND AS FINANCIAL STATEMENTS

CIN : L24291UP1975PLC004583

ADVANCE

(a) Details of shares held by shareholders holding more than 5% of the aggregate shares in the Company

Name of the shareholder	31 March 2022 Number of shares	% of holding in the class	31 March 2021 Number of shares	% of holding in the class
E. N. Agarwal	72,050	10	72,050	10
Daulat Ram Agarwala	40,000	5	40,000	5
Lalit Agarwal	53,150	7	53,150	7
Romil Agarwal	36,600	5	36,600	5
Vaashi Agarwal	66,550	9	66,550	9
Vatsal Agarwal	38,650	5	38,650	5
The Kinshuk Agarwal Trust	1,14,250	15	1,14,250	15

S. No	Promoter name	31 March 2022		% of total shares	31 March 2021		% Change during the year*
		No. Of Shares	% of total shares		No. Of Shares	% of total shares	
1	Aashish Agarwal	30,450	4	30,450	4	-	
2	D. N. Agarwal	72,050	10	72,050	10	-	
3	Daulat Ram Agarwala	40,000	5	40,000	5	-	
4	Lalit Agarwal	53,150	7	53,150	7	-	
5	Laxmi Devi Agarwal	31,200	4	31,200	4	-	
6	Romil Agarwal	36,600	5	36,600	5	-	
7	Shalini Agarwal	5,000	1	5,000	1	-	
8	Shashi Agarwal	66,550	9	66,550	9	-	
9	Shuchita Agarwal	26,800	4	26,800	4	-	
10	Shivama Devi Agarwal	13,200	2	13,200	2	-	
11	Suyash Agarwal	26,700	4	26,700	4	-	
12	Vatsal Agarwal	38,650	5	38,650	5	-	
13	Zaheer Ram Agarwal	32,500	4	32,500	4	-	
14	Deekshamdan Agarwal HUF	41,500	6	41,500	6	-	
15	Lalit Agarwal Representative of HUF	40,250	5	40,250	5	-	
	<b>Total</b>	<b>5,54,600</b>	<b>75</b>	<b>5,54,600</b>	<b>75</b>	<b>-</b>	

\*Percentage change shall be computed with respect to the number at the beginning of the year or if issued during the year for the first time then with respect to the date of issue.

Note No 14 Reserves and surplus

	31 March 2022	31 March 2021
(a) Capital Reserve		
Opening balance	1,25,000	1,25,000
Closing balance	1,25,000	1,25,000
(b) Securities Premium Account		
Opening balance	50,00,000	50,00,000
Closing balance	50,00,000	50,00,000
(c) Other Reserves (General)		
Opening balance	8844,13,436	8448,37,641
Add: Transfer from Profit & Loss A/c	491,63,960	393,75,795
Closing balance	9335,77,396	8844,13,436
Total Reserves and surplus	9387,02,396	8895,38,436
No Share application money pending allotment		



**ADVANCE STEEL TUBES LIMITED**

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NOTES ON IND AS FINANCIAL STATEMENTS

CIN : L24231UP1978PLC004583

Particulars	Figures	
	as at 31.03.2022	as at 31.03.2021
<b>Note No. 15: Borrowings</b>		
From Bank (Secured):		
Term Loans:	-	-
Long term maturities of Finance Lease obligations**		
Vehicle Loan from Banks*	3,38,745	18,10,331
<b>Less: Current Maturity of Long Term Debt [See Note -9(a)]</b>	3,38,745	14,71,178
	-	<b>3,39,153</b>

**Additional Information**

\*Term Loan from bank secured against an exclusive charge on specified vehicles of the company on a first charge basis. Further loan repayable with in a period 36 to 60 months as per repayment schedule.

**Note No. 16: Provisions**

(a) Provision for Employee Benefits	31,43,291	32,36,546
	<b>31,43,291</b>	<b>32,36,546</b>

**Note No. 17: Deferred Tax Liabilities (Net)**

Deferred Tax Assets on Account of:		
(a) Provision for Doubtful Debts	87,44,606	86,87,026
(b) Provision for Doubtful Advances	8,25,197	8,25,197
(c) Disallowance u/s 43B of the Income Tax Act, 1961	20,37,883	17,65,830
	<b>116,07,685</b>	<b>112,78,053</b>
Deferred Tax Liabilities on account of:		
Deprecation	177,00,927	217,08,209
	177,00,927	217,08,209
<b>Deferred Tax Liabilities (Net)</b>	<b>(60,93,242)</b>	<b>(104,30,156)</b>

**Note No. 18: Borrowings**

(a) From Banks:		
Cash Credit (Secured)*	474,67,733	718,58,496
(b) Loans From related Party (Unsecured)	-	541,62,500
(c) Loan from other Parties (Unsecured)	-	-
	<b>474,67,733</b>	<b>1260,20,996</b>

**Additional Information**

\*Cash Credit from banks secured on pari-passu basis against hypothecation of inventories and book debts & fixed assets and mortgage of specified immovable properties of the company on a second pari-passu basis.

**Note No. 19: Trade Payables**

	As at	
	31-Mar-22	31-Mar-21
Trade payables	13449435	11930614
Trade payables-related parties (refer note 3)	11,328	NIL
Unbilled and accruals		
Unbilled and accruals-related parties (refer note 3)	NIL	NIL
	NIL	NIL





As per information available with the management, the dues payable to enterprises covered under "The Micro, Small and Medium Enterprises Development Act, 2006" are as follows

	For the year ended 31-Mar-22		For the year ended 31-Mar-21	
	Principal	Interest	Principal	Interest
Amount due to vendors (Including capital account payables)	-	-	-	-
Principal amount paid beyond the appointed date	-	-	-	-
Interest under normal credit terms -	-	-	-	-
Accrued and unpaid during the year	-	-	-	-
Total interest payable -	-	-	-	-
Accrued and unpaid during the year	-	-	-	-

No Declaration has been sought by the company

Particulars	Not Due	Outstanding as at 31 March 2022 from the due date of payment		
		Less than 1 year	1-2 years	2-3 years
(i) MSME	-	-	-	-
(ii) Others	-	134,60,763	-	-
(iii) Disputed dues - others	-	-	-	-
Unbilled and accruals	-	-	-	-
				Total
				134,60,763

Particulars	Not Due	Outstanding as at 31 March 2021 from the due date of payment		
		Less than 1 year	1-2 years	2-3 years
(i) MSME	-	-	-	-
(ii) Others	-	119,30,614	-	-
(iii) Disputed dues - others	-	-	-	-
Unbilled and accruals	-	-	-	-
				Total
				119,30,614



**ADVANCE STEEL TUBES LIMITED**

NOTES ON IND AS FINANCIAL STATEMENTS

TTCL

ADVANCE

CIN : 124231UP1978PLC004583

Particulars	Figures as at 31.03.2022	Figures as at 31.03.2021
<b>Note No. 20: Other Financial Liabilities</b>		
(a)(iii) Current Maturity of Long Term Debt [See Note -15]	3,38,745	14,71,178
	<u>3,38,745</u>	<u>14,71,178</u>
<b>Note No. 21: Other Current Liabilities</b>		
(a) Statutory Dues	71,49,148	30,89,520
(b) Security deposits Recd.	25,000	25,000
(c) Unclaimed dividend	41,000	41,000
(d) Credit balance of Customers	11,82,963	22,02,624
(e) Liability for Expenses	79,20,292	75,97,445
	<u>163,18,403</u>	<u>129,55,589</u>
<b>Note No. 22:</b>		
1) Provisions		
(a) Provision for Employee Benefits (Bonus)	41,81,953	31,10,793
(b) Provision for Dividend	-	-
(c) Other Provision		
-Provision for CSR (2020-21)	-	5,19,727
-Provision for Service Tax Liability	-	-
	<u>41,81,953</u>	<u>36,30,520</u>
2) Current Tax Liabilities		
(a) Provision for Income Tax	200,46,811	122,63,582
(b) Dividend Distribution Tax	-	-
	<u>200,46,811</u>	<u>122,63,582</u>



INCORPORATED AS FINANCIAL STATEMENTS  
 CIN: 1292510197871 CRR4583

Particulars	Figures	
	YEAR ENDED 31.03.2022	YEAR ENDED 31.03.2021
<b>Note No. 23: Revenue from Operations:</b>		
(a) Sale of products	95,31,42,286	68,93,46,752
(b) Sale of Services	94,05,07,56	85,03,07,54
(c) Other Operating Revenues (Export Incentives)	2,79,427	2,79,427
<b>Total</b>	<b>104,71,93,042</b>	<b>77,46,56,933</b>
	<b>104,71,93,042</b>	<b>77,46,56,933</b>

Statement Showing Turn-over for FY 2020-21 & 2021-22

Financial Year	SHR Unit	HRD Unit	MFG Sale	Waste & Scrap	Raw Mat. Sale	Trading Sale	Services	Export Incentive	Total
FY-2020-21			61,35,81,747	14,51,96,51	45,23,02,113	10,18,14,54	85,03,07,54	27,84,27	76,89,32,245
			31,77,75	5,43,59,12					57,23,68,7
FY-2021-22			83,54,67,192	15,77,52,52	40,28,73,43	57,06,05,76	94,05,07,56		104,26,81,119
				4,56,19,23					4,56,19,23
<b>Total</b>									<b>104,71,93,042</b>

**Note No. 24: Other Income:**

(a) Interest Income (TDS Rs. 1,99,379 /- Prev. Year Rs. 1,15,1,657 /-)	199,75,430	195,51,884
(b) Net gain on foreign currency transactions (other than considered as financial cost)	13,613	(43,045)
(c) Other Non operating income comprises:		
i) Rental Income	3,60,000	3,60,000
ii) EPF Subsidy	3,44,921	-
iii) Profit on Sale of assets	745,20,155	187,31,639
iv) Excess Provisions W/ Back (Net)	93,255	13,12,769
v) Miscellaneous Income	11,390	5,53,567
<b>Total</b>	<b>953,18,764</b>	<b>404,65,814</b>



**ADVANCE STEEL TUBES LIMITED**

ADVANCE

**NOTES ON IND AS FINANCIAL STATEMENTS**

CIN : L24231UP1978PLC004583

Particulars	Figures	
	YEAR ENDED	YEAR ENDED
	31.03.2022	31.03.2021
<b>Note No. 25: Cost of Materials Consumed:</b>		
(a) Opening Stock	937,36,214	1055,61,963
(b) Add: Purchases During the Year	7918,98,863	5493,82,242
	<b>8856,35,077</b>	<b>6549,44,205</b>
(c) Less: Closing Stock	878,03,488	937,36,214
<b>Consumption</b>	<b>7978,31,589</b>	<b>5612,07,991</b>
<b>Additional Information:</b>		
<b>Product Wise Break -Up of Consumption</b>		
H.R. Coil	4819,06,195	4328,72,341
Zinc	783,04,145	359,96,133
Black Pipe	1906,17,341	442,24,012
Socket	20,10,752	24,26,599
Other Raw Material	449,93,156	456,88,906
	<b>7978,31,589</b>	<b>5612,07,991</b>

**Note No. 26: Purchase of Traded Goods:**

(a) Purchases During the Year	530,38,139	95,82,216
	<b>530,38,139</b>	<b>95,82,216</b>

**Note No. 27: Changes in inventories of finished goods, work-in-progress and stock-in-trade:**

(1) Inventories at the beginning of the year:		
(a) Work-in-Progress	-	-
(b) Finished Goods	511,74,076	672,88,055
(c) Stock-in-Trade	-	-
(2) Inventories at the end of the year:		
(a) Work-in-Progress	-	-
(b) Finished Goods	577,20,922	511,74,076
(c) Stock-in-Trade	-	-
<b>(Increase)/Decrease during the year</b>	<b>(65,46,846)</b>	<b>161,13,979</b>

**Note No. 28: Employees Benefit Expenses**

(a) Salaries & Wages#	630,77,815	563,39,190
(b) Contributions to provident and other funds*	40,43,452	33,50,909
(c) Staff welfare expenses **	35,90,341	18,77,046
	<b>707,11,608</b>	<b>615,67,145</b>

**Additional Information**

# Salaries and wages include: Salaries, wages, bonus, compensated absences and all other amounts payable to employees in respect of services rendered as per their employment terms under a contract of service / employment.

Employee would deem to include directors, in full time or part time employment of the Company, but would exclude directors who are not under a contract of employment with the Company.

\* Contribution to provident fund and other funds would include contributions to other funds like gratuity fund, etc. Pertaining to employees. Contributions to ESIC, Labour Welfare Fund and other such funds where the benefit an employee derives is not directly linked to the contributions made on his behalf are to be grouped as part of Staff welfare expenses.

Penalties and other similar amounts paid to the statutory authorities are not in the nature of contribution hence not be included above.

\*\* Staff welfare expenses include accrual for post-employment medical benefits, ESIC, Labour Fund, etc.



## NOTES ON IND AS FINANCIAL STATEMENTS

CIN : L24231UP1978PLC004583

Particulars	Figures	
	YEAR ENDED	YEAR ENDED
	31.03.2022	31.03.2021
<b>Note No. 29: Finance Cost</b>		
(a) Interest Expense on Borrowings		
(i) Interest on borrowings	26,72,808	14,29,186
a) Banks	26,72,808	
b) Other Parties		
(ii) Others interest	40,45,172	68,66,135
	67,17,980	82,95,321
(b) Other Borrowing Costs*	18,95,937	150,27,764
	<b>86,13,917</b>	<b>233,23,085</b>

**Additional Information**

\*Other borrowing costs would include commitment charges, loan processing charges, guarantee charges, loan facilitation charges, discounts / premiums on borrowings, other ancillary costs incurred in connection with borrowings or amortisation of such costs, etc.

**Note No. 30: Other Expenses**

(a) Consumption of stores and spare parts	189,79,979	186,45,661
(b) Power & Fuel	338,56,616	274,87,812
(c) Rent	23,98,545	12,00,000
(d) Repair & Maintenance - Building	44,30,394	7,51,790
(e) Repair & Maintenance - Plant & Machinery	16,21,243	15,75,243
(f) Insurance Expenses	2,98,411	3,58,599
(g) Rates & Taxes	27,29,936	16,44,628
(h) <b>Other Miscellaneous Expenses</b>		
(i) Job/Erection Charges	58,48,691	78,97,545
(ii) Carriage Inward	7,13,743	12,56,902
(iii) Testing, Inspection & ISI Marking Fee	5,15,505	9,86,408
(iv) Freight Outward	117,35,647	97,05,769
(v) Commission & Brokerage	23,60,282	13,55,208
(vi) Claims & Shortage	350,22,532	5,53,697
(vii) Rebate & Discount	-	10,834
(viii) Packing Expenses	39,00,422	23,67,101
(ix) Advertisement & Publicity	17,640	46,683
(x) Sales Promotion expenses	3,75,485	2,51,594
(xi) Traveling Expenses	10,58,411	2,69,947
(xii) Vehicle Running, Maintenance & Conveyance Expenses	32,56,808	30,71,493
(xiii) Electricity Expenses	5,79,190	31,260
(xiv) Printing & Stationery	3,32,298	3,53,204
(xv) Other Repairs	13,03,499	15,49,915
(xvi) Postage & Telephones	6,77,562	7,59,906
(xvii) Auditor's Remuneration		
- Audit Fee	2,20,000	2,20,000
- Tax Audit Fees	35,000	35,000
- Certification	35,000	35,000
- Cost Audit Fees	90,000	90,000
(xviii) Legal & Professional Charges	10,79,237	11,90,118
(xix) Finance Charges on Lease	1,01,591	-
(xx) Assets Discarded	1,08,029	-
(xxi) Miscellaneous Expenses	7,62,835	4,83,947
(xxii) Charity & Donation	10,200	-
(xxiii) Miscellaneous Balance W/off.	4,93,783	5,49,697
(xxiv) Share of loss from partnership firm (Net)	64,98,914	(83,62,978)
(xxv) Prior Period Expenses	5,83,303	-
(xxvi) -Provisions for Doubtful Debts written off.	2,06,969	1,19,385
(xxvii) -Provisions for Doubtful Advance written off.		
(xxviii) Short Term loss on Fixed Assets		
	22,93,981	2,24,211
	<b>1445,31,681</b>	<b>767,15,579</b>

**Note No. 31: Earning per Equity Share**

(a) Net profit as per Profit & Loss statement	491,63,960	395,75,795
(b) Weighted average number of share of Rs. 10/- each end of the year	7,40,000	7,40,000
	66	53



**Regulatory Disclosure**

**Title deeds of Immovable Properties not held in name of the Company**  
Provide the details of all the immovable property (other than properties where the Company is the lessee and the lease agreements are duly executed in favour of the lessee) whose title deeds are not held in the name of the company in format given above.

31 March 2022

Relevant line item in the Balance sheet	Description of item of property	Gross carrying value	Title deeds held in the name of	If held jointly (Name and Company's Share)	Whether title deed holder is a promoter, director or relative of promoter/director or employee of promoter/director	Property held since which date	Reason for not being held in the name of the company
Building	BUILDING (Sancharjanga Build.)	5,34,339	Lalit Agarwal	NA	Mr. Lalit Agarwal is Director & Promoter	1993	Since deal was initiated by Mr. Lalit, further Only Company is Sole Beneficial owner of this PPE

31 March 2021

Relevant line item in the Balance sheet	Description of item of property	Gross carrying value	Title deeds held in the name of	If held jointly (Name and Company's Share)	Whether title deed holder is a promoter, director or relative of promoter/director or employee of promoter/director	Property held since which date	Reason for not being held in the name of the company
Building	BUILDING (Sancharjanga Build.)	5,34,339	Lalit Agarwal	NA	Mr. Lalit Agarwal is Director & Promoter	1993	Since deal was initiated by Mr. Lalit, further Only Company is Sole Beneficial owner of this PPE

If the Company has revalued the Property, Plant and Equipment (including Right-of-Use Assets) then the following will be included-  
Revaluation of Property, Plant and Equipment (including Right-of-Use Assets) has not been carried out.

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The following disclosures shall be made where Loans or Advances in the nature of loans are granted to promoters, directors, KMPs and the related parties (as defined under Companies Act, 2013), either severally or jointly with any other person, that are:

Type of Borrower [The relationship should be considered on the date of loan]	Loans/Advances granted Individually or jointly with other. (Individually / jointly)*	Repayable on demand (Yes / No)	Terms/Period of repayment is specified (Yes/No)	31 March 2022		31 March 2021	
				Amount outstanding as at the balance sheet date [Shall include details of loan & advance in the nature of loan (The amount outstanding should be the gross carrying amount (without netting the provision for doubtful debts or impairment loss allowance) included by the company in its respective balance sheet]	% of Total [Shall represent Percentage to total loan & advance in the nature of loan]	Amount outstanding [Shall include details of loan & advance in the nature of loan]	% of Total [Shall represent Percentage to total loan & advance in the nature of loan]
Related Parties	Phir Panchal Construction Pvt Ltd	Yes	No	392,81,504.00	75%	635,24,928.00	93%
	Advance Infra Solution (P) Ltd.	Yes	No	74,21,137.00	14%	74,21,137.00	10%
	TSL Piping Solution (P) Ltd.	Yes	No	56,50,000.00	11%	-	0%
Total of Loan and Advances in the nature of Loan [Refer Note-4 (2)]				523,52,641.00	100%	709,46,065.00	100%



**ADVANCE STEEL TUBES LIMITED**

ADVANCE

NOTES ON IND AS FINANCIAL STATEMENTS

CIN : L24231UP1978PLC004583



**Regulatory Disclosure**

**Details of Benami Property held**

The Company does not have any Benami property, where any proceeding has been initiated or pending against the company for holding any Benami property.

**Reconciliation of quarterly returns or statements of current assets filed with banks or financial institutions**

#####

Quarter	Name of bank	Particulars of Securities Provided	Amount as per books of account	Amount as reported in the quarterly return/ statement	Amount of difference	Reason for material discrepancies
Jun-21	FBL Bank	75 % OF (STOCK - CREDITORS)	1079,30,555	1151,68,444	(72,37,889)	SENT THE DATA ON PROVISIONAL BASIS, BUT AT THE OF QUARTERLY RESULT DATA GOT CHANGED
		60 % DEBTORS	577,47,716	425,30,634	152,17,082	
		TOTAL	1656,78,270	1576,99,078	79,79,193	
	HDFC BANK	STOCK - CREDITORS	1079,30,555	1151,68,444	(72,37,889)	SENT THE DATA ON PROVISIONAL BASIS, BUT AT THE OF QUARTERLY RESULT DATA GOT CHANGED
		DEBTORS	577,47,716	425,30,634	152,17,082	
		TOTAL	1656,78,270	1576,99,078	79,79,193	
Sep-21	FBL Bank	75 % OF (STOCK - CREDITORS)	1248,01,871	1246,56,181	1,45,690	SENT THE DATA ON PROVISIONAL BASIS, BUT AT THE OF QUARTERLY RESULT DATA GOT CHANGED
		60 % DEBTORS	747,11,484	740,07,060	7,04,424	
		TOTAL	1995,13,355	1986,63,241	8,50,114	
	HDFC BANK	STOCK - CREDITORS	1248,01,871	1246,56,181	1,45,690	SENT THE DATA ON PROVISIONAL BASIS, BUT AT THE OF QUARTERLY RESULT DATA GOT CHANGED
		DEBTORS	747,11,484	740,07,060	7,04,424	
		TOTAL	1995,13,355	1986,63,241	8,50,114	
Dec-21	FBL Bank	STOCK - CREDITORS	1145,57,809	1116,78,354	28,79,455	SENT THE DATA ON PROVISIONAL BASIS, BUT AT THE OF QUARTERLY RESULT DATA GOT CHANGED
		DEBTORS	696,63,845	704,26,015	(7,62,170)	
		TOTAL	1842,21,654	1821,04,369	21,17,285	
	HDFC BANK	STOCK - CREDITORS	1145,57,809	1116,78,354	28,79,455	SENT THE DATA ON PROVISIONAL BASIS, BUT AT THE OF QUARTERLY RESULT DATA GOT CHANGED
		DEBTORS	696,63,845	704,26,015	(7,62,170)	
		TOTAL	1842,21,654	1821,04,369	21,17,285	
Mar-22	FBL Bank	STOCK - CREDITORS	1040,03,348	1029,44,780	10,58,567	SENT THE DATA ON PROVISIONAL BASIS, BUT AT THE OF QUARTERLY RESULT DATA GOT CHANGED
		DEBTORS	1223,41,865	1000,86,328	222,55,537	
		TOTAL	2263,45,212	2030,31,108	233,14,104	
	HDFC BANK	STOCK - CREDITORS	1040,03,348	1029,44,780	10,58,567	SENT THE DATA ON PROVISIONAL BASIS, BUT AT THE OF QUARTERLY RESULT DATA GOT CHANGED
		DEBTORS	1223,41,865	1000,86,328	222,55,537	
		TOTAL	2263,45,212	2030,31,108	233,14,104	

**Wilful Defaulter**

The company has NOT been declared a wilful defaulter (as defined by RBI Circular)

**Relationship with Struck off Companies under section 248 of the Companies Act, 2013 or section 560 of Companies Act, 1956,**

The Company does not have any transactions with companies struck off under section 248 of the Companies Act, 2013 or section 560 of Companies Act, 1956,

**Registration of charges or satisfaction with Registrar of Companies**

The Company does not have any charges or satisfaction which is yet to be registered with ROC beyond the statutory period.

**Compliance with number of layers of companies**

The company has complied with the number of layers prescribed under clause (87) of section 2 of the Act read with the Companies

**Compliance with approved Scheme(s) of Arrangements**

The Company has NOT entered into any scheme of arrangement



**ADVANCE STEEL TUBES LIMITED**

ADVANCE

NOTES ON IND AS FINANCIAL STATEMENTS

CIN : L24231UP1978PLC004583

**Regulatory Disclosure**

**Utilisation of Borrowed funds and share premium:**

(i) The Company has not advanced or loaned or invested funds to any other person(s) or entity(ies), including foreign entities (Intermediaries) with the understanding that the Intermediary shall:

- (a) directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the company (Ultimate Beneficiaries) or
- (b) provide any guarantee, security or the like to or on behalf of the Ultimate Beneficiaries

(ii) The Company has not received any fund from any person(s) or entity(ies), including foreign entities (Funding Party) with the understanding (whether recorded in writing or otherwise) that the Company shall:

- (a) directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party (Ultimate Beneficiaries) or
- (b) provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.

**Undisclosed income**

The Company does not have any undisclosed income which is not recorded in the books of account that has been surrendered or disclosed as income during the year (previous year) in the tax assessments under the Income Tax Act, 1961 (such as, search or survey or any other relevant provisions of the Income Tax Act, 1961.

**Corporate Social Responsibility**

As per Section 135 of the Companies Act, 2013, a company, meeting the applicability threshold, needs to spend at least 2% of its average net profit for the immediately preceding three financial years on corporate social responsibility (CSR) activities. A CSR committee has been formed by the company as per the Act. The funds are utilized through the year on these activities which are specified in Schedule VII of the Companies Act, 2013.

A. Particulars	31-Mar-22	31-Mar-21
Gross Amount required to be spent as per Section 135 of the Act	11,38,127.00	8,24,700.00
Add: Amount Unspent from previous years	5,19,727.00	-
<b>Total Gross amount required to be spent, during the year</b>	<b>16,57,854.00</b>	<b>8,24,700.00</b>

B. Amount approved by the Board to be spent during the year	17,00,000.00	3,04,973.00
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C. Amount spent during the year on	31-Mar-22	31-Mar-21
(i) Construction/acquisition of an asset	-	-
(ii) On purposes other than (i) above	17,00,000.00	3,04,973.00

D. Particulars	31-Mar-22	31-Mar-21
Contribution to Mata Krishnawati Memorial Trust	11,80,273.00	-
Spent on welfare activities	-	-
Contribution to RNB GLOBAL (EDU. UNIV.)	-	3,04,973.00
Accrual towards unspent obligations in relation to:	-	5,19,727.00
Contribution to Mata Krishnawati Memorial Trust	5,19,727.00	-
Ongoing projects	-	-
Other than Ongoing projects	-	-
<b>TOTAL</b>	<b>17,00,000.00</b>	<b>8,24,700.00</b>
EXCESS PAYMENT	42,145.00	-
SHORT PAYMENT	-	-5,19,727.00

E. Particulars	March 31, 2022	March 31, 2021
Amount Required to be spent by the Company during the year	16,57,854.00	8,24,700.00
Actual Amount Spent by the Company during the year	17,00,000.00	3,04,973.00
Shortfall at the end of the year	-	5,19,727.00
Total of previous years shortfall	-	-
Reason for shortfall - State reasons for shortfall in expenditure	-	-

**Details of Crypto Currency or Virtual Currency**

The Company has not traded or invested in Crypto currency or Virtual Currency during the financial year.

**Commitments and contingent liabilities**

PARTICULARS	As at	
	31-Mar-22	31-Mar-21
(i) Capital and other commitments		
Capital commitments		
Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances)		
(ii) Contingent liabilities	131,43,635.00	131,43,636.00





**SIGNIFICANT ACCOUNTING POLICIES & NOTES TO ACCOUNTS**

(Annexed to forming part of the accounts for the year ended **31<sup>st</sup> March 2022**)

**NOTE NO. 1 - NATURE OF OPERATION****1.1 Company Overview**

Advance Steel Tubes Limited ("the Company") is a listed entity incorporated in India and is incorporated under the provisions of the Companies Act applicable in India. Having its registered office at 45/3 sight -4 industrial area Sahibabad, Ghaziabad India, having CIN: **L24231UP1978PLC004583**

The company has been engaged primarily in the business of manufacture and sale of Steel Products. The Company has its manufacturing facilities in India and sells products in India & Abroad. We declare with conviction that the company as its foreseeable life in.

**1.2 Basis of preparation****a) Statement of Compliance**

These financial statements are prepared in accordance with Indian Accounting Standards (IND AS) notified under Section 133 of the Companies Act, 2013 ('the Act') read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015, and presentation requirements of Schedule III to the Act under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair value.

Accounting policies have been consistently applied except where a newly issued accounting standard is initially adopted or a revision to an existing accounting standard requires a change in the accounting policy hitherto in use.

**b) Basis of measurement**

The Financial Statements are prepared under the historical cost convention on accrual basis of accounting in accordance with generally accepted accounting principles, unless otherwise stated and comply with the accounting standard referred to in section 133 of the Companies Act 2013 read with rule 7 of company (Accounts) Rules 2014 to the extent applicable.

The amendment to IND AS 102 provides specific guidance to measurement of cash-settled awards, modification of cash-settled awards and awards that include a net settlement feature in respect of withholding taxes.

It clarifies that the fair value of cash-settled awards is determined on a basis consistent with that used for equity settled awards. Market-based performance conditions and non-vesting conditions are reflected in the 'fair values', but non-market performance conditions and service vesting conditions are reflected in the estimate of the number of awards expected to vest. Also, the amendment clarifies that if the terms and conditions of a cash-settled share based payment transaction are modified with the result that it becomes an equity-settled share-based payment transaction, the transaction is accounted for as such from the date of the modification. Further, the amendment requires the award that includes a net settlement feature in respect of withholding taxes to be treated as equity-settled in its entirety. The cash payment to the tax authority is treated as if it was part of an equity settlement.

The requirements of the amendment have no impact on the financial statements as the standard is not applicable to the Company.



**c) Use of Estimates**

In the preparation of the financial statements, the management of the company makes estimates and assumptions in conformity with the applicable accounting principles in India that affect the reported balance of assets & liabilities and disclosures relating to contingent assets and liabilities as at the date of the financial statements and reported amounts of income and expenses during the period. Examples of such estimates include provisions for doubtful debts, future obligations under employee's retirement benefit plans, income taxes, the useful lives of fixed assets and intangible assets and estimates for recognizing impairment losses.

These estimates could change from period to period and also the actual results could vary from the estimates. Appropriate changes are made to the estimates as the management becomes aware of changes in circumstances surrounding these estimates. The changes in estimates are reflected in the financial statements in the period in which changes are made and, if material their effects are disclosed in the notes to the financial statements.

**d) Critical accounting judgments' and key sources of estimation uncertainty**

The preparation of the financial statements in conformity with the IND AS requires management to make judgments, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities and disclosures as at date of the financial statements and the reported amounts of the revenues and expenses for the years presented. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates under different assumptions and conditions.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

**Critical Judgments** In the process of applying the Company's accounting policies, management has made the following judgments, which have the most significant effect on the amounts recognized in the financial statements:

**Discount rate used to determine the carrying amount of the Company's defined benefit obligation and Lease Hold Lands:** In determining the appropriate discount rate for plans operated in India, the management considers the interest rates of government bonds in currencies consistent with the currencies of the post-employment benefit obligation.

**Contingences and commitments:** In the normal course of business, contingent liabilities may arise from litigations and other claims against the Company. Where the potential liabilities have a low probability of crystallizing or are very difficult to quantify reliably, company treat them as contingent liabilities. Such liabilities are disclosed in the notes but are not provided for in the financial statements. Although there can be no assurance regarding the final outcome of the legal proceedings, company do not expect them to have a materially adverse impact on the financial position or profitability.

**Key sources of estimation uncertainty**

The key assumptions concerning the future, and other key sources of estimation uncertainty at the end of the reporting period, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year are discussed below:



**Income taxes:** The Company's tax jurisdiction is India. Significant judgments are involved in determining the provision for income taxes, including amount expected to be paid / recovered for uncertain tax positions.

**Useful lives of property, plant and equipment:** As described in Note 3.8, the Company reviews the estimated useful lives and residual values of property, plant and equipment at the end of each reporting period. During the current financial year, the management determined that there were no changes to the useful lives and residual values of the property, plant and equipment.

**Allowances for doubtful debts:** The Company makes allowances for doubtful debts based on an assessment of the recoverability of trade and other receivables. The identification of doubtful debts requires use of judgment and estimates.

**e) Operating Cycle and Current versus non-current classification**

The Company presents assets and liabilities in the balance sheet based on current/ non-current classification in accordance with Part-I of Division- II of Schedule III of the Companies Act, 2013.

An asset is treated as current when it (a) Expected to be realized or intended to be sold or consumed in normal operating cycle; (b) Held primarily for the purpose of trading; or (c) Expected to be realized within twelve months after the reporting period, or (d) The asset is cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period. All other assets are classified as non-current.

A liability is current when (a) It is expected to be settled in normal operating cycle; or (b) It is held primarily for the purpose of trading; or (c) It is due to be settled within twelve months after the reporting period, or (d) There is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period. Terms of a liability that could, at the option of the counterparty, results in its settlement by the issue of equity instruments do not affect its classification. The Company classifies all other liabilities as non-current.

The operating cycle is the time between the acquisition of assets for processing and their realization in cash and cash equivalents. The Company has identified twelve months as its normal operating cycle.

**NOTE NO. 2 – SIGNIFICANT ACCOUNTING POLICIES**

**2.1 Revenue recognition**

Revenue is recognized to the extent that it is probable that the economic benefits will flow to the Company and the revenue can be reliably measured, regardless of when the payment is being made. Revenue is measured at the fair value of the consideration received or receivable, taking into account contractually defined terms of payment inclusive of excise duty and net of returns, trade allowances, rebates excluding GST as collected on behalf of third party & Government.

**Sale of Goods** Revenue from the sale of goods is recognized when the goods are delivered and titles have passed, at which time all the following conditions are satisfied:

The Company has transferred to the buyer the significant risks and rewards of ownership of the goods;

The Company retains neither continuing managerial involvement to the degree usually associated with ownership nor effective control over the goods sold;



The amount of revenue can be measured reliably;

It is probable that the economic benefits associated with the transaction will flow to the Company; and the Costs incurred or to be incurred in respect of the transaction can be measured reliably.

**Interest income** Interest income is accrued on a time basis, by reference to the principal outstanding and at the effective interest rate applicable.

**Dividends** Dividend income from investments is recognized when the Company's right to receive the payment is established, which is generally when shareholders approve the dividend.

## 2.2 Segment Reporting

Operating segments are defined as components of an enterprise for which discrete financial information is available that is evaluated regularly by the chief operating decision maker, in deciding how to allocate resources and assessing performance. Thus, the Company's business falls under one operational segments i.e. Steel Products,

## 2.3 Foreign Currencies

**Functional currency:** The functional currency of the Company is the Indian rupee.

**Transactions and translations:** Foreign currency transactions are translated into the functional currency using the exchange rates at the dates of the transactions. Foreign-currency-denominated monetary assets and liabilities are translated into the relevant functional currency at exchange rates in effect at the Balance Sheet date. The gains or losses resulting from such translations are included in net profit in the Statement of Profit and Loss. Non-monetary assets and non-monetary liabilities denominated in a foreign currency and measured at fair value are translated at the exchange rate prevalent at the date when the fair value was determined. Non-monetary assets and non-monetary liabilities denominated in a foreign currency and measured at historical cost are translated at the exchange rate prevalent at the date of the transaction.

Transaction gains or losses realized upon settlement of foreign currency transactions are included in determining net profit for the period in which the transaction is settled. Revenue, expense and cash flow items denominated in foreign currencies are translated into the relevant functional currencies using the exchange rate in effect on the date of the transaction.

## 2.4 Property, plant and equipment

Property, plant and equipment (PPE) are initially recognized at cost. The initial cost of PPE comprises its purchase price, including non-refundable duties and taxes net of any trade discounts and rebates. The cost of PPE includes interest on borrowings (borrowing cost) directly attributable to acquisition, construction or production of qualifying assets subsequent to initial recognition, PPE are stated at cost less accumulated depreciation (other than leased land, which are stated as per IND-AS 116) and impairment losses, if any.

There are prescribed fair value method and cost method. The basis of cost method is being carried on for the valuation of PPE (other than leasehold land)

### Leasehold Land

There are prescribed two types of lease, Financial and operating. AS newly inserted in IND-AS-116. The operating lease from the point of view of lessee and lesser, the discounting of lease rental need to done, however if the lease period is not more than one year, discounting is not required.



Further the carrying value the leasehold land shall be taken as Right to Use for the purpose of IND-AS 116 thereby all leasehold assets whether operating or financial shall be treated in equal manner.

Subsequent costs are included in the asset's carrying amount or recognized as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Company and the cost of the item can be measured reliably. The carrying amount of any component accounted for as a separate asset is de-recognized when replaced. All other repairs and maintenance are charged to profit or loss during the reporting period in which they are incurred.

Depreciation is recognized so as to write off the cost of assets (other than freehold land and capital work in progress) less their residual values over the useful lives, using the straight-line method ("SLM") in the manner prescribed in Schedule II of the Act. Management believes based on a technical evaluation (which is based on technical advice, taking into account the nature of the asset, the estimated usage of the asset, the operating conditions of the asset, past history of replacement, anticipated technological changes, manufacturers warranties and maintenance support, etc.) that the useful lives of the assets as considered by the company reflect the periods over which these assets are expected to be used.

The carrying values of property, plant and equipment are reviewed for impairment when events or changes in circumstances indicate that the carrying value may not be recoverable.

The residual values, useful life and depreciation method are reviewed at each financial year-end to ensure that the amount, method and period of depreciation are consistent with previous estimates and the expected pattern of consumption of the future economic benefits embodied in the items of property, plant and equipment.

An item of property, plant and equipment is de-recognized upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on disposal or retirement of an item of property, plant and equipment is determined as the difference between sales proceeds and the carrying amount of the asset and is recognized in profit or loss. Fully depreciated assets still in use are retained in financial statements.

## 2.5 Financial Assets, Financial Liabilities & Equity INS-AS 32, 107 and 109

The advance to employee are capped not to exceed not three months' salary and no interest is charged. The advance are recoverable within one year

## 2.6 Capital work-in-progress and intangible assets under development

Capital work-in-progress/intangible assets under development are carried at cost, comprising direct cost, related incidental expenses and attributable borrowing cost.

## 2.7 Income tax

Income tax expense comprises current tax expense and the net change in the deferred tax asset or liability during the year. Current and deferred taxes are recognized in Statement of Profit and Loss, except when they relate to items that are recognized in other comprehensive income or directly in equity, in which case, the current and deferred tax are also recognized in other comprehensive income or directly in equity, respectively.

**Current tax:** Current tax is measured at the amount of tax expected to be payable on the taxable income for the year as determined in accordance with the provisions of the Income Tax Act, 1961. Current tax assets and current tax liabilities are offset when there is a legally enforceable right to set off the recognized amounts and there is an intention to settle the asset and the liability on a net basis.



**Deferred tax:** Deferred income tax is recognized using the Balance Sheet approach. Deferred income tax assets and liabilities are recognized for deductible and taxable temporary differences arising between the tax base of assets and liabilities and their carrying amount, except when the deferred income tax arises from the initial recognition of an asset or liability in a transaction that is not a business combination and affects neither accounting nor taxable profit or loss at the time of the transaction.

Deferred tax assets are recognized only to the extent that it is probable that either future taxable profits or reversal of deferred tax liabilities will be available, against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilized. The carrying amount of a deferred tax asset is reviewed at the end of each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred income tax asset to be utilized.

Deferred tax assets and liabilities are measured using the tax rates and tax laws that have been enacted or substantively enacted by the end of the reporting period and are expected to apply when the related deferred tax asset is realized or the deferred tax liability is settled. Deferred tax assets and liabilities are offset when there is a legally enforceable right to set current tax assets and liabilities and when the deferred tax balances relate to the same taxation authority.

## 2.8 Impairment of assets

**Financial assets:** The Company assesses on a forward looking basis the expected credit losses associated with its financial assets. The impairment methodology applied depends on whether there has been a significant increase in credit risk. For trade receivables only, the Company applies the simplified approach permitted by IND AS 109 Financial Instruments, which requires expected lifetime losses to be recognized from initial recognition of the receivables.

**PPE and intangibles assets:** Property, plant and equipment and intangible assets with finite life are evaluated for recoverability whenever there is any indication that their carrying amounts may not be recoverable. If any such indication exists, the recoverable amount (i.e. higher of the fair value less cost to sell and the value-in-use) is determined on an individual asset basis unless the asset does not generate cash flows that are largely independent of those from other assets. In such cases, the recoverable amount is determined for the cash-generating unit (CGU) to which the asset belongs.

If the recoverable amount of an asset (or CGU) is estimated to be less than its carrying amount, the carrying amount of the asset (or CGU) is reduced to its recoverable amount. An impairment loss is recognized in the Statement of Profit and Loss.

## 2.9 Cash and cash equivalents

For the purpose of presentation in the statement of cash flows, cash and cash equivalents includes cash on hand, deposits held at call with financial institutions, other short-term, highly liquid investments with original maturities of three months or less that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value.

## 2.10 Provisions and Contingent Liabilities:

Provisions are recognized 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. Provisions are measured at the best estimate of the expenditure required to settle the present obligation at the Balance Sheet date.



If the effect of the time value of money is material, provisions are discounted to reflect its present value using a current pre tax rate that reflects the current market assessments of the time value of money and the risks specific to the obligation. When discounting is used, the increase in the provision due to the passage of time is recognized as a finance cost.

Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle the obligation or a reliable estimate of the amount cannot be made.

### **2.11 Inventories**

Inventories are valued at lower of cost on FIFO basis and net realizable value after providing for obsolescence and other losses, where considered necessary. Cost includes all charges in bringing the goods to their present location and condition, including octroi and other levies, transit insurance and receiving charges. Work-in-progress and finished goods include appropriate proportion of overheads and, where applicable, excise duty. Net realizable value is the estimated selling price in the ordinary course of business, less the estimated costs of completion and the estimated costs necessary to make the sale.

### **2.12 Borrowing costs**

General and specific borrowing costs (including exchange differences arising from foreign currency borrowing to the extent that they are regarded as an adjustment to interest cost) that are directly attributable to the acquisition, construction or production of a qualifying asset are capitalized during the period of time that is required to complete and prepare the asset for its intended use or sale. Qualifying assets are assets that necessarily take a substantial period of time to get ready for their intended use or sale.

Investment income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalization. Other borrowing costs are expensed in the period in which they are incurred.

### **2.13 Employee Benefits**

Employee benefits consist of contribution to Employees State Insurance, Provident Fund, Gratuity Fund and Compensated Absences.

#### **Post-employment benefit plans**

##### **Defined Contribution plans**

Contributions to defined contribution schemes such as employees' state insurance, labour welfare fund, employee pension scheme etc. are charged as an expense based on the amount of contribution required to be made as and when services are rendered by the employees. Company's provident fund contribution is made to a government administered fund and charged as an expense to the Statement of Profit and Loss. The above benefits are classified as Defined Contribution Schemes as the Company has no further defined obligations beyond the monthly contributions.

**Defined benefit plans**

The Company operates defined benefit plan in the form of gratuity and compensated absence. The liability or asset recognized in the balance sheet in respect of its defined benefit plans is the present value of the defined benefit obligation at the end of the reporting period. The defined benefit obligation is calculated annually by actuaries using the projected unit credit method. The present value of the said obligation is determined by discounting the estimated future cash out flows, using market yields of government bonds that have tenure approximating the tenures of the related liability.

The interest expenses are calculated by applying the discount rate to the net defined benefit liability or asset. The net interest expense on the net defined benefit liability or asset is recognised in the Statement of Profit and loss.

Re-measurement gains and losses arising from experience adjustments and changes in actuarial assumptions are recognized in the period in which they occur, directly in other comprehensive income. They are included in retained earnings in the Statement of Changes in Equity and in the Balance Sheet.

Changes in the present value of the defined benefit obligation resulting from plan amendments or curtailments are recognized immediately in profit or loss as past service cost.

The classification of the company's net obligation into current and non-current is as per the actuarial valuation report.

**2.14 Earnings per share (EPS)**

Basic EPS is computed by dividing the profit or loss attributable to the equity shareholders of the Company by the weighted average number of Ordinary shares outstanding during the year. Diluted EPS is computed by adjusting the profit or loss attributable to the ordinary equity shareholders and the weighted average number of ordinary equity shares, for the effects of all dilutive potential Ordinary shares.

**2.15 Depreciation**

Depreciation is charged on straight-line method (SLM) at the rates prescribed under Schedule-II of the Companies Act, 2013. Where, during any financial year, any addition has been made to any asset, or where any asset has been sold, discarded, demolished or destroyed, the depreciation on such assets is calculated on a pro-rata basis from the date of such addition or, as the case may be, up-to the date on which such asset has been sold discarded, demolished or destroyed.

**2.16 Investments**

Investments are carried at the lower of cost or quoted / fair value, computed category wise. Long-term investments are stated at cost. Provision for diminution in the value of the long-term investments is made only if such decline is other than temporary in the opinion of the management.

**2.17 Investments Properties**

The property is held for long term rentals else or for capital appreciation or both, and that is not occupied by the company is classified as investment property, investment property is measured at its cost, including related transaction cost





**2.18 Joint Venture / Investment in Partnership Firm**

Interest in jointly controlled entity is accounted for as an investment in accordance with Indian Accounting Standard IND-AS 28 Accounting for Investment in associate or joint venture. The equity method is applied and net profit or loss are to be accounted through FVTOCI. Further there an exception to the equity method which is non-existent or future sale out of controlling interest.

**2.19 Dividend to Equity**

Dividend paid /payable shall be recognized in the year in which the related dividends are paid by shareholders or board of directors as appropriate.

**2.20 Financial Instruments:-****a) Initial recognition and measurement**

Financial Instruments are recognized at its fair value plus or minus transaction costs that are attributable to the acquisition or issue of the financial instruments.

**2.21 Non-Current Assets (or disposal groups) held for sale**

Non-current assets (or disposal groups) are classified as assets held for sale when their carrying amount is to be recovered principally through a sale transaction and a sale is considered highly probable only when the asset or disposal group is available for immediately sale in its present condition, it is unlikely the sale will be withdrawn and sale is expected within one year from the date of the classification. Disposal group classified held for sale are stated at the lower of carrying amount and fair value less costs to sell. Property Plant and equipment and intangible assets are not depreciated or amortized once classified as held for sale. Assets and liabilities classified as held for sale are presented separately in the statement of financial position.

If the criteria stated by IND AS 105 "Non-current Assets Held for Sale and Discontinued Operations" are no longer met the disposal group ceases to be classified as held for sale. Non-current asset that ceases to be classified as held for sale are measured at the lower of

- (i) Its carrying amount before the asset was classified as held for sale, adjusted for depreciation that would have been recognized had that asset not been classified as held for sale, and
- (ii) Its recoverable amount at the date when the disposal group ceases to be classified as held for sale.

**2.22 Recently issued accounting pronouncements:**

On 23 March 2022, the MCA, Notified Companies (Indian Accounting Standards) Amendments Rules, 2022 effective from 1 April 2022. Following is the key amended provision which may have an impact on the standalone financial statements of the companies:

- (i) Onerous Contracts Cost of fulfilling a contract (Amendment to IND AS 37)
- (ii) The amendment clarify that the cost of fulfilling a contract' comprise both the incremental costs and allocation of other direct costs. The company does not expect the adoption of this update to have a material impact on its standalone financial statements.

## NOTE NO. 32 - OTHER INFORMATION / DISCLOSURE

## 1. Contingent Liabilities

A.	Current Year (Amount in ₹)	Previous Year (Amount in ₹)
Bank Guarantees	73,790,097	67,617,554

- B. In the matter of Sale Tax / Central Sale Tax / VAT / Central Excise / Service Tax & Income Tax where the respective disputes have created demand has been provided for and the company has preferred appeal against the said demand at the appropriate authority pending for hearing or orders. The management is of the view that there shall be no demand.
- C. The Company has taken the EPC Project of UPPTCL through PNC infratech Limited & A2Z Maintenance & Engineering Services Limited. As per the terms of agreement UPPTCL has retained ₹ 39,277,120/- as penalty from time to time out of running payments due to delay in completing the project caused by hampering by land owners from where transmission lines are passing. The company has already applied for the extension of time and is expected to get the time extension and expect no penalties shall be finally levied because of the above.
- D. Rs. 5,067,045/- is due from HPSEB for which arbitration tribunal proceeding are continued with Sh. Sunil Kumar Sharma-Shimla (HP) since 3 year. The company expects to recover the money. The above amount is kept as recoverable from them and considered good. Liability if any on this account will be accounted for on the final outcome.

## 2. Share of profit from Partnership Firm Pir Panchal Construction Pvt. Ltd.-JV &amp; Advance Stimul Consortium has recognized based on provisional accounts.

- a. Pir Panchal Construction Pvt. Ltd. -- JV(Loss) 64,58,906/-
- b. Advance Stimul Consortium (Loss) 40,008/-

Further share of profit increase / (decrease) shall account for in next year based on audited balance sheet & P&L and accordingly last year decrease in share of profit of Rs. (78,44,885/-) of PIR Panchal Construction (P) Ltd – JV has been recognized during the year.



3. Information as per the requirement of Section 22 of the Micro, Small and Medium Enterprises Development Act, 2006 are as under based on documents available with the company: -

	(Amount in ₹)	
	2021-2022	2020-2021
(i) Principal amount remaining unpaid to any supplier at the end of accounting year.	-/-	556,713/-
(ii) Interest due on above	--	--
<b>Total of (i) &amp; (ii)</b>	-/-	556,713/-
(iii) Amount of interest paid by the Company to the suppliers.	--	--
(iv) Amounts paid to the suppliers beyond the respective due date.	--	--
(v) Amount of interest due and payable for the period of delay in payments but without adding the interest specified under the Act.	--	--
(vi) Amount of interest accrued and remaining unpaid at the end of accounting year.	--	--
(vii) Amount of further interest remaining due and payable even in the succeeding years, until such date when the interest dues as above are actually paid to the small enterprises, for the purpose of disallowance as a deductible expenditure under Section 23 of this Act.	--	--

4. Interest Free Advance to Employees given not exceeding three months salary and the advance is recovered in a year. However, in some cases it has not been recovered due to covid-19 Pandemic. Therefore, it has not discounted as required as per IN-AS 109.

5. No provision has been made in respect of liquidated damages (as per the terms of the present agreements) on security deposits.

6. One half of the leasehold property at Sahibabad and the leasehold property at Jammu for which agreement shall executed pending for transfer of title. Therefore, the discounting has not applied.

**Non-current assets held for sale**

a) The Company, in an earlier years, had entered into a lease arrangement with a lessor for lease of a piece of land in Haridwar, right of use have been sold out during GY 2021-22

**Leasehold accounting.**

b) IND-AS 116 is applied from 01<sup>st</sup> April, 2020 here for the leasehold land, However IND AS 17 was not applied for earlier accounting period therefore we are using modified retrospective method for accounting as per IND-AS 116. Furthermore, taking year 2018-2019 as a base year instead of the year 2017-2018. therefore discounted the lease rental for booking of the lease liability, and carrying value of the leasehold land as at beginning year of 2018-2019, which was depreciated as per the lease life is given here in below

PARTICULARS	2021-2022	2020-2021
<b>Right to Use</b>	9,037,104	17,981,860
<b>Lease Liabilities</b>	106,669	709,722
<b>Depreciation on Right To use</b>	246,085	278,264
<b>Finance Charges of Lease</b>	101,591	0



**7. Information regarding Operation of the Company**

The Company have three units at Sahibabad, Haridwar and Jammu. The operation of Jammu Unit & Haridwar Unit have come ended. However, sales and operations in Haridwar unit took place.

PARTICULARS	Sahibabad Unit	Haridwar Unit	TOTAL
Turn-over for 2021-22	1,042,631,119	4,561,923	1,047,193,042
Profit For 2021-22	29,639,509	33,111,752	62,751,261
Turn-over after 31 <sup>st</sup> March 2022 to 30 <sup>th</sup> May 2022,	230,448,346	N/A	230,448,346

8. All reimbursements Made to Directors and employees relates to business purpose. Internal manual for SOP'S is in process to be prepared regarding conveyance, travelling, advances etc.
9. The codification and maintenance of register of Fixed Assets is under progress.
10. Inventory lying with third party / consignees are Rs. 2,992,839/- for which no confirmation is available with the company
11. Confirmations in respect of certain accounts of Debtors /Penalty deducted by customers have not been received and are subject to confirmations. The management is of the opinion that adjustment, if any arising out of such reconciliation will be accounted for on final reconciliation.
12. Interest Free Advance to Employees given not exceeding three months salary and the advance is recovered in a year. However, in some cases it has not been recovered due to covid-19 Pandemic,
13. Advance include Rs.30,00,000/- to M/s Yamuna Industries to purchase RCC Cement Poles & Slab factory in Yamuna Nagar since the business could not be operationalized thus stands closed. The amount is recoverable only on disposal of Assets.

**15. Financial risk management**

The Company's activities expose it to a variety of financial risks: credit risk, liquidity risk, foreign currency risk and interest rate risk. The Company's primary focus is to foresee the unpredictability of financial markets and seek to minimize potential adverse effects on its financial performance. The primary market risk to the Company is foreign exchange risk. The Company uses derivative financial instruments to mitigate foreign exchange related risk exposures. All derivative activities for risk management purposes are carried out by specialist teams that have the appropriate skills, experience and supervision. It is the Company's policy that no trading in derivative for speculative purposes may be undertaken. The Board of Directors reviews and agrees policies for managing each of these risks, which are summarized below

**Credit risk**

Credit risk is the risk of financial loss to the Company if a customer or counterparty to a financial instrument fails to meet its contractual obligations, and arises principally from the Company's receivables from customers and investment securities. Credit risk arises from cash held with banks and financial institutions, as well as credit exposure to clients, including outstanding accounts receivable. The maximum exposure to credit risk is equal to the carrying value of the financial assets. The objective of managing counterparty credit risk is to prevent losses in financial assets. The Company assess the credit quality of the counterparties, taking into account their financial position, past experience and other factors.

**Trade and other receivables**

The Company's exposure to credit risk is influenced mainly by the individual characteristics of each customer. The demographics of the customer, including the default risk of the industry the country in which the customer operates, also has an influence on credit risk assessment. Ratings of customers are periodically monitored. The Company has considered the latest Available credit-ratings of customers to ensure the adequacy of allowance for expected credit loss towards trade and other receivables.

Further 8.65 Percent Provision for Doubtful Debts have been provided in view of current situations.

The following table gives details in respect of revenues generated from top customer and top 5 customers:

Particulars	Revenue top 5 customers
Top 5 customers	49.32 Cr.

**Liquidity risk**

Liquidity Risk is the risk that the Company will not be able to meet its financial obligations as they become due. The Company manages its liquidity risk by ensuring, as far as possible,

However it will always have sufficient liquidity to meet its liabilities when due. Also, the Company has unutilized credit limits with banks.

The Company's corporate treasury department is responsible for liquidity, funding as well as settlement management. In addition, processes and policies related to such risks are overseen by senior management

The working capital position of the Company is given below:

Particulars	Amount
Working Capital ( Current Assets - Current Liabilities)	375,219,410/-

**16. Interest Rate Risk**

Interest rate risk is the risk that the fair value of 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 Company's debt obligations with floating interest rates and investments. The Company's borrowings and investments are primarily short-term, which do not expose it to significant interest rate risk.

**17. Related Party Disclosure**

Company's related parties in terms of IND AS- 24 are as disclosed below:-

**18.1 Relationships**

- (a) Related parties in Advance Steel Tubes Limited where common control exists:
- Advance Ispat (India) Limited
  - Tirupati Structurals Limited
  - Advance Enterprises (P) Limited
  - Marda Commercial & Holding Limited
  - Sophia Exports Limited
  - TAK Buildtech Private Limited





- Advance Infrasoftware Private Limited
- ADV Drilling Products PLC
- Pir Panchal Construction Pvt. Ltd.

(b) Joint Venture / Firm

- Pir Panchal Construction Pvt. Ltd.-JV
- Advance Stimul Consortium

(c) Key Management Personnel

- Mr. D. N. Agarwal
- Mr. Vatsal Agarwal
- Ms. Parul Misra

Above transactions have been approved by Nomination and Remuneration committee.

18.2 The following transactions were carried out with related parties in the ordinary course of business. Transactions with parties in item (a) above:

Particulars	Transaction during the Year 2021-22						Outstanding Balance As at 31.03.2022		
	Loan Given	Loan Taken Back	Loan Taken	Loan Repaid	Sales & Service	Purchase, Services, Interest & Rent	Loan Liability	Loan/ Advance Assets	Debtors/ Creditors
Marda Commercial & Holdings Ltd.(DIR)	-- (--)	-- (--)	-- (--)	57748451 (337,500)	-- (--)	3,585,951 (4,500,000)	-- (54,162,500)	-- (--)	-- (--)
Advance Ispat (India) Limited(DIR)	-- (--)	-- (--)	-- (--)	-- (--)	33,647,805 (41,082,474)	-- (--)	-- (--)	-- (--)	-- (4,723,071)
Tirupati Structural Ltd.(DIR)	-- (--)	-- (--)	-- (--)	-- (--)	2,933,763 (7,112,518)	36,161 (57,230)	-- (--)	-- (--)	-- (--)
Advance Enterprises Pvt. Ltd.(DIR)	-- (--)	-- (--)	-- (--)	-- (--)	-- (--)	2,322,750 (1,200,000)	-- (--)	-- (600,000)	1,008,075 (--)
Advance Infra Solutions Pvt. Ltd.(DIR)	-- (--)	-- (--)	-- (--)	-- (--)	-- (--)	-- (--)	-- (--)	7,421,137 (7,421,137)	-- (--)
Pir Panchal Construction Pvt. Ltd. (Fello Holding)	-- (--)	-- (--)	-- (--)	-- (--)	6,345,881 (5,574,139)	-- (--)	-- (--)	-- (--)	2,752,615 (10,240,684)



Pir Panchal Construction Pvt. Ltd- JV	-- (1,000,000)	30,666,286 (1,515,513)			6,422,862 (6,873,510)		39,281,504 (63,524,928)
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18.3 The detail of payment to key management personnel is as under:

Managerial Remuneration u/s 198 of the Companies Act, 2013 to Directors and Key Managerial Personnel.

Key Management Personnel		Gross Salary Current Year (₹)	Gross Salary Previous Year (₹)
D.N. Agarwal	Managing Director / (CEO)	2,997,200	2,718,300
Vatsal Agarwal	CFO	600,000	550,000
Parul Mishra	Company Secretary	780,000	780,000

**19. Segment Reporting**

The Company is operating in a single business / geographical segment and therefore no additional disclosures are required.

**20. Employee Benefits:**

(a) **Defined Contribution Plans**

The Company has recognized the contribution of EPF in the Profit & Loss Account for the financial year.

(b) **Defined Benefit Plans & other Long Term Benefits:**

The following disclosures are made in accordance with IND AS-19 (Revised) pertaining to Defined Benefit Plans & Other Long Term Benefits:

(Amount in ₹)

I. Assumptions:	Gratuity (Funded Plan)		Leave Encashment (Unfunded Plan)	
	As of 31.03.2021	As of 31.03.2022	As of 31.03.2021	As of 31.03.2022
Discount Rate	6.80%	7.15%	6.80%	7.15%
Rate of increase in Compensation levels	5.00%	5.00%	5.00%	5.00%
Average remaining working lives of employees (years)	13.67	13.31	16.51	17.27

II. Table showing changes in present value of obligations:	Gratuity (Funded Plan)		Leave Encashment (Unfunded Plan)	
	01.04.20 to 31.03.21	01.04.21 to 31.03.22	01.04.20 to 31.03.21	01.04.21 to 31.03.22
Present Value of Obligation as at the beginning of the period	12660079	11484283	1569163	1568734
Acquisition adjustment	Nil	Nil	Nil	Nil



Interest Cost	857087	780931	106232	106674
Past Service Cost	Nil	Nil	Nil	Nil

II. Table showing changes in present value of obligations:	Gratuity (Funded Plan)		Leave Encashment (Unfunded Plan)	
	01.04.20 to 31.03.21	01.04.21 to 31.03.22	01.04.20 to 31.03.21	01.04.21 to 31.03.22
Current Service Cost	855604	856196	347816	447603
Gains or Losses on Non Routine Settlements	Nil	Nil	Nil	Nil
Curtailment Cost / (Credit)	Nil	Nil	Nil	Nil
Settlement Cost / (Credit)	Nil	Nil	Nil	Nil
Benefits paid	-601308	-1792704	-176318	-188703
Actuarial (gain)/ loss on obligations	-2287179	-221308	-278153	-129293
Present Value of Obligation as at the end of the period	11484283	11550014	1568734	1305015

III. NET INTEREST COST:

Interest Cost on Defined Benefit Obligation	857087	780931	106232	106674
Interest Income on Plan Assets	659880	667520	Nil	Nil
Net Interest Cost / (Income)	197207	113411	106232	106674

IV. Bifurcation of actuarial (Gain) / Loss:

Actuarial (Gain) / Loss on arising from Change in	Nil	Nil	Nil	Nil
Demographic Assumption	Nil	Nil	Nil	Nil
Actuarial (Gain) / Loss on arising from Change in Financial Assumption	-20561	-151486	-3607	-29611
Actuarial (Gain) / Loss on arising from Change in Experience Assumption	-2266618	372794	-274552	-99682
Total - Actuarial (Gain) / Loss on obligations -	-2287179	221308	-278159	-129293

V. ACTUARIAL GAIN / LOSS - PLAN ASSETS:

Actual income on plan assets	670652	651188	Nil	Nil
Expected Interest Income	659880	667520	Nil	Nil
Actuarial (Gain) / Loss - Plan Assets	-10772	16332	Nil	Nil







VI. CHANGES IN THE FAIR VALUE OF PLAN ASSETS:	Gratuity (Funded Plan)		Gratuity (Funded Plan)	
	01.04.20 to 31.03.21	01.04.21 to 31.03.22	01.04.20 to 31.03.21	01.04.21 to 31.03.22
Fair Value of Plan Assets at the beginning of the period	9747120	9816471	Nil	Nil
Acquisition Adjustments	Nil	Nil	Nil	Nil
Actual Return on Plan Assets	670652	651188	Nil	Nil
Contributions	Nil	1536783	Nil	Nil
Charges deducted	Nil	Nil	Nil	Nil
Benefits Paid	-691308	-1792704	Nil	Nil
Fair Value of Plan Assets at the end of the period	9316471	10211738	Nil	Nil
<b>VII. The amounts to be recognized in balance sheet:</b>				
Present Value of Obligation as the end of the period	11484283	11550014	1568734	1805015
Fair Value of Plan Assets as at the end of the period	9816471	10211738	Nil	Nil
Net Asset / (Liability) Recognized in Balance Sheet	-1667812	-1338276	-1568734	-1805015
<b>VIII. The amounts recognized in the income statement:</b>				
Current Service Cost	855604	856196	347816	447600
Past Service Cost Vested	Nil	Nil	Nil	Nil
Past Service Cost Non-Vested	Nil	Nil	Nil	Nil
Net Interest Cost	197207	113411	106232	106674
Expense recognized in the income statement	1052811	969607	454048	554277
<b>IX. Other Comprehensive Income (OCI):</b>				
Net Cumulative unrecognized actuarial (gain) / loss Opening	Nil	Nil	Nil	Nil
Actuarial (gain) / loss for the year on PBO	-2287179	221308	-278159	-129293
Actuarial (gain) / loss for the year on Plan Asset	-10772	16332	Nil	Nil
Unrecognized Actuarial (gain) / loss at the end of the year	Nil	Nil	Nil	Nil
Total Actuarial (gain) / loss at the end of the year	2297951	237640	-278159	-129293

X. Change in net defined benefit obligation:	Gratuity (Funded Plan)		Leave Encashment (Unfunded Plan)	
	01.04.20 to 31.03.21	01.04.21 to 31.03.22	01.04.20 to 31.03.21	01.04.21 to 31.03.22
Net Defined Benefit Liability at the start of the Period	2912052	1367812	1569163	1568734
Past Service Cost Vested	Nil	Nil	Nil	Nil





Service Cost	855604	856196	347816	447603
Net Interest Cost / (Income)	197207	113411	106232	106674
Re-measurements	-2297951	237640	-278159	-129293
Contribution paid to the fund	Nil	-1536783	Nil	Nil
Benefit paid directly by the enterprise	Nil	Nil	-176318	-188703
Charges deducted	Nil	Nil	Nil	Nil
Net defined benefit liability at the end of the period	1867812	1338276	1568734	1805015

**XI. Bifurcation of PBO at the end of year in current and non-current:**

Current liability (Amount due within one year)	2615677	1611549	218936	304317
Non-Current liability (Amount due over one year)	9468606	9938463	1349798	1500698
Total PBO at the end of year	11484283	11550014	1568734	1805015

**XII. Expected contribution for the next annual reporting period:**

Service Cost	949721	950377	568685	477459
Net Interest Cost	113411	95687	106674	129059
Net Periodic Benefit Cost	1063132	1046064	475359	603518

**XIII. Sensitivity analysis of the defined benefit obligation:**

a) Impact of the change in Discount Rate present value of obligation at the end of the period	11484283	11550014	1568734	1805015
1. Impact due to increase of 0.50%	-397491	-392576	-92614	-152895
2. Impact due to decrease of 0.50%	370206	364897	74830	53750
b) Impact of the change in Salary Increase present value of obligation at the end of the period	11484283	11550014	1568734	1805015
1. Impact due to increase of 0.50%	380202	374749	-95115	-157023
2. Impact due to decrease of 0.50%	-403223	-403176	76850	55201

*Sensitivities due to mortality & withdrawals are insignificant & hence ignored.*

XIV. Maturity profile of defined benefit obligation:	Gratuity (Funded Plan)		Leave Encashment (Unfunded Plan)	
	01.04.20 to 31.03.21	01.04.21 to 31.03.22	01.04.20 to 31.03.21	01.04.21 to 31.03.22
a) March 2022 to March 2023	1924826	1536913	197766	279416
b) March 2023 to March 2024	327272	1188092	77649	73369
c) March 2024 to March 2025	1072521	2712639	70427	63651



d) March 2025 to March 2026	2638149	685302	43691	77871
e) March 2026 to March 2027	688106	652985	77204	139214
f) March 2027 to March 2028	475832	354499	140506	80057
g) March 2023 onwards	5017564	6187244	1223754	1464918

**Note:**

- a) The estimates of future salary increases, considered in actuarial valuation, takes into account the inflation, seniority, promotion and other relevant factors, such as supply and demand in the employment market.
- b) The company estimates that the amount to be contributed to the Gratuity fund for the financial year 2021-22 will be ₹16.58 Lac.
- c) The liability towards the earned leave for the year ended 31<sup>st</sup> March, 2022, based on actuarial valuation is amounting to ₹1,805,015/- (P.Y. ₹1,568,734/-) Lac has been recognized in the profit & loss account.
21. Disclosure of the Company's interest in joint venture as per the Accounting Standard relating to financial reporting of interest in Joint Venture IND-AS 28:
- i. Aggregate amount of each of the assets, liabilities, income and expenses related to extant interest of the Company in Pir Panchal Construction Pvt. Ltd. – JV and Advance Stimul Consortium.

Particulars	Pir Panchal Construction (P) Ltd. – JV/Firm		Advance Stimul Consortium Firm	
	Current Year (Provisional)	Previous Year (Audited)	Current Year (Provisional)	Previous Year (Audited)
Assets	--	162,066,862	--	28,032,130
Capital	--	74,711,593	--	234,677
Liabilities	--	37,355,269	--	27,847,453
Net Profit/(Loss)	1,385,979	6,198,677	--	(1,000,686)
Expenses	56,533,496	105,041,961	--	1,000,686
Tax Expense	--	--	--	--
Contingent Liability - BG O/s	--	--	--	--
Capital Commitments	--	--	--	--

## (b) List of Joint Ventures / Firm

Sr. No.	Name of the Joint Venture	Interest	Place of incorporation
1.	Pir Panchal Construction Pvt. Ltd. - JV / Firm	25%	India
2.	Advance Stimul – Consortium	50%	India

(c) For accounting JV/Firm the equity method has been applied and Income/Loss has been shown through fair value through other comprehensive income (FVTOCI). Since, there was no goodwill at the entry of JV/Firm therefore, investment in the JV's / Firm has been at par.

PARTICULARS	Pir Panchal Construction Pvt. Ltd.- JV/Firm	Advance Stimul Consortium
The investment carried on on 01 <sup>st</sup> April, 2021	82556478	239385
Adjustment after Receiving Audited Financial Statements	(7,844,885)	(4707)
Add: profit Share For the Year	1,385,979	-
Less: Share in loss for the Year	--	--

## 22. Foreign Currency Risk

The Company's exchange risk arises from its foreign operations, foreign currency revenues and expenses, (primarily in U.S. Dollars) and foreign currency borrowings (in U.S. Dollars). A non significant portion of the Company's revenues are in these foreign currencies, while a significant portion of its costs are in Indian Rupees. As a result, if the value of the Indian Rupee appreciates relative to these foreign currencies, the Company's revenues measured in Rupees may decrease. The exchange rate between the Indian Rupee and these foreign currencies has changed substantially in recent periods and may continue to fluctuate substantially in the future.

### 23.1 Earning in Foreign Exchange

FOB Value of Export ₹ Nil (P.Y.Nil)  
FOB Value in Supply to SEZ Unit ₹6,250,797(P.Y.6,618,671)

The Company has the following un-hedged exposures in foreign currencies as at the yearend:

Sr. No.	Particulars	As at 31 <sup>st</sup> March '2022		As at 31 <sup>st</sup> March '2021	
		USD (\$)	INR (₹)	USD (\$)	INR (₹)
1.	Trade Receivables	--	--	19952.91	1,460,683

### 23.2 Value of import on CIF basis

Store Goods ₹ 182098/- (P.Y.₹ 276,247/-)

### 23.3 Expenditure in Foreign Currency ₹ Nil (P.Y.₹ Nil)

24. Previous year's figures have been regrouped & reclassified to the extent necessary to confirm to the current year's figures.

25. The Financial Statements were approved for issue by Board of Directors on 30<sup>th</sup> May'2022,

### 26. Subsequent events

The Board of Directors at its meeting held on 21 April 2022 has declared an interim dividend of ' per share.

The accompanying notes to standalone Financial Statements.

In terms of our report attached  
For **Singhal Shubham & Co.**  
Chartered Accountants  
Firm No. 028622C

*[Signature]*  
**Shubham Singhal**  
Proprietor M. No. 444873  
Ground floor, 2-1/414  
New Shivpuri  
Hapur (UP)-245101  
(UDIN- 22444873ANTDJY7526)



*[Signature]*  
**D. N. Agarwal**  
(Managing Director)  
DIN: 00586794  
B-16, Swasthya Vihar  
Delhi

For and on behalf of the Board of Directors

*[Signature]*  
**Vatsal Agarwal**  
(C.F.O.)  
B-16, Swasthya Vihar  
Delhi

*[Signature]*  
**Lalit Agarwal**  
(Director)  
DIN: 00109920  
B-16, Swasthya Vihar  
Delhi

*[Signature]*

**Parul Mishra**  
(Company Secretary)  
M. No.: A16018  
A-725, Gaur Green Avenue,  
Vaishali, Ghaziabad (UP)

Place : Sahibabad  
Date 30-05-2022