



ESL STEEL LIMITED



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transforming elements

ESL STEEL LIMITED

Annual Report 2020-21



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CORPORATE INFORMATION

CIN: U27310JH2006PLC012663

| | |
|--------------------------------|---|
| BOARD OF DIRECTORS | Mr. Mahendra Singh Mehta (DIN: 00019566), Non-Executive Independent Director Mr. Prasun Kumar Mukherjee (DIN: 00015999), Non-Executive Independent Director Mr. Navnath Laxman Vhatte (DIN: 09048441), Chief Executive Officer & Whole Time Director Ms. Poovannan Sumathi (DIN: 07147100), Non-Executive Director |
| CHIEF FINANCIAL OFFICER | Mr. Mahesh Iyer |
| COMPANY SECRETARY | Mr. Manish Kumar Chaudhary |
| STATUTORY AUDITORS | M/s. Lodha & Co., Chartered Accountants |
| LENDERS | ICICI Bank Ltd. Bank of Baroda Bank of India Indian Bank Punjab National Bank Karnataka Bank Union (eAndhra) HDFC Bank Limited Yes Bank Limited Standard Chartered Bank |
| REGISTERED OFFICE | Village Siyaljori, P.O - Jogidih, P.S - Chandankyari, Dist - Bokaro, Pin - 828 303, Jharkhand. |
| PLANT | Village Siyaljori, P.O - Jogidih, P.S - Chandankyari, Dist - Bokaro, Pin - 828 303, Jharkhand. |
| CORPORATE OFFICE | Lohanchal Colony, Plot No. 10, Beside Sector 12, Bokaro Steel City, Jharkhand Pin - 827013 Phone : 08651-102477 Email: esl.shares@vedanta.co.in Website: https://www.eslsteel.com/ |

BOARD'S REPORT

Dear Shareholders,

The Board of Directors (Board) presents the Company's 14th Annual Report along with the Audited Financial Statements for the year ended March 31, 2021.

FINANCIAL SUMMARY/HIGHLIGHTS AND BUSINESS PERFORMANCE

| Particular | Amount (INR in Lakhs) (Except otherwise stated) | |
|--|--|----------------------------|
| | Year Ended 31 Mar' 2021 | Year Ended 31 Mar' 2020 |
| Revenue from operation | 4,77,142.77 | 4,37,750.81 |
| Other Income | 12,780.64 | 10,364.45 |
| Finance Cost | 37,652.67 | 38,413.55 |
| Exceptional Item | (27,634.25) | - |
| Profit/ (Loss) before exceptional items and tax | 25,452.83 | (2,180.92) |
| Profit/(Loss) after tax | 2,73,201.20 | (2,180.92) |
| EPS (Basic & Diluted) – (INR) | 14.78 | (0.11) |

ESL Steel Limited (Formerly known as Electrosteel Steels Limited) (hereinafter referred to as ESL or the Company) is a fully integrated iron and steel Plant, situated at Siyaljori Village in Bokaro, Jharkhand. The Company has fully integrated steel capacity of 1.5. MTPA with expansion plan underway to double the existing capacity. ESL has established excellence at every stage of production by bringing international expertise and solutions from reputed manufacturers. Along with the latest technology, the plant operates in synchronization with highest ecological standards. ESL is selling primarily TMT Bars, Wire Rods, DI Pipes, Pig Iron and Steel Billets in open market and has established its presence in the domestic market.

In FY2021, ESL achieved the lowest ever cost during the year since acquisition. Our EBITDA margin increased 28% y-o-y compared to previous period from INR 5,514 per tonne to INR 7,070 per tonne mainly on account of increase in average sales realization 3% y-o-y from INR 35,109 per tonne in FY2019 to INR 36,197 per tonne and reduction in cost by 1.5% from INR 29,563 to INR 29,127. Prices of iron and steel are influenced by several macro-economic factors. These include global economic slowdown, US-China trade war, supply chain destocking, government spend on infrastructure being lower than expected, the emphasis on developmental projects, demand-supply forces, lower Purchasing Managers' Index (PMI) in India and higher production and inventory levels across the globe specially China. We were able to increase our EBITDA margin through focused cost control owing to operational efficiencies and lower coking coal prices.

During FY 2021, your Company achieved 1,187 KT of saleable production, down 4% y-o-y, on account of reduced availability of hot metal due to lower production amidst the disruption caused by the pandemic.

Steel demand is expected to see a surge in 2021 owing to recovering economy, sprouting demand and improving prices. This surge will be influenced by the Government's intention to spend larger capital on infrastructure projects in the coming year which will have a multiplier impact on the demand of steel. Coking coal prices are index linked and hence volatile. Iron ore prices are also continuously increasing owing to international price rise and domestic supply constraints, Any movement in the prices of coking coal and iron ore, the main raw materials, will have a material effect on our costs, results of operations and financial condition.

India's finished steel consumption is anticipated to increase to 230 MT by 2030-31 from 90.68 MT in 2017-18 and hence the demand outlook is strong in medium to long term.

SIGNIFICANT DEVELOPMENTS

- **NAME CHANGE OF THE COMPANY**

With effect from September 26, 2020, the name of your Company changed to “**ESL Steel Limited**”, pursuant to issue of Certificate of name change by Registrar of Companies on September 26, 2020.

- **SHIFTING OF REGISTERED OFFICE OF THE COMPANY**

Pursuant to compliance with all regulatory provisions, the Registered Office of the Company shifted from 801, Uma Shanti Apartments, Kanke Road, Ranchi-834008 to “**Vill. Siyaljori, Post – Jogidih, O.P. – Bangaria, PS- Chandankyari, Dist. Bokaro – 828303, Jharkhand**” with effect from October 1, 2020.

- **AMENDMENT IN MEMORANDUM & ARTICLES OF ASSOCIATION OF THE COMPANY**

- **Amendment in Memorandum of Association**

During the year, pursuant to the Scheme of Amalgamation and in accordance with the applicable provisions of the Companies Act, 2013, the existing “Clause I” of the Memorandum of Association of the Company has been altered and substituted with following new “Clause 1”:

“I. The name of the Company is “ESL Steel Limited.”

- **Amendment in Articles of Association**

The name of the Company, appearing in the Articles of Association in clause 2(1)(e) shall be read as “Company” means “ESL Steel Limited”.

DIVIDEND

ESL is in the process of initiating capacity expansion and hence, for conserving resources, your Directors do not recommend any dividend for the Financial Year ended March 31, 2021

TRANSFER TO RESERVES

No amounts have been transferred to the Reserve during the year under review.

EQUITY SHARE CAPITAL

(a) Authorised Share Capital:

Authorised Share Capital of your Company as on March 31, 2021 is INR 1,00,20,00,00,000 divided into 10,02,00,00,000 Equity Shares of INR 10 each.

(b) Issued, Subscribed and Paid Up Share Capital of the Company:

Issued, Subscribed and Paid Up Share Capital of your Company as on March 31, 2021, is INR 18,49,03,02,240 divided into 1,84,90,30,224 Equity Shares of INR 10 each fully paid up.

(c) Buy Back of Securities:

The Company has not bought back any of its securities during the Financial Year under review.

(d) Sweat Equity:

The Company has not issued any Sweat Equity Shares during the Financial Year under review.

(e) Bonus Shares:

The Company has not issued any Bonus Shares.

(f) Employees Stock Option Plan:

The Company has not provided any Stock Option Scheme to the employees.

None of the Directors of the Company hold any equity shares or convertible instruments of the Company.

HOLDING COMPANY

Vedanta Limited (VEDL) is the 'Holding Company' of ESL Steel Limited, holding 95.49% of share capital of the Company. VEDL holds 1,76,55,53,040 no. equity shares of INR 10 each.

CREDIT RATING

CRISIL has reassigned its rating for Company's long term borrowing to CRISIL AA-/Stable on 02.11.2020 downgrading it from CRISIL AA/Negative and reaffirmed with CRISIL A1+ for short term bank facilities.

DEPOSITS

The Company has not accepted or renewed any fixed deposits during the period under review. It has not accepted any deposits from the public within the meaning of the provisions of Section 73 of the Companies Act, 2013 and Rules made thereunder.

NATURE OF BUSINESS

There has been no change in the nature of the business of the Company during the year.

NUMBER OF BOARD & COMMITTEE MEETINGS

The Board of Directors met seven (7) times during the year. The intervening gap between the meetings was within the period prescribed under the provision of Section 173 of the Companies Act, 2013.

Attendance during the year 2020-21:

Board of Director's Meeting:

| Name of Member | No. of meetings held | No. of meetings entitled to attend | No. of meetings attended |
|----------------------------|----------------------|------------------------------------|--------------------------|
| Mr. Prasun Kumar Mukherjee | 7 | 7 | 7 |
| Mr. Mahendra Singh Mehta | 7 | 7 | 7 |
| Mr. Pankaj Malhan* | 7 | 7 | 7 |
| Ms. Poovannan Sumathi | 7 | 7 | 7 |

Committee Meetings:

- Audit Committee

| Name of Member | No. of meetings held | No. of meetings entitled to attend | No. of meetings attended |
|----------------------------|----------------------|------------------------------------|--------------------------|
| Mr. Prasun Kumar Mukherjee | 4 | 4 | 4 |
| Mr. Mahendra Singh Mehta | 4 | 4 | 4 |
| Mr. Pankaj Malhan* | 4 | 4 | 4 |

- **Nomination and Remuneration Committee**

| Name of Member | No. of meetings held | No. of meetings entitled to attend | No. of meetings attended |
|----------------------------|----------------------|------------------------------------|--------------------------|
| Mr. Prasun Kumar Mukherjee | 2 | 2 | 2 |
| Mr. Mahendra Singh Mehta | 2 | 2 | 2 |
| Ms. Poovannan Sumathi | 2 | 2 | 2 |

- **Stakeholders' Relationship Committee**

| Name of Member | No. of meetings held | No. of meetings entitled to attend | No. of meetings attended |
|----------------------------|----------------------|------------------------------------|--------------------------|
| Mr. Prasun Kumar Mukherjee | 1 | 1 | 1 |
| Mr. Pankaj Malhan* | 1 | 1 | 1 |
| Ms. Poovannan Sumathi | 1 | 1 | 1 |

*Ceased to be Whole Time Director w.e.f. April 19, 2021

COMMITTEES OF BOARD

AUDIT COMMITTEE

Audit Committee has been re-constituted pursuant to provisions of Companies Act, 2013, with effect from May 10, 2021:

1. Mr. Prasun Kumar Mukherjee, Non-Executive Independent Director – Chairman
2. Mr. Mahendra Singh Mehta, Non-Executive Independent Director – Member
3. Mr. Navnath Laxman Vhatte, Chief Executive Officer & Whole Time Director - Member

NOMINATION & REMUNERATION COMMITTEE

Nomination & Remuneration Committee, constituted pursuant to provisions of Companies Act, 2013, consists of following Members:

1. Mr. Prasun Kumar Mukherjee, Non-Executive Independent Director – Chairman
2. Mr. Mahendra Singh Mehta, Non-Executive Independent Director - Member
3. Ms. Poovannan Sumathi, Non-Executive Director – Member

STAKEHOLDERS' RELATIONSHIP COMMITTEE

Stakeholders' Relationship Committee has been re-constituted pursuant to provisions of Companies Act, 2013, with effect from May 10, 2021:

1. Mr. Prasun Kumar Mukherjee, Non-Executive Independent Director – Chairman
2. Mr. Navnath Laxman Vhatte, Chief Executive Officer & Whole Time Director - Member
3. Ms. Poovannan Sumathi, Non-Executive Director – Member

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

Corporate Social Responsibility Committee has been re-constituted pursuant to provisions of Companies Act, 2013, with effect from May 10, 2021:

1. Mr. Prasun Kumar Mukherjee, Non-Executive Independent Director – Chairman
2. Mr. Navnath Laxman Vhatte, Chief Executive Officer & Whole Time Director - Member
3. Ms. Poovannan Sumathi, Non-Executive Director – Member

DIRECTORS AND KEY MANAGERIAL PERSONNEL

CHANGES IN DIRECTORS AND KEY MANAGERIAL PERSONNEL

I. The period under review saw the following changes in the Board of Directors of the Company:

(a) *Appointment:*

During the period under review, in compliance with provisions of Section 152 of the Companies Act, 2013, regarding Director liable to retire by rotation, the shareholders re-appointed Mr. Pankaj Malhan (DIN: 08516185) as Whole Time Director and appointed Ms. Poovannan Sumathi (DIN: 07147100) as Non-Executive Director of the Company, effective from October 22, 2019 at the 13th AGM held on September 29, 2020.

Further, on recommendation of Nomination and Remuneration Committee, the Board of Directors of the company appointed Mr. Navnath Laxman Vhatte (DIN: 09048441) as Additional Director designated as Whole Time Director, effective from May 10, 2021. Your Company is seeking approval from shareholders in the forthcoming Annual General Meeting for confirming the appointment of Mr. Navnath Laxman Vhatte as Whole Time Director.

Additionally, the Board has re-appointed Mr. Prasun Kumar Mukherjee (DIN: 00015999) as an Independent Director of the Company for a period of two years w.e.f. June 4, 2021, subject to the approval of the members in ensuing Annual General Meeting as a Special Resolution. The present terms of his appointment expired on June 3, 2021. Directors recommend his re-appointment.

The Board has also re-appointed Mr. Mahendra Singh Mehta (DIN: 00019566) as an Independent Director of the Company for a period of two years w.e.f. June 21, 2021, subject to the approval of the members in ensuing Annual General Meeting as a Special Resolution. The present terms of his appointment expired on June 20, 2021. Directors recommend his re-appointment.

(b) Director retiring by rotation:

In terms of provisions of Companies Act, 2013, Ms. Poovannan Sumathi (DIN: 07147100) retires by rotation at ensuing Annual General Meeting and being eligible seeks re-appointment. The Board recommends her re-appointment as Director.

Note: Particulars of the directors seeking appointment/re-appointment are provided in the notes forming part of the notice for the ensuing Annual General Meeting.

(c) Cessation:

Mr. Pankaj Malhan (DIN: 08516185) resigned from Board of Directors with effect from April 19, 2021.

The Board of Directors places on record its appreciation towards Mr. Pankaj Malhan for his valuable contribution during his tenure as Director.

II. The period under review saw the following changes in the Key Managerial Personnel (KMP) of the Company:

(a) Cessation:

Mr. Jalaj Kumar Malpani, Chief Financial Officer and KMP, resigned with effect from end of business hours of July 31, 2020.

Mr. Binaya Kumar Dash, Company Secretary and KMP, resigned with effect from end of business hours of October 31, 2020.

Further, Mr. Pankaj Malhan also resigned from the position of Chief Executive Officer & Whole Time Director of the Company with effect from April 19, 2021.

The Board of Directors places on record its appreciation towards them for their valuable contribution during their tenure as KMP.

(b) Appointment:

Upon recommendation of Nomination and Remuneration Committee, the Board of Directors of the Company appointed Mr. Mahesh Iyer as Chief Financial Officer and KMP of the Company, with effect from August 1, 2020.

The Board of Directors of the Company also appointed Mr. Manish Kumar Chaudhary as Company Secretary and KMP of the Company, with effect from November 1, 2020.

Further, the Board of Directors at its meeting held on May 10, 2021, on

recommendation of Nomination and Remuneration Committee, appointed Mr. Navnath Laxman Vhatte as Chief Executive Officer & Whole Time Director w.e.f. May 10, 2021, subject to requisite approval in the ensuing Annual General Meeting.

PRESENT BOARD OF DIRECTORS

The Board of Directors of your Company as on date consists of following Members:

| Sl. No. | Name of Director | Designation |
|---------|----------------------------|---|
| 1. | Mr. Mahendra Singh Mehta | Non-Executive Independent Director |
| 2. | Mr. Prasun Kumar Mukherjee | Non-Executive Independent Director |
| 3. | Mr. Navnath Laxman Vhatte | Chief Executive Officer & Whole Time Director |
| 4. | Ms. Poovannan Sumathi | Non – Executive Director |

PRESENT KEY MANAGERIAL PERSONNEL

Pursuant to Section 203 of Companies Act, 2013, the Key Managerial Personnel of your Company as on date are:

| Sl. No. | Name of Director | Designation |
|---------|----------------------------|---|
| 1. | Mr. Navnath Laxman Vhatte | Chief Executive Officer & Whole Time Director |
| 2. | Mr. Mahesh Iyer | Chief Financial Officer |
| 3. | Mr. Manish Kumar Chaudhary | Company Secretary |

INDEPENDENT DIRECTORS AND THEIR DECLARATION

Mr. Prasun Kumar Mukherjee and Mr. Mahendra Singh Mehta are the Independent Directors of the Company. The Company has received declarations pursuant to Section 149(7) of the Companies Act, 2013 from both the Independent Directors of the Company confirming that they meet the criteria of independence as prescribed both under Section 149(6) of the Companies Act, 2013.

The Independent Directors have submitted a declaration that they are not aware of any circumstance or situation, which exist or may be reasonably anticipated, that could impair or impact their ability to discharge their duties with an objective independent judgment and without any external influence.

Further, declaration on compliance with Rule 6(3) of the Companies (Appointment and Qualification of Directors) Rules, 2014, as amended by Ministry of Corporate Affairs (“MCA”) Notification dated October 22, 2019, regarding the requirement relating to enrolment in the Data Bank created by MCA for Independent Directors, has been received from both the Independent Directors.

DIRECTORS' RESPONSIBILITY STATEMENT

Your Directors hereby confirm, in terms of Section 134 (5) of the Companies Act, 2013 (“the Act”), that:

- a. in the preparation of annual accounts, containing financial statements for the year ended March 31, 2021, the applicable accounting standards have been followed along with proper explanations, wherever required.
- b. they have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent, so as to give a true and fair view of the state of affairs of the Company at the end of the financial year 2020-21 and of the profit/loss of the Company for that period.
- c. they 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 and for preventing and detecting any fraud and other irregularities.
- d. they have prepared Annual Accounts on a going concern basis.
- e. Sufficient internal financial controls have been laid down and such internal financial controls are adequate and were operating effectively.
- f. they have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

SUBSIDIARY/ASSOCIATE /JOINT VENTURE COMPANY

The Company did not have any subsidiary/associate /joint venture Company during the year ended March 31, 2021.

INTERNAL FINANCIAL CONTROLS

Internal financial controls mean the policies and procedures adopted by the Company for ensuring the orderly and efficient conduct of its business, including adherence to Company’s policies, safeguarding of its assets, prevention and detection of frauds and errors, the accuracy and completeness of the accounting records and the timely preparation of reliable financial information.

Your Company has a well-documented Standard Operating Procedures (SOP) for procurement of materials, capital expenditure, human resources, sales and marketing, finance, treasury, compliance, Health, Safety and Environment (HSE) etc.

Your Company has in place systems, policies and procedures/frameworks, which are currently operational, for ensuring the orderly and efficient conduct of its business, which includes adherence to policies, safeguarding its assets, prevention and detection of frauds and errors, accuracy and completeness of the accounting records and timely preparation of reliable financial information. In line with best practices, the Audit Committee and the Board reviews these internal control systems to ensure they remain effective and are achieving their intended purpose.

INVESTOR EDUCATION AND PROTECTION FUND

All unclaimed / unpaid share application money, remaining unclaimed / unpaid for a period of seven years from the date they became due for payment, are required to be transferred to the Investor Education And Protection Fund (IEPF).

During the year, the Company was not required to transfer any amount to the said IEPF.

SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS OR COURTS OR TRIBUNALS IMPACTING THE GOING CONCERN STATUS AND COMPANY'S OPERATIONS IN FUTURE

1. The Consent to Operate (CTO) for the steel plant at Bokaro, which was valid till December 2017, was not renewed by the State Pollution Control Board (PCB). This was followed by the Ministry of Environment, Forests and Climate Change (MoEFCC) revoking the Environmental Clearance (EC). The High Court of Jharkhand had extended the interim protection granted in the pending writ petitions till September 16, 2020. However, on September 16, 2020, Hon'ble Jharkhand High Court pronounced and revoked the interim stay for plant continuity w.e.f September 24, 2020. ESL filed an special leave petition before Hon'ble Supreme Court against order dated September 16, 2020 for grant of interim stay order and plant continuity. Hon'ble Supreme Court vide order dated September 22, 2020 allowed plant operations to continue till further orders and stayed High Court order dated September 16, 2020.
2. Subsequent to Order of Hon'ble National Company Law Appellate Tribunal (NCLAT) dated August 10, 2018, Renaissance Steel Private Limited, an unsuccessful resolution applicant, filed an appeal before Hon'ble Supreme Court of India, challenging the Order of the Hon'ble NCLAT. The said petitioner has vide it's prayer filed on July 10, 2020 before the said court expressed it's intention of not pursuing the matter further and applied for withdrawing the said appeal. The court has allowed the withdrawal application and dismissed the matter vide order dated November 20, 2020.
3. In respect of claims and demand by certain Statutory Authorities, the matters are pending before High Court, Supreme Court and other adjudicating authorities for decision. Further, in respect of claims of erstwhile Operational Creditors, Hon'ble Supreme Court has referred back the matter to Hon'ble National Company Law Tribunal (NCLT), Kolkata Bench, for decision. However, Management is of view that the claims and demands are not tenable as per the approved Resolution Plan and various judicial pronouncements. Recently in ESL sales tax matter, Hon'ble Supreme Court has passed an order in Company's favour stating that all pre-acquisition liability which is not a part of the resolution plan will stand extinguished.
4. In respect of alleged non-disclosure of material information in the prospectus, during Initial Public Offering (IPO) of the Company in 2010, Hon'ble Securities Appellate Tribunal (SAT), Mumbai, vide it's order dated 14th November, 2019, had imposed penalty of INR 50 lakhs on the Company. The Company has approached SEBI and has taken the contention that Company is not liable to pay any penalty for acts committed prior to acquisition. Recently in

ESL sales tax matter, Hon'ble Supreme Court has passed an order in Company's favour stating that all pre-acquisition liability which is not a part of the resolution plan will stand extinguished.

There has been no material changes and commitments affecting the financial position of the Company that have occurred between the end of the Financial Year and the date of the Board's Report.

ANNUAL EVALUATION OF THE BOARD

The Board on the recommendation of the Nomination and Remuneration Committee had adopted Schedule IV to the Companies Act, 2013 (hereinafter referred to as "the Act"), including any amended thereof, as criteria for evaluating performance of Independent Directors.

The Independent Directors of the Company in their meeting held on January 21, 2021, without the attendance of Non-Independent Directors and members of the Management, on the basis of defined and agreed parameters, inter alia, had (i) reviewed the performance of the Non Independent Directors, the Board and Committees thereof and (ii) assessed the quality, quantity and timeliness of flow of information between the Management and the Board, that is necessary for the Board to be effective and reasonably perform their duties.

COVID 19 STEPS TAKEN BY THE COMPANY

Your company stands by the society and community in times of despair. COVID relief initiatives are undertaken by ESL to combat the spread of COVID 19 are as follows:

- About 500 MT of Liquid Medical Oxygen supplied to Jharkhand, Bihar, and Punjab.
- More than 4000 employees, business partners, and 579 villagers have been vaccinated
- Hon'ble Chief Minister of Jharkhand, Hemant Soren virtually launched Vedanta's 100 bed Vedanta COVID Cares field hospital in Bokaro. A vaccination camp was organized at the hospital site in collaboration with the district administration and health department, wherein more than 2000 people have been vaccinated so far.
- Organised webinar to create awareness about COVID. More than 300 self-help group members and rural women participated
- 5000 more masks are being made by the SHG women
- ESL Steel Limited has delivered about 500 oxygen cylinders during the pandemic period.
- ESL has delivered life-saving equipment to the CSE Hospital, Chandankiyari, Bokaro and organized awareness campaigns in 20 villages on COVID prevention and measures among its stakeholders such as community, activists, and PRI members.
- About 5050 sanitizer bottles have been distributed to ESL workers, nearby villages, and the government.
- More than 414 Oxygen cylinders have been delivered to the government for ease of transporting oxygen during the pandemic.
- 20 oxygen cylinders (47meter cube each) procured for the plant isolation centre.

CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTGO

The information related to conservation of energy, technology absorption, foreign exchange earnings and outgo is enclosed as “Annexure A” and forms an integral part of this Report.

STATUTORY AUDITORS

The shareholders of the Company at the Tenth Annual General Meeting (AGM) held on November 7, 2017 had appointed M/s. Lodha & Co., Chartered Accountants (Firm Registration No.:301051E) of 14, Government Place East, Kolkata 700069, as Statutory Auditors of the Company to hold office for a period of five consecutive years, commencing from the conclusion of Tenth Annual General Meeting till the conclusion of the Fifteenth Annual General Meeting.

The said M/s. Lodha & Co., Chartered Accountants have confirmed that they are eligible to continue as Statutory Auditors of the Company for the financial year ending March 31, 2021.

AUDITOR’S REPORT

M/s. Lodha & Co., Chartered Accountants have audited the books of accounts of the Company for the financial year ended March 31, 2021 and have issued the Auditors’ Report thereon. There are no qualifications or reservations or adverse remarks in the said Report.

COST AUDITORS & COST AUDIT REPORT

In terms of requirement of Section 148 of the Companies Act, 2013, read with Companies (Cost Records and Audit) Rules, 2014, (as amended), the Board of Directors of your Company, upon recommendation of Audit Committee, have appointed M/s. Sanjiban & Co., Cost Accountants, (Registration No.: 000259) as Cost Auditors, to conduct cost audit of your Company for the FY 2021-22, at a remuneration of INR 1,00,000.

As required under the Act, the remuneration payable to the Cost Auditors is required to be placed before the Members for ratification. Accordingly, a resolution seeking Members ratification for the remuneration payable to M/s Sanjiban & Co., Cost Accountants for FY 2021-22 is included in the Notice convening the ensuing AGM.

The cost audit report of the Company for the financial year ended March 31, 2020, does not contain any qualification or adverse remarks and was filed with the Ministry of Corporate Affairs(MCA) in XBRL mode within the stipulated due date.

SECRETARIAL AUDITOR & SECRETARIAL AUDIT REPORT

Pursuant to the provisions of Section 204 of the Companies Act, 2013 and Rules thereunder, the Board of Directors had appointed M/s. Chandrasekaran Associates, Company Secretaries

of 11-F, Pocket –IV, Mayur Vihar, Phase I, Delhi, as Secretarial Auditor for the FY 2020-21, to conduct secretarial audit of the Company. The said M/s Chandrasekaran Associates have submitted their Report for the financial year ended March 31, 2021. The Report contains certain observations of the Auditor and is enclosed as “**Annexure B**” and forms an integral part of this Report.

Further, Company has appointed the Vinod Kothari & Company, Practicing Company Secretaries of 1006-1009, Krishna Building, 224 A.J.C. Bose Road Kolkata – 700 017, India, as Secretarial Auditor of the Company for the FY 2021-22.

INTERNAL AUDITORS

In line with the provisions of Section 138 of the Companies Act, 2013, M/s. KPMG, were appointed by the Board of Directors as Internal Auditors of the Company for the FY 2020-21. The Audit Committee defines the scope of internal audit from time to time and also reviews the observations of internal auditors and the action taken report submitted by the management on the observations at its meeting held every quarter and also suggests the management the improvements required in the systems followed by the Company.

Further, the Internal audit activity of your Company is managed through Management Assurance Services (MAS) function of Vedanta Limited.

The Board, on the recommendation of the Audit Committee, has re-appointed M/s. KPMG as the Internal Auditors for FY 2021-22.

EXTRACTS OF ANNUAL RETURN

In accordance with notification of Ministry of Corporate Affairs, dated August 28, 2020 read with Sec. 92(3) of the Companies Act, 2013, copy of the Annual Return of the Company shall be available on the Company’s website: <https://www.eslsteel.com/>

PARTICULARS OF CONTRACTS OR ARRANGEMENT WITH RELATED PARTIES

The related party transactions are entered into based on considerations of various business requirement such as synergy in operations, profitability, legal requirements, liquidity, resources availability, etc. of related parties. All related party transactions are intended to further the Company’s interests.

All related party transactions entered during the year 2020-21 have been placed on quarterly basis before the Audit Committee for approval and before the Board for consideration and noting.

During the period under review related party transactions have been on arms- length basis and in ordinary course of business. Accordingly, the particulars of the transactions as prescribed in form AOC-2 under Section 134 of the Act read with rules made therein are not required to be disclosed as they are not applicable.

The policy on Related Party Transactions as approved by the Board is available on the Company's website: <https://www.eslsteel.com/>

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS

Details of Loans, Guarantees and Investments covered under the provisions of Section 186 of the Companies Act, 2013 are given in the notes to the Financial Statements.

RISK MANAGEMENT POLICY

The Company has in place a Risk Management Policy, which is reviewed by the Audit Committee from time to time. The Company has constituted Risk Management Committee at management level, which identifies potential risks associated with the Company and formulates its mitigation plan.

CORPORATE SOCIAL RESPONSIBILITY POLICY

The Company has in place a Board approved Corporate Social Responsibility Policy and it is available on the website of the Company at <https://www.eslsteel.com/>.

During the year, the Company has undertaken various CSR initiatives, although not mandatory under Section 135 of the Act read with Companies (Corporate Social Responsibility Policy) Rules, 2014.

MANAGERIAL REMUNERATION AND REMUNERATION POLICY

The information required pursuant to Section 197 read with Rule 5(2) of The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 in respect of employees of the Company, will be provided upon request.

In terms of Section 136 of the Companies Act, 2013 the Report and Accounts are being sent to the Members and others entitled thereto, excluding the information on employees' particulars which is available for inspection by the Members at the Registered Office of the Company during business hours on working days of the Company up to the date of the ensuing Annual General Meeting. If any Member is interested in obtaining a copy thereof, such Member may write to the Company in this regard.

The Company has in place a Remuneration Policy and it is available on the website of the Company at <https://www.eslsteel.com/>.

DISCLOSURE UNDER "THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

The Company has zero tolerance for sexual harassment at workplace and has adopted a Policy on prevention, prohibition and redressal of sexual harassment at workplace in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules thereunder for prevention and redressal of complaints of

sexual harassment at workplace. Internal Complaints Committee (ICC) has been set up to redress complaints received regarding sexual harassment. All employees (permanent, contractual, temporary, trainees) are covered under this policy.

As part of Vedanta Group, your Company is an equal opportunity employer and believes in providing opportunity and key positions to women professionals. The Group has endeavoured to encourage women professionals by creating proper policies to tackle issues relating to safe and proper working conditions, and create and maintain a healthy and conducive work environment that is free from discrimination. This includes discrimination on any basis, including gender, as well as any form of sexual harassment. During the period under review, no complaints were received.

VIGIL MECHANISM/WHISTLE BLOWER POLICY

The Company has in place a robust vigil mechanism for reporting genuine concerns through the Company's Whistle Blower Policy. As per the Policy adopted by various businesses in the Group, all complaints are reported to the Director – Management Assurance, who is independent of operating management and the businesses. In line with global practices, dedicated email IDs, a centralized database, a 24X7 whistle blower hotline and a web-based portal have been created to facilitate receipt of complaints. All employees and stakeholders can register their integrity related concerns either by calling the number or by writing on the web-based portal which is managed by an independent third party. The hotline provides multiple local language options. All cases reported as part of whistle blower mechanism are taken to their logical conclusion within a reasonable timeframe. After the investigation, established cases are brought to the Group Ethics Committee for decision making. All Whistle Blower cases are periodically presented and reported to the Company's Audit Committee. The details of this process are provided in the Whistle Blower Policy and is posted on the Company's website <https://www.eslsteel.com/>.

SECRETARIAL STANDARDS

The Company has in place proper system to ensure compliance with the provisions of the applicable Secretarial Standards issued by The Institute of Company Secretaries of India and such systems are adequate and operating effectively.

AWARDS & RECOGNITIONS

Being a people-centric organisation committed to its CSR & ESG values, ESL Steel Limited was awarded various recognitions in all fields ranging from 'GreenTech Corona Warrior Award 2020', 'GreenTech Safety Award 2020' and 'Great Place to Work', among others. These recognitions testify to the Company's relentless efforts to be a benchmark in best and fair practices. And it shall always stay committed to its core values.

Your Company has been included in Global list of Integrated Management System after getting IMS Certification of ISO 9001:2015, 14001:2015 & 45001:2018 in the month of June'21.

GREEN INITIATIVE

In support of “Green Initiative” taken by the Ministry of Corporate Affairs (“MCA”) in the Corporate Governance” by allowing service of documents by a Company to its Members through electronic mode, the Company will continue to send various communications and documents like notice calling general meetings, audited financial statements, directors’ report, auditor’s report etc., in electronic form, to the email address provided by the Members to the Depositories or to the Company.

Your Company impresses upon its shareholders to contribute to this green initiative in full measure by registering their e-mail addresses, in respect of electronic holdings with the Depository through their concerned Depository Participant. Members who hold shares in physical form are requested to take necessary steps for registering the same so that they can also become a part of the initiative and contribute to the Green Movement.

APPRECIATION

The Directors would like to thank the employees, shareholders, customers, suppliers, bankers, advisors, auditors, regulatory authorities and all the other stakeholders of the Company for their confidence and continued support to the Management. Your directors would also like to place on record their appreciation to the Central and State Governments for the valuable support. Your Company also recognizes and appreciates the cooperation and support from its holding company Vedanta Limited.

For and on behalf of the Board of Directors

Place : Bokaro

Dated : 30th June, 2021

Navnath Laxman Vhatte
Chief Executive Officer &
Whole Time Director
(DIN : 09048441)

Poovannan Sumathi
Non-Executive Director
(DIN : 07147100)

ANNEXURE A

PARTICULARS OF ENERGY CONSERVATION, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO REQUIRED UNDER THE COMPANIES (ACCOUNTS) RULES, 2014 DURING THE FINANCIAL YEAR 2020-21

A) CONSERVATION OF ENERGY

(i) Steps taken for Conservation of Energy

ESL Steel Limited (ESL) has been a front runner in adopting technological innovations in the manufacturing process. The thrust on energy conservation continued during the year. The Company recognized the importance of the energy conservation in decreasing the effects of global warming and climate change. The various measures undertaken by the Company includes:

- (a) Reduction in Auxiliary Power consumption and heat energy loss saving on account of below measures:
 - i. Installation of variable frequency drive with feedback system at circulating cold water and hot water pumps at Ductile Iron Pipe will lead to annual energy saving of 572.040 MWH
 - ii. Modification in boiler feed pump recirculation valve will lead to annual energy saving of 805 MWH
 - iii. Installation of variable frequency drive in intermediate pump and soft water pump at DM plant resulting in 189 MWH auxiliary power saving annually
- (b) Improvement in station heat rate of captive power plant from 3300Kcal/kwh to 2950 Kcal/kwh

(ii) Proposed Project in Energy Savings

ESL has taken various measures for saving energy across the plant. Some of the energy saving projects are as mentioned below:

- (a) Variable Frequency Drive (VFD) installation for 2 X 4.5 MW synchronous motor of Sinter ID fans in progress. (expected energy saving: 102,00000 Units Annually)
- (b) Ordering in process for 4 numbers of VFD Drives (2 nos. in Sinter ID Fan & 2 nos. in Secondary dedusting system of SMS) in process. (expected energy saving: 57,80000 Units Annually)
- (c) Feasibility study for 40 number pump application motors in utility area for installation of VFD for energy saving purpose.
- (d) Feasibility study for Reduction in Coke Moisture (from 5% to 3%) to reduce coke rate of Blast Furnace resulting reduction of coke consumption by 10401 MT yearly.
- (e) Replacement of around 19000 conventional lights of different wattage around the plant by suitable LED light which accounts energy savings of around 12700 MWH annually.
- (f) Installation of Solar Power plant (total 18 MW- 4.5MW Roof Top & 13.5MW ground mounted).

B) TECHNOLOGY ABSORPTION

(i) Efforts made towards technology absorption

Conscious efforts are being made to ensure that the technology is absorbed and necessary measures to minimize energy consumption are incorporated in the Plant. Energy Management system for bulk energy data collection and analysis across the plant initiated, work toward achieving ISO 50001 energy management certification also initiated.

(ii) Benefits derived like product improvement, cost reduction, product development or import substitution

- a) Improvement in productivity and reduction in conversion cost
- b) Establish production of various grade of value-added product in wire rod mill.

(iii) In case of imported technology (imported during the last three years reckoned from the beginning of the financial year) - Not Applicable

(iv) Expenditure incurred on Research and Development

The Company is continuously working for the development of new products, grades, etc. for exploring the opportunity in new market segment. Further, trials of different types of coal to achieve the optimized coal blend were also undertaken during the year. The said costs have been included under the respective operating cost heads.

B) FOREIGN EXCHANGE EARNINGS AND OUTGO:

| | Rs. In Lakhs |
|---------------------------|---------------------|
| Foreign Exchange earnings | 45,236.42 |
| Foreign Exchange outgo | 90,368.87 |

For and on behalf of the Board of Directors

Place: Bokaro

Navnath Laxman Vhatte
 Chief Executive Officer & Whole Time
Director
 (DIN: 09048441)

Poovannan Sumathi
Non-Executive Director
 (DIN: 07147100)

Dated: 30th June, 2021

ANNEXURE B

SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED MARCH 31, 2021

To,
The Members,
ESL Steel Limited
(Formerly known as Electrosteel Steels Limited)
Village -Siyaljori, Post– Jogidih,
O.P. – Bangaria, PS- Chandankyari,
Bokaro Steel City, Bokaro, Jharkhand - 828303

We have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate governance practices by ESL Steel Limited (Formerly known as Electrosteel Steels Limited) (hereinafter called “Company”). Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the Company’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, we hereby report that in our opinion, the Company has, during the audit period covering the financial year ended on March 31, 2021 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:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the Financial Year ended on March 31, 2021 (“during the period under review”) according 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 to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; Not Applicable during the period under review.
- (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”):- Not applicable during the period under review.
 - (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, 2015;
 - (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
 - (d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
 - (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 to the extent of securities issued;
 - (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
 - (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (vi) As confirmed and certified by the management, there is no law specifically applicable to the Company based on the Sectors / Businesses.

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

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India and notified by Ministry of Corporate affairs.

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

- i. Pursuant to the provisions of Section 178, the Nomination & Remuneration Committee should have minimum 3 Non-Executive Directors as Members but the Committee had only two Non-Executive Directors during the period starting from April 01, 2020 till May 17, 2020.
- ii. Pursuant to the provisions of section 203 of the Act, every whole-time key managerial personnel of a company shall be appointed by means of a resolution of the Board containing the terms and conditions of the appointment including the remuneration. However the resolution(s) passed by the Board of directors for the Chief Financial Officer and Company Secretary did not contained their remuneration in monetary terms.
- iii. The company has made all the necessary disclosure(s) in the board's report in accordance with Section 134 of the Act except the explanations or comments by the Board on every qualification, reservation or adverse remark or disclaimer made by the Secretarial Auditors in its Secretarial Audit Report.
- iv. Certain e-forms were delayed filed with the Registrar of Companies.

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, if any, 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/ Committee Meetings. Agenda and detailed notes on agenda were sent in advance (and at a shorter notice for which necessary approvals obtained, if any) 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.

All decisions at Board Meetings and Committee Meetings are carried out unanimously as recorded in the minutes of the meetings of the Board of Directors or Committee of the Board, as the case may be.

We further report that there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

We further report that during the audit period, following specific events / actions took place having a major bearing on the Company's affairs in pursuance of the above referred laws, rules, regulations, guidelines, standards, etc. :-

- a) During the period under review, the members of the Company have increased the overall borrowing limit of the Company from INR 10,000 Crores to INR 12,000 Crores.
- b) During the period under review, the members of the Company have increased the overall limit for the Creation of charges, mortgages, hypothecation on the immovable and movable properties of the Company to secure the amount borrowed by the Company or any third party from time to time for the due payment of the principal and/or together with interest, charges, costs, expenses and all other monies payable by the Company in respect of such borrowings from INR 10,000 Crores to INR 12,000 Crores.

For Chandrasekaran Associates
Company Secretaries

Shashikant Tiwari
Partner
Membership No. A28994
Certificate of Practice No. 13050
UDIN: A028994C000487573

Date: June 25, 2021
Place: Delhi

Notes:

- i. This report is to be read with our letter of even date which is annexed as Annexure-A and forms an integral part of this report.
- ii. Due to restricted movement amid COVID-19 pandemic, we conducted the secretarial audit by examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are the true and correct. This Report is limited to the Statutory Compliances on laws / regulations / guidelines listed in our report of which, the due date has been ended/expired on or before March 31, 2021 pertaining to Financial Year 2020-21.

Annexure-A to Secretarial Audit report

To,
The Members,
ESL Steel Limited
(Formerly known as Electrosteel Steels Limited)
Village -Siyaljori, Post– Jogidih,
O.P. – Bangaria, PS- Chandankyari,
Bokaro Steel City, Bokaro, Jharkhand - 828303

Our report of even date is to be read along with its letter.

1. Maintenance of secretarial record is the responsibility of the Management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Whenever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of Management. Our examination was limited to the verification of procedures on random test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the Management has conducted the affairs of the Company.

For Chandrasekaran Associates
Company Secretaries

Shashikant Tiwari
Partner
Membership No. A28994
Certificate of Practice No. 13050
UDIN: A028994C000487573

Date: June 25, 2021
Place: Delhi

RESPONSE TO OBSERVATION OF SECRETARIAL AUDIT REPORT FOR THE FINANCIAL YEAR ENDED MARCH 31, 2021

| OBSERVATION | MANAGEMENT RESPONSE |
|--|--|
| Pursuant to the provisions of Section 178, the Nomination & Remuneration Committee should have minimum 3 Non-Executive Directors as Members but the Committee had only two Non-Executive Directors during the period starting from April 01, 2020 till May 17, 2020. | The Company at its Board Meeting held on May 18, 2020, re-constituted Nomination & Remuneration Committee with all three Non-Executive Directors. Due to lockdown in India, in the beginning of FY21, Board meeting was held in the month of May and as such, NRC constitution fell short of 1 NED. |
| Pursuant to the provisions of section 203 of the Act, every whole-time key managerial personnel of a company shall be appointed by means of a resolution of the Board containing the terms and conditions of the appointment including the remuneration. However the resolution(s) passed by the Board of directors for the Chief Financial Officer and Company Secretary did not contained their remuneration in monetary terms | The Company has mentioned in the resolution that the remuneration is based on rules and policies of the Company. However, the remuneration in monetary term was shared separately with BOD, which the Members approved. |
| The company has made all the necessary disclosure(s) in the board's report in accordance with Section 134 of the Act except the explanations or comments by the Board on every qualification, reservation or adverse remark or disclaimer made by the Secretarial Auditors in its Secretarial Audit Report. | The company had placed the Secretarial Audit Report along with management response to observations of Secretarial Auditor before the Board of Directors at its meeting held on September 5, 2020. However, the same was inadvertently not attached in the Annual Report. |
| Certain e-forms were delayed filed with the Registrar of Companies | The Company has been filing all statutory forms within timeline. However, certain e-forms were filed after due date. |

INDEPENDENT AUDITORS' REPORT

The Members of ESL Steel Limited (Formerly Electrosteel Steels Limited)

Report on the Audit of the Standalone Financial Statements

Opinion

We have audited the standalone financial statements of ESL Steel Limited (“the Company”), which comprise the balance sheet as at March 31, 2021, and the statement of Profit and Loss (including other Comprehensive Income), statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other notes for the year ended on that date (hereinafter referred to as “financial statements”).

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

Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies Act, 2013. Our responsibilities under those Standards are further described in the Auditors' Responsibilities for the Audit of the financial statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Companies Act, 2013 and the Rules thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Material Uncertainty Related to Going Concern

We draw attention to Note no. 44 of the financial Statement which indicates that matters relating to denial of approval for Consent to Operate (CTO) and Environmental Clearance are pending before Hon'ble High Court of Jharkhand and Supreme Court of India. Pending final decision on the matter for the reasons stated in the said note, there is a material uncertainty on the Company's ability to continue as a going concern. Our opinion is not modified in respect of this matter.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current year. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

| Key Audit Matters | Addressing the key audit matters |
|--|---|
| Impairment of Property, Plant and Equipment (PPE), Capital Work in Progress (CWIP) and Intangible Assets (as described in note 5.5 and 6.1 of the financial statements) | |
| <p>Evaluation of the impairment involves assessment of value in use of the Cash Generating Units (CGUs) and requires significant judgements and assumptions about the forecast for cash flows, production, volume of operations, selling prices of the product and its discount rate.</p> <p>The above includes the evaluation of plant and equipment pertaining to expansion project undertaken in earlier years and lying unmoved pending further progress and implementation in this respect.</p> <p>Impairment testing of PPE, CWIP and Intangible assets were carried out during the year ended March 31, 2018 and provision of Rs. 5,11,193.01 lakhs were made. No further provision or reversal thereof has been considered necessary during this year.</p> | <p>Our Audit procedures based on which we arrived at the conclusion regarding reasonableness of Impairment includes the following:</p> <ul style="list-style-type: none"> • Critical evaluation of internal and external factors impacting the entity’s performance and indicators of impairment (or reversal thereof) in line with Ind AS 38; • Analysing the management’s review, contention and representation regarding the project in progress and adjustments possible against carrying value of the assets. This includes, reviewing the feasibility study of the project carried out by an independent technical consultant and status of plant and equipment so far procured for the same; • Reviewed the physical verification of plant and equipment and finding there from and adequacy of provision made against the discrepancies; • Review of impairment covering the entire block of tangible and intangible assets and capital work in progress and valuation models used to determine the recoverable amount by analysing the key assumptions used by management in this respect including: <ul style="list-style-type: none"> - Consistency with respect to forecast for arriving at the valuation and assessing the potential impact of any variances; - Price assumptions used in the models; and - The assumption/estimation for the weighted average cost of capital and rate of discount for arriving at the value in use. • Placing reliance on the management’s assumption for future prospects, expected volume of business and sustainability of the cash flows. |
| Recognition of Deferred Tax Assets (as described in note 48 of the financial statements) | |
| <p>Deferred tax assets amounting to Rs. 2,75,228.77 lakhs (attributable to depreciation and losses carry forwards) have been recognized in the financial statements as at March 31, 2021.</p> | <p>Our Audit procedures based on which we arrived at the conclusion regarding reasonableness of recognition of Deferred Tax includes the following:</p> <ul style="list-style-type: none"> • Utilisation of Deferred tax assets have been tested on the basis of internal forecasts prepared by the Company and probability of future taxable income; • We critically examined the temporary differences between the carrying amounts for Ind AS financial statement and tax purposes; |

| Key Audit Matters | Addressing the key audit matters |
|--|--|
| | <ul style="list-style-type: none"> • Reversal of deferred liability due to timing differences and possible adjustments of deferred tax assets there against; and • Critical review of the underlying assumptions for consistency and principle of prudence for arriving at reasonable degree of probability on the matters. • Review of management’s assumption with respect to profit in future periods and taxability thereof and placing reliance on such assumptions and projections given the current scale of operations and prevailing conditions and situations. |
| <u>Statutory Claims and Liabilities prior to implementation of Resolution Plan (as described in note 40(B) of the financial statements)</u> | |
| <p>As per ARP, the contingent liabilities primarily concerning EPCG obligations, Custom Duty, Sales Tax, Excise Duty, Service Tax, Entry Tax, etc., and commitments, claims and obligations, prior to June 04, 2018 stand extinguished on implementation of the resolution plan approved by NCLT and therefore disclosure of contingent liabilities in this respect have not been considered necessary. However, these matters are pending for decision before various judicial and legislative authorities and in certain cases even balances lying in current account with banks and government authorities have been withheld for payment/utilisations.</p> | <p>Our Audit procedures based on which we arrived at the conclusion regarding reasonableness of disclosure includes the following:</p> <ul style="list-style-type: none"> • Assessing and analysing management’s contention, disclosures, accounting and legal requirement vis-à-vis order of NCLT and conclusion drawn thereto; • Understanding the requirement of the Standard and the accounting being effected and overriding effect of the rulings and requirements of ARP especially considering the decision of Supreme Court received in the matter of Sales Tax and its implications on other such matters pending before various authorities; • Assessing the design and implementation of controls for monitoring and arriving at the possible implication of the various legal issues and matters; and • Where relevant, reading external expert advice obtained by the management or discussion of matters with the management and placing reliance on the expert advice on legal, taxation matters, and conclusions drawn therefrom. |
| <u>Non-Renewal of Consent to Operate from JPSCB (as described in note 44 of the financial statements)</u> | |
| <p>The Company’s application for renewal of Consent to Operate (‘CTO’) was denied by Jharkhand State Pollution Control Board (‘JSPCB’). Further Environmental Clearance has also not been granted by Ministry of Environment and</p> | <p>Our Audit procedures based on which we arrived at the conclusion regarding reasonableness of “Going Concern” include the following:</p> <ul style="list-style-type: none"> • Obtained the status of the case from the legal department and their view on the matter; |

| Key Audit Matters | Addressing the key audit matters |
|---|--|
| <p>Forest (MoEF). Hon'ble High Court of Jharkhand vide an Interim Order allowed the operations which had been vacated vide order dated September 23, 2020 and listed the matter for hearing on dated June 25, 2021.</p> <p>The Company has filed a Special Leave Petition (SLP) before Hon'ble Supreme Court of India on September 22, 2020, consequent to which permission has been granted to operate the plant till further order of the said court.</p> | <ul style="list-style-type: none"> • Evaluated the steps being taken by management for ensuring the related compliances and plans for future actions; • Reviewed the appropriateness of provision made for afforestation and other costs to be incurred based on the report received from EIA consultant after considering the various concerns raised during the public hearing on the matter and disclosures made in this respect by the management; and • Reliance placed on the legal expert's view vis-à-vis stay being granted and consultants recommendation and report, pending final decision on the matter. |
| Determination and Valuation of Inventories (as described in note 30.1 of the financial statements) | |
| <p>Inventory of the Company amounting to Rs. 63,552.34 lakhs (as on March 31, 2021) forms about 5.61% of the total assets of the Company.</p> <p>This includes bulk materials such as coal, coke, iron ore etc, which are susceptible to handling loss, moisture loss/gain, spillage etc. and determination of the same requires estimation based on experience and technical expertise.</p> | <p>Our Audit procedures based on which we arrived at the conclusion regarding reasonableness of determination of year-end inventory and valuation thereof include the following:</p> <ul style="list-style-type: none"> • The company has procedure of physical verification of inventories at regular interval by Independent agency for verification of Bulk and other Materials were engaged for the purpose; • We reviewed the report submitted for the verification along with workings and supporting details and obtained reasons/explanation for variations observed with respect to book stock; • Materiality for variations, discrepancies after considering the reasonable allowance for volumetric measurement were duly adjusted with respect to subsequent movements and discrepancies and adjustments pursuant to last such verification carried out. • We examined the valuation process/methodology and checks being performed at multiple levels to ensure that the valuation is consistent with and as per the policy followed in this respect. |

Information Other than the Financial Statements and Auditors' Report Thereon

The Company's Board of Directors is responsible for the other information. The other information comprises the information included in the Annual report but does not include the financial statements and our auditors' report thereon. The other information as stated above is expected to be made available to us after the date of this Auditors' Report.

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

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

Responsibilities of the Management and those charged with governance for the Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these financial statements that give a true and fair view of the state of affairs (financial position), Profit or Loss (financial performance including other comprehensive income), changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the accounting Standards specified under section 133 of the Act.

This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statement that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

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

Auditors' Responsibility for the Audit of the Financial Statements

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

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Companies Act, 2013, we are also responsible for expressing our opinion on whether the company has adequate internal financial controls system with reference to financial statements in place and the operating effectiveness of such controls;
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Company to cease to continue as a going concern; and
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

Materiality is the magnitude of misstatements in the financial statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the 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 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 financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditors' Report) Order, 2016 ("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 in the "Annexure A" a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.
2. Further to our comments in the annexure referred to in the paragraph above, 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 dealt with by this Report are in agreement with the books of account;
 - d) In our opinion, the aforesaid financial statements comply with the Indian 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 March 31, 2021 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2021 from being appointed as a director in terms of Section 164 (2) of the Act; and
 - f) With respect to the adequacy of the internal financial controls with reference to financial statements in place and the operating effectiveness of such controls, refer to our separate Report in "Annexure B". Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company's internal control with reference to financial statements.
3. With respect to the other matters to be included in the Auditors' 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 no. 40 to the financial statements;
 - ii. The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts – Refer Note no. 47(d) to the financial statements; and
 - iii. There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.
4. With respect to the reporting under section 197(16) of the Act to be included in the Auditors' Report, In our opinion and according to the information and explanations given to us, the remuneration (including sitting fees) paid by the Company to its Directors during the current year is in accordance with the provisions of section 197 of the Act and is not in excess of the limit laid down therein.

For Lodha & Co,
Chartered Accountants
Firm's ICAI Registration No.:301051E

Place: Kolkata
Date: April 19, 2021

R. P. Singh
Partner
Membership No: 52438
UDIN: 21052438AAAABC4441

ANNEXURE “A” TO THE AUDITORS’ REPORT OF EVEN DATE:

- i) a. The Company has maintained proper records showing full particulars, including quantitative details and situations of fixed assets.
- b. The Company has a program of verification to cover all the items of fixed assets in a phased manner which, in our opinion, is reasonable having regard to the size of the company and the nature of its assets. Pursuant to this program and also as a specific and comprehensive exercise in this respect, detailed verification of fixed assets was carried out in the 2018-2019 by engaging the services of an Independent firm of professional for the purpose. Further, during the year, the company has carried out physical verification of majority of Capital Work in progress. The discrepancies noted on such verification as stated in Note no. 5.6 and 6.1 of the financial statements even though material in certain cases, pending completion of exercise of ascertaining the reasons thereof had been kept provided for in the books of the account. Considering the coverage of verification as above, no further verification of Property, Plant and Equipment has as such been undertaken and will be covered as per the programme devised in this respect. The programme of verification in our opinion is reasonable having regard to the size and nature of its Assets.
- c. According to the information and explanations given to us, the records examined by us and based on the conveyance deeds provided to us, we report that, the title deeds, comprising all the immovable properties of land and building are held in the name of the Company as on the balance sheet date except as detailed below: (Refer Note no. 5.3 and 5.4 of the financial statements).

(Amount Rs. In Lakhs)

| Freehold Land | Area | Gross Block |
|---|-----------------|--------------------|
| Land under CNT Act pending execution of registration in favour of the company | 229.43 acres | 1,615.99 |

| ROU- Leasehold Land | Area | Gross Block |
|---|-----------------|--------------------|
| Deeds with defective title deed to be converted into Leasehold Land | 325.19 acres | 5,530.82 |
| Title on Forest Land pending compliance of afforestation | 455.35 acres | 31,937.81 |

As stated in Note no. 5.3(a) and (b), the above land are to be regularised after obtaining necessary approvals of the authorities and charge holders. Pending execution of lease deed, these have been shown as ROU Land Leasehold.

- ii) As informed, the inventories of the Company except for materials in transit have been physically verified by the management during the year. In our opinion and according to the information and explanations given to us, the frequency of such verification is reasonable. As the Company’s inventory of raw materials comprises mostly of bulk materials such as coal, coke, iron ore, etc. requiring technical expertise for quantification, the Company has hired an independent agency for the physical verification of the stock of these materials. The material discrepancies noted during the year on verification as stated in Note no. 30.1 of the financial statement have been properly dealt with in the books of the account.

- iii) The Company has not granted any loans secured or unsecured to companies, firms or parties covered in the register maintained under Section 189 of the Act. Accordingly, clause 3 (iii) of the Order is not applicable to the Company.
- iv) In our opinion and according to the information and explanations given to us, the Company has not granted any loans, made investments or provided any guarantees/securities to parties covered under Section 185 and 186 of the Act. Accordingly, clause 3 (iv) of the Order is not applicable to the Company.
- v) The Company has not accepted any deposits during the year and does not have any unclaimed deposits as at March 31, 2021 from public covered under Sections 73 to 76 or any other relevant provisions of the Act and rules framed thereunder and therefore, the provisions of clause 3(v) of the Order is not applicable to the company.
- vi) We have broadly reviewed the books of account maintained by the company pursuant to the Rules made by the Central Government for the maintenance of cost records under Section 148 (1) of the Act in respect of the Company's products to which the said rules are made applicable and are of the opinion that prima facie, the prescribed records have been maintained. We have however, not made a detailed examination of the said records with a view to determine whether they are accurate or complete.
- vii)
 - a. According to the information and explanations given to us, during the year, the Company has generally been regular in depositing with appropriate authorities undisputed statutory dues including Provident Fund, Investor Education Protection fund, Employees' State Insurance, Income Tax, Sales Tax, Wealth Tax, Goods and Service Tax, Service tax, Custom Duty, Excise Duty, Value Added Tax, Cess and other material statutory dues as applicable to it.
 - b. There were no undisputed amounts payable in respect of Provident Fund, Investor Education Protection fund, Employees' State Insurance, Income Tax, Sales Tax, Goods and Service Tax, Wealth Tax, Service tax, Custom Duty, Excise Duty, Value Added Tax, Cess and other material statutory dues in arrear as at March 31, 2021 for a period of more than six months from the date they become payable.
 - c. According to the information and explanations given to us and as stated in Note no. 40(B) of the financial statements, all disputed dues of sales tax, income tax, customs duty, wealth tax, excise duty, service tax, and Cess, if any, prior to the effective date i.e., June 04, 2018 stand extinguished in terms of the resolution plan approved by Hon'ble NCLT. This is supported by the legal opinion taken by the company and on various judicial pronouncements on the said matter.
- viii) In our opinion and on the basis of information and explanations given to us by the management, we are of the opinion that the Company has not defaulted in repayment of dues to financial institutions, banks or debenture holders.
- ix) In our opinion and according to the information and explanations given to us, the company did not raise any money by way of initial public offer or further public offer (including debt instruments) or term loans during the year. Accordingly, provisions of clause 3 (ix) of the Order is not applicable.
- x) During the course of our examination of books of account carried out during the year in accordance with generally accepted auditing practices in India, we have neither come

across incidence of any material fraud by the company or on the company by its officer or employees nor have we been informed of any such case by the management.

- xi) According to the information and explanations given to us and based on our examination of the records of the Company, the Company has paid/provided for managerial remuneration in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Act.
- xii) The Company is not a Nidhi company and hence reporting under paragraph 3(xii) of the Order is 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 Section 177 and 188 of the Act where applicable and details of such transactions have been disclosed in the Financial statements as required by the applicable accounting standards.
- xiv) 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 or partly convertible debentures during the year. Accordingly, clause 3 (xiv) of the Order is not applicable to the Company.
- xv) According to the information and explanations given to us and as represented to us by the management and based on our examination of the records of the Company, the Company has not entered into non-cash transactions with directors or persons connected with him. Accordingly, paragraph 3(xv) of the Order is not applicable.
- xvi) The Company is not required to be registered under section 45-IA of the Reserve Bank of India Act 1934.

For Lodha & Co
Chartered Accountants
Firm's ICAI Registration
No.:301051E

Place: Kolkata
Date: April 19, 2021

R. P. Singh
Partner
Membership No: 52438
UDIN: 21052438AAAABC4441

ANNEXURE “B” TO THE INDEPENDENT AUDITORS’ REPORT

(Referred to in paragraph (f) under ‘Report on Other Legal and Regulatory Requirements’ of our report of even date)

Report on the Internal Financial Controls with reference to financial statements under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 (“the Act”)

We have audited the internal financial controls with reference to financial statements of ESL Steel Limited (“the Company”) as of March 31, 2021 in conjunction with our audit of the financial statements of the Company for the year ended on that date.

Management’s Responsibility for Internal Financial Controls

The Company’s management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated under the Committee of Sponsoring Organisations of the Treadway Commission (2013 framework) (“COSO 2013”). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to company’s policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditors’ Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls with reference to financial statements 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 Institute of Chartered Accountants of India 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 with reference to financial statements 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 with reference to financial statements and their operating effectiveness. Our audit of internal financial controls with reference to financial statements included obtaining an understanding of internal financial controls with reference to financial statements, 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 auditors’ 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 with reference to financial statements 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 with reference to financial statements includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorisations of management and directors of the company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorised acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Inherent Limitations of Internal Financial Controls over Financial Reporting

Because of the inherent limitations of internal financial controls with reference to financial statements, 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 with reference to financial statements to future periods are subject to the risk that the internal financial control with reference to financial statements may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, to the best of our information and according to the explanations given to us, the Company has, in all material respects, an adequate internal financial controls system with reference to financial statements and such internal financial controls with reference to financial statements were operating effectively as at March 31, 2021, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in COSO 2013.

Other Matters

The discrepancies noticed on physical verification of fixed assets and Capital Work in Progress as stated in Note no. 5.6 and 6.1 are being reviewed and required provision with respect to discrepancies etc., has been made in the financial statements. Reliance has been placed on the managements contention and procedures followed for testing the control and forming an opinion on the matter.

For Lodha & Co
Chartered Accountants
Firm's ICAI Registration No.:301051E

Place: Kolkata
Date: April 19, 2021

R. P. Singh
Partner
Membership No: 52438
UDIN: 21052438AAAABC4441

ESL STEEL LIMITED
[Formerly known as Electrosteel Steels Limited]
BALANCE SHEET AS AT March 31, 2021

| Particulars | Note No. | (Rs. in lakhs) | |
|--|----------|-------------------------|-------------------------|
| | | As at March 31, 2021 | As at March 31, 2020 |
| ASSETS | | | |
| Non-current assets | | | |
| (a) Property, Plant and Equipment | 5 | 4,76,305.09 | 4,98,169.05 |
| (b) Capital work-in-progress | 6 | 83,465.94 | 91,011.72 |
| (c) Other Intangible Assets | 7 | 425.97 | 139.39 |
| (d) Financial Assets: | | | |
| (i) Loans | 8 | 53.89 | 52.15 |
| (ii) Other Financial Assets | 9 | 1,058.28 | 505.78 |
| (e) Non Current Tax Assets (net) | 10 | 1,286.10 | 2,206.34 |
| (f) Deferred Tax Assets (net) | 48 | 2,75,228.77 | - |
| (g) Other Non-Current Assets | 11 | 233.31 | 27.69 |
| Total Non-Current Assets | | 8,38,057.35 | 5,92,112.12 |
| Current assets | | | |
| (a) Inventories | 12 | 63,552.34 | 87,074.83 |
| (b) Financial Assets: | | | |
| (i) Investments | 13 | 40,889.96 | 1,10,046.33 |
| (ii) Trade Receivables | 14 | 10,289.77 | 17,172.51 |
| (iii) Cash and Cash Equivalents | 15 | 12,082.00 | 17,077.62 |
| (iv) Bank Balances other than (iii) above | 16 | 27,256.07 | 11,352.41 |
| (v) Other Financial Assets | 17 | 1,25,525.74 | 1,262.99 |
| (c) Other Current Assets | 18 | 15,401.37 | 3,984.44 |
| Total Current Assets | | 2,94,997.25 | 2,47,971.13 |
| TOTAL ASSETS | | 11,33,054.60 | 8,40,083.25 |
| EQUITY AND LIABILITIES | | | |
| Equity | | | |
| (a) Equity Share Capital | 19 | 1,84,903.02 | 1,84,903.02 |
| (b) Other Equity | 20 | 4,37,530.37 | 1,64,380.20 |
| Total Equity | | 6,22,433.39 | 3,49,283.22 |
| Liabilities | | | |
| Non-current liabilities | | | |
| (a) Financial Liabilities: | | | |
| Borrowings | 21 | 2,86,247.91 | 3,31,581.57 |
| Lease Liability | 39 | 478.16 | 451.92 |
| (b) Provisions | 22 | 21,869.42 | 671.79 |
| Total Non-Current Liabilities | | 3,08,595.49 | 3,32,705.28 |
| Current liabilities | | | |
| (a) Financial Liabilities: | | | |
| (i) Operational Buyers' Credit / Suppliers' Credit | 46 | 26,925.27 | 45,826.78 |
| (ii) Trade Payables | 23 | | |
| - Total Outstanding dues of micro enterprises and small enterprises | | 11,002.84 | 4,488.44 |
| - Total Outstanding dues of creditors other than micro enterprises and small enterprises | | 54,109.21 | 38,422.15 |
| (iii) Other Financial Liabilities | 24 | 78,007.94 | 56,350.93 |
| (b) Other Current Liabilities | 25 | 31,264.72 | 12,600.50 |
| (c) Provisions | 26 | 715.74 | 405.95 |
| Total Current Liabilities | | 2,02,025.72 | 1,58,094.75 |
| Total Liabilities | | 5,10,621.21 | 4,90,800.03 |
| TOTAL EQUITY AND LIABILITIES | | 11,33,054.60 | 8,40,083.25 |

Significant accounting policies and other accompanying notes (1 to 49) form an integral part of the financial statements

As per our report of even date

For and on behalf of the Board of Directors

For Lodha & Co,
Chartered Accountants

A Sumathi
(DIN : 07147100)

Non-Executive Director

Pankaj Malhan
(DIN : 08516185)

Whole time Director

R.P. Singh
Partner

Mahesh Iyer

Chief Financial Officer

Place: Bokaro
Dated: April 19, 2021

Manish Kumar Chaudhary
M.No. ACS 23037

Company Secretary

ESL STEEL LIMITED

[Formerly known as Electrosteel Steels Limited]

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

| Particulars | Note No. | (Rs. in lakhs) | |
|--|----------|------------------------------|------------------------------|
| | | Year ended March 31, 2021 | Year ended March 31, 2020 |
| Revenue from Operations | | | |
| Sale of Products | 27 | 4,66,804.69 | 4,29,403.99 |
| Other Operating Income | 28 | 10,338.08 | 8,346.82 |
| Total Revenue from Operations | | 4,77,142.77 | 4,37,750.81 |
| Other Income | 29 | 12,780.64 | 10,364.45 |
| Total Income | | 4,89,923.41 | 4,48,115.26 |
| Expenses | | | |
| Cost of Materials Consumed | 30 | 2,68,286.00 | 2,82,423.70 |
| Changes in Inventories of Finished Goods, Stock-in-Trade and Work-in-Progress | 31 | 13,058.66 | (14,222.62) |
| Employee Benefits Expense | 32 | 15,440.21 | 16,181.47 |
| Finance Costs | 33 | 37,652.67 | 38,413.55 |
| Depreciation and Amortisation Expense | 34 | 34,642.80 | 30,651.89 |
| Other Expenses | 35 | 95,390.24 | 96,848.19 |
| Total Expenses | | 4,64,470.58 | 4,50,296.18 |
| Profit/ (Loss) before exceptional items and tax | | 25,452.83 | (2,180.92) |
| Exceptional Items | 36 | (27,634.25) | - |
| Profit/ (loss) before tax | | (2,181.42) | (2,180.92) |
| Tax expense: | 48 | | |
| (i) Current tax | | - | - |
| (ii) Income Tax for earlier years | | (181.26) | - |
| (iii) Deferred Tax | | (2,75,201.36) | - |
| Profit/ (loss) for the year | | 2,73,201.20 | (2,180.92) |
| Other Comprehensive Income: | | | |
| (i) Items that will not be reclassified to profit or loss | 37 | (78.44) | (52.24) |
| (ii) Income tax relating to items that will not be reclassified to profit or loss | 48 | 27.41 | - |
| Other Comprehensive Income (net of taxes) | | (51.03) | (52.24) |
| Total Comprehensive Income for the year (comprising of Profit/(Loss) and Other Comprehensive Income for the year) | | 2,73,150.17 | (2,233.16) |
| Earning per Equity Share [Face value of Rs. 10 each]: | 42 | | |
| Basic and Diluted | | 14.78 | (0.12) |

Significant accounting policies and other accompanying notes (1 to 49) form an integral part of the financial statements

As per our report of even date

For Lodha & Co,
Chartered Accountants

 R.P. Singh
Partner

 Place: Bokaro
Dated: April 19, 2021

For and on behalf of the Board of Directors

A Sumathi
(DIN : 07147100)

Pankaj Malhan
(DIN : 08516185)

Mahesh Iyer
Manish Kumar Chaudhary
M.No. ACS 23037

Non-Executive Director

Whole time Director

Chief Financial Officer

Company Secretary

ESL STEEL LIMITED

[Formerly known as Electrosteel Steels Limited]

STATEMENT OF CASH FLOW FOR THE YEAR ENDED MARCH 31, 2021

| | (Rs. in lakhs) | |
|---|------------------------------|------------------------------|
| Particulars | Year Ended March 31, 2021 | Year Ended March 31, 2020 |
| A. Cash flow from Operating Activities | | |
| Profit/(Loss) before tax | (2,181.42) | (2,180.92) |
| Adjustment to reconcile Profit/(Loss) before tax to net cash generated from operating activities | | |
| Provision against Compliance Cost for Environmental Clearence | 21,350.95 | - |
| Provision against Capital work in progress | 6,283.30 | - |
| Provision for Obsolete and Non-moving Stores and Spares | 395.18 | 761.44 |
| Depreciation and amortization expenses | 34,642.80 | 30,651.89 |
| Loss/(profit) on sale/discard of fixed assets | 201.68 | 140.53 |
| Sundry credit balances written back | (850.46) | (62.47) |
| Sundry Balances written-off | 716.55 | 4.57 |
| Unrealised (gain)/ Loss on foreign currency translation and transaction | (650.28) | (882.26) |
| Net gain/(loss) on Derivative Instruments on fair valuation through profit and loss | 1,075.57 | (1,958.36) |
| Interest Income | (10,100.44) | (3,833.07) |
| Net Gain/(loss) on Current Investments on Fair Valuation through profit and loss | (65.14) | (857.27) |
| Net Gain/(loss) on disposal of Current Investments | (802.80) | (3,505.94) |
| Impairment Allowance for doubtful debts, Advances and deposits | 512.21 | 261.66 |
| Finance Cost | 37,652.67 | 38,413.55 |
| Operating profit before Working Capital Changes | 88,180.37 | 56,953.35 |
| Movements in working capital : | | |
| Decrease/(Increase) in Inventories | 23,127.32 | (3,538.71) |
| (Decrease)/Increase in Trade Payables, Other financial/Non-Financial liabilities and Provisions | 1,113.18 | 3,477.23 |
| Decrease/(Increase) in Trade Receivables | 17,313.91 | 10,597.40 |
| Decrease/(increase) in loans and advances, Other financial/non-financial assets and other assets | (1,22,811.31) | 436.54 |
| Cash generated from / (used in) operations | 6,923.47 | 67,925.81 |
| Income taxes (paid)/refund (net) | 920.23 | (635.35) |
| Net Cash flow generated / (used in) Operating Activities (A) | 7,843.70 | 67,290.46 |
| B. Cash flow from Investing Activities | | |
| Purchase of Property, Plant and Equipments including intangible assets and movement in Capital Work in Progress | (5,112.33) | (8,210.26) |
| Proceeds from sale of Property, Plant and Equipments | 1.14 | 167.27 |
| Movement in Fixed Deposits and other bank balances (having original maturity of more than three months) | (16,445.83) | 10,474.31 |
| Investment in mutual funds | (2,34,393.89) | (5,21,293.43) |
| Sale Proceeds on disposal of mutual funds | 3,04,418.19 | 4,78,286.28 |
| Interest received | 2,500.16 | 3,918.92 |
| Net Cash flow generated / (used in) Investing Activities (B) | 50,967.44 | (36,656.91) |
| Cash flow from Financing Activities | | |
| Payment to Shareholders pursuant to Exit Offer | - | (10,744.85) |
| Repayment of long-term borrowings (net) | (25,327.31) | - |
| Payment of Lease Liability | (247.30) | (136.06) |
| Interest and other borrowing cost paid | (38,232.15) | (38,365.57) |
| Net Cash flow generated / (used in) Financing Activities (C) | (63,806.76) | (49,246.48) |
| Net Increase/(Decrease) in cash and cash equivalents (A+B+C) | (4,995.62) | (18,612.93) |
| Cash and cash equivalents at the beginning of the year | 17,077.62 | 35,690.55 |
| Cash and cash equivalents at the end of the year (Refer Note no. 15) | 12,082.00 | 17,077.62 |

ESL STEEL LIMITED

[Formerly known as Electrosteel Steels Limited]

STATEMENT OF CASH FLOW FOR THE YEAR ENDED MARCH 31, 2021**(Rs. in lakhs)****Notes**

1. The above Statement of Cash flow has been prepared under Indirect Method as set out in Ind AS 7 "Statement of Cash Flows" as notified under Companies Act, 2013

2. Change in Company's liabilities arising from financing activities:

| Particulars | As at | | Non-Cash Flows | As at | |
|--|----------------|-------------|----------------|----------------|----------------|
| | March 31, 2020 | Cash flows* | | March 31, 2021 | March 31, 2021 |
| Non-current borrowings [Refer Note no. 21] | 3,31,581.57 | - | (45,333.66) | 2,86,247.91 | |
| Current maturities of long term debt [Refer Note no. 24] | 25,327.31 | (25,327.31) | 45,509.16 | 45,509.16 | |
| Finance Lease Liabilities [Refer Note no. 39] | 884.86 | (247.30) | 27,922.22 | 28,559.78 | |
| Interest accrued but not due on borrowings [Refer Note no. 24] | 2,800.56 | (2,800.56) | 1,991.61 | 1,991.61 | |

*Includes cash flows on account of both principal and interest.

3. Cash and cash equivalents consists of the following for the purpose of the Cash Flow Statement:

| Particulars | Year Ended March 31, 2021 | Year Ended March 31, 2020 |
|---|------------------------------|------------------------------|
| Balances with Banks | | |
| In Current Accounts | 5,082.00 | 3,026.67 |
| Cash on hand | - | 0.95 |
| Fixed Deposits with original maturity of less than 3 months | 7,000.00 | 14,050.00 |
| Total cash and cash equivalents (Refer Note No. 15) | 12,082.00 | 17,077.62 |

Significant accounting policies and other accompanying notes (1 to 49) form an integral part of the financial statements

As per our report of even date

For Lodha & Co,

Chartered Accountants

For and on behalf of the Board of Directors

A Sumathi

(DIN : 07147100)

Non-Executive Director

R.P. Singh

Partner

Pankaj Malhan

(DIN : 08516185)

Whole time Director

Mahesh Iyer

Chief Financial Officer

Place: Bokaro

Dated: April 19, 2021

Manish Kumar Chaudhary Company Secretary

M.No. ACS 23037

A. Equity Share Capital

| Particulars | Amount | Amount |
|---|-------------|--------------------|
| Balance as at March 31, 2019 | | |
| Equity Share Capital | 19,616.73 | |
| Share Suspense | 1,76,549.24 | 1,96,165.97 |
| Less: Balance of Shares Suspense pending allotment as on March 31, 2019 | | (1,76,555.30) |
| Add: Shares issued to Shareholders on Amalgamation (Refer Note. 43(a)) | | 1,76,555.30 |
| Less: Shares cancelled pursuant to "Exit Offer" (Refer Note. 43(b)) | | (11,262.95) |
| Balance as at March 31, 2020 | | 1,84,903.02 |
| Changes during the year | | - |
| Balance as at March 31, 2021 | | 1,84,903.02 |

B. Other Equity

As at March 31, 2021

| Particulars | Capital Reserve | Capital Reserve on Amalgamation | Reserves and Surplus | | Other Comprehensive Income | Total |
|--|--------------------|---------------------------------|----------------------|----------------------|--|--------------------|
| | | | Securities premium | Retained earnings | Re-measurement of defined benefit plan | |
| Balance as at March 31, 2020 | 9,59,908.68 | (1,74,593.58) | 1,79,036.44 | (7,99,971.34) | - | 1,64,380.20 |
| Profit/(Loss) for the Year | - | - | - | 2,73,201.20 | - | 2,73,201.20 |
| Other Comprehensive Income for the year | - | - | - | - | (51.03) | (51.03) |
| Total comprehensive income for the year | - | - | - | 2,73,201.20 | (51.03) | 2,73,150.17 |
| Transfer to Retained Earning | | | | (51.03) | 51.03 | - |
| Capital Reserve on cancellation of Shares pursuant to "Exit Offer" (Refer Note. 43(b)) | - | - | - | - | - | - |
| Balance as at March 31, 2021 | 9,59,908.68 | (1,74,593.58) | 1,79,036.44 | (5,26,821.17) | - | 4,37,530.37 |

As at March 31, 2020

| Particulars | Capital Reserve | Capital Reserve on Amalgamation | Reserves and Surplus | | Other Comprehensive Income | Total |
|--|--------------------|---------------------------------|----------------------|----------------------|--|--------------------|
| | | | Securities premium | Retained earnings | Re-measurement of defined benefit plan | |
| Balance as at March 31, 2019 | 9,59,389.11 | (1,74,593.58) | 1,79,036.44 | (7,97,738.18) | - | 1,66,093.79 |
| Profit/(Loss) for the Year | - | - | - | (2,180.92) | - | (2,180.92) |
| Other Comprehensive Income for the year | - | - | - | - | (52.24) | (52.24) |
| Total comprehensive income for the year | - | - | - | (2,180.92) | (52.24) | (2,233.16) |
| Transfer to Retained Earning | | | | (52.24) | 52.24 | - |
| Capital Reserve on cancellation of Shares pursuant to "Exit Offer" (Refer Note. 43(b)) | 519.57 | - | - | - | - | 519.57 |
| Balance at March 31, 2020 | 9,59,908.68 | (1,74,593.58) | 1,79,036.44 | (7,99,971.34) | - | 1,64,380.20 |

Refer Note no. 20 for nature and purpose of reserves

Significant accounting policies and other accompanying notes (1 to 49) form an integral part of the financial statements

As per our report of even date

For Lodha & Co,
Chartered AccountantsR.P. Singh
PartnerPlace: Bokaro
Dated: April 19, 2021

For and on behalf of the Board of Directors

A Sumathi
(DIN : 07147100)

Non-Executive Director

Pankaj Malhan
(DIN : 08516185)

Whole time Director

Mahesh Iyer

Chief Financial Officer

Manish Kumar Chaudhary
M.No. ACS 23037

Company Secretary

ESL STEEL LIMITED

[Formerly known as Electrosteel Steels Limited]

NOTES TO FINANCIAL STATEMENTS FOR THE YEAR ENDED MARCH 31, 2021

1 CORPORATE INFORMATION

ESL Steel Limited ("ESL" or "the Company") is a public limited company in India having its registered office at, Siyaljori, P.O. Jogidih, O.P. Bangaria, P.S. Chandankyari, Bokaro, PIN: 828 303 Jharkhand and is engaged in the manufacture and supply of Billets, TMT Bars, Wire Rods and Ductile Iron(DI) Pipes and also deals in Pig Iron and Iron and Steel Scrap products generated while manufacturing these products. It also produces Metallurgical Coke, Sinter and Power for captive consumption. The Company caters to the needs of construction, automobile, industrial machinery and equipments and water Infrastructure development. The company is a subsidiary of Vedanta Limited. During the year, the company has changed its name from Electrosteel Steels Limited to ESL Steel Limited and also shifted its registered office from Ranchi to Bokaro.

2 BASIS OF PREPARATION OF FINANCIAL STATEMENTS

i. Statement of Compliance

The financial statement have been prepared in accordance with Indian Accounting Standards (referred to as "Ind AS") notified under the Companies (Indian Accounting Standards) Rules, 2015 (as amended) read with Section 133 of the Companies Act, 2013 ("the Act"). The Company has complied with Ind As issued, notified and made effective till the date of authorisation of the financial statements.

Application of new and revised standards:

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

Effective April 01, 2020, there were certain ammendments in Indian Accounting Standards (Ind AS) vide Companies (Indian Accounting Standards) Amendment Rules, 2020 notifying amendment to existing Ind AS 1 'Presentation of Financial Statements', Ind AS 8 'Accounting Policies, Changes in Estimates and Errors', Ind AS 10 'Events after the Reporting Period', Ind AS 34 'Interim Financial Reporting', Ind AS 37 'Provisions, Contingent Liabilities and Contingent Assets', Ind AS 103 'Business Combinations', Ind AS 107 'Financial Instruments: Disclosures', Ind AS 109 'Financial Instruments', Ind AS 116 'Leases'.

Ind AS 1 has been modified to redefine the term 'Material' and consequential amendments have been made in Ind AS 8, Ind AS 10, Ind AS 34 and Ind AS 37.

Ind AS 103 dealing with 'Business Combination' has defined the term 'Business' to determine whether a transaction or event is a business combination. Amendment to Ind AS 107 and 109 relate to hedging relationship directly affected by Interest Rate Benchmark reforms. The ammendment among other things requires an entity to assume that Interest Rate Benchmark on which hedged cash flows are based is not altered as a result of Interest Rate Benchmark reforms.

Ind AS 116 dealing with 'Leases' permitted lessees, as a practical expedient, not to assess whether rent concessions that occur as a direct consequenc of COVID-19 pandemic and meet specified conditions are lease modifications and, instead, to account for those rent concessions as if they were not lease modifications.

Revision in these standards did not have any material impact on the profit/loss and earning per share for the period.

3 SIGNIFICANT ACCOUNTING POLICIES

A. Basis of Preparation

The Financial Statements have been prepared under the historical cost convention on accrual basis except for

- a) certain financial instruments that are measured in terms of relevant Ind AS at fair values/ amortized costs at the end of each reporting period;
- b) certain class of Property, Plant and Equipment which on the date of transition i.e. have been fair valued to be considered as deemed costs; and
- c) Defined benefit plans- Plan Assets measured at fair value

Historical cost convention is generally based on the fair value of the consideration given in exchange for goods and services.

All the assets and liabilities have been classified as current or non-current as per the Company's normal operating cycle and other criteria set out in Ind AS-1 'Presentation of Financial Statements' and Schedule III to the Companies Act, 2013. Having regard to the nature of business being carried out by the Company, the Company has determined its operating cycle as twelve months for the purpose of current and non-current classification.

The functional currency of the Company is determined as the currency of the primary economic environment in which it operates. The Financial Statements are presented in Indian Rupees and all values are rounded off to the nearest two decimal lakhs except otherwise stated.

Fair value measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date under current market conditions.

The Company categorizes assets and liabilities measured at fair value into one of three levels depending on the ability to observe inputs employed for such measurements:

- a) Level 1: Quoted prices (unadjusted) in active markets for identical assets or liabilities.
- b) Level 2: Inputs other than quoted prices included in inputs that are observable, either directly or indirectly for the asset or liability.
- c) Level 3: Inputs for the asset or liability which are not based on observable market data.

The Company has an established control framework with respect to the measurement of fair value. This includes a finance team headed by Chief Financial Officer who has overall responsibility for overseeing all significant fair value measurements who regularly reviews significant unobservable inputs, valuation adjustments and fair value hierarchy under which the valuation should be classified.

B. PROPERTY, PLANT AND EQUIPMENT (PPE)

Property, plant and equipment are stated at cost of acquisition, construction and subsequent improvements thereto less accumulated depreciation and impairment losses, if any. For this purpose cost includes deemed cost on the date of transition i.e. have been fair valued to be considered as deemed costs and comprises purchase price of assets or its construction cost including inward freight, duties and taxes (net of input credit availed) and other expenses related to acquisition or installation and any cost directly attributable to bringing the assets into the location and condition necessary for it to be capable of operating in the manner intended for its use.

Parts of an item of PPE having different useful lives and material value and subsequent expenditure on PPE arising on account of capital improvement or other factors are accounted for as separate components.

The cost of replacing part of an item of PPE is recognised in the carrying amount of the item if it is probable that the future economic benefits embodied within the part will flow to the Company and its cost can be measured reliably. The costs of the day-to-day servicing of PPE are recognised in the statement of profit and loss when incurred. Assets to be disposed off are reported at the lower of the carrying value or the fair value less cost to sell.

The company's leased assets comprises of land, building, plant and machinery etc and these have been separately shown/disclosed under PPE as Right of Use (ROU) Assets.

Direct Expenditure on implementation of the project prior to commencement of production and stabilization of commercial production of the respective plant facility, are classified as Project Development Expenditure and included under Capital Work-in-Progress (net of income earned during the project development stage).

Capital work in progress includes Project Development expenditure, equipment to be installed, construction and erection costs, etc. Such costs are added to the related items of PPE and are classified to the appropriate categories when completed and ready for its intended use.

C. LEASES

The Company's lease asset classes primarily consist of leases for land, office space, transit houses, plant and equipments, furnitures and fixtures etc. The Company assesses whether a contract contains a lease, at inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company assesses whether: (i) the contract involves the use of an identified asset (ii) the Company has substantially all of the economic benefits from use of the asset through the period of the lease and (iii) the Company has the right to direct the use of the asset.

At the date of commencement of the lease, the Company recognizes a right-of-use asset ("ROU") and a corresponding lease liability where applicable for all lease arrangements, except for leases with a term of twelve months or less (short-term leases) and low value leases. For these short-term and low value leases, the Company recognizes the lease payments as an operating expense on a straight-line basis over the term of the lease.

Certain lease arrangements includes the options to extend or terminate the lease before the end of the lease term. ROU assets and lease liabilities include these options considered for arriving at ROU and lease liabilities when it is reasonably certain that they will be exercised.

The lease liability is initially measured at amortized cost at the present value of the future lease payments. The lease payments are discounted using the interest rate implicit in the lease or, if not readily determinable, using the incremental borrowing rates of these leases. Lease liabilities are remeasured with a corresponding adjustment to the related right of use asset if the Company changes its assessment if whether it will exercise an extension or a termination option. ROU asset are separately presented/disclosed under PPE. Lease liability obligations is presented separately under the head "Financial Liabilities" and lease payments are classified as financing cash flows.

The right-of-use assets are initially recognized at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or prior to the commencement date of the lease. Direct cost incurred in this respect are added to the said cost and lease incentive if any are deducted therefrom. They are subsequently measured at cost less accumulated depreciation and impairment losses.

D. DEPRECIATION AND AMORTISATION

Depreciation on PPE except otherwise stated, is provided as per Schedule II of the Companies Act, 2013 on straight line method over the estimated useful lives. Certain Plant and Machinery have been considered Continuous Process Plant on the basis of technical assessment. Depreciation on upgradation of Property, Plant and Equipment is provided over the remaining useful life of the entire component/ PPE.

Depreciation on PPE commences when the assets are ready for their intended use. Based on above, the estimated useful lives of assets for the current period are as follows:

| Category | Useful life |
|---|--------------------|
| Buildings | Upto 60 years |
| Roads | Upto 10 years |
| Plant and machinery | Upto 40 years |
| Computer equipment | 3 to 6 years |
| Furniture and fixtures, Electrical Installation and Laboratory Equipments | 10 Years |
| Railway Sidings | 15 Years |
| Office equipment | 5 Years |
| Vehicles | |
| - Motor cycles, scooters and other mopeds | 10 Years |
| - Others | 8 Years |

For Buildings and Plant and Machinery, the useful life has been determined based on internal assessment and independent evaluation carried out by technical experts. The useful life in case of remaining assets have been taken as per Schedule II of the Act. The company believes that the useful life as given above represents the period over which the company expects to use the assets.

Major Furnance relining are depreciated over a period of 15 years (average expected life)

Pipe Moulds of 350 MM and above are depreciated over a period of three years. Other such moulds are charged to consumption based on production.

Right-of-use assets are depreciated from the commencement date on a straight-line basis over the shorter of the lease term and useful life of the underlying asset.

Machinery Spares which can be used in connection with an item of PPE and whose use are expected to be irregular, are amortised over the useful life of the respective PPE .

Depreciation methods, useful lives and residual values are reviewed, and adjusted as appropriate, at each reporting date.

E. INTANGIBLE ASSETS

Intangible assets are stated at cost of acquisition/deemed cost on transition date, comprising of purchase price inclusive of taxes and duties (net of Input Credit) less accumulated amortization and impairment losses.

Accordingly, cost of computer software are amortized over the useful life using straight line method over a period of 3-5 years.

Depreciation methods, useful lives and residual values and are reviewed, and adjusted as appropriate, at each reporting date.

F. DERECOGNITION OF TANGIBLE AND INTANGIBLE ASSETS

An item of PPE/ROU/Intangible assets is de-recognised upon disposal or when no future economic benefits are expected to arise from its use or disposal. Gain or loss arising on the disposal or retirement of an item of PPE/Intangible Assets is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognised in the Statement of Profit and Loss.

G. IMPAIRMENT OF TANGIBLE AND INTANGIBLE ASSETS

Tangible, Intangible and ROU assets are reviewed at each balance sheet date for impairment. In case events and circumstances indicate any impairment, recoverable amount of assets is determined. An impairment loss is recognized in the statement of profit and loss, whenever the carrying amount of assets either belonging to Cash Generating Unit (CGU) or otherwise exceeds recoverable amount. The recoverable amount is the higher of assets' fair value less cost to disposal and its value in use. In assessing value in use, the estimated future cash flows from the use of the assets are discounted to their present value at appropriate rate.

Impairment losses recognized earlier may no longer exist or may have come down. Based on such assessment at each reporting period the impairment loss is reversed and recognized in the Statement of Profit and Loss. In such cases the carrying amount of the asset is increased to the lower of its recoverable amount and the carrying amount that have been determined, net of depreciation, had no impairment loss been recognized for the asset in prior years that reflects current market assessments of the time value of money and the risk specific to the asset.

H. FINANCIAL INSTRUMENTS

Financial assets and financial liabilities (financial instruments) are recognised when Company becomes a party to the contractual provisions of the instruments.

Financial assets and financial liabilities are initially measured at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities (other than financial assets and financial liabilities at fair value through profit or loss) are added to or deducted from the fair value of the financial assets or financial liabilities, as appropriate, on initial recognition. Transaction costs directly attributable to the financial assets or financial liabilities at fair value through profit or loss are recognised immediately in the Statement of Profit and Loss.

The financial assets and financial liabilities are classified as current if they are expected to be realised or settled within operating cycle of the company or otherwise these are classified as non-current.

The classification of financial instruments whether to be measured at Amortized Cost, at Fair Value Through Profit and Loss (FVTPL) or at Fair Value Through Other Comprehensive Income (FVTOCI) depends on the objective and contractual terms to which they relate. Classification of financial instruments are determined on initial recognition.

i. Financial Assets and Financial Liabilities measured at amortised cost

Financial Assets held within a business whose objective is to hold these assets in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding are measured at amortized cost.

The above Financial Assets and Financial Liabilities comprising of Borrowings, trade and other payables subsequent to initial recognition are measured at amortized cost using Effective Interest Rate (EIR) method.

The effective interest rate is the rate that discounts estimated future cash payments or receipts (including all fees, transaction costs and other premiums or discounts) through the expected life of the Financial Asset or Financial Liability to the gross carrying amount of the financial asset or to the amortised cost of financial liability.

ii. Financial Asset at Fair Value through Other Comprehensive Income (FVTOCI)

Financial assets are measured at fair value through other comprehensive income if these financial assets are held within a business whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. Subsequent to initial recognition, they are measured at fair value and changes therein are recognised directly in other comprehensive income.

NOTES TO FINANCIAL STATEMENTS FOR THE YEAR ENDED MARCH 31, 2021

iii. For the purpose of para (i) and (ii) above, principal is the fair value of the financial asset at initial recognition and interest consists of consideration for the time value of money and associated credit risk.

iv. **Financial Assets or Liabilities at Fair value through profit or loss (FVTPL)**

Financial Instruments which does not meet the criteria of amortised cost or fair value through other comprehensive income are classified as Fair Value through Profit or loss. These are recognised at fair value and changes therein are recognized in the statement of profit and loss.

v. **Derivative and Hedge Accounting**

The company enters into derivative financial instruments such as foreign exchange forward contracts to mitigate the risk of changes in foreign exchange rates in respect of financial instruments and forecasted cash flows denominated in certain foreign currencies. The Company uses hedging instruments which provide principles on the use of such financial derivatives consistent with the risk management strategy of the Company. The hedge instruments are designated and documented as hedges and effectiveness of hedge instruments is assessed and measured at inception and on an ongoing basis to reduce the risk associated with the exposure being hedged.

Any derivative that is either not designated as a hedge, or is so designated but is ineffective as per Ind AS 109 "Financial Instruments", is categorized as a financial asset/liability, at fair value through profit or loss. Transaction costs attributable to the same are also recognized in statement of profit and loss. Changes in the fair value of the derivative hedging instrument designated as a fair value hedge are recognized in the statement of profit and loss.

Changes in the fair value of the derivative hedging instrument designated as a cash flow hedge are recognized in other comprehensive income and presented within equity as cash flow hedging reserve to the extent that the hedge is effective.

Hedging instrument which no longer meets the criteria for hedge accounting, expires or is sold, terminated or exercised, then hedge accounting is discontinued prospectively. Any gain or loss recognised in other comprehensive income and accumulated in equity remains therein till that time and thereafter to the extent hedge accounting being discontinued is recognised in Statement of Profit and Loss. When a forecasted transaction is no longer expected to occur, the cumulative gain or loss accumulated in equity is transferred to the statement of profit and loss.

vi. **Impairment of financial assets**

A financial asset is assessed for impairment at each balance sheet date. A financial asset is considered to be impaired if objective evidence indicates that one or more events have had a negative effect on the estimated future cash flows of that asset.

The company measures the loss allowance for a financial assets at an amount equal to the lifetime expected credit losses if the credit risk on that financial instrument has increased significantly since initial recognition. If the credit risk on a financial instrument has not increased significantly since initial recognition, the company measures the loss allowance for that financial instrument at an amount equal to 12-month expected credit losses.

In case of trade receivables or contract assets that result in relation to revenue from contracts with customers, the company measures the loss allowance at an amount equal to lifetime expected credit losses.

vii. **Derecognition of financial instruments**

The Company derecognizes a financial asset or a group of financial assets when the contractual rights to the cash flows from the asset expire, or when it transfers the financial asset and substantially all the risks and rewards of ownership of the asset to another party.

On derecognition of a financial asset, the difference between the asset's carrying amount and the sum of the consideration received and receivable are recognized in statement of profit and loss.

On derecognition of assets measured at FVTOCI the cumulative gain or loss previously recognised in other comprehensive income is reclassified from equity to profit or loss as a reclassification adjustment.

Financial liabilities are derecognized if the Company's obligations specified in the contract expire or are discharged or cancelled. The difference between the carrying amount of the financial liability derecognized and the consideration paid and payable is recognized in Statement of Profit and Loss.

viii. **Offsetting financial instruments**

Financial assets and liabilities are offset and the net amount is reported in the balance sheet where there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis or realise the asset and settle the liability simultaneously. The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the Company or the counterparty.

ix. **Cash and cash equivalents**

All highly liquid financial instruments, which are readily convertible into determinable amounts of cash and which are subject to an insignificant risk of change in value and are having original maturities of three months or less from the date of purchase, are considered as cash equivalents. Cash and cash equivalents includes balances with banks which are unrestricted for withdrawal and usage.

I. INVENTORIES

Inventories are valued at lower of the cost or net realizable value. Cost of inventories is ascertained on 'weighted average' basis. Materials and other supplies held for use in the production of inventories are not written down below cost if the finished products in which they will be incorporated are expected to be sold at or above cost.

Cost in respect of raw materials and stores and spares includes expenses incidental to procurement of the same. Cost in respect of finished goods represents raw material cost plus costs of conversion, comprising labor costs and an attributable proportion of manufacturing overheads based on normal levels of activity.

Net realisable 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.

By-products and scrap are valued at net realisable value.

J. FOREIGN CURRENCY TRANSACTIONS

Transactions in foreign currencies are translated into the functional currency at the exchange rates prevailing on the date of the transactions. Foreign currency monetary assets and liabilities at the year-end are translated at the year-end exchange rates. Non-monetary items which are carried in terms of historical cost denominated in a foreign currency, are reported using the exchange rate at the date of transaction. The loss or gain thereon and also on the exchange differences on settlement of the foreign currency transactions during the year are recognized as income or expense in the statement of Profit and Loss account. Foreign exchange gain/loss to the extent considered as an adjustment to Interest Cost are considered as part of borrowing cost.

K. EQUITY SHARE CAPITAL

An equity instrument is a contract that evidences residual interest in the assets of the company after deducting all of its liabilities. Par value of the equity shares is recorded as share capital and the amount received in excess of par value is classified as Securities Premium.

Costs directly attributable to the issue of ordinary shares are recognised as a deduction from equity, net of any tax effects.

L. PROVISIONS, CONTINGENT LIABILITIES AND CONTINGENT ASSETS

Provisions involving substantial degree of estimation in measurement are recognized when there is a legal or constructive obligation as a result of past events and it is probable that there will be an outflow of resources and a reliable estimate can be made of the amount of obligation. Provisions are not recognised for future operating losses. The amount recognized as a provision is the best estimate of the consideration required to settle the present obligation at the end of the reporting period, taking into account the risks and uncertainties surrounding the obligation.

Contingent liabilities are not recognised and disclosed by way of notes to the financial statements 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 when there is 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 same or a reliable estimate of the amount in this respect cannot be made.

When there is a possible obligation or a present obligation and the likelihood of outflow of resources is remote, no provision or disclosure for contingent liability is made.

Contingent Assets are not recognized but disclosed in the financial statement by way of notes when inflow of economic benefit is probable.

M. EMPLOYEE BENEFITS

Employee benefits are accrued in the year in which services are rendered by the employee.

Short-term Employee Benefits

Short term Employee benefits are recognised as an expense in the statement of profit and loss in the year in which services are rendered.

Post-employment Benefit Plans

Contribution to defined contribution plans such as Provident Fund etc. is being made in accordance with the statute and are recognized as and when incurred.

Contribution to gratuity, superannuation etc., under defined benefit plans in keeping with the related scheme are recognised as expenditure for the year.

In case of Defined Benefit Plans, the cost of providing the benefit is determined using the Projected Unit Credit Method with actuarial valuation being carried out at each Balance Sheet date. Actuarial gains and losses are recognised in Other Comprehensive Income for the period in which they occur. Past service cost is recognised immediately to the extent that the benefits are already vested, and otherwise is amortised on a straight-line basis over the average period until the benefits become vested. The retirement benefit obligation recognised in the Balance Sheet represents the present value of the defined benefit obligation as adjusted for unrecognised past service cost, if any, and as reduced by the fair value of plan assets, where funded. Any asset resulting from this calculation is limited to the present value of any economic benefit available in the form of refunds from the plan or reductions in future contributions to the plan.

Other Long-term Employee Benefits (Unfunded)

The cost of providing long-term employee benefits consisting of Leave Encashment is determined using Projected Unit Credit Method with actuarial valuation being carried out at each Balance Sheet date. Actuarial gains and losses and past service cost are recognised immediately in the Statement of Profit and Loss for the period in which they occur. Long term employee benefit obligation recognised in the Balance Sheet represents the present value of related obligation.

N. REVENUE RECOGNITION

i. REVENUE FROM SALE OF PRODUCT

Revenue from Sales is recognised when control of the products has been transferred and/or the products are delivered to the customers. Delivery occurs when the product has been shipped or delivered to the specific location as the case may be, and control has been transferred and either the customer has accepted the product in accordance with the contract or the company has objective evidence that all criteria for acceptance has been satisfied.

Revenue is measured at the fair value of the consideration received or receivable net of returns, claims and discounts to customers. Goods and Service Tax (GST) and such other taxes collected on behalf of third party not being economic benefits flowing to the Company are excluded from revenue.

Discount as estimated based on expected sales volume or otherwise is deducted from Revenue from Operations. Past experience is used to estimate the discounts, using the most likely method and revenue is recognised to the extent that it is highly probable that a significant reversal will not occur.

The Company provides warranties for defects, replacement etc. that existed at the time of sale based on historical trend and records.

ii. INTEREST, DIVIDEND AND CLAIMS

Dividend income is recognized when the right to receive payment is established. Interest has been accounted using effective interest rate method. Insurance claims/ other claims are accounted as and when admitted / settled.

iii. EXPORT BENEFITS

Export incentives are accounted for in the year of export if the entitlements and realisability thereof can be estimated with reasonable accuracy and conditions precedent to such benefit is fulfilled.

O. BORROWING COST

Borrowing cost comprises of interest and other costs incurred in connection with the borrowing of the funds. All borrowing costs are recognized in the Statement of Profit and Loss using the effective interest method except to the extent attributable to qualifying Property Plant Equipment (PPE) which are capitalized to the cost of the related assets. A qualifying PPE is an asset, that necessarily takes a substantial period of time to get ready for its intended use or sale. Borrowing cost also includes exchange differences to the extent considered as an adjustment to the borrowing costs.

P. RESEARCH AND DEVELOPMENT

Research and development cost (other than cost of fixed assets acquired) are charged as an expense in the year in which they are incurred.

Q. GOVERNMENT GRANTS

Government grants are recognized on systematic basis when there is reasonable certainty of realization of the same. Revenue grants including subsidy/rebates are credited to Statement of Profit and Loss Account under "Other Operating Income" or deducted from the related expenses for the period to which these are related. Grants which are meant for purchase, construction or otherwise to acquire non current assets are recognized as Deferred Income and disclosed under Non Current Liabilities and transferred to Statement of Profit and Loss on a systematic basis over the useful life of the respective asset. Grants relating to non-depreciable assets is transferred to Statement of Profit and Loss over the periods that bear the cost of meeting the obligations related to such grants.

R. TAXES ON INCOME

Income tax expense representing the sum of current tax expenses and the net charge of the deferred taxes is recognized in the income statement except to the extent that it relates to items recognized directly in equity or other comprehensive income.

Current income tax is provided on the taxable income and recognized at the amount expected to be paid to or recovered from the tax authorities, using the tax rates and tax laws that have been enacted by the end of the reporting period.

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities in the Financial Statements and the corresponding tax bases used in the computation of taxable profit. Deferred tax liabilities are generally recognized for all taxable temporary differences. Deferred tax assets are generally recognized for all deductible temporary differences with respect to carry forward of any unused tax losses/depreciation to the extent that it is probable that taxable profits will be available against these can be utilized.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets and liabilities and when the deferred tax balances relate to the same taxation authority. Current tax assets and tax liabilities are offset where the Company has a legally enforceable right to offset and intends either to settle on a net basis, or to realise the asset and settle the liability simultaneously.

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

NOTES TO FINANCIAL STATEMENTS FOR THE YEAR ENDED MARCH 31, 2021

Deferred tax assets include Minimum Alternative Tax (MAT) measured in accordance with the tax laws in India, which is likely to give future economic benefits in the form of availability of set off against future income tax liability and such benefits can be measured reliably and it is probable that the future economic benefit associated with asset will be realized.

The carrying amount of deferred tax assets is reviewed at the end of each reporting period and adjusted to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the deferred tax asset to be utilized.

S. EARNINGS PER SHARE

Basic earnings per share are computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares outstanding during the period. Diluted earnings per share is computed by dividing the net profit attributable to the equity holders of the company by the weighted average number of equity shares considered for deriving basic earnings per share and also the weighted average number of equity shares that could have been issued upon conversion of all dilutive potential equity shares.

T. SEGMENT REPORTING

Operating segments are identified and reported taking into account the different risk and return, organisation structure and the internal reporting provided to the chief-operating decision maker. The chief operating decision maker, who is responsible for allocating resources and assessing performance of the operating segments, has been identified as the Segment manager who allocates resources and assess the operating activities, financial results, forecasts, or plans for the segment.

4 CRITICAL ACCOUNTING JUDGMENTS, ASSUMPTIONS AND KEY SOURCES OF ESTIMATION AND UNCERTAINTY

The preparation of the financial statements in conformity with the measurement principle of Ind AS requires management to make estimates, judgments and assumptions. These estimates, judgments and assumptions affect the application of accounting policies and the reported amounts of assets and liabilities, the disclosures of contingent assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the period. Accounting estimates could change from period to period. Actual results could differ from those estimates. Appropriate changes in estimates are made as management becomes aware of changes in circumstances surrounding the estimates. Differences between the actual results and estimates are recognized in the year in which the results are known / materialized and, if material, their effects are disclosed in the notes to the financial statements.

Application of accounting policies that require significant areas of estimation, uncertainty and critical judgments and the use of assumptions in the financial statements have been disclosed below. The notes provide an overview of the areas that involved a high degree of judgement or complexity and of items which are likely to be materially adjusted due to estimates and assumptions turning out to be different than those originally assessed. Detailed information about each of these estimates and judgements is included in relevant note together with information about basis of calculation of each affected line item in the financial statements. The key assumptions concerning the future and other key sources of estimation/assumptions at the balance sheet date, that have a significant risk of causing a material adjustment to the carrying amount of assets and liabilities and related revenue impact within the next financial year are discussed below:

a) **Depreciation / amortisation of and impairment loss on property, plant and equipment / intangible assets.**

Property, plant and equipment, ROU and intangible assets are depreciated/amortized on straight-line basis over the estimated useful lives in accordance with Internal assessment and Independent evaluation carried out by technical expert/ Schedule II of the Companies Act, 2013, taking into account the estimated residual value, wherever applicable.

The company reviews its carrying value of its Tangible and Intangible Assets whenever there is objective evidence that the assets are impaired. The required level of impairment losses to be recognised is estimated by reference to the estimated value in use or recoverable amount of the respective assets. In such situation Assets' recoverable amount is estimated which is higher of asset's or cash generating units (CGU) fair value less cost of disposal and its value in use. In assessing value in use the future cash flows are estimated based on assumptions involving future projections and profitability which are inherently uncertain and are discounted using pre-tax discount rate which reflect the current assessment of time value of money. In determining fair value less cost of disposal, recent market realisations are considered or otherwise in absence of such transactions appropriate valuations are adopted.

During the year ended March 31, 2018 the company determined the recoverable amount of the CGU based on value in use (i.e. the transaction price in terms of approved resolution plan) and impairment with respect to carrying value of the assets was provided. This has been reviewed based on the assumptions and adjustments for forecasts which may vary subsequently. According to such review, no further adjustment in the carrying value thereof has been considered essential. There are uncertainties involved in assumptions and estimations and actual impact thereof may be different than estimated.

b) **Arrangement contain leases and classification of leases**

Ind AS 116 requires lessees to determine the lease term as the non-cancellable period of a lease adjusted with any option to extend or terminate the lease, if the use of such option is reasonably certain. The Company makes an assessment on the expected lease term on a lease-by-lease basis and thereby assesses whether it is reasonably certain that any options to extend or terminate the contract will be exercised. In evaluating the lease term, the Company considers factors such as any significant leasehold improvements undertaken over the lease term, costs relating to the termination of the lease and the importance of the underlying asset to the company's operations taking into account among other things, the location of the underlying asset and the availability of suitable alternatives. The lease term in future periods is reassessed to ensure that the lease term reflects the current economic circumstances.

c) **Impairment loss on trade receivables**

The Company evaluates whether there is any objective evidence that trade receivables are impaired and determines the amount of impairment loss as a result of the inability of the debtors to make required payments. The Company bases the estimates on the ageing of the trade receivables balance, credit-worthiness of the trade receivables and historical write-off experience. If the financial conditions of the trade receivable were to deteriorate, actual write-offs would be higher than estimated.

d) **Income taxes**

Significant judgment is required in determination of taxability of certain income and deductibility of certain expenses during the estimation of the provision for income taxes. Also there are many transactions and calculations during the ordinary course of business for which the ultimate tax determination is uncertain. Further judgement is involved in determining the deferred tax position on the balance sheet date. In earlier year, the company subsequent to approval of ARP by Hon'ble NCLT had credited the amount of Equity Share Capital issued against non-sustainable debt and reduced thereafter to Capital Reserve in accordance with ARP. The management does not expect any tax liability in this respect based on independent professional advice received in this respect.

The Company has significant amount of unused tax losses. Significant management judgement is required to determine the amount of deferred tax assets that can be recognised, based upon the likely timing for utilisation thereof against taxable profit in future years and the level of future taxable profit together with future tax planning strategies. The management has reviewed the rationale for recognition of DTA and based on the likely timing and level of profitability in future and expected utilisation of deferred tax thereagainst and has been recognised during the year. These are based on assumptions and projections for future which are inherently uncertain. The amount of DTA may vary in subsequent years depending upon then prevailing condition, circumstances and profitability.

e) **Going Concern assumption**

As indicated in Note no. 44 of the financial statements, renewal of Consent to Operate (CTO) and Environmental Clearance (EC) has been denied by the respective authorities and the matter had been referred to Hon'ble High Court of Jharkhand whereby a stay had been granted till further hearing. However, such stay was vacated by Hon'ble High Court beyond Septemebr 23, 2020 and the company had to file a SLP before Hon'ble Supreme Court of India consequent to which permission has been granted to operate till further order. Even though EC has not yet been received and there is a uncertainty in this respect on this date, pending final decision and considering the effective steps are being taken towards required clearances, regularisation and compliance of TOR to secure EC, the financial statement has been prepared on a Going Concern basis.

f) **Defined benefit obligation (DBO)**

The present value of the defined benefit obligations and long term employee benefits depends on a number of factors that are determined on an actuarial basis using a number of assumptions. The assumptions used in determining the net cost (income) include the discount rate. Any changes in these assumptions will impact the carrying amount of defined benefit obligations. The Company determines the appropriate discount rate at the end of each year. This is the interest rate that should be used to determine the present value of estimated future cash outflows expected to be required to settle the obligations. In determining the appropriate discount rate, the Company considers the interest rates of Government securities that have terms to maturity approximating the terms of the related defined benefit obligation. Other key assumptions for obligations are based on current market conditions

g) **Provisions and Contingencies**

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

Management uses in-house and external legal professional to make judgment for estimating the possible outflow of resources, if any, in respect of contingencies/claim/litigations/ against the Company as it is not possible to predict the outcome of pending matters with accuracy.

In accordance with ARP, contingent liability prior to the effective date of NCLT Order has been extinguished which being further substantiated based on various judicial pronouncements including those of Hon'ble Supreme Court of India. Although there can be no assurance with regard to final outcome of the legal proceeding, the company does not expect to have an adverse impact in this respect. Disclosure in this respect have been made in Note no. 40(B) of the financial statements.

5 PROPERTY, PLANT AND EQUIPMENT:

| As at March 31, 2021 | | | | | | | | | | | |
|---------------------------------|------------------|--------------------|----------------------|--------------------------|----------------------------|---------------------|------------------------|---------------|-------------------|------------------|---------------------|
| Particulars | Freehold land | Buildings | ROU - Land Leasehold | ROU - Building Leasehold | ROU - Equipments Leasehold | Plant and Equipment | Furniture and Fixtures | Vehicles | Office Equipments | Railway Siding | Total |
| Gross Block | | | | | | | | | | | |
| As at March 31, 2020 | 66,455.73 | 1,99,589.11 | 5,531.76 | 360.90 | 661.70 | 8,00,919.59 | 592.68 | 389.29 | 3,478.05 | 20,046.13 | 10,98,024.94 |
| Additions | - | 20.72 | 6,611.69 | 4.31 | 196.99 | 8,964.38 | 37.83 | 8.71 | 91.85 | - | 15,936.48 |
| Disposal | - | - | - | - | - | (467.97) | - | (8.46) | (3.18) | (5.84) | (485.45) |
| Other Adjustments | (25,326.12) | - | 25,326.12 | (45.57) | (93.54) | - | - | - | - | - | (139.11) |
| As at March 31, 2021 | 41,129.61 | 1,99,609.83 | 37,469.57 | 319.64 | 765.15 | 8,09,416.00 | 630.51 | 389.54 | 3,566.72 | 20,040.29 | 11,13,336.86 |
| Accumulated Depreciation | | | | | | | | | | | |
| As at March 31, 2020 | - | 34,415.31 | 1.67 | 101.36 | 70.89 | 1,39,891.64 | 265.00 | 247.98 | 1,218.62 | 4,353.81 | 1,80,566.28 |
| Charge for the period | - | 3,872.72 | 2,281.81 | 105.85 | 295.00 | 26,314.29 | 33.36 | 12.53 | 910.04 | 766.24 | 34,591.84 |
| Disposal | - | - | - | - | - | (101.86) | - | (5.23) | (2.52) | (2.07) | (111.68) |
| Other Adjustments | - | - | - | - | - | - | - | - | - | - | - |
| As at March 31, 2021 | - | 38,288.03 | 2,283.48 | 207.21 | 365.89 | 1,66,104.07 | 298.36 | 255.28 | 2,126.14 | 5,117.98 | 2,15,046.44 |
| Impairment | | | | | | | | | | | |
| As at March 31, 2020 | 19,848.34 | 77,522.21 | - | - | - | 3,12,899.17 | 156.95 | 62.55 | 1,113.49 | 7,686.90 | 4,19,289.61 |
| Charge for the period | - | - | - | - | - | - | - | - | - | - | - |
| Disposal | - | - | - | - | - | (148.54) | - | (2.28) | (0.63) | (2.02) | (153.47) |
| Other Adjustments | - | - | - | - | - | 2,849.19 | - | - | - | - | 2,849.19 |
| As at March 31, 2021 | 19,848.34 | 77,522.21 | - | - | - | 3,15,599.82 | 156.95 | 60.27 | 1,112.86 | 7,684.88 | 4,21,985.33 |
| Net carrying amount | | | | | | | | | | | |
| As at March 31, 2021 | 21,281.27 | 83,799.59 | 35,186.09 | 112.43 | 399.26 | 3,27,712.11 | 175.20 | 73.99 | 327.72 | 7,237.43 | 4,76,305.09 |

| As at March 31, 2020 | | | | | | | | | | | |
|---------------------------------|------------------|--------------------|----------------------|--------------------------|----------------------------|---------------------|------------------------|---------------|-------------------|------------------|---------------------|
| Particulars | Freehold land | Buildings | ROU - Land Leasehold | ROU - Building Leasehold | ROU - Equipments Leasehold | Plant and Equipment | Furniture and Fixtures | Vehicles | Office Equipments | Railway Siding | Total |
| Gross Block | | | | | | | | | | | |
| As at March 31, 2019 | 66,453.85 | 1,99,524.70 | - | - | - | 7,93,542.31 | 589.45 | 390.39 | 3,410.94 | 20,029.67 | 10,83,941.31 |
| Additions | 1.88 | 64.41 | 5,531.76 | 360.90 | 661.70 | 8,160.75 | 6.88 | 31.00 | 67.74 | 16.46 | 14,903.48 |
| Disposal | - | - | - | - | - | (783.47) | (3.65) | (32.10) | (0.63) | - | (819.85) |
| Other Adjustments | - | - | - | - | - | - | - | - | - | - | - |
| As at March 31, 2020 | 66,455.73 | 1,99,589.11 | 5,531.76 | 360.90 | 661.70 | 8,00,919.59 | 592.68 | 389.29 | 3,478.05 | 20,046.13 | 10,98,024.94 |
| Accumulated Depreciation | | | | | | | | | | | |
| As at March 31, 2019 | - | 30,553.80 | - | - | - | 1,14,558.84 | 225.44 | 260.75 | 1,001.77 | 3,589.42 | 1,50,190.02 |
| Charge for the period | - | 3,861.51 | 1.67 | 101.36 | 70.89 | 25,534.88 | 41.39 | 11.78 | 217.32 | 764.39 | 30,605.19 |
| Disposal | - | - | - | - | - | (202.08) | (1.83) | (24.55) | (0.47) | - | (228.93) |
| Other Adjustments | - | - | - | - | - | - | - | - | - | - | - |
| As at March 31, 2020 | - | 34,415.31 | 1.67 | 101.36 | 70.89 | 1,39,891.64 | 265.00 | 247.98 | 1,218.62 | 4,353.81 | 1,80,566.28 |
| Impairment | | | | | | | | | | | |
| As at March 31, 2019 | 19,848.34 | 77,522.21 | - | - | - | 3,13,176.65 | 158.06 | 66.99 | 1,113.60 | 7,686.90 | 4,19,572.75 |
| Charge for the period | - | - | - | - | - | - | - | - | - | - | - |
| Disposal | - | - | - | - | - | (277.48) | (1.11) | (4.44) | (0.11) | - | (283.14) |
| Other Adjustments | - | - | - | - | - | - | - | - | - | - | - |
| As at March 31, 2020 | 19,848.34 | 77,522.21 | - | - | - | 3,12,899.17 | 156.95 | 62.55 | 1,113.49 | 7,686.90 | 4,19,289.61 |
| Net carrying amount | | | | | | | | | | | |
| As at March 31, 2020 | 46,607.39 | 87,651.59 | 5,530.09 | 259.54 | 590.81 | 3,48,128.78 | 170.73 | 78.76 | 1,145.94 | 8,005.42 | 4,98,169.05 |

- 5.1 Gross block includes certain property, plant and equipment i.e. freehold land which have been valued on April 01, 2015 i.e. the date of transition by an Independent Valuer and considered as "deemed cost" resulting in increase in value thereof by Rs. 17,355.54 lakhs
- 5.2 Gross block of Railway siding includes Rs. 120,70.19 lakhs (March 31, 2020: Rs 12,070.19 lakhs), incurred for construction of Railway siding ownership of which does not vest with the company.
- 5.3 ROU Land Leasehold includes:-
a) Rs. 5,461.16 lakhs in respect of 325.19 acres which are under process of regularisation by conversion to leasehold land (including Rs.4,144.74 lakhs being demand for such conversion) against which Rs. 3,315.79 lakhs has been paid. Pending execution of lease deed such Leasehold land has been accounted for as "ROU- Land Leasehold".
b) 455.35 acres amounting to Rs. 31,935.00 lakhs (on proportionate basis) including demand of Rs. 23,552.55 lakhs against which Rs. 2,295.98 lakhs has been paid and to provide non-forest land in exchange thereof. The title deed for such land pertain to forest department pending compliances pertaining to requirement of afforestation etc. and approval from respective authorities. Necessary steps are being taken for regularisation etc., as detailed in Note no. 44 in respect of above land and execution of lease deed in this respect is subject to necessary approval from relevant authorities and charge holders.
c) As per the Stage 1 clearance, the company apart from afforestation cost was required to provide non-forest land in exchange of the land used by the company for Steel Plant and Rs. 23,552.55 lakhs was provided in earlier year as cost estimated to be incurred in this respect. Since, there is restriction on use of such land the same has been transferred from Freehold to ROU- Land Leasehold included under other adjustments. Further, Rs. 6,611.69 lakhs being the NPV for area under utilisation by the Steel Plant as per the report of EIA consultant has been capitalised during the year as detailed in Note no. 44.
d) Pending execution of lease deed and necessary approval in this respect, the above ROU Land Leasehold has been amortised considering a period of thirty years from the date of demand/capitalisation as the case may be.
- 5.4 Freehold land includes 229.42 acres amounting to Rs. 1,615.99 lakh covered under The Chota Nagpur Tenancy Act, 1908 and as such registration in favour of the company could not be executed.
- 5.5 In earlier years, the Company had carried out the Impairment testing determining the Fair Value of Property, Plant and Equipment (including those lying under Capital Work in Progress) less cost to Sale and Value in Use of the Cash Generating Unit. The said Valuation was been carried out by an Independent Valuer appointed in this respect.
- For the said purpose, the entire Steel manufacturing facility consisting of DI Pipe, Wire Rod, TMT Bar, Steel Billets and Pig Iron was considered as a single cash generating unit for arriving at the value in use. This had been estimated as per the Discounted Cash Flow method based on future projections and assumptions.
- The recoverable amount of the CGU was determined to be Rs. 6,08,186.00 lakhs as on that date and impairment of Rs. 5,11,193.01 lakhs was provided in that year. During the year, no further impairment/reversal thereof has been indicated and provision for impairment as determined has remained unchanged.
- 5.6 During the year ended March 31, 2019, the management had appointed an External Agency for physical verification of fixed assets and review of useful life and residual value of the Property, Plant and Equipment. Provision for discrepancies with respect to Property, Plant and Equipment being physically not traceable amounting to Rs.14,277.91 lakhs (Net Block) as made in that year has been continued in this year.
- 5.7 Refer note. No. 21 in respect of charge created against borrowings. This includes 325.19 acres of land to be converted to leasehold land as stated in Note no. 5.3(a) above.

6 CAPITAL WORK-IN-PROGRESS

| Particulars | Refer Note No. | As at | |
|-------------------------------------|----------------|------------------|------------------|
| | | Mar 31, 2021 | March 31, 2020 |
| (a) Capital Work in Progress | 6.1 | 95,301.02 | 96,776.15 |
| (b) Project Development Expenditure | 6.2 | 68,832.61 | 71,469.15 |
| (c) Impairment | 5.5 | (74,384.39) | (77,233.58) |
| (d) Less: Provision | 6.1 | (6,283.30) | - |
| | | 83,465.94 | 91,011.72 |

6.1 The project undertaken in earlier years for enhancing the production capacity from 1.5MTPA to 2.57MTPA mainly consisting of one Blast Furnace, Horizontal Coke Oven and other related equipments and facilities and selection of vendors etc, for the project is under advanced stage of consideration. Accordingly, Rs. 83,465.94 lakhs being cost of various plant and equipment acquired for the project in earlier years has been carried forward as capital work in progress. Detailed physical verification of project equipments is being undertaken by an independent firm of professionals. Pending completion of exercise as an interim measure provision of Rs. 6,283.30 lakhs towards discrepancies observed on such verification has been made in these financial statements. This will be followed by the technical evaluation and study of various equipments etc., so carried forward as capital work in progress. Review of adjustments finally needed in this respect will be undertaken and given effect to on determination thereof on completion of the entire exercise.

6.2 Project Development Expenditure

'Project Development Expenditure' as given below represents proportionate Interest and other pre-operative expenditure related to the above project accounted pending allocation to the respective assets and/or otherwise to be adjusted on completion of the project:

Project Development Expenditure Account (Included under Capital Work-in-Progress)

| Particulars | As at | |
|--|------------------|------------------|
| | Mar 31, 2021 | March 31, 2020 |
| Balance brought forward | 71,469.15 | 71,469.15 |
| Less: Allocated/Transferred during the year to Property, Plant and Equipment | (2,636.54) | - |
| Total Project development expenditure carried forward | 68,832.61 | 71,469.15 |

NOTES TO FINANCIAL STATEMENTS FOR THE PERIOD ENDED MARCH 31, 2021

7. OTHER INTANGIBLE ASSETS

(Rs. in lakhs)

As at March 31, 2021

| Particulars | Gross Block | | | Amortisation | | | | Impairment | | | | Net carrying amount | |
|--------------------|----------------------|-----------|-------------------|----------------------|----------------------|-----------------------|-------------------|----------------------|----------------------|----------------|-------------------|----------------------|----------------------|
| | As at March 31, 2020 | Additions | Other Adjustments | As at March 31, 2021 | As at March 31, 2020 | Charge for the period | Other Adjustments | As at March 31, 2021 | As at March 31, 2020 | For the period | Other Adjustments | As at March 31, 2021 | As at March 31, 2021 |
| Computer Softwares | 496.58 | 337.54 | - | 834.12 | 302.53 | 50.96 | - | 353.49 | 54.66 | - | - | 54.66 | 425.97 |

As at March 31, 2020

| Particulars | Gross Block | | | Amortisation | | | | Impairment | | | | Net carrying amount | |
|--------------------|----------------------|-----------|-------------------|----------------------|----------------------|-----------------------|-------------------|----------------------|----------------------|----------------|-------------------|----------------------|----------------------|
| | As at March 31, 2019 | Additions | Other Adjustments | As at March 31, 2020 | As at March 31, 2019 | Charge for the period | Other Adjustments | As at March 31, 2020 | As at March 31, 2019 | For the period | Other Adjustments | As at March 31, 2020 | As at March 31, 2020 |
| Computer Softwares | 380.46 | 116.12 | - | 496.58 | 255.83 | 46.70 | - | 302.53 | 54.66 | - | - | 54.66 | 139.39 |

8 LOANS

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|---|----------------|-------------------------|-------------------------|
| (a) Security Deposit | | | |
| Unsecured, considered good | | 53.89 | 52.15 |
| Unsecured, Credit Impaired | | 840.81 | 853.94 |
| Less: Impairment Allowance for doubtful deposit | 8.1 | (840.81) | (853.94) |
| | | 53.89 | 52.15 |

8.1 Movement of Impairment Allowances for doubtful deposits

| Particulars | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--------------------------------------|--------------------------------------|--------------------------------------|
| Balance at the beginning of the year | 853.94 | 856.55 |
| Recognised during the year | - | - |
| Reversal during the year | (13.13) | (2.61) |
| Balance at the end of the year | 840.81 | 853.94 |

9 OTHER FINANCIAL ASSETS

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|---|----------------|-------------------------|-------------------------|
| (a) Fixed Deposits with Banks (having original maturity of more than 12 months) | 16.2 | 1,036.14 | 493.98 |
| (b) Interest receivable on fixed deposits | 16.2 | 22.14 | 11.80 |
| | | 1,058.28 | 505.78 |

10 NON-CURRENT TAX ASSETS (NET)

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|--|----------------|-------------------------|-------------------------|
| Advance Income Tax including Tax deducted at source (net of provision) | | 1,286.10 | 2,206.34 |
| | | 1,286.10 | 2,206.34 |

11 OTHER NON-CURRENT ASSETS

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|--|----------------|-------------------------|-------------------------|
| (a) Capital advances | | | |
| Considered good | | 17.51 | 20.78 |
| Considered Doubtful | | 2,656.72 | 3,010.03 |
| Less: Impairment Allowance for doubtful Advances | 11.1 | (2,656.72) | (3,010.03) |
| (b) Prepaid Expenses | | 156.97 | - |
| (c) Gratuity Fund Receivable | | 58.83 | 6.91 |
| | | 233.31 | 27.69 |

11.1 Movement of Impairment Allowances for doubtful advances

| Particulars | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--------------------------------------|--------------------------------------|--------------------------------------|
| Balance at the beginning of the year | 3,010.03 | 3,044.85 |
| Recognised during the year | - | - |
| Reversal during the year | (353.31) | (34.82) |
| Balance at the end of the year | 2,656.72 | 3,010.03 |

12 INVENTORIES

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|---|----------------|-------------------------|-------------------------|
| (a) Raw Materials | 12.2 | 31,608.38 | 42,277.36 |
| (b) Raw Materials in transit | | 2,028.56 | 196.50 |
| (c) Semi Finished Goods/ Work In Progress | | 6,630.96 | 5,973.64 |
| (d) Finished Goods | | 4,286.65 | 17,610.81 |
| (e) Finished Goods in transit | | 479.41 | 2,049.18 |
| (f) Stores and Spares | 12.1 | 18,499.05 | 19,474.50 |
| Less: Provision for Obsolete and Non-moving Stores and Spares | 12.3 | (4,239.70) | (3,803.50) |
| (g) Stores and Spare Parts in transit | | 430.67 | 686.95 |
| Less: Provision for Obsolete and Non-moving Stores and Spares | 12.3 | - | (41.02) |
| (h) Scrap and By Products | | 3,828.36 | 2,650.41 |
| | | 63,552.34 | 87,074.83 |

12.1 Stores and Spares stock includes stock of DI Pipe Mould of size 350 mm and above amounting to Rs. 1,156.04 lakhs (March 31, 2020: Rs.1,692.06 lakhs).

12.2 Raw Materials includes Nil (March 31, 2020: Rs. 359.41 lakhs) being Stock of ROM Coal to be used in Power Plant and shown as Power and Fuel expense.

12.3 The Company has a policy of provisions against obsolete and non-moving stores and spares lying unused for a period above two years. The movement in provisions are as follows:

| Particulars | For the Year ended | For the Year ended |
|--------------------------------------|--------------------|--------------------|
| | March 31, 2021 | March 31, 2020 |
| Balance at the beginning of the year | 3,844.52 | 3,083.08 |
| Recognised during the year | 395.18 | 761.44 |
| Reversal during the year | - | S |
| Balance at the end of the year | 4,239.70 | 3,844.52 |

12.4 Also refer Note no. 45 in respect of charge created against borrowings

13 INVESTMENTS

| Particulars | As at | | As at | |
|---|----------------|------------------|----------------|--------------------|
| | March 31, 2021 | | March 31, 2020 | |
| Investments measured at fair value through Profit and Loss | Units | Amount | Units | Amount |
| Investment in Mutual Funds (quoted) | | | | |
| (a) Kotak Money Market Fund- Direct Plan- Growth Option (Face Value: Rs. 1,000) | - | - | 6,34,789.84 | 21,031.10 |
| (b) NIPPON India Liquid Fund- Direct Plan- Growth Option (LFAGG) (Face Value: Rs. 1,000) | 3,24,548.21 | 16,333.19 | - | - |
| (c) UTI Liquid Cash Plan - Direct- Growth Plan (Face Value: Rs. 1,000) | 3,86,559.56 | 13,028.94 | - | - |
| (d) Aditya Birla Sunlife Savings Fund- Direct Plan- Growth Option (Face Value: Rs. 100) | - | - | 52,23,019.97 | 20,935.38 |
| (e) HDFC Money Market Fund- Direct Plan - Growth Option (Face Value: Rs. 10) | - | - | 4,74,118.97 | 20,007.05 |
| (f) ICICI Prudential Money Market Fund- Direct Plan - Growth Option (Face Value: Rs. 100) | - | - | 16,36,636.32 | 4,570.55 |
| (g) ICICI Prudential Liquid Fund- Direct Plan- Growth Option (Face Value: Rs. 100) | 37,82,886.68 | 11,527.83 | - | - |
| (h) L&T Ultra Short Term Fund- Direct Plan- Growth Option (Face Value: Rs. 10) | - | - | 5,16,74,375.58 | 17,274.64 |
| (i) TATA Liquid Fund- Direct Plan- Growth Option (Face Value: Rs. 1,000) | - | - | 66,790.78 | 2,091.88 |
| (j) NIPPON India Money Market Fund- Direct Plan- Growth Option (Formerly Reliance Money Market Fund - Direct Plan- Growth Option) (Face Value: Rs. 1,000) | - | - | 6,82,429.53 | 20,832.24 |
| (k) AXIS Liquid Fund- Direct Plan- Growth Option (CFDGG) (Face Value: Rs. 1,000) | - | - | 1,49,863.12 | 3,303.49 |
| | | 40,889.96 | | 1,10,046.33 |

13.1 Aggregate amount of quoted Investments in Mutual Funds 40,889.96 1,10,046.33

13.2 Aggregate amount of NAV of Investments in Mutual Funds 40,889.96 1,10,046.33

13.3 Particulars of Investments as required under Section 186(4) of the Companies Act, 2013 have been disclosed herein above.

13.4 Also refer Note no. 45 in respect of charge created against borrowings

14 TRADE RECEIVABLES

| Particulars | Refer Note No. | As at | As at |
|---|----------------|------------------|------------------|
| | | March 31, 2021 | March 31, 2020 |
| Unsecured | | | |
| Considered good | 14.1 | 9,690.20 | 16,759.38 |
| Considered good, having significant increase in Credit Risk | 14.1 | 599.57 | 413.13 |
| Credit Impaired | | 1,920.90 | 1,920.90 |
| Less: Impairment Allowance for doubtful debts | 14.2 | (1,920.90) | (1,920.90) |
| | | 10,289.77 | 17,172.51 |

14.1 Ageing of Trade Receivables

Particulars

| |
|--------------------------|
| Within the credit period |
| 0 - 90 days |
| 91 - 180 days |
| More than 180 days |

| | As at March 31, 2021 | As at March 31, 2020 |
|------------------|-------------------------|-------------------------|
| 6,441.64 | 5,381.53 | |
| 757.04 | 5,811.27 | |
| 2,318.91 | 4,214.65 | |
| 772.18 | 1,765.06 | |
| 10,289.77 | 17,172.51 | |

14.2 Movement of Impairment Allowances for doubtful debts

Particulars

| |
|--------------------------------------|
| Balance at the beginning of the year |
| Recognised during the year |
| Reversal during the year |
| Balance at the end of the year |

| | As at March 31, 2021 | As at March 31, 2020 |
|-----------------|-------------------------|-------------------------|
| 1,920.90 | 1,755.49 | |
| - | 165.41 | |
| - | - | |
| 1,920.90 | 1,920.90 | |

14.3 Also refer Note no. 45 in respect of charge created against borrowings

15 CASH AND CASH EQUIVALENTS

Particulars

| |
|---|
| (a) Balances with Banks: |
| - In Current Accounts |
| (b) Cash on hand |
| (c) Fixed Deposits with original maturity of less than 3 months |

Refer Note No.

| | As at March 31, 2021 | As at March 31, 2020 |
|------------------|-------------------------|-------------------------|
| 5,082.00 | 3,026.67 | |
| - | 0.95 | |
| 7,000.00 | 14,050.00 | |
| 12,082.00 | 17,077.62 | |

15.1 Also refer Note no. 45 in respect of charge created against borrowings

16 BANK BALANCES OTHER THAN CASH AND CASH EQUIVALENTS

Particulars

| |
|--|
| (a) Balances with Banks: |
| - In Current Accounts |
| (b) Fixed Deposits with Banks (having original maturity of more than 3 months) |

Refer Note No.

| | As at March 31, 2021 | As at March 31, 2020 |
|------------------|-------------------------|-------------------------|
| 5,177.66 | 1,499.29 | |
| 22,078.41 | 9,853.12 | |
| 27,256.07 | 11,352.41 | |

16.1 Refer Note no. 45 in respect of charge created against borrowings

16.2 Fixed Deposits with banks includes:

- a) Rs. 22,913.69 lakhs (March 31, 2020: Rs. 6,982.44 lakhs) (including Rs. 1028.87 lakhs (March 31, 2020: Rs. 275.72 Lakhs) disclosed under other non-current assets) which have been lodged with bank as margin money against Letter of Credit/Bank Guarantees/OD facilities issued/granted by them;
- b) Rs. 55.90 lakhs (March 31, 2020: Rs. 264.66 lakhs) (including Rs. 7.27 lakhs (March 31, 2020: Rs. 217.56 lakhs) disclosed under other non-current assets) lying with Customers/ Vendors/ Government Authorities in term of agreement/orders; and
- c) Nil (March 31, 2020: Rs. 3,100.00 lakhs) lying with Banks as per the Interest Service Account in term of facilities granted as detailed in Note no. 21.

16.3 Balances with banks in current account includes

- a) Rs. 2,821.25 lakhs (March 31, 2020: Rs. 1,394.60) and balances with government authorities includes Rs. 148.57 lakhs (March 31, 2020: 148.57) against accounts frozen and amount withheld by commercial tax department against sales tax demand. Matter has since been decided by Hon'ble Supreme Court of India (Refer Note. no. 40(B)).
- b) Includes Rs. 2,356.41 (March 31, 2020: Rs. 104.69 lakhs) maintained in terms of agreement with borrowers as detailed in Note no. 21

17 OTHER FINANCIAL ASSETS

Particulars

| |
|---|
| (a) Earnest Money/ Security Deposits to Vendors |
| Considered good |
| Considered Doubtful |
| Less: Impairment Allowance for doubtful deposits |
| (b) Earnest Money to Customers |
| Considered good |
| Considered Doubtful |
| Less: Impairment Allowance for doubtful debts |
| (c) Derivative Assets at fair value through profit and loss |
| (d) Interest receivable |
| (e) Export incentive receivables |
| Considered good |
| Considered doubtful |
| Less: Impairment Allowance for doubtful balances |

Refer Note No.

| | As at March 31, 2021 | As at March 31, 2020 |
|--------------------|-------------------------|-------------------------|
| 1,17,658.08 | 86.32 | |
| 36.08 | 60.96 | |
| (36.08) | (60.96) | |
| 4.00 | 4.00 | |
| 6.75 | 6.75 | |
| (6.75) | (6.75) | |
| - | 1,034.59 | |
| 7,686.06 | 96.12 | |
| 177.60 | 41.96 | |
| - | 4.55 | |
| - | (4.55) | |
| 1,25,525.74 | 1,262.99 | |

17.1 Movement of Impairment Allowances for doubtful Debts and Deposits

| Particulars | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--------------------------------------|--------------------------------------|--------------------------------------|
| Balance at the beginning of the year | 72.26 | 42.21 |
| Recognised during the year | - | 30.05 |
| Reversal during the year | (29.44) | - |
| Balance at the end of the year | 42.82 | 72.26 |

17.2 Includes Interest bearing security deposit of Rs. 1,17,000 (March 31, 2020: Nil) given to holding company in terms of Agreement with them for facilitating Purchase of Coking Coal and Limestone. This will be refunded on completion of purchase or otherwise on expiration of the agreement along with interest at SBI 1Y MCLR+0.15.

17.3 Refer Note no. 45 in respect of charge created against borrowings

18 OTHER CURRENT ASSETS

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|--|----------------|-------------------------|-------------------------|
| (a) Balance with Government Authorities | | | |
| Considered good | 16.3 | 914.96 | 440.21 |
| Considered doubtful | | 501.55 | - |
| Less: Impairment Allowance for doubtful balances | 18.1 | (501.55) | - |
| (b) Advances for supply of goods and services | | | |
| Considered good | | 10,155.35 | 2,505.77 |
| Considered doubtful | | 1,362.54 | 1,368.56 |
| Less: Impairment Allowance for doubtful balances | 18.1 | (1,362.54) | (1,368.56) |
| (c) Prepaid Expenses | 18.2 | 3,386.40 | 905.70 |
| (d) Advances against salaries | | 12.10 | 9.52 |
| (e) Stamp papers on hand | | 10.22 | 10.22 |
| (f) MEIS Licences | | | |
| Considered good | | 578.97 | 75.97 |
| Considered doubtful | | - | 68.80 |
| Less: Impairment Allowance for doubtful balances | 18.1 | - | (68.80) |
| (g) Others- GST Clearing accounts | | 343.37 | 37.05 |
| | | 15,401.37 | 3,984.44 |

18.1 Movement of Impairment Allowances for doubtful balances:

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|--------------------------------------|-------------------------|-------------------------|
| Balance at the beginning of the year | 1,437.36 | 1,389.15 |
| Recognised during the year | 501.56 | 68.80 |
| Reversal during the year | (74.83) | (20.59) |
| Balance at the end of the year | 1,864.09 | 1,437.36 |

18.2 Includes amount paid to related parties (Refer Note no. 38)

18.3 Refer Note no. 45 in respect of charge created against borrowings

19 EQUITY SHARE CAPITAL

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|--|-------------------------|-------------------------|
| (a) Authorised: | | |
| 10,02,00,00,000 Equity Shares of Rs. 10/- each (March 31, 2020: 10,02,00,00,000 Equity Shares) | 10,02,000.00 | 10,02,000.00 |
| | 10,02,000.00 | 10,02,000.00 |
| (b) Issued, Subscribed and Fully Paid Up: | | |
| 1,84,90,30,224 Equity Shares of Rs. 10/- each (March 31, 2020: 1,84,90,30,224 Equity Shares) | 1,84,903.02 | 1,84,903.02 |
| | 1,84,903.02 | 1,84,903.02 |

19.1 Reconciliation of the number of Equity Shares Outstanding:

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|--|----------------|-------------------------|-------------------------|
| No. of shares as at the beginning | | 1,84,90,30,224 | 19,61,67,342 |
| Shares issued to Shareholders of erstwhile VSL on Amalgamation | 43(a) | - | 1,76,55,53,040 |
| Shares cancelled pursuant to Exit Offer | 43(b) | - | (11,26,90,158) |
| No. of shares as at the end | | 1,84,90,30,224 | 1,84,90,30,224 |

19.2 Shareholders holding more than 5% Shares Equity Shares:

| Name of Shareholder | As at March 31, 2021 | | As at March 31, 2020 | |
|---------------------|----------------------|-----------|----------------------|-----------|
| | Nos | % holding | Nos | % holding |
| Vedanta Limited | 1,76,55,53,040 | 95.49% | 1,76,55,53,040 | 95.49% |

19.3 The Company has one class of shares referred to as Equity Shares having a par value of Rs. 10/-. Each Holder of Equity Shares is entitled to one vote per share. In the event of liquidation of the Company, the equity shareholders will be entitled to receive assets of the Company remaining after distribution of all preferential amounts, in proportion of their shareholding.

19.4 Consequent to the amalgamation of Erstwhile Vedanta Star Limited (VSL), the immediate holding company w.e.f. October 01, 2018 i.e. the Appointed Date pursuant to the Scheme of Amalgamation approved by Hon'ble NCLT, Kolkata, the existing shares held by VSL stands cancelled and new shares have been allotted to the shareholders of erstwhile VSL i.e. Vedanta Limited on March 25, 2020 in exchange of their holding in VSL. (Refer Note no. 43(a) of the financial statement)

20 OTHER EQUITY

| Particulars | | As at March 31, 2021 | As at March 31, 2020 |
|---|------|-------------------------|-------------------------|
| (a) Capital Reserve | 20.1 | | |
| As per last Balance Sheet | | 9,59,908.68 | 9,59,389.11 |
| On Cancellation of Equity Shares pursuant to Exit Offer to the equity shareholders of the company | | - | 519.57 |
| | | 9,59,908.68 | 9,59,908.68 |
| (b) Capital Reserve on Amalgamation | 20.1 | | |
| As per last Balance Sheet | | (1,74,593.58) | (1,74,593.58) |
| (c) Securities Premium | 20.2 | | |
| As per last Balance Sheet | | 1,79,036.44 | 1,79,036.44 |
| (d) Retained Earnings | 20.3 | | |
| As per last Balance Sheet | | (7,99,971.34) | (7,97,738.18) |
| Profit/(Loss) for the Year | | 2,73,201.20 | (2,180.92) |
| Transfer from Other Comprehensive Income | | (51.03) | (52.24) |
| | | (5,26,821.17) | (7,99,971.34) |
| (e) Other Comprehensive Income | 20.4 | | |
| Re-measurement of defined benefit plan | | | |
| As per last Balance Sheet | | - | - |
| Other Comprehensive Income for the year | | (51.03) | (52.24) |
| Transfer to Retained Earnings | | 51.03 | 52.24 |
| | | - | - |
| | | 4,37,530.37 | 1,64,380.20 |

20.1 Capital Reserve

Capital Reserve includes:

a) Rs. 9,61,219.97 lakhs recognised on Consolidation and Reduction of Equity Share Capital of the Company on Jun 14, 2018 in terms of Hon'ble NCLT Order dated April 17, 2018.

b) Further on amalgamation of erstwhile VSL with the company with effect from October 01, 2018:

i) Differential of Rs. 519.85 lakhs arising on cancellation of equity shares acquired by erstwhile VSL pursuant to 'Exit Offer' with respect to face value thereof were added to capital reserve and

ii) Differential of Rs. 1,831.14 lakhs with respect to the cost of investment in the books of VSL and face value thereof was adjusted to Capital Reserve.

Capital Reserve on Amalgamation represents the excess of consideration paid i.e. equity shares issued with respect to net assets and reserves acquired consequent to amalgamation of erstwhile VSL with the company.

20.2 Securities Premium

Securities Premium represents the amount received in excess of par value of securities and is available for utilisation as specified under Section 52 of Companies Act, 2013.

20.3 Retained Earnings

Retained earnings generally represents the undistributed profit/ amount of accumulated earnings/losses of the company. This includes Other Comprehensive Income of (Rs. 245.74 lakhs) (March 31, 2020: (Rs. 194.71 lakhs)) relating to remeasurement of defined benefit plans (net of tax) which cannot be reclassified to Statement of Profit and Loss.

20.4 Other Comprehensive Income

This includes gain/losses on defined benefit obligations which is transferred to retained earnings as stated in Note 20.3 above.

21 BORROWINGS

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|---|----------------------|-------------------------|-------------------------|
| Secured Borrowings | | | |
| (a) From Banks: | | | |
| - Term Loan | 21.1, 21.2, and 21.3 | 3,13,475.47 | 3,37,208.88 |
| Total (a) | | 3,13,475.47 | 3,37,208.88 |
| Unsecured Borrowings | | | |
| (a) Inter-Corporate Deposits from Holding Company | 21.2 and 21.3 | 18,281.60 | 19,700.00 |
| | | 18,281.60 | 19,700.00 |
| Less: Disclosed under Current Maturity of Long Term Debt- Unsecured | 24(a) | (2,521.60) | (1,418.40) |
| Less: Disclosed under Current Maturity of Long Term Debt- Secured | 24(b) | (42,987.56) | (23,908.91) |
| | | 2,86,247.91 | 3,31,581.57 |

21.1 Security

- (i) Term Loan from banks is secured by:
- First ranking pari passu charge by way of hypothecation on all fixed assets of the Borrower, including the bank accounts and the bank balances earmarked against the Interest Service Reserve Account;
 - First ranking pari passu charge by deed of Hypothecation on November 28, 2018 in favour of Vistra ITCL (India) Limited, security trustees by way of deposit of 1,993.35 acres of title deed of mortgageable lands.
 - Corporate Guarantee, in favour of the Security Trustee for the benefit of the Lenders in form and substance satisfactory to the Security Trustee. These shall be collectively referred to as the "Security"; and
 - Negative Pledge over shares of the company i.e. post merger, Guarantor (M/s Vedanta Ltd.) to hold 76% of the shares of the company.
- e) Each of the Guarantor and the Borrower has also to provide and maintain at all times a Non Disposal Undertaking in favour of the Security Trustee acting for the Lenders, in a form and substance acceptable to the Security Trustee (acting on the instructions of the Lenders).

21.2 The interest rate for the above loans ranges from 8.75% to 9.55%.

21.3 Repayment terms:

| Year | Term Loan from Banks | Inter-Corporate Deposit from Holding Company |
|-----------|----------------------|--|
| 2021-2022 | 43,520.00 | 2,521.60 |
| 2022-2023 | 43,520.00 | 2,521.60 |
| 2023-2024 | 43,520.00 | 2,521.60 |
| 2024-2025 | 43,520.00 | 2,521.60 |
| 2025-2026 | 43,520.00 | 2,521.60 |
| 2026-2027 | 43,520.00 | 2,521.60 |
| 2027-2028 | 43,520.00 | 2,521.60 |
| 2028-2029 | 10,880.00 | 630.40 |

21.4 The amount disclosed herein above represents the amortised cost in accordance with Ind AS 109 "Financial Instruments".

22 PROVISIONS

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|-------------------------------------|----------------|----------------------|----------------------|
| (a) Provision for Employee Benefits | 32.1 | 518.47 | 671.79 |
| (b) Provision pertaining to EC | 22.1 | 21,350.95 | - |
| | | 21,869.42 | 671.79 |

22.1 Provision pertaining to EC represents costs to be incurred being estimated cost of compliances and damages etc., for forest area diversion, wild life development and green belt conservation and other concerns raised on public hearing for granting EC based on the report of EIA consultant appointed in terms of TOR as detailed in Note no. 44. The movement in such provision is as follows:

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|--------------------------------------|----------------|----------------------|----------------------|
| Balance at the beginning of the year | | - | - |
| Recognised during the year | | 21,350.95 | - |
| Written back during the year | | - | - |
| Balance at the end of the year | | 21,350.95 | - |

23 TRADE PAYABLES

| Particulars | Refer Note No. | As at March 31, 2021 | As at March 31, 2020 |
|------------------------------------|----------------|----------------------|----------------------|
| Payable for goods and services | | | |
| Due to Micro and Small Enterprises | 23.1 | 11,002.84 | 4,488.44 |
| Others | | 54,109.21 | 38,422.15 |
| | | 65,112.05 | 42,910.59 |

23.1 Disclosure of Trade payables as required under section 22 of Micro, Small and Medium Enterprises Development (MSMED) Act, 2006, based on the confirmation and information available with the company regarding the status of suppliers.

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|---|----------------------|----------------------|
| a) Principal amount remaining unpaid but not due as at year end | 11,001.50 | 4,421.11 |
| a) Interest amount remaining unpaid but not due as at year end | - | - |
| b) Interest paid by the Company in terms of Section 16 of Micro, Small and Medium Enterprises Development Act, 2006, along with the amount of the payment made to the supplier beyond the appointed day during the year | - | - |
| c) Interest due and payable for the period of delay in making payment (which have been paid but beyond the appointed day during the year) but without adding the interest specified under Micro, Small and Medium Enterprises Development Act, 2006 | - | - |
| d) Interest accrued and remaining unpaid as at year end | - | - |
| e) 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 enterprise | 0.09 | 5.26 |

24 OTHER FINANCIAL LIABILITIES

| Particulars | Refer Note No. | As at | As at |
|---|----------------|------------------|------------------|
| | | March 31, 2021 | March 31, 2020 |
| (a) Current maturities of long-term debts- Unsecured | 21 | 2,521.60 | 1,418.40 |
| (b) Current maturities of long-term debts- Secured | 21 | 42,987.56 | 23,908.91 |
| (c) Interest accrued but not due on borrowings | 21 | 1,991.61 | 2,800.56 |
| (d) Earnest Money Deposit | | 98.01 | 65.73 |
| (e) Capital Vendors | 24.1 | 1,178.70 | 22,156.78 |
| (f) Lease Liability | 24.1 and 24.2 | 28,081.62 | 432.94 |
| (g) Derivative Instrument Liability at fair value through profit and loss (net) | 47(d)(iii) | 185.03 | - |
| (h) Others Payables | | | |
| - Employees payable | | 886.89 | 1,519.36 |
| - Corporate Guarantee commission and others | | 76.92 | 4,048.25 |
| | | 78,007.94 | 56,350.93 |

24.1 Includes Rs. 27,868.26 lakhs (March 31, 2020: Rs. 21,256.57 lakhs shown under capital vendors) provided for balance amount of demand (net of advance of Rs. 2,296.00 lakhs) against cost of afforestation etc. of forest land acquired by the Company (Refer Note No. 5.3(b)).

24.2 Includes Rs. 828.95 lakhs (March 31, 2019: Rs. 828.95 lakhs) provided for balance amount of demand (Net of Advance of Rs. 3,315.79 lakhs) for execution of leasehold agreement (Refer Note No. 5.3(a)).

25 OTHER CURRENT LIABILITIES

| Particulars | Refer Note No. | As at | As at |
|--|----------------|------------------|------------------|
| | | March 31, 2021 | March 31, 2020 |
| (a) Advance from customers | | 21,014.54 | 10,582.65 |
| (b) Statutory Dues Payables (includes Provident Fund, GST, Tax deducted at source etc.) | | 10,250.18 | 2,017.85 |
| | | 31,264.72 | 12,600.50 |

26 PROVISIONS

| Particulars | Refer Note No. | As at | As at |
|---------------------------------|----------------|----------------|----------------|
| | | March 31, 2021 | March 31, 2020 |
| Provision for Employee Benefits | 32.1 | 79.81 | 87.91 |
| Other Provisions | 26.1 | 635.93 | 318.04 |
| | | 715.74 | 405.95 |

26.1 Other Provisions represent amount provided in respect of defined contribution for employee benefit including contractual workmen pursuant to the Order of Hon'ble Supreme Court pending final decision/demand from the relevant authorities in this respect. Movement of such Provisions are as follows:

| Particulars | Refer Note No. | As at | As at |
|--------------------------------------|----------------|----------------|----------------|
| | | March 31, 2021 | March 31, 2020 |
| Balance at the beginning of the year | | 318.04 | - |
| Recognised during the year | | 317.89 | 318.04 |
| Written back during the year | | - | - |
| Balance at the end of the year | | 635.93 | 318.04 |

27 REVENUE FROM OPERATIONS

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|-----------------------------------|----------------|--------------------------------------|--------------------------------------|
| Sale of Products: | | | |
| Semi-Finished and Finished Goods: | | | |
| - Export Sales | | 45,236.42 | 1,689.33 |
| - Domestic Sales | | 4,21,568.27 | 4,27,714.66 |
| | | 4,66,804.69 | 4,29,403.99 |

27.1 Disclosure as per Ind AS 115:

Disaggregate Revenue

The break up with respect to type of revenue stream of the Company are as follows:

| Particulars | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|----------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| | Government | | Non-Government | |
| Within India | | | | |
| - Billets | - | - | 5,961.38 | 6,576.32 |
| - TMT bars | 8,932.52 | 23,809.96 | 1,33,717.27 | 1,35,337.55 |
| - Wire rods | - | - | 1,40,910.89 | 1,46,434.16 |
| - DI pipes | 53,501.66 | 2,044.30 | 8,367.23 | 62,608.16 |
| - PIG Iron | - | - | 54,328.98 | 39,563.65 |
| - Others | - | - | 15,848.34 | 11,340.56 |
| Outside India | | | | |
| - Billets | - | - | 36,659.37 | - |
| - Wire rods | - | - | 8,577.05 | 1,689.33 |
| | 62,434.18 | 25,854.26 | 4,04,370.51 | 4,03,549.73 |

28 OTHER OPERATING INCOME

| Particulars | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|-------------------------------|--------------------------------------|--------------------------------------|
| Scrap/ By-products and Others | 8,816.15 | 8,294.38 |
| Incentive on Exports | 1,521.93 | 52.44 |
| | 10,338.08 | 8,346.82 |

29 OTHER INCOME

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---|----------------|--------------------------------------|--------------------------------------|
| (a) Interest income on Fixed deposits, Security Deposits, overdue debts etc. measured at amortised cost | | 10,100.44 | 3,833.07 |
| (b) Interest income on financial assets measured at amortised cost | | 3.18 | 3.70 |
| (c) Sundry Credit balances/Provision no longer required written back | | 850.46 | 62.47 |
| (d) Net (gain)/loss on foreign exchange fluctuation | | 184.68 | - |
| (e) Net gain/(loss) on Derivative Instruments on fair valuation through profit and loss | | - | 1,958.36 |
| (f) Net Gain/(loss) on Current Investments on Fair Valuation through profit and loss | | 65.14 | 857.27 |
| (g) Net Gain/(loss) on disposal of Current Investments | | 802.80 | 3,505.94 |
| (h) Miscellaneous Income | | 773.94 | 143.64 |
| | | 12,780.64 | 10,364.45 |

30 COST OF MATERIALS CONSUMED

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--|----------------|--------------------------------------|--------------------------------------|
| (a) Raw material and other materials consumed | | | |
| Inventory at the beginning of the year | | 42,473.86 | 50,349.02 |
| Add: Purchases | | 2,59,449.08 | 2,74,548.54 |
| Less: Inventory at the end of the year | | 33,636.94 | 42,473.86 |
| | 30.1 | 2,68,286.00 | 2,82,423.70 |

30.1 Based on the physical verification of Inventories carried out by an Independent professionals and on reconciliation with book stock, the following amounts have been adjusted to Cost of Material consumed/ Changes in Inventories of Finished Goods, Stock-in-Trade and Work-in-Progress. This also includes adjustments arising on heap clearances of material:

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--|----------------|--------------------------------------|--------------------------------------|
| Cost of Material consumed | | | |
| Increase/(Decrease) in Stock of Raw Material | | (2,388.26) | 975.64 |
| Changes in Inventories of Finished Goods, Stock-in-Trade and Work-in-Progress | | | |
| Increase/(Decrease) in Stock of Finished Goods | | (2.69) | (92.33) |
| Increase/(Decrease) in Stock of Semi-Finished Goods | | (6.18) | (7.05) |
| Increase/(Decrease) in Stock of Scrap/ By-products | | (676.97) | 69.18 |
| | | (3,074.10) | 945.44 |

31 CHANGES IN INVENTORIES OF FINISHED GOODS, STOCK-IN-TRADE AND WORK-IN-PROGRESS

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--|----------------|--------------------------------------|--------------------------------------|
| (i) Inventories at the end of the year | | | |
| (a) Finished Goods | | 4,766.06 | 19,659.99 |
| (b) Semi-Finished Goods | | 6,630.96 | 5,973.64 |
| (c) Scrap / By-products | | 3,828.36 | 2,650.41 |
| | | 15,225.38 | 28,284.04 |
| (ii) Inventories at the beginning of the year | | | |
| (a) Finished Goods | | 19,659.99 | 9,591.81 |
| (b) Semi-Finished Goods | | 5,973.64 | 2,079.96 |
| (c) Scrap / By-products | | 2,650.41 | 2,389.65 |
| | | 28,284.04 | 14,061.42 |
| | 30.1 | 13,058.66 | (14,222.62) |

31.1 Also Refer Note no. 30.1 for adjustments carried out on reconciliation of physical stock with book stock.

31.2 Disclosures as required under Ind AS 2 "Inventories" are as follows:

a) Inventories recognised as expense

| | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--|--------------------------------------|--------------------------------------|
| | 3,85,956.40 | 3,54,319.01 |

32 EMPLOYEE BENEFITS EXPENSE

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---|----------------|--------------------------------------|--------------------------------------|
| (a) Salaries and wages | | 14,531.46 | 14,880.71 |
| (b) Contribution to Provident and Other Funds | 32.1 | 704.93 | 778.47 |
| (c) Staff welfare expenses | | 203.82 | 522.29 |
| | | 15,440.21 | 16,181.47 |

32.1 POST RETIREMENT EMPLOYEE BENEFITS

The disclosures required under Ind AS 19 on "Employee Benefits", are given below:

(i) Defined Contribution Plans

The Company makes contributions to Provident Fund and Pension Scheme for eligible employees. Under the schemes, the Company is required to contribute a specified percentage/fixed amount of the payroll costs to fund the benefits. The contributions as specified under the law are paid to the respective fund set up by the government authority. Contributions towards provident funds are recognised as an expense for the year. Both the employees and the Company make monthly contributions to the Funds at specified percentage of the employee's salary and aggregate contributions along with interest thereon are paid to the employees/their nominees at retirement, death or cessation of employment.

Contributions to Defined Contribution Plans, recognized for the year are as under:

| Particulars | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--|--------------------------------------|--------------------------------------|
| Employer's Contribution to Provident Fund | 394.96 | 457.65 |
| Employer's Contribution to Pension Scheme | 224.31 | 244.31 |
| Employer's Contribution to Superannuation Scheme | 51.45 | 17.92 |

(ii) Post Employment Defined Benefit Plans:

The Post Employment defined benefit scheme are managed by TATA AIA is a defined benefit plan. The present value of obligation is determined based on independent actuarial valuation using the Projected Unit Credit Method, which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation. Details of such fund are as follows:

a) Gratuity (Funded)

The Company's gratuity scheme, a defined benefit plan is as per the Payment of Gratuity Act, 1972, covers the eligible employees and is administered through certain gratuity fund trusts. Such gratuity funds, whose investments are managed by insurance companies, make payments to vested employees or their nominees upon retirement, death, incapacitation or cessation of employment, of an amount based on the respective employee's salary and tenure of employment. Vesting occurs upon completion of five years of service. The amount of gratuity payable is the employees last drawn basic salary per month computed proportionately for 15 days salary multiplied for the number of years of service.

b) Superannuation (Funded)

The Company's Superannuation scheme, a Defined Benefit plan, is administered through trust funds and covers certain categories of employees. Investments of the funds are managed by insurance companies /trustees themselves. Benefits under these plans had been are based on certain category of employees. Upon retirement, death or cessation of employment, Superannuation Funds purchase annuity policies in favour of vested employees or their spouses to secure periodic pension. Such superannuation benefits are based on respective employee's tenure of employment and salary.

(III) The following tables set forth the particulars in respect of aforesaid Defined Benefit plans of the Company for the year ended March 31, 2021 and corresponding figures for the previous year:

(a) Change in the present value of the defined benefit obligation:

| | Gratuity (funded) | |
|--|---------------------------------|---------------------------------|
| | As at March 31, 2021 | As at March 31, 2020 |
| Liability at the beginning of the year | 1,083.16 | 953.04 |
| Interest Cost | 73.65 | 74.34 |
| Current Service Cost | 156.54 | 178.00 |
| Benefits paid | (286.44) | (243.29) |
| Remeasurements - Due to Financial Assumptions | (11.77) | 111.71 |
| Remeasurements - Due to Experience Adjustments | 94.51 | 9.36 |
| Liability at the end of the year | 1,109.65 | 1,083.16 |

(b) Changes in the Fair Value of Plan Asset

| | As at March 31, 2021 | As at March 31, 2020 |
|---|--|---------------------------------|
| | Fair value of Plan Assets at the beginning of the year | 1,090.07 |
| Expected return on Plan Assets | 74.12 | 68.19 |
| Contributions by the Company | - | 78.80 |
| Benefits paid | - | - |
| Remeasurements - Return on Assets (Excluding Interest Income) | 4.30 | 68.83 |
| Fair value of Plan Assets at the end of the year | 1,168.49 | 1,090.07 |

(c) Amount recognised in Balance Sheet

| | As at March 31, 2021 | As at March 31, 2020 |
|--|---------------------------------|---------------------------------|
| Liability at the end of the year | 1,109.65 | 1,083.16 |
| Fair value of Plan Assets at the end of the year | 1,168.49 | 1,090.07 |
| Amount recognised in the Balance Sheet | (58.84) | (6.91) |

(d) Components of Defined Benefit Cost

| | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|--|--|--|
| Current Service Cost | 156.54 | 178.00 |
| Interest Cost | 73.65 | 74.34 |
| Expected return on plan assets | (74.12) | (68.19) |
| Total Defined benefit recognised in Statement of Profit & Loss Account | 156.07 | 184.15 |

(e) Remeasurements recognised in Other Comprehensive Income

| | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---|--|--|
| Remeasurements - Due to Financial Assumptions | (11.77) | 111.71 |
| Remeasurements - Due to Experience Adjustments | 94.51 | 9.36 |
| Remeasurements- Return on Assets | (4.30) | (68.83) |
| Remeasurements recognised in Other Comprehensive Income | 78.44 | 52.24 |

(f) Balance Sheet Reconciliation

| | As at March 31, 2021 | As at March 31, 2020 |
|---|-------------------------|-------------------------|
| Opening Net Liability | (6.91) | 78.79 |
| Defined Benefit Cost included in Statement of Profit and Loss Account | 156.07 | 184.15 |
| Remeasurements recognised in OCI | 78.44 | 52.24 |
| Employers Contribution | - | (78.80) |
| Benefit Paid Directly by Enterprise | (286.44) | (243.29) |
| Amount recognised in Balance Sheet | (58.84) | (6.91) |

(g) Percentage allocation of plan assets in

| | As at March 31, 2021 | As at March 31, 2020 |
|-------------------------|-------------------------|-------------------------|
| Fund managed by Insurer | 100.00% | 100.00% |

(h) The Principal actuarial assumptions as at the Balance Sheet date are set out as below:

| | As at March 31, 2021 | As at March 31, 2020 |
|---|-------------------------|-------------------------|
| Summary of Financial Assumptions | | |
| Discount Rate | 6.90% | 6.80% |
| Future Salary Increase | 6.00% | 6.00% |
| Salary Escalation- After Five Years | 6.00% | 6.00% |
| Expected Return on Plan Assets | 6.90% | 6.80% |
| Summary of Demographic Assumptions | | |
| Mortality Rate [as % of IALM (2012-14) (Mod.) Ult. Mortality Table] | 100.00% | 100.00% |
| Disability Table (as % of above mortality rate) | 5.00% | 5% |
| Withdrawal Rate | 1% to 8% | 1% to 8% |
| Retirement Age | 60/58 Years | 60/58 Years |
| Average Future Service | 23.73 | 22.30 |
| Weighted Average Duration | 13.34 | 13.32 |

Sensitivity Analysis

| Particulars | Change in Assumption | Gratuity As at March 31, 2021 | Gratuity As at March 31, 2020 |
|--|----------------------|----------------------------------|----------------------------------|
| Changes in Defined Benefit Obligations: | | | |
| Salary Escalation | +1% | 127.10 | 117.90 |
| Salary Escalation | -1% | (109.79) | (106.24) |
| Discount Rates | +1% | (107.99) | (108.34) |
| Discount Rates | -1% | 127.23 | 117.55 |

The above sensitivity analysis is based on a change in assumption while holding all other assumption constant. In practice, this is unlikely to occur, and changes in some of the assumption may be co-related. When calculating the sensitivity of the defined benefit obligations to significant actuarial assumptions the same method (projected unit credit method) has been applied as when calculating the defined benefit obligations recognised in the balance sheet. The methods and type of assumption used in preparing the sensitivity analysis did not change compared to the prior period.

Estimate of expected benefit payments (in absolute terms i.e. undiscounted)

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|----------------------------|-------------------------|-------------------------|
| Year 1 | 58.35 | 47.11 |
| Year 2 | 41.62 | 56.46 |
| Year 3 | 39.78 | 58.39 |
| Year 4 | 49.63 | 53.61 |
| Year 5 | 49.11 | 61.21 |
| Remaining Subsequent Years | 871.15 | 806.38 |

Other Long Term Employee benefits

Compensated Absences

The obligation for compensated absences is recognised in the same manner as gratuity except remeasurement benefit which is treated as part of other comprehensive income. The actuarial liability of Compensated Absences (unfunded) of accumulated privileged and sick leaves of the employees of the Company as at March 31, 2021 & March 31, 2020 is given below:

| | As at March 31, 2021 | As at March 31, 2020 |
|-----------------------------------|-------------------------|-------------------------|
| Privileged Leave | 572.12 | 716.98 |
| Sick Leave | 26.16 | 24.81 |
| Average number of people employed | 1,871 | 2,064 |

Risk analysis

Through its defined benefit plans, the Company is exposed to a number of risks in the defined benefit plans. Most significant risks pertaining to defined benefit plans and, management's estimation of the impact of these risks are as follows:

Investment risk

The Gratuity plan is funded with Tata AIA Limited and the company does not have any liberty to manage the fund provided to them. The present value of the defined benefit plan liability is calculated using a discount rate determined by reference to Government of India bonds. If the return on plan asset is below this rate, it will create a plan deficit.

Interest risk

A decrease in the interest rate on plan assets will increase the plan liability.

Longevity risk / Life expectancy

The present value of the defined benefit plan liability is calculated by reference to the best estimate of the mortality of plan participants both during and at the end of the employment. An increase in the life expectancy of the plan participants will increase the plan liability

Salary growth risk

The present value of the defined benefit plan liability is calculated by reference to the future salaries of plan participants. An increase in the salary of the plan participants will increase the plan liability.

33 FINANCE COSTS

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---|----------------|--------------------------------------|--------------------------------------|
| (a) Interest Expense on financial liabilities not measured at FVTPL | | 36,375.01 | 37,012.14 |
| (b) Other Borrowing Cost (i.e. LC charges, Suppliers Credit, Guarantee Commission etc.) | | 1,277.66 | 1,401.41 |
| | | 37,652.67 | 38,413.55 |

34 DEPRECIATION AND AMORTISATION EXPENSE

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---------------------------------------|----------------|--------------------------------------|--------------------------------------|
| (a) Depreciation on Tangible Assets | 5 | 34,591.84 | 30,605.19 |
| (b) Amortisation of Intangible Assets | 7 | 50.96 | 46.70 |
| | | 34,642.80 | 30,651.89 |

35 OTHER EXPENSES

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---|----------------|--------------------------------------|--------------------------------------|
| (a) Consumption of Stores and Spares | | 16,377.35 | 14,034.29 |
| (b) Power and Fuel | | 23,460.44 | 24,613.58 |
| (c) Freight and Forwarding Charges | | 20,007.59 | 14,331.46 |
| (d) Rent | 39(v) | 183.94 | 358.43 |
| (e) Rates and taxes | | 369.28 | 1,014.55 |
| (f) Insurance | | 1,618.20 | 1,965.29 |
| (g) Repairs to Plant and Machinery | | 2,155.35 | 10,234.72 |
| (h) Repairs to Building | | 285.26 | 487.74 |
| (i) Repairs to Others | | 174.23 | 393.36 |
| (j) Operation & Maintenance expenses | | 11,006.52 | 11,135.90 |
| (k) Machine Hire Charges | | 656.44 | 1,336.33 |
| (l) Material Handling Expenses | | 1,127.45 | 1,200.21 |
| (m) Listing & Registrar Expenses | | 12.94 | 0.01 |
| (n) Security Expenses | | 1,186.66 | 973.36 |
| (o) Advertisement and Business Promotion Expenses | | 35.04 | 107.29 |
| (p) Travelling & Conveyance | | 1,143.87 | 1,026.90 |
| (q) Legal & Professional Fees | | 3,371.03 | 1,471.95 |
| (r) Payment to Auditors | 35.1 | 75.79 | 59.37 |
| (s) Net (gain)/loss on foreign exchange fluctuation | | - | 2,733.42 |
| (t) Net (gain)/loss on Derivative Instruments on fair valuation through profit and loss | | 1,075.57 | - |
| (u) Loss on Sale/Discard of Fixed Assets (Net) | | 201.68 | 140.53 |
| (v) Selling & Distribution Expenses | | 585.91 | 448.19 |
| (w) CSR Expenditure | | 201.46 | 76.62 |
| (x) Impairment Allowance for Doubtful Debt and Deposits | | - | 261.66 |
| (y) Provision for Doubtful Advance | | 512.21 | - |
| (z) Provision for Obsolete and Non-moving Stores and Spares | | 395.18 | 761.44 |
| (aa) Charity and Donation | | 0.19 | 101.07 |
| (ab) Sundry Balances written-off | | 716.55 | 4.57 |
| (ac) Brand Fees | 35.2 | 6,763.70 | 6,203.92 |
| (ad) Sitting Fees to Directors | | 10.25 | 8.25 |
| (ae) Other Miscellaneous Expenses | | 1,680.16 | 1,363.78 |
| | | 95,390.24 | 96,848.19 |

35.1 Payment to Auditors

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|----------------------------|----------------|--------------------------------------|--------------------------------------|
| (a) Statutory Audit Fee | | 26.50 | 25.00 |
| (b) Tax Audit Fee | | 3.50 | 3.00 |
| (c) Certification etc. | 35.1.1 | 44.50 | 29.75 |
| (d) Out of Pocket Expenses | | 1.29 | 1.62 |
| | | 75.79 | 59.37 |

35.1.1 This includes Rs. 20.00 lakhs (March 31, 2020: Nil) for various certification and reports in connection with offering of US Guaranteed Senior Bonds by Vedanta Resources Finance II plc.

35.2 The company in terms of the Brand Licence Agreement dated September 24, 2019 with Vedanta Resources Limited has agreed to pay 1.5% of the Turnover as "Brand Fee". In accordance with the said agreement the company has paid advance of Rs. 8,662.42 lakhs (March 31, 2020: Rs. 6,735.51 lakhs) against which Rs. 6,763.70 lakhs (March 31, 2020: Rs. 6,203.92 lakhs) has been recognised as expenses in terms of the agreement and balance has been shown as recoverable under "Advances against supply of goods and Services".

36 EXCEPTIONAL ITEMS

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---|----------------|--------------------------------------|--------------------------------------|
| Provision against Compliance Cost for Environmental Clearance | 36.1(a) | (21,350.95) | - |
| Provision against Capital work in progress | 36.1(b) | (6,283.30) | - |
| | | (27,634.25) | - |

36.1 Exceptional Item relates to:

- Provision of Rs.21,350.95 lakhs for estimated damages for wild life development and green belt conservation and other concerns raised on public hearing relating to environmental clearance as detailed in Note no. 44.
- Provision of Rs. 6,283.30 lakhs made for discrepancy on physical verification of project equipment and material carried forward under Capital Work in Progress as detailed in Note no. 6.1.

37 COMPONENTS OF OTHER COMPREHENSIVE INCOME

| Particulars | Refer Note No. | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---|----------------|--------------------------------------|--------------------------------------|
| Items that will not be reclassified to Statement of Profit and Loss | | | |
| Remeasurement of Defined benefit plans | 32.1 | (78.44) | (52.24) |
| | | (78.44) | (52.24) |

38 RELATED PARTY TRANSACTIONS

Related party disclosure as identified by the management in accordance with the Ind AS 24 on 'Related Party Disclosures' are as follows:

Names of the related parties and description of relationships:

| | | |
|----------|---|--|
| A | Company | Relationship |
| | Volcan Investment Limited (VIL) | Ultimate Holding Company |
| | Vedanta Limited (VL) | Holding Company |
| B | Key Management personnel | Designation |
| | Prasun Kumar Mukherjee | Director |
| | Mahendra Singh Mehta | Director |
| | Rashmi Mohanty | Director (From June 04, 2018 to October 01, 2019) |
| | Angusamy Sumathi | Director (Appointed w.e.f. October 22, 2019) |
| | Pankaj Malhan | Whole Time Director (w.e.f. July 22, 2019) |
| | Jalaj Kumar Malpani | Chief Financial Officer (Resigned w.e.f. July 31, 2020) |
| | Mahesh Iyer | Chief Financial Officer (Appointed w.e.f. August 01, 2020) |
| C | Entities where KMP or their close member have significant influence or control or Group Enterprises or Companies under common control and with whom transaction have taken place during the year | |
| | Bharat Aluminium Company Limited (BALCO) | |
| | Sterlite Power Transmission limited (SPTL) | |
| | Vizag General Cargo Berth Private Limited (VGCBP) | |
| | Maritime Ventures Private Limited (MVPL) | |
| | Vedanta Resources Limited (VRL) | |
| | Talwandi Saboo Power Limited (TSPL) | |
| | Hindusthan Zinc Limited (HZL) | |
| | Janhit Electoral Trust (JET) | |
| | Ferro Alloy Corporation Limited (FACL) | |

E Related party transaction:

| Nature of Transaction | Holding Company- VL | |
|---------------------------------------|---------------------|-----------|
| | 2020-21 | 2019-20 |
| Recovery of Expenses | 4.26 | - |
| Purchase of materials | 173.92 | 89.45 |
| Purchase of assets | 8.72 | - |
| Interest Expenses | 1,684.05 | 1,728.47 |
| Interest Income | 7,925.52 | - |
| Security Deposit given | 1,20,000.00 | - |
| Guarantee Commission | 989.87 | 1,059.88 |
| Recovery of Corporate and Other Costs | 2,690.58 | 932.63 |
| Purchase of Scripts/Licences | 354.29 | 229.75 |
| Closing balance as at March 31 | | |
| Inter Corporate Deposit Payable | 18,281.60 | 19,700.00 |
| Security Deposit Receivable | 1,17,000.00 | - |
| Trade Payables | 18.04 | 886.58 |
| Reimbursement of Expenses Payable | 2,412.53 | 3,509.82 |
| Guarantee Commission payable | - | 500.72 |
| Interest Receivable | 7,528.03 | - |

| Nature of Transaction | Key Management Personnel | | Entities where KMP or their close member have significant influence or control and Companies under Common control or Group Enterprises | |
|--|--------------------------|---------|--|-----------|
| | 2020-21 | 2019-20 | 2020-21 | 2019-20 |
| Sale of goods | | | | |
| SPTL | - | - | 2,427.17 | 1,895.19 |
| HZL | - | - | 43.82 | - |
| Purchase of assets | | | | |
| BACL | - | - | - | 12.01 |
| Reimbursement of Expenses | | | | |
| BACL | - | - | 3.42 | 14.28 |
| TSPL | - | - | - | 16.66 |
| MVPL | - | - | - | 1,719.25 |
| HZL | - | - | 254.33 | 12.42 |
| VGCBPL | - | - | 5.25 | 236.92 |
| Purchase of Materials/Services Received | | | | |
| VGCBPL | - | - | 262.91 | 3,054.70 |
| FACL | - | - | 51.62 | - |
| MVPL | - | - | 528.11 | 1,539.39 |
| Donation | | | | |
| JET | - | - | - | 100.00 |
| Other Income | | | | |
| VGCBPL | - | - | - | 38.70 |
| Loan Given | | | | |
| TSPL | - | - | - | 90,000.00 |
| Brand Fees | | | | |
| VRL | - | - | 6,763.70 | 6,203.92 |
| Interest Received | | | | |
| TSPL | - | - | - | 1,207.75 |
| SPTL | - | - | 36.10 | - |
| Purchase of Scripts/Licences | | | | |
| VGCBPL | - | - | 3.02 | 76.47 |
| BACL | - | - | 432.15 | 985.18 |
| Remuneration | | | | |
| Jalaj Kumar Malpani | 62.59 | 127.56 | - | - |
| Pankaj Malhan | 141.88 | 133.66 | - | - |
| Mahesh Iyer | 52.36 | - | - | - |
| Director sitting fees | | | | |
| Prasun Kumar Mukherjee | 5.25 | 5.00 | - | - |
| Mahendra Singh Mehta | 5.00 | 3.25 | - | - |
| Closing balance as at March 31 | | | | |
| Remuneration Payable | | | | |
| Jalaj Kumar Malpani | - | 8.86 | - | - |
| Pankaj Malhan | - | 9.47 | - | - |
| Trade Payable | | | | |
| HZL | - | - | 0.04 | - |
| VGCBPL | - | - | 0.74 | 41.70 |
| MVPL | - | - | 10.73 | 306.62 |
| BACL | - | - | 31.26 | 197.07 |
| Advances Given | | | | |
| VRL | - | - | 1,898.72 | 531.59 |
| Trade Receivable | | | | |
| SPTL | - | - | 21.99 | 261.00 |

F Compensation of Key management personnel

The remuneration of directors and other member of key management personnel during the year was as follows:

| Particulars | Year ended March 31, 2021 | Year ended March 31, 2020 |
|------------------------------|------------------------------|------------------------------|
| Short-term employee benefits | 219.05 | 252.31 |
| Post-employment benefits | 26.60 | 8.91 |
| Other long-term benefits | 11.18 | - |

Notes:

- The above related party information is as identified by the management and relied upon by the auditor
- In respect of above parties, there is no provision for doubtful debts as on March 31, 2021 and no amount has been written back or written off during the year in respect of debts due from/ to them
- Post-Employee benefits and other long term employee benefits have been disclosed made on retirement/resignation of services but does not include provision made on actuarial basis as the same is available for all the employees together.

4. Terms and conditions of transactions with related parties

All transactions from related parties are made in ordinary course of business. For the year ended March 31 2021, the Company has not recorded any impairment of receivables relating to amounts owed by related parties. This assessment is undertaken each financial year through examining the financial position of the related party and the market in which the related party operates.

39 DISCLOSURE AS PER IND AS 116

- i) Following are the changes in the carrying value of right of use assets for the year ended March 31, 2021:

| Particulars | Land | Buildings | Equipment | Total |
|-------------------------------------|------------------|---------------|---------------|------------------|
| As at March 31, 2020 | 5,530.09 | 259.54 | 590.81 | 6,380.44 |
| Addition | 6,611.69 | 4.31 | 196.99 | 6,812.99 |
| Adjustments (Refer Note no. 5.3(c)) | 25,326.12 | - | - | 25,326.12 |
| Deletion | - | 45.57 | 93.54 | 139.11 |
| Depreciation | 2,281.81 | 105.85 | 295.00 | 2,682.66 |
| As at March 31, 2021 | 35,186.09 | 112.43 | 399.26 | 35,697.78 |

- ii) The following is the break-up of current and non-current lease liabilities:

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|-------------------------------|-------------------------|-------------------------|
| Current lease liabilities | 28,081.62 | 432.94 |
| Non-current lease liabilities | 478.16 | 451.92 |
| Total | 28,559.78 | 884.86 |

- iii) The following is the movement in lease liabilities:

| Particulars | As at March 31, 2021 | As at March 31, 2021 |
|--|-------------------------|-------------------------|
| As at March 31, 2020 | 884.86 | 305.96 |
| Additions | 28,069.56 | 716.64 |
| Finance cost accrued during the period | 53.96 | 40.01 |
| Deletions | (139.11) | - |
| Payment of lease liabilities | (309.49) | (177.75) |
| As at March 31, 2021 | 28,559.78 | 884.86 |

- iv) The table below provides details regarding the contractual maturities of lease liabilities on an undiscounted basis

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|--|-------------------------|-------------------------|
| Not later than one year | 28,081.62 | 467.55 |
| Later than one year and not more than five years | 478.16 | 539.00 |
| Later than five years | - | - |

- v)

Further to above, the Company has certain operating lease arrangements for office, transit houses, furniture's and fixtures etc. for short-term leases. Expenditure incurred on account of rental payments under such leases during the year and recognized in the Profit and Loss account amounts to Rs. 183.94 lakhs (March 31, 2020: Rs. 358.43 lakhs).

40 CONTINGENT LIABILITIES AND COMMITMENTS (TO THE EXTENT NOT PROVIDED FOR):

A) CONTINGENT LIABILITIES

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|---|--------------------------|--------------------------|
| a) Guarantees given by banks on behalf of the Company | 7,780.10 | 11,170.10 |
| b) As per Stage 1 clearance given on December 17, 2019, besides the afforestation cost in respect of 455.23 acre of land, the company shall provide non forest land equivalent to five times of the forest land utilised for steel plant. | Amount not ascertainable | Amount not ascertainable |
| | 7,780.10 | 11,170.10 |

B) (i) Claims in respect of various show cause notices/demands issued/ raised by Central Excise & Service Tax of Rs.8,311.10 lakhs , Customs Duty (under EPCG) of Rs.1,72,560.51 lakhs , Sales Tax and VAT Rs. 15,815.36 lakhs, GST of Rs. 741.92 lakhs, Entry Tax of Rs. 33,494.59 lakhs, Income Tax, etc. for the period upto June 04, 2018 as per the Resolution Plan approved by Hon'ble NCLT have been extinguished. However, considering that certain statutory authorities have made demand and matters are pending for final adjudication, the details of such demand have been disclosed. In certain cases even as stated in Note no. 16.3, balances with bank in current Account and lying with Government Authorities has been withheld.

(ii) Similarly in respect of claims of certain operational creditors amounting to Rs. 15,31,426.60 lakhs which have been extinguished pursuant to the Resolution Plan, the matters have been referred to Supreme Court. In majority of the cases, the said court has referred back the matter to NCLT for decision.

(iii) In view of the management supported by legal opinion and various judicial pronouncements, the contention of the claimants including in respect of statutory liability are not tenable as per the Resolution Plan approved by Hon'ble NCLT since is binding on the parties concerned and no outflow of fund with respect to these are expected. Further, one of the case dealing with Sales Tax matter, the Hon'ble Supreme Court has upheld the said contention and declined to allow the claim made beyond the resolution plan approved by NCLT.

Notes:

The Company's pending litigations comprises of claims against the company and proceedings pending with Statutory/ Government Authorities. The Company has reviewed all its pending litigations and proceedings and has made adequate provisions, and disclosed contingent liabilities, where applicable, in its financial statements. The Company does not expect the outcome of these proceedings to have a material impact on its financial positions. Future cash outflow, if any in respect of the above are dependent upon the outcome of judgements/ decisions and acceptance by the respective authorities.

C) CAPITAL AND OTHER COMMITMENTS

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|--|----------------------------|----------------------------|
| (a) Estimated amount of contracts remaining to be executed on capital account (net of advances) and not provided for (net) | 1,782.45 | 4,935.20 |
| | In Foreign Currency | In Foreign Currency |
| (b) Forward Contract Outstanding | | |
| In USD | 4,06,02,220 | 7,72,24,851 |
| In GBP/USD | 13,650.00 | 27,300.00 |
| In EURO/USD | 6,05,460.00 | 1,35,072.00 |

41 Segment information

(a) Description of segments and principal activities

The Company is engaged in the manufacture and supply of TMT bars, Wire rods and Ductile Iron(DI) Pipes and also deals in Billets, Pig iron and Iron and Steel scrap products generated while manufacturing these products. In term of Ind AS 108 "Operating Segment", the Company has one business segment i.e. Iron and Steel and related products and all other activities revolve around the said business.

(b) Geographical information

The company is domiciled in India, however sells its products outside India also. The product wise revenue from external customers broken down by location is shown in the table below.

| Particulars | As at March 31, 2021 | As at March 31, 2020 |
|----------------------|-------------------------|-------------------------|
| In India | | |
| - Billets | 5,961.38 | 6,576.32 |
| - TMT bars | 1,42,649.79 | 1,59,147.51 |
| - Wire rods | 1,40,910.89 | 1,46,434.16 |
| - DI pipes | 61,868.89 | 64,652.46 |
| - PIG Iron | 54,328.98 | 39,563.65 |
| - Others | 15,848.34 | 11,340.56 |
| Outside India | | |
| - Billets | 36,659.37 | - |
| - Wire rods | 8,577.05 | 1,689.33 |

(c) There are no single customer directly or indirectly from whom more than 10% of the revenue is derived.

42 Calculation of Earning Per Share is as follows:

| Particulars | As at | As at |
|--|--------------------|-------------------|
| | March 31, 2021 | March 31, 2020 |
| a) Net Profit/ (Loss) for basic and diluted earnings per share as per Statement of Profit and Loss | 2,73,201.20 | (2,180.92) |
| Net Profit/ (Loss) for Basic and Diluted earnings per share | 2,73,201.20 | (2,180.92) |
| b) Weighted average number of equity shares for calculation of basic and diluted earnings per share (Face value Rs. 10/- per share) | | |
| Number of equity shares outstanding as on March 31 | 1,84,90,30,224 | 19,61,67,342 |
| Add: Equity Shares issued during the period (Refer Note no. 43(a)) | - | 1,76,55,53,040 |
| Less: Shares cancelled pursuant to Exit Offer (Refer Note no. 43(b)) | - | (11,26,90,158) |
| Number of equity shares outstanding | 1,84,90,30,224 | 1,84,90,30,224 |
| Weighted average number of equity shares considered for calculation of basic and diluted earnings per share | 1,84,90,30,224 | 1,92,33,96,826 |
| c) Earnings per share (EPS) of Equity | | |
| Basic EPS (Rs.) (a/d) | 14.78 | (0.11) |
| Diluted EPS (Rs.) (a/d) | 14.78 | (0.11) |

43 Accounting and Disclosures for Scheme of Amalgamation:

a) Pursuant to Order dated January 31, 2020 of Hon'ble National Company Law Tribunal, Kolkata Bench (NCLT) the scheme of Arrangement for Amalgamation of Vedanta Star Limited, the erstwhile immediate Holding Company (VSL) with ESL Steel Limited (ESL) (the Scheme) with effect from October 01, 2018 i.e. the appointed date has been approved and thereby on the Scheme becoming effective on March 25, 2020, VSL stands amalgamated with ESL with effect from the said appointed date. The Company as on the record date i.e. March 25, 2020 issued 17,655.53 lakh equity shares to shareholders of VSL i.e. Vedanta Limited in the exchange ratio of 90 shares of ESL against one share held by them in VSL. The excess of the consideration over the net assets and the reserves acquired consequent to amalgamation was transferred to capital reserve on amalgamation (i.e. debit balance of Rs. 1,74,593.58 lakhs) and share capital of the company issued to VSL were cancelled. Differential of Rs. 1,831.14 lakhs with respect to the cost of investment in the book of VSL and face value thereof was adjusted to Capital Reserve. The title deeds for licenses, agreements, bank accounts, loan documents etc. of the transferor company have been transferred in the name of transferee company.

b) Further, VSL vide its Resolution dated September 18, 2018 had made an "Exit Offer" to the shareholders of ESL for purchase of the shares at a price of Rs. 9.54 per equity share for a period of one year from the date of delisting i.e. December 20, 2018. Accordingly in the previous year, 11,26,90,158 Equity Shares of Rs. 10 each amounting to Rs. 11,269.02 lakhs was acquired for Rs. 10,749.45 lakhs subsequent to the appointed date and cancelled consequent to the aforesaid amalgamation. Differential with respect to the face value thereof amounting to Rs. 519.57 lakhs was adjusted to capital reserve.

44 a) The Company had filed application for renewal of Consent to Operate (CTO) on August 24, 2017 which was denied by Jharkhand State Pollution Control Board (JSPCB) on August 23, 2018. Ministry of Environment and Forest (MoEF) has revoked the environmental clearance vide order dated September 20, 2018. The order of denial of CTO by JSPCB and Environmental Clearance (EC) by MoEF has been stayed by Hon'ble High Court of Jharkhand and interim stay allowing the operations was granted in favour of the company. Meanwhile, on September 16, 2020, Hon'ble High Court of Jharkhand has vacated the said Interim Stay beyond September 23, 2020 and the matter has been listed for hearing on June 25, 2021. Aggrieved by the said order, the Company has filed a Special Leave Petition (SLP) before Hon'ble Supreme Court of India on September 18, 2020, consequent to which permission has been granted to operate the plant till further order of the said court vide order dated September 22, 2020.

The Forest Advisory Committee (FAC) of MoEF&CC has granted the Stage 1 clearance and on an application made for EC by the Company MoEF&CC has approved the related Terms of Reference (TOR) on August 25, 2020. Draft Environmental Impact Assessment (EIA)/Environment Management Plan (EMP) has been submitted to JSPCB on November 05, 2020 and on conclusion of Public hearing by JSPCB, Final EIA/EMP report was uploaded on Parivesh Portal of MoEF&CC on January 11, 2021 for consideration by EAC. Observations raised by EAC in this respect are currently under implementation and final proposal as revised consequent to this will be submitted in the upcoming EAC meeting for their consideration. After getting EC, approval for CTE and then CTO will be obtained.

Pending decision of the Court and considering that effective steps are being taken towards required clearances, regularisations and compliances of TOR to secure EC, the accounts of the company have been prepared on going concern basis.

b) As per Stage 1 clearance as above, the company apart from the afforestation cost was required to provide non-forest land in exchange thereof as determined in this respect and Rs. 23,552.55 lakhs was provided in earlier years as cost estimated to be incurred for such "ROU- Land Leasehold".

The company considering the TOR as specified herein above, has appointed an EIA consultant to carry out EIA/EMP study and based on the report of such consultant has recognised in the financial statement afforestation and other costs etc., to be incurred by the company for obtaining EC. Accordingly, Rs. 27,962.64 lakhs (including Rs. 6,611.69 lakhs capitalised as cost of "ROU - Land Leasehold" being NPV for area under possession by the Steel Plant) being estimated cost of damages etc. for the forest area diversion, wild life development and green belt conservation and other concerns raised on public hearing has been provided for in these financial statements and Rs.21,350.95 lakhs has been charged to the Statement of Profit and Loss and shown as exceptional item.

45 The Company has availed various fund and non-fund based working capital facilities from banks amounting to Rs. 1,12,500.00 lakhs secured by First ranking pari passu charge by deed of Hypothecation executed in favour of Vistra ITCL (India) Limited, security trustees over the whole of the current assets of the company both present and future including stock of raw materials, stock-in-process, semi-finished goods, finished goods, stores and spares. Further secured by all of the book debts, amount outstanding, monies receivable, investments, claims and bills of the borrower.

46 Operational Buyers' Credit and Suppliers' Credit availed in foreign currency from offshore branches of Indian banks or from foreign banks carry interest rate ranging from 2.5% to 4% per annum. These trade credits are largely repayable within 180 days from the date of draw down of the fund against the said credit. Operational Buyer's credit is backed by Standby Letter of Credit issued under working capital facilities sanctioned by domestic banks. These facilities are secured by first pari passu charge over the present and future current assets of the Company as given in Note no. 45 above.

47 FINANCIAL INSTRUMENTS

a) The accounting classification of each category of financial instrument, their carrying amount and fair value are as follows:-

| Particulars | As at March 31, 2021 | | As at March 31, 2020 | |
|--|----------------------|-------------|----------------------|-------------|
| | Carrying Amount | Fair Value | Carrying Amount | Fair Value |
| Financial Assets (Current and Non-Current) | | | | |
| Fair Value through Profit and Loss Account | | | | |
| Derivative Assets - not designated as hedging instruments | | | | |
| -Forward Contracts | - | - | 1,034.59 | 1,034.59 |
| Investments in Mutual Funds | 40,889.96 | 40,889.96 | 1,10,046.33 | 1,10,046.33 |
| Financial Assets at amortised cost | | | | |
| Trade receivables | 10,289.77 | 10,289.77 | 17,172.51 | 17,172.51 |
| Cash and Bank Balances | 10,259.66 | 10,259.66 | 4,526.91 | 4,526.91 |
| Fixed Deposits with bank | 30,114.55 | 30,114.55 | 24,397.10 | 24,397.10 |
| Loans | 53.89 | 53.89 | 52.15 | 52.15 |
| Interest bearing Deposits | 1,17,000.00 | 1,17,000.00 | - | - |
| Other Financial Assets | 8,547.88 | 8,547.88 | 240.20 | 240.20 |
| Financial Liabilities (Current and Non-Current) | | | | |
| Financial Liabilities at amortised cost | | | | |
| Borrowings- Floating Rate | 3,13,475.47 | 3,13,475.47 | 3,37,208.88 | 3,37,208.88 |
| Borrowings- Fixed Rate | 18,281.60 | 18,281.60 | 19,700.00 | 19,700.00 |
| Lease Liability | 28,559.78 | 28,559.78 | 884.86 | 884.86 |
| Trade payables | 65,112.05 | 65,112.05 | 42,910.59 | 42,910.59 |
| Operational Buyers' Credit / Suppliers' Credit | 26,925.27 | 26,925.27 | 45,826.78 | 45,826.78 |
| Interest on Loans and Borrowings | 1,991.61 | 1,991.61 | 2,800.56 | 2,800.56 |
| Others financial liabilities | 2,240.52 | 2,240.52 | 27,790.12 | 27,790.12 |
| Fair Value through Profit and Loss Account | | | | |
| Derivative Liabilities - not designated as hedging instruments | | | | |
| -Forward Contracts | 185.03 | 185.03 | - | - |

b) Fair Valuation Techniques

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

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

- The fair value of cash and cash equivalents, current trade receivables and payables, current financial liabilities and assets and borrowings approximate their carrying amount largely due to the short-term nature of these instruments. The management considers that the carrying amounts of financial assets and financial liabilities recognised at nominal cost in the financial statements approximate their fair values.
- The Company's long-term debt has been contracted at floating rates of interest. Fair value of variable interest rate borrowings approximates their carrying value subject to adjustments made for transaction cost. In respect of fixed interest rate borrowings, fair value is determined by using discount rates that reflects the present borrowing rate of the company.
- Investment in liquid and short-term mutual funds which are classified as fair value through profit and loss are measured using quoted market prices at the reporting date multiplied by the quantity held.
- The fair value of derivative financial instruments is determined based on observable market inputs including currency spot and forward rates, yield curves, currency volatility etc. The said valuation has been carried out by the counter party with whom the contract has been entered with and Management has evaluated the credit and non-performance risks associated with the counterparties and believes them to be insignificant and not requiring any credit adjustments.

c) Fair value hierarchy

The following table presents fair value hierarchy of assets and liabilities measured at fair value on a recurring basis as of March 31, 2021:

| Particulars | As at March 31, 2021 | As at March 31, 2020 | Fair value measurements at reporting date using | | |
|---|----------------------|----------------------|---|---------------|---------|
| | | | Level 1 | Level 2 | Level 3 |
| Financial Assets | | | | | |
| Derivative- not designated as hedging instruments | | | | | |
| o Forward Contracts | - | 1,034.59 | - | - | - |
| | | | - | (1,034.59) | - |
| Investment in Mutual Funds | 40,889.96 | 1,10,046.33 | 40,889.96 | - | - |
| | | | (1,10,046.33) | - | - |
| Investment in Fixed Deposits | 30,114.55 | 24,397.10 | | 30,114.55 | |
| | | | | (24,397.10) | |
| Interest bearing Deposits | 1,17,000.00 | - | | 1,17,000.00 | |
| | | | | - | |
| Financial Liabilities | | | | | |
| Borrowings- Floating Rate | 3,13,475.47 | 3,37,208.88 | - | 3,13,475.47 | - |
| | | | (-) | (3,37,208.88) | (-) |
| Borrowings- Fixed Rate | 18,281.60 | 19,700.00 | - | 18,281.60 | - |
| | | | (-) | (19,700.00) | (-) |
| Operational Buyers' Credit / Suppliers' Credit | 26,925.27 | 45,826.78 | - | 26,925.27 | - |
| | | | (-) | (45,826.78) | (-) |
| Lease Liability | 28,559.78 | 884.86 | - | 28,559.78 | - |
| | | | (-) | (884.86) | (-) |
| Derivative- not designated as hedging instruments | | | | | |
| o Forward Contracts | 185.03 | - | - | 185.03 | - |
| | | | (-) | - | - |

(*) Figures in round brackets () indicate figures as at March 31, 2020

During the year ended March 31, 2021 and March 31, 2020, there were no transfers between Level 1, Level 2 and Level 3.

The Inputs used in fair valuation measurement are as follows:

-Fair valuation of Financial assets and liabilities not within the operating cycle of the company is amortised based on the borrowing rate of the company.

-Financial instruments are valued based on quoted prices for similar assets and liabilities in active markets or inputs that are directly or indirectly observable in the marketplace. In respect of derivative financial instruments, the inputs used for forward contracts are Forward foreign currency exchange rates and Interest rates to discount future cash flow.

d) Derivatives assets and liabilities:

The Company follows established risk management policies, including the use of derivatives to hedge its exposure to foreign currency fluctuations on foreign currency assets / liabilities. The counter party in these derivative instruments is a bank and the Company considers the risks of non-performance by the counterparty as non-material.

i) The following tables present the aggregate contracted principal amounts of the Company's derivative contracts outstanding:

| Category | Currency | As at March 31, 2021 | | As at March 31, 2020 | |
|-------------|----------|----------------------|----------------------------|----------------------|----------------------------|
| | | No. of Deals | Amount in Foreign Currency | No. of Deals | Amount in Foreign Currency |
| Buy Forward | USD/INR | 64 | 4,06,02,220 | 61 | 7,72,24,851 |
| | EURO/USD | 2 | 6,05,460 | 1 | 1,35,072 |
| | GBP/USD | 1 | 13,650 | 1 | 27,300 |

ii) Unhedged Foreign Currency exposures are as follows: - (Amount in Foreign Currency)

| Nature | Currency | As at March 31, 2021 | As at March 31, 2020 |
|--|----------|----------------------|----------------------|
| Trade Payables (Including acceptances) | EURO | 85,476 | - |
| Trade Receivable | USD | 15,62,610 | 13,77,586 |

iii) The foreign exchange forward contracts mature within twelve months. The table below analyses the derivative financial instruments into relevant maturity groupings based on the remaining period as of the balance sheet date:

| Particulars | (Amount in Rs. Lakh) | |
|--|----------------------|----------------------|
| | As at March 31, 2021 | As at March 31, 2020 |
| Not later than one month | (71.34) | 618.77 |
| Later than one month and not later than three months | (156.08) | 482.29 |
| Later than three months and not later than one year | 42.39 | (66.47) |
| Later than one year | - | - |

e) Sale of financial assets

In the normal course of business, the Company transfers its bills receivable to banks. Under the terms of the arrangements, the Company surrenders control over the financial assets and transfer is without recourse. Accordingly, such transfers are recorded as sale of financial assets. Gains and losses on sale of financial assets without recourse are recorded at the time of sale based on the carrying value of the financial assets. In certain cases, transfer of financial assets may be with recourse. Under arrangements with recourse, the Company is obligated to repurchase the uncollected financial assets, subject to limits specified in the agreement with the banks. Accordingly, in such cases the amounts received are recorded as borrowings in the statement of financial position and cash flows from financing activities.

During the year ended March 31, 2021 and 2020, the Company transferred and recorded as sale of financial assets of Rs. 536,99.43 lakhs and Rs. 67,083.92 lakhs respectively, under arrangements without recourse and has included the proceeds from such sale in net cash provided by operating activities. These transfers resulted in loss (cost) of Rs. 593.82 lakhs and Rs. 1,358.77 lakhs for the year ended March 31, 2021 and 2020 respectively.

f) FINANCIAL RISK MANAGEMENT

The Company's activities are exposed to a variety of financial risks. The key financial risk includes market risk, credit risk and liquidity risk. The Company's focus is to foresee the unpredictability of financial markets and seek to minimize potential adverse effects on its financial performance. The Board of Director's reviews and approves policies for managing these risks. The risks are governed by appropriate policies and procedures and that financial risks are identified, measured and managed in accordance with the Company's policies and risk objectives.

MARKET RISK

Market risk is the risk or uncertainty arising from possible market fluctuation resulting in variation in the fair value of future cash flows of a financial instrument. The major components of Market risks are currency risk, interest rate risk and other price risk. Financial instruments affected by market risk includes trade receivables, investment in fixed deposits and mutual funds, borrowings and trade and other payables.

Foreign Currency Risk

Foreign currency risk is the risk that the fair value or future cash flows of an exposure will fluctuate because of changes in foreign exchange rates. The Company's exposure to the risk of changes in foreign exchange rates relates primarily to the Company's trade and other payables and trade receivables.

The Company has foreign exchange gain of Rs. 184.68 lakhs during the year. In order to mitigate forex losses, the company has a comprehensive risk management review system wherein it actively hedges its foreign currency exposure with defined parameters through use of hedging instrument such as forward contracts. The Company periodically reviews its risk management initiatives and also takes expert advice on regular basis on hedging strategy.

The carrying amount of the various exposure to foreign currency as at the end of the reporting period are as follows:

| Particulars | (Amount in Foreign Currency) | | | |
|---------------------------------|------------------------------|-------------------------|-------------------------|-------------------------|
| | As at March 31, 2021 | As at March 31, 2020 | As at March 31, 2021 | As at March 31, 2020 |
| | USD | USD | EURO | EURO |
| Trade Receivable | 15,62,610 | 13,77,586 | - | - |
| Trade and other Payables | - | - | (85,476) | - |
| Net assets/(liabilities) | 15,62,610 | 13,77,586 | (85,476) | - |

Sensitivity analysis resulting in profit or loss arises mainly from USD denominated receivables and payables are as follows:

| Particulars | Effect on Profit before tax (RS in Lakhs) | |
|---|---|--------------------------------------|
| | For the year ended March 31, 2021 | For the year ended March 31, 2020 |
| PAYABLES (Weakening of INR by 5%) | | |
| USD | - | - |
| RECEIVABLES (Weakening of INR by 5%) | | |
| USD | 0.78 | 0.69 |

A 5% strengthening of INR would have an equal and opposite effect on the Company's financial statements

Interest Rate Risk

The company exposure in market risk relating to change in interest rate primarily arises from floating rate borrowing and credits from the banks and financial institutions. Considering the same the carrying amount of said borrowing was considered to be at fair value.

Further there are deposits with banks and related party which are for short term period are exposed to interest rate, falling due for renewal. These deposits are however generally for trade purposes for short term and as such do not cause material implication.

With all other variables held constant, the following table demonstrates the impact of the borrowing cost on floating rate portion of loans and borrowings:

| Particulars | Effect on Profit before tax (RS in Lakhs) | |
|------------------------------------|---|--------------------------------------|
| | For the year ended March 31, 2021 | For the year ended March 31, 2020 |
| Increase in 50 basis points | | |
| Borrowings- Floating Rate | 1,567.38 | 1,686.04 |

A decrease in 50 basis point would have an equal and opposite effect on the Company's financial statements.

Other price risk

The Company also invests in mutual fund schemes of leading fund houses. Such investments are susceptible to market price risk that arise mainly from changes in interest rate which may impact the return and value of such investments. However, given the relatively short tenure of underlying portfolio of the mutual fund schemes in which the Company has invested, such price risk is not significant.

CREDIT RISK

Credit risk is the risk that counterparty will not meet its obligations under a financial instrument or customer contract, leading to a financial loss. The Company is exposed to credit risk from its operating activities (primarily trade receivables). To manage this, the management has a credit policy in place and the exposure to credit risk is monitored on an ongoing basis. The Company periodically assesses the financial reliability of customers, taking into account the financial condition, current economic trends and ageing of accounts receivable. Individual risk limits are set accordingly. Further the company obtains necessary security including letter of credits and/or bank guarantee to mitigate its credit risk.

The Company establishes an allowance for impairment that represents its estimate of incurred losses in respect of trade and other receivables. Receivables from customers are reviewed/evaluated periodically by the management and appropriate provisions are made to the extent recovery there against has been considered to be remote.

The carrying amount of respective financial assets recognised in the financial statements, (net of impairment losses) represents the Company's maximum exposure to credit risk. The concentration of credit risk is limited due to the customer base being large and unrelated. Of the trade receivables balance at the end of the year, there are three (March 31, 2020: two) customers having outstanding of Rs. 6,197.93 lakhs (March 31, 2020: Rs. 5,582.78 lakhs) which accounts for more than 10% of the accounts receivable.

The Company takes collateral or other credit enhancements to secure the credit risk. The Company has also taken advances, security deposits and Letter of Credit from its customers, which mitigate the credit risk to that extent.

Financial assets that are neither past due nor impaired

Cash and cash equivalents and deposits with banks are neither past due nor impaired. Cash and cash equivalents with banks are held with reputed and credit worthy banking institutions.

Financial assets that are past due but not impaired

Trade receivables amounting to Rs. 3,848.13 lakhs (March 31, 2020: Rs. 1,765.06 lakhs) which are past due at the end of the reporting period, no credit losses there against are expected to arise.

LIQUIDITY RISK

Liquidity risk is defined as the risk that the Company will not be able to settle or meet its obligations on time or at a reasonable price. The Company's objective is to maintain optimum level of liquidity to meet its cash and collateral requirements at all times. The company relies on internal accruals and borrowings from holding company to meet its fund requirement. The ongoing implementation measures will have a positive cash flow and in term help to control the liquidity crisis.

Liquidity and interest risk tables

The following tables detail the Company's remaining contractual maturity for its non-derivative financial liabilities with agreed repayment periods. The tables have been drawn up based on the undiscounted cash flows of financial liabilities based on the earliest date on which the Company can be required to pay. The tables include both interest and principal cash flows.

Interest rate and currency of borrowings

| Particulars | As at March 31, 2021 | | |
|--------------|--------------------------|-----------------------|------------------------------------|
| | Floating rate borrowings | Fixed rate borrowings | Weighted average Interest Rate (%) |
| INR | 3,13,475.47 | 18,281.60 | 8.88% |
| Total | 3,13,475.47 | 18,281.60 | |

| Particulars | As at March 31, 2020 | | |
|--------------|--------------------------|-----------------------|------------------------------------|
| | Floating rate borrowings | Fixed rate borrowings | Weighted average Interest Rate (%) |
| INR | 3,37,208.88 | 19,700.00 | 9.46% |
| Total | 3,37,208.88 | 19,700.00 | |

Maturity Analysis of Financial Liabilities

As at March 31, 2021

| Particulars | Carrying Amount | On Demand | Less than 6 months | 6 to 12 months | > 1 year | Total |
|--|-----------------|-----------|--------------------|----------------|-------------|-------------|
| Interest bearing borrowings (including current maturities) | 3,31,757.07 | - | 23,020.80 | 23,020.80 | 2,85,715.47 | 3,31,757.07 |
| Interest payable | 1,991.61 | - | 1,991.61 | - | - | 1,991.61 |
| Lease Liability | 28,559.78 | 27,868.26 | 197.79 | 90.84 | 402.89 | 28,559.78 |
| Operational Buyers' Credit / Suppliers' Credit | 26,925.27 | - | 26,925.27 | - | - | 26,925.27 |
| Trade and other payables | 67,352.57 | 58,099.86 | 9,252.71 | - | - | 67,352.57 |

As at March 31, 2020

| Particulars | Carrying Amount | On Demand | Less than 6 months | 6 to 12 months | > 1 year | Total |
|--|-----------------|-----------|--------------------|----------------|-------------|-------------|
| Interest bearing borrowings (including current maturities) | 3,56,908.88 | - | 12,594.60 | 12,594.60 | 3,31,719.68 | 3,56,908.88 |
| Interest payable | 2,800.56 | - | 2,800.56 | - | - | 2,800.56 |
| Lease Liability | 884.86 | - | 220.46 | 212.47 | 451.93 | 884.86 |
| Operational Buyers' Credit / Suppliers' Credit | 45,826.78 | - | 45,826.78 | - | - | 45,826.78 |
| Trade and other payables | 70,700.71 | 56,402.48 | 14,298.23 | - | - | 70,700.71 |

The company has current financial assets which will be realised in ordinary course of business. Further it has significant retained surplus lying invested in fixed deposits, mutual funds so as to ensure that it has sufficient cash and also short term deposits to holding company against supplies and procurements to meet expected operational expenses and obligations.

CAPITAL MANAGEMENT

The primary objective of the Company's capital management is to ensure that it maintains a healthy capital ratio in order to support its business and maximise shareholder value. The Company's objective when managing capital is to safeguard their ability to continue as a going concern so that they can continue to provide returns for shareholders and benefits for other stake holders. The Company is focused on keeping strong total equity base to ensure independence, security, as well as a high financial flexibility for potential future borrowings, if required without impacting the risk profile of the Company.

The gearing ratio as at March 31, 2021 and March 31, 2020 are as follows:

| Particulars | As at | As at |
|---|--------------------|--------------------|
| | March 31, 2021 | March 31, 2020 |
| Current loans and borrowings | 45,509.16 | 25,327.31 |
| Non-current loans and borrowings | 2,86,247.91 | 3,31,581.57 |
| Total loans and borrowings | 3,31,757.07 | 3,56,908.88 |
| Less: Cash and Cash Equivalents | 12,082.00 | 17,077.62 |
| Net Debt | 3,19,675.07 | 3,39,831.26 |
| Total equity attributable to the equity shareholders of the Company | 6,22,433.39 | 3,49,283.22 |
| Capital and Debt | 9,42,108.46 | 6,89,114.48 |
| Total capital (loans and borrowings and equity) | 0.51 | 0.97 |

48 INCOME TAX

- (a) Income Tax has been provided considering the provisions of Income Tax Act and based on the legal opinion and advices received in this respect.
- (b) The rationale for recognition of Deferred Tax Assets (DTA) has been reviewed during the year based on the expected sustainability of the profit and growth in volume of business of the company as per the current projection and estimation prepared in this respect. Realisation of DTA is dependent upon generation of future taxable profit against which those temporary differences and carry forward of tax losses become deductible. Accordingly, Deferred Tax Assets of Rs. 2,75,228.77 lakhs (including Rs. 27.41 lakhs disclosed under Other Comprehensive Income) based on management's assumption for reasonable certainty of realisation thereof against the expected taxable income and reversal of Deferred Tax Liabilities (DTL) in future as required in terms of Ind AS 12 "Income Taxes" has been recognised in these financial statements.

Movement of Deferred Tax from beginning to the end of the financial year is as follows:

| Particulars | As at March 31, 2019 | Charge/ (Credit) to Statement of | Charge/ (Credit) to Other | As at March 31, 2020 | Charge/ (Credit) to Statement of Profit | Charge/ (Credit) to Other | As at March 31, 2021 |
|---|-------------------------|-------------------------------------|------------------------------|-------------------------|--|------------------------------|-------------------------|
| Deferred Tax Liability | | | | | | | |
| a) Related to Property, Plant and Equipment and Intangible Assets | 34,823.47 | 10,854.79 | - | 45,678.26 | 3,607.98 | - | 49,286.24 |
| b) Fair Valuation of Mutual Funds | 137.66 | 316.08 | - | 453.74 | (430.64) | - | 23.10 |
| c) Loans carried at Amortised Cost | - | 975.33 | - | 975.33 | (260.89) | - | 714.44 |
| d) Forward Contract receivable | - | 361.53 | - | 361.53 | (361.53) | - | - |
| Total Deferred Tax Liability | 34,961.13 | 12,507.73 | - | 47,468.86 | 2,554.92 | - | 50,023.78 |
| Deferred Tax Assets | | | | | | | |
| a) Accumulated Unabsorbed depreciation | 32,303.63 | (11,613.50) | - | 43,917.13 | (1,99,396.88) | - | 2,43,314.01 |
| b) Accumulated Unabsorbed business loss | - | - | - | - | (67,753.42) | - | 67,753.42 |
| c) Provision for doubtful debts and advances and others | 2,211.53 | (1,068.35) | - | 3,279.88 | (761.41) | - | 4,041.29 |
| c) Provision for afforestation and Capital work in progress | - | - | - | - | (9,656.51) | - | 9,656.51 |
| c) Amount deductible on payment basis | 445.97 | 186.76 | - | 259.21 | 77.56 | (27.41) | 209.06 |
| c) Others | - | (12.64) | - | 12.64 | (265.62) | - | 278.26 |
| Total Deferred Tax Assets | 34,961.13 | (12,507.73) | - | 47,468.86 | (2,77,756.28) | (27.41) | 3,25,252.55 |
| Deferred Tax Liability/(Assets) (Net) | - | - | - | - | (2,75,201.36) | (27.41) | (2,75,228.77) |

In view of the management, future taxable income of the company considering the projected volume of operations based on current profitability and estimate for sustainability in this respect in future will be sufficient to absorb the deferred tax assets on utilisation thereof over a period of time.

- (c) **The Expiry date for accumulated business loss are as follows:**

| Particulars | Year of Expiry | Amount |
|-------------------------|----------------|-------------|
| Business Loss | 2022-2023 | 58,445.72 |
| Business Loss | 2023-2024 | 28,638.62 |
| Business Loss | 2026-2027 | 27,793.81 |
| Business Loss | 2027-2028 | 1,11,510.00 |
| Unabsorbed depreciation | No Expiry | 6,96,296.96 |

(d) Reconciliation of Tax expense and the accounting profit multiplied by domestic tax rate for March 31, 2020

| Particulars | For the Year ended March 31, 2021 | For the Year ended March 31, 2020 |
|---|--------------------------------------|--------------------------------------|
| Profit/ (Loss) before tax | (2,181.42) | (2,180.92) |
| Income Tax Charge/(Credit) thereon based on tax rate @ 34.94% | (762.28) | (762.10) |
| Adjustment for: | | |
| Unrecognised Deferred Tax in earlier years recognised during the year | (2,85,878.20) | (2,49,020.29) |
| Difference in Tax Rates used | - | (29,882.43) |
| Difference in amount of Unabsorbed business loss considered for last year computation | (2,049.08) | (7,816.39) |
| Deferred Tax Liability on Loan Processing Fees | - | 975.33 |
| Other Permanent difference | 70.40 | (1.94) |
| Revision in Tax Return for previous year | - | 629.62 |
| Closing unrecognised unused tax losses | 13,417.80 | 2,85,878.20 |
| | (2,75,201.36) | - |

49 Previous Period's figure has been regrouped/rearranged wherever necessary to comply with current year presentation

As per our report of even date

For and on behalf of the Board of Directors

For Lodha & Co,
Chartered Accountants

R.P. Singh
Partner

Place: Bokaro
Dated: April 19, 2021

| | |
|--|-------------------------|
| A Sumathi (DIN : 07147100) | Non-Executive Director |
| Pankaj Malhan (DIN : 08516185) | Whole time Director |
| Mahesh Iyer | Chief Financial Officer |
| Manish Kumar Chaudhary M.No. ACS 23037 | Company Secretary |