



SAGARDEEP ALLOYS LIMITED

CIN - L29253GJ2007PLC050007



14th
Annual Report
2020 - 2021

ABOUT THE COMPANY

Sagardeep Alloys Ltd. is the umbrella brand of Sagardeep Metals, established in 1972 and promoted by Mr. Asmal Mehta. With over 35 years of experience in the Indian market, SagarDeep Alloys is a trusted and reputed manufacturer of copper alloys consumables, Copper pipes and tubes, Copper flats, Copper coils, Copper rods, Copper anodes, Copper nuggets and Copper plates and also trades in Stainless Steel sheets / coils, rods.

Our production unit (Yard) is well equipped with for high quality products. The manufacturing facility of the Company is able to produce various types of Copper and Copper Alloy products like sheet, pipe, tube, section, bus bar etc.

We are supplying also to few well know companies and that has enabled our company to exhibit the traits of good quality, precise adherence to global standards and maintaining of a thorough constant update on latest developments in the copper and copper alloy technology.

On getting trading opportunity, the Company also do trades in Stainless Steel Pipes, Seamless Pipes, Welded Pipes, Tubes, Sheets, Coils, Plates, Welding Electrodes and other similar products.

During the Financial Year 2020-21, the Company has completed the installation work for new plant and machinery at our existing factory at Plot No. Plot no. 2070, Rajnagar Patia, Santej, Khatraj Road, Santej Kalol, Gandhinagar -382721 , which also includes up-gradation of some of existing machinery. The Company will produce Copper Busbar, Copper Strips, Copper Plates, Coppers Wire to be used in electric cable.

The Company is working to enlarge its market reach and expecting to increase its present capacity utilization to around 80% in coming years and such increase in capacity utilization will improve the profitability of the Company.

The Company is also in the process to expand its business in the segment of production of "Copper Sulphate" and "Ferrous Sulphate". The Company has taken factory land and shed on lease. The installation capacity of "Copper Sulphate and "Ferrous Sulphate" is 25 MT/Month each. The Company already produces Copper Scrap one of raw material to produce Copper Sulphate and therefore, it would result in increase in margin of the Company. These products will also improve the turnover and profitability of the Company. The Company has also received the Consent to Commence (CTC) from GPCB to commence the production of these products and started commercial production of Copper Sulphate in the current Financial Year 2021-22 and yet to start the production of Ferrous Sulphate.

CHAIRMAN'S MESSAGE

Dear Shareholders,

We all passed through a very troubled year 2020-21 which has impacted us and also changed our approach towards life. We all have never gone through such unprecedented and difficult time which we have not recovered from completely. The frontline healthcare staff has done excellent efforts to save the precious life of human on the risk of their own safety and so I feel that our society will always cherish their efforts and hereby like to be very thankful for their utmost dedication and heroic efforts for providing the essential service to the nation.

The present pandemic has also affected negatively the economy worldwide and especially of India. But, I also want to put a note that people of our great nation are hardworking and courageous and their approach will soon bring economy of our nation on positive track. Our Company is engaged in manufacturing of Copper and Copper Alloy Products, which are mainly industrial in nature and improvement in industrial sentiments will also improve the performance of our Company.

I would also take this opportunity to inform you that apart from increasing the capacity of the present line of products, your Company is also in process of expanding and has already started commercial production of Copper Sulphate with a production capacity of 25MT/Month and in future will also start production of Ferrous Sulphate. These inclusion of new line of activity will improve the performance of the Company.

Your Company will continue to explore the available opportunity to improve its market position and also of its financial performance.

I, Once again like to convey that we all should follow the necessary guidelines and protocol to save ourselves and our family from this Covid-19 and wish you all very safe days ahead.

On behalf of the Board, I would like to thank all our stakeholders including shareholders, investors, bankers, creditors and employees for their continued support. I would like to express my sincere gratitude to all the members of our Board for their continued insights and invaluable guidance as we explore new opportunities and move ahead with confidence.

Warm regards,

SATISHKUMAR ASAMAL MEHTA
CHAIRMAN

CORPORATE INFORMATION

Board of Directors

Mr. Satishkumar Asamal Mehta
Chairman & Managing Director
(Din: 01958984)

Mr. Jayeshkumar Ashmal Mehta
Whole-Time Director
(Din: 02156140)

Mr. Hemendra Bhailal Patel
Independent Director
(Din: 01827562)

Mrs. Vinita Pankaj Maheshwari
Independent Director
(Din: 07187365)

Mr. Jitendrakumar Dhanjibhai Patel
Independent Director
(Din: 07369309)

Mr. Parimal Suryakant Patwa
Director
(Din: 00093852)

Chief Financial Officer

Mr. Krishnakant Somani
(upto 01.08.2021)

Mr. Darshan P. Chouhan
(w.e.f. 01.08.2021)

Company Secretary & Compliance Officer

Ms. Priya Raval
(upto 26.06.2021)

Mr. Ankit sanchiher
(w.e.f. 01 July, 2021)

Registered Office

Plot no. 2070, Rajnagar Patia, Santej
Khatraj Road, Santej Kalol,
Gandhinagar -382721
Phone: 079- 25626304, 25626335
E- Mail: secretary@sdalloys.com,
investors@sdalloys.com
Website: www.sdalloys.com

Statutory Auditors

M/s. Piyush J Shah & Co
504-B, Shikhar Complex,
Nr. Vadilal House,
Mithakali Six Roads,
Navrangpura,
Ahmedabad-380009

Banker

Axis Bank Limited

Registrar & share Transfer Agent

Link Intime India Private Ltd
C-101, 247 Park,
L.B.S. Marg, Vikhroli (West),
Mumbai-400 083

INDEX

Sr. No.	Contents	Page No.
1)	Directors' Report	4
2)	Management And Discussion Analysis	35
3)	Corporate Governance Report	37
4)	Standalone Independent Auditors' Report and Financials	60
5)	Consolidated Independent Auditors' Report and Financials	95

Note:

The Ministry of Corporate Affairs has taken a "Green Initiative in the Corporate Governance" by allowing paperless compliances by the companies and has issued circulars stating that service of notice / documents including Annual Report can be sent by e-mail to its members. To support this green initiative of the Government in full measure, members who have not registered their e-mail addresses, so far, are requested to register their e-mail addresses, in respects of electronic holding with the Depository through their concerned Depository Participants.

DIRECTOR'S REPORT

Dear Members,

Your Directors take pleasure in presenting the 14th Annual Report along with Audited Financial Statements of your Company for the financial year ended 31st March, 2021.

1. Financial Results

During the year under review, your Company has achieved a total net sale of Rs. 6548.37 lakhs and Net Profit after Tax (NP) of Rs. 14.68 lakhs. There is decrease in profit after tax during the current year in comparison to that of previous year. Your directors are optimistic about the performance of the Company in the coming years. The financial highlights for the year 2020-21 are as under:

Standalone (in lakhs)

Particulars for the year ended	March 31, 2021	March 31, 2020
Net revenue from Operations (Sales)	6548.37	3380.27
Profit Before Depreciation and Tax	58.3	73.82
Less: Depreciation	50.81	42.37
Profit Before Tax	7.49	31.45
Less: Tax Expense	(7.19)	5.37
Profit After Tax	14.68	26.07
EPS (Basic)	0.09	0.23
EPS (Diluted)	0.09	0.23

Consolidated (in Lakhs)

Particulars for the year ended	March 31, 2021	March 31, 2020
Net revenue from Operations (Sales)	6548.37	3380.27
Profit Before Depreciation and Tax	60.82	73.54
Less: Depreciation	52.33	43.92
Profit Before Tax	8.49	29.43
Less: Tax Expense	-5.92	6.63
Profit After Tax	14.41	22.80
EPS (Basic)	0.08	0.21
EPS (Diluted)	0.08	0.21

2. Dividend

Your Director feel that it is prudent to plough back the profits of the Company for future growth of the Company and therefore do not recommend any dividend for the year ended March 31st, 2021.

3. COVID-19

We all passed through a very troubled year 2020-21 which has impacted us and also changed our approached towards life. We all have never gone through such unprecedented and difficult time which we have not recovered from completely. The present pandemic has also affected negatively

the economy worldwide and especially of India. Our Company is engaged in manufacturing of Copper and Copper Alloy Products, which are mainly industrial in nature and improvement in industrial sentiments will also improve the performance of our Company. The production and other business activities of the Companies were affected due to restrictions/guidelines due to Covid-19 but the efforts of the Company resulted into increase in Turnover during the year under review. Your Board finds that this Covid-19 has affected us negatively in some areas but has also brought new business opportunities to Indian Economy due to change in approach towards China and that has specially resulted very good for metal industry and your Company will also gain good results in coming years.

4. Transfer of Unclaimed Dividend to Investor Education and Protection Fund

Since there was no unpaid/unclaimed dividend, the provision of Section 125 of the Companies Act, 2013 do not apply.

5. Change in the nature of business, if any-

There is no change in the nature of business carried out by the Company in the Year 2020-2021.

6. Reserves

The Company has not transferred any amount to the reserves during the current financial year.

7. Subsidiary, Joint Ventures and Associate Companies

The Company has one wholly owned Indian Subsidiary company i.e. Sagardeep Engineers Private Limited. A statement containing the salient features of financial statement of our subsidiary in the prescribed format AOC-1 is appended to the financial statements of the Company.

8. Consolidated Financial Statement

The Financial Statement of the Company for the Financial year 2020-21 are prepared in compliance with the applicable provisions of the Act, Accounting Standards and as prescribed by Securities and Exchange Board of India (SEBI) under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The Consolidated Financial Statement has been prepared on the basis of the audited financial statement of the Company as approved by their respective Board of Directors. Pursuant to the provisions of Section 136 of the Act, the Financial Statements of the Company, the Consolidated Financial Statements along with all relevant documents and Auditors report thereon form part of this Annual Report.

9. Public Deposit

The Company has not accepted or renewed any amount falling within the purview of provisions of Section 73 of the Companies Act, 2013 ("the Act") read with the Companies (Acceptance of Deposit) Rules, 2014 during the period under review. Hence, the requirement for furnishing the details of deposits which are not in compliance with Chapter V of the Act is not applicable.

10. Particulars of loan, Guarantees or Investment made under Section 186

During the year, the Company has not given any guarantee or provided security in connection with the loan to any other body corporate or person or made any investments however the Company has provided loans to persons/body corporate and the particulars of such loans, falling under the provisions of Section 186 of the Companies Act, 2013 are provided in the notes to financial statements of the Company

11. Extract of the annual return

The extract of the Annual Return in Form MGT-9 pursuant to the provisions of Section 92 read with Rule 12 of the Companies (Management and Administration) Rules, 2014 is furnished in Annexure I and is attached to the report.

12. Directors & Key Management Personnel

I. Composition of Board & Board Meetings

The Board of Directors of the Company has an optimum combination of Executive, Non-Executive and Independent Directors. As on the date of this report, the Board comprises of 6(Six) Directors, out of which 2 are Executive Directors, 1 is Non-executive Director and 3 are Non-Executive Independent Directors that includes one Woman Director. The Chairman of the Board is an executive Director.

The Board of Directors duly met 11 (Eleven) times on 22/05/2020, 27/06/2020, 06/07/2020, 27/07/2020, 21/08/2020, 12/09/2020, 07/10/2020, 16/10/2020, 26/10/2020, 11/11/2020 and 08/02/2021 during the year. The Composition, category and attendance of each Director at the Board and Annual General Meeting of each Director in various companies is as follows: -

Name of Director, Designation and Category	No of Board Meetings held during the year	No of Board Meetings attended during the year	Attendance at the AGM
Mr. Satishkumar A Mehta Chairman & Managing Director, Promoter	11	11	Yes
Mr. Jayeshkumar A Mehta Whole Time Director Promoter	11	11	Yes
Mr. Hemendra B Patel Non-Executive Director Independent	11	10	Yes
Mrs. Vinita P Maheshwari Non-Executive Director Independent	11	11	Yes
Mr. Jitendra D Patel Non-Executive Director Independent	11	11	Yes
Mr. Parimal Patwa Non-Executive Director Non-Independent	11	8	No

II. INDUCTIONS

The following appointments were made

To fill the vacancy caused by resignation of Mr. Nayan Pitroda, the Nomination and Remuneration Committee has recommended name of Ms. Priya Raval. She has taken the charge as Company Secretary and Compliance Officer w.e.f October 26, 2020.

Further Ms. Priya A Raval has resigned w.e.f. 26th June, 2021, the Nomination and Remuneration Committee has recommended name of Mr. Ankit Sanchiher and board appointed him as Company Secretary and Compliance Officer w.e.f July 01, 2021.

Also, During the year under review, Mr. Parimal S. Patwa has been appointed as an Additional Director w.e.f. May 22, 2020 in Non-Executive, Non-Independent category and the shareholders of the Company have regularized the appointment of Mr. Parimal S. Patwa in the 13th Annual General Meeting of the Company held on August 27, 2020.

III. REAPPOINTMENT:

During the year under review, the shareholders of the Company in the 13th Annual General Meeting of the Company held on September 03, 2020 re-appointed Mr. Hemendrabhai B. Patel and Mrs. Vinita P. Maheshwari as Independent Directors of the Company to hold the office for a period of five (5) consecutive years w.e.f. August 28, 2020 by way of Special Resolution pursuant to the provisions of Companies Act, 2013 ("the Act").

Further, the Board of Directors at its meeting held on 13th July, 2021, on the recommendation of Nomination and Remuneration Committee, re-appointed Mr. Satishkumar A. Mehta as Managing Director for a period of Three (3) years w.e.f. December 30, 2021, and Mr. Jayeshkumar A. Mehta as Whole Time Director for a period of Three (3) years w.e.f. December 30, 2021, and recommended the shareholder to approve the appointment at the ensuing Annual General Meeting.

IV. CESSATIONS:

During the year Mr. Nayan P. Pitroda resigned as a company secretary and compliance officer of the company effective from 16th October, 2020.

V. Retirement by Rotation

In accordance with the provisions of the Companies Act 2013 and Companies Articles of Association, Mr. Satishkumar A. Mehta (DIN: 01958984) retires by rotation at the ensuing Annual General Meeting and being eligible offers himself for re-appointment. The Board recommends his re-appointment. Necessary resolution for his re-appointment is placed before the shareholder for approval.

VI. Familiarisation Programme of Independent Directors

The Independent Directors have been updated with their roles, rights and responsibilities in the Company by specifying them in their appointment letter along with necessary documents, reports and internal policies to enable them to familiarize with the Company's procedures and practices. The Company endeavors, through presentations at regular intervals, to familiarize the Independent Directors with the strategy, operations and functioning of the Company and also with changes in the regulatory environment having a significant impact on the operations of the Company and the industry as a whole. The Independent Directors also meet with senior management team of the Company in informal gatherings. During the year 2020-21, the Company has conducted 4 programs for familiarizing the Directors for a total duration of 6 hours. The Policy on familiarization program for independent directors, role, and responsibility and rights of independent directors is uploaded on www.sdalloys.com

VII. Profile of Directors seeking appointment / reappointment

As required under regulation 36(3) of SEBI (LODR), 2015, particulars of the Directors retiring and seeking reappointment at the ensuing Annual General Meeting is annexed to the notice convening 14th Annual General Meeting.

VIII. Key Managerial Personnel

As on the date of this report, the following persons are the Key Managerial Personnel(s) of the Company:

- a) Mr. Satishkumar A. Mehta, Chairman & Managing Director
- b) Mr. Jayeshkumar A. Mehta, Whole Time Director
- c) Mr. Krishnakant P. Somani, Chief Financial Officer (Resigned w.e.f. 01st August 2021)
- d) Mr. Darshan P. Chauhan, Chief Financial Officer (Effective from 01st August, 2021)

Company Secretary and Compliance Officer

- Mr. Nayan Pitroda (upto 16.10.2020)
- Ms. Priya Raval (upto 26.06.2021)
- Mr. Ankit Sanchiher (w.e.f. 01.07.2021)

IX. Declaration from Independent Director

All the Independent Directors of the Company have given their declarations stating that they meet the criteria of independence as prescribed under the Section 149(6) of the Companies Act, 2013 read with the rules made there under and in the opinion of the Board, the Independent Directors meet the said criteria.

During the year under review the Independent Directors duly met pursuant to the provisions as specified in Schedule IV of the Companies Act, 2013 and the quorum was present throughout the meeting.

13. Postal ballot

During the year, pursuant to Section 110 of the Companies Act, 2013 read with the Companies (Management and Administration) Rules, 2014 (including any statutory amendment(s) or re-enactment(s) made thereunder), your Company passed the following resolution through postal ballot as per the details below:

Date of Postal ballot Notice	: 21.08.2020
Date of declaration of result	: 27.09.2020
Voting period	: 28.08.2020 to 26.09.2020
Date of approval	: 26.09.2020

Name of resolution	Type of resolution	No. of votes polled	Votes cast in favor		Votes cast against	
			No of Votes	%	No of Votes	%
ADOPTION OF NEW SET OF ARTICLES OF ASSOCIATION OF THE COMPANY	Special	8731600	8731600	100 %	0	0.00
ISSUE OF BONUS SHARES	Special	8731600	8731600	100 %	0	0.00

14. Audit Committee

The Audit Committee is duly constituted in accordance with SEBI (LODR) Regulations 2015 and Section 177 of the Companies Act, 2013 read with Rule 6 of the Companies (Meetings of the Board and its Powers) Rules, 2014 as amended from time to time. It adheres to the terms of reference which is prepared in compliance with Section 177 of the Companies Act, 2013, and SEBI (LODR) Regulations 2015. The Members of the Committee are: -

Name Category & Position	Number of meetings held	Number of meetings attended
Mr. Jitendrakumar Patel Non Executive Independent Director, Chairman	6	6
Mrs. Vinita Maheshwari Non Executive Independent Director, Member	6	6
Mr. Satishkumar A Mehta Executive Director, Member	6	6

Two third of the members are Independent Directors and all the members are financially literate. The composition, role, functions and powers of the Audit Committee are in line with the requirements of applicable laws and regulations. The Audit Committee shall oversee financial reporting process and disclosures, review financial statements, internal audit reports, related party transactions, financial and risk management policies, auditors qualifications, compliance with Accounting Standards

etc. and oversee compliance with Stock Exchanges and legal requirements concerning financial statements and fixation of audit fee as well as payment for other services etc.

Six Audit Committee meetings were held during the year 2020-21 at the Registered Office of the Company on 27/06/2020, 21/08/2020, 12/09/2020, 07/10/2020, 11/11/2020, and 08/02/2021.

15. Nomination and Remuneration Committee

The Nomination and Remuneration Committee is constituted in accordance with SEBI (LODR) Regulations 2015 and Section 178 of the Companies Act, 2013 read with Rule 6 of the Companies (Meetings of the Board and its Powers) Rules, 2014 as amended from time to time. The Company Secretary acts as the Secretary to the committee and the Committee Members are:

Name Category & Position	Number of meetings held	Number of meetings attended
Mr. Jitendrakumar Patel Non Executive Independent Director, Chairman	3	3
Mrs. Vinita Maheshwari Non Executive Independent Director, Member	3	3
Mr. Hemendra B Patel Non Executive Independent Director, Member	3	3

The Board has in accordance with the provisions of sub-section (3) of Section 178 of the Companies Act, 2013, formulated the policy setting out the criteria for determining qualifications, positive attributes, independence of a Director and policy relating to remuneration of Directors, Key Managerial Personnel and other employees. The said policy is available on the website of the Company (www.sdalloys.com).

Three meeting was held during the year 2020-21 on 22/05/2020, 27/07/2020 and 26/10/2020.

16. Stakeholders Relationship Committee

The Stakeholders Relationship Committee is constituted in compliance with the requirements of Section 178 of the Companies Act, 2013. Company Secretary is the Compliance Officer, who acts as the Secretary to the Committee and the Members of the Committee are:

Name Category & Position	Number of meetings held	Number of meetings attended
Mrs. Vinita P Maheshwari Non Executive Independent Director, Chairman	2	2
Mr. HemendrabhaiPatel Non Executive Independent Director, Member	2	2
Mr. Satishkumar A Mehta Managing Director, Member	2	2

The Stakeholders Relationship Committee looks into shareholders' complaints related to transfer of shares, non-receipts of balance sheet besides complaints from SEBI, Stock Exchanges, Court and various Investor Forums. It oversees the performance of the Registrars and Transfer Agent, and recommends measures for overall improvement in the quality of investor services. The Company is in compliance with the SCORES, which has initiated by SEBI for processing the investor complaints in a centralized web-based redress system and online redressal of all the shareholders complaints.

Two meeting was held during the year 2020-21 at the Registered Office of the Company on 21/08/2020 and 07/10/2020.

17. Compliance Officer

The Compliance officer of the Company is Ms. Priya A. Rawal, who is also designated as Company Secretary of the Company who hold office till 26th June, 2021. The Company has appointed Mr. Ankit Sanchiher appointed as Company Secretary and compliance officer of the Company w.e.f. 1st July, 2021.

18. Statement On Formal Annual Evaluation Of Board

Nomination and Remuneration Committee annually evaluates the performance of individual Directors, Committees, and of the Board as a whole in accordance with the formal system adopted by it. Further, the Board also regularly in their meetings held for various purposes evaluates the performance of all the Directors, committees and the Board as a whole. The Board considers the recommendation made by Nomination and Remuneration Committee in regard to the evaluation of board members and also tries to discharge its duties more effectively. Each Board member's contribution, their participation was evaluated and the domain knowledge they bring. They also evaluated the manner in which the information flows between the Board and the Management and the manner in which the board papers and other documents are prepared and furnished.

19. Material changes and commitments, if any, affecting the financial position of the company which have occurred between the end of the financial year of the company to which the financial statements relate and the date of the report

There are no material changes and commitments affecting the financial position of the Company which have occurred between the end of the financial year of the Company and the date or report.

20. Details of significant and material orders passed by the regulators or courts or tribunals impacting the going concern status and company's operations in future

There are no significant and material orders passed by the regulators or courts or tribunals impacting the going concerns status and Company's operations in future.

21. Auditors

1. Statutory Auditors

Your Company at it's at the 09th Annual General Meeting held on September 30, 2016 had appointed M/s. Piyush J Shah & Co., Chartered Accountants as Statutory Auditors of the Company for a period of 5 consecutive years i.e., from the Ninth Annual General Meeting till Fourteenth Annual General Meeting at a remuneration as may be fixed by the Board of Directors and Audit Committee in consultation with the Auditors thereof. The said appointment will be completed at this Fourteenth Annual General Meeting.

The Audit Committee and the Board of Directors at their meeting held on June 15 2021, after considering various parameters of M/s. Piyush J Shah & Co., Chartered Accountants, recommended the re-appointment as Statutory Auditors of the Company to hold office for another period of five consecutive years commencing from the conclusion of this Fourteenth Annual General Meeting up to the conclusion of Nineteenth Annual General Meeting of the Company. The resolution for the re-appointment of Statutory Auditors is being included in the Notice of Fourteenth Annual General Meeting of the Company.

The Statutory Auditors have confirmed their Independence, eligibility and willingness to be re-appointed.

There are no qualifications, reservations or adverse remarks made by M/s. Piyush J Shah & Co., Chartered Accountants, the Statutory Auditors of the Company, in their report.

2. Secretarial Auditor

M/s. Khandelwal Devesh & Associates, Company Secretaries, Ahmedabad were appointed as Secretarial Auditor of the Company to conduct secretarial audit pursuant to the provisions of

Section 204 of the Companies Act, 2013. The secretarial audit of the Company has been conducted on a concurrent basis in respect of the matters as set out in the said rules and Secretarial Audit Report given by M/s. Khandelwal Devesh & Associates, Company Secretaries, Secretarial Auditor of the Company forms part of this report and is marked as Annexure-II.

The said report contains observation or qualification certain observation and qualification which are mentioned her under.

Qualification

The Company has violated the provisions of Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the criteria applicable to top 2000 Companies. The Company failed to appoint a director to have at least 6 directors latest by 1st April, 2020 and finally complied with the said Regulation by appointing a new Non-executive Director effective from 22/05/2020 and therefore NSE has imposed fine on the Company of Rs. 2,55,000/- for non-compliance of 51 days.

Board Explanation

We are aware that Regulation 17(1-) of SEBI (LODR) mandate a Company which comes within the top 2000 Companies by market capitalization as on 31.03.2020 to have at least 6 (six) Directors on its Board of Directors w.e.f. 1st April, 2020, further, it is to be noted that due to non-clarity on part of how to assess top 2000 companies, we assumed that it would be counted on the basis of market capitalization of NSE and BSE and a combine list would be made available based on the market capitalization as on 31.03.2020, but to our surprise, the said list is prepared exchange wise and accordingly our Company also comes in top 2000 companies based on market capitalization as on 31.03.2020. Therefore, we were also required to appoint a suitable person as director effective from 1st April, 2020.

However, the Board could not appoint the director because of complete lock down declared by the Government from 22nd March, 2020 to 17th May, 2020 due to spread of Pandemic Novel Corona Virus (COVID 19). The board had appointed Mr. Parimal Patwa as a non-executive director w.e.f. 22nd May, 2021 as the relaxations were provided by the Government in lockdown.

The Company has made application to NSE for waiver/reduction of penalty under POLICY FOR EXEMPTION OF FINES LEVIED AS PER THE PROVISIONS OF SEBI SOP CIRCULAR, however NSE didn't provide any waiver/reduction in penalty and company paid the fine Rs.2,55,000/- for non-compliance of 51 days.

The Company has also undertaken an audit for the FY 2020-21 pursuant to SEBI Circular No.CIR/CFD/CMO/1/27/2019 dated 08th February 2019 for all applicable compliances as per the Securities and Exchange Board of India Regulations and Circular/ Guidelines issued thereunder. The Report (Annual Secretarial Compliance Report as per Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015) has been submitted to the Stock Exchanges. The said report is annexed as Annexure-III.

Further as per the provisions of Regulation 24A of the Securities and Exchange Board of India(Listing Obligations and Disclosure Requirements) Regulations, 2015, M/s. Khandelwal Devesh & Associates, Company Secretaries, had undertaken secretarial auditor of the Company's material subsidiary i.e., Sagardeep Engineers Private Limited for the FY 2020-21. The Audit Report confirms that the material subsidiary has complied with the provisions of the Act, Rules, Regulations and Guidelines and that there were no deviations or non-compliances.

The Board, at its meeting held on July 13, 2021, has re-appointed M/s. Khandelwal Devesh & Associates, Company Secretaries, as Secretarial Auditor, for conducting Secretarial Audit of the Company for FY 2021-22 and 2022-23.

3. Cost Auditor

The provision of the section 148 of the Companies' act, 2013 read with Rules 14 of the Companies (Audit & Auditors) rules, 2014 is not applicable to the company.

Reporting of Frauds by Auditors:

Pursuant to Section 134 (3) (ca) of the Companies Act, 2013, the Statutory Auditor and Secretarial Auditor have not reported any instances of frauds committed in the Company during the year under review by its Officers or Employees to the Audit Committee or Board under section 143(12) of the Companies Act, 2013, details of which needs to be mentioned in this Report.

4. Internal Auditor

M/s Vishwas Sharma & Associates resigned from the Internal Auditor of the Company w.e.f. 15th June, 2021. The Audit Committee recommended and the Board of Directors at their meeting held on 13th July 2021 appointed M/s Amit Uttamchandani & Associates, chartered accountant as an Internal Auditor w.e.f. 13th July, 2021

22. Personnel

The information required under Section 197 of the Companies Act, 2013 read with rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 is provided in the Report and marked as Annexure-IV. No employee of the Company was in receipt of the remuneration exceeding the limits prescribed in the rule 5(2) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.

23. Management's Discussion and Analysis Report

The Management's Discussion and Analysis Report for the year under review, as stipulated under Regulation 34 (2) (e) of the Listing Regulations is given as Annexure-"V" to this report.

24. Corporate Social Responsibility (CSR)

The provisions of Corporate Social Responsibility (CSR) are not applicable to the Company.

25. Conservation of energy, technology absorption and foreign exchange earnings and outgo

A. CONSERVATION OF ENERGY:

- i. the steps taken or impact on conservation of energy: Nil
- ii. the steps taken by the company for utilising alternate sources of energy: None
- iii. the capital investment on energy conservation equipment :Nil

B. TECHNOLOGY ABSORPTION:

- i. the efforts made towards technology absorption: None
- ii. the benefits derived like product improvement, cost reduction, product development or import substitution: None
- iii. in case of imported technology (imported during the last three years reckoned from the beginning of the financial year)-
 - a) the details of technology imported :None
 - b) the year of import : N.A.
 - c) whether the technology been fully absorbed : N.A.
 - d) if not fully absorbed, areas where absorption has not taken place, and the reasons thereof : N.A.
 - e) the expenditure incurred on Research and Development : Nil

C. Foreign exchange Earnings & Outgo

- Foreign Exchange Earning: NIL
- Foreign Exchange Outgo: NIL

24. Particulars of contracts or arrangements with related parties:

The Company has no material significant transactions with its related parties which may have potential conflict with the interest of the Company at large.

25. Statement regarding the development and implementation of Risk Management Policy

The risk management process is followed by the company to ensure timely identification, categorization and prioritization of operational, financial and strategic business risks. Teams are authorized for managing such risks and updating it to the senior management. The Board and Audit Committee review on regular basis the risk assessment in the company.

26. Prevention of Sexual Harassment at Workplace

As per the requirement of The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 and rules made there under, your Company has constituted Internal Complaints Committee (ICC) which is responsible for redressal of complaints related to sexual harassment.

Your Directors declared and confirm that, during the year under review, there is no case filed under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

27. Vigil Mechanism:

The Company believes in the conduct of its affairs in a fair and transparent manner to foster professionalism, honesty, integrity and ethical behavior in its employees & stakeholders. The Company has adopted a Whistle Blower Policy as a part of vigil mechanism.

Also, the Code of Business Conduct (Code) lays down important corporate ethical practices that shape the Company's value system and business functions and represents cherished values of the Company.

28. Adequacy of Internal Financial Control

The Company has designed and implemented a process driven framework for Internal Financial Controls ('IFC') within the meaning of the explanation to Section 134(5)(e) of the Act. For the year ended March 31, 2021, the Board is of the opinion that the Company has sound IFC commensurate with the nature and size of its business operations and operating effectively and no material weaknesses exist. The Company has a process in place to continuously monitor the same and identify gaps, if any, and implement new and / or improved controls wherever the effect of such gaps would have a material effect on the Company's operations.

During the year, no reportable material weakness was observed.

29. Directors' Responsibility Statement

In terms of Section 134 (5) of the Companies Act, 2013, the directors would like to state that:

- (a) In the preparation of the annual accounts for the financial year ended March 31, 2021, the applicable accounting standards have been followed along with proper explanation relating to material departures.
- (b) The directors have selected such accounting policies and applied them consistently and made judgments and estimates that were 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 and of the profit and loss of the Company for that period under review.
- (c) The directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities.

- (d) The directors have prepared the annual accounts on a going concern basis.
- (e) The directors had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively.
- (f) The directors have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

30. Listing

The equity shares of the Company are listed on NSE and the Company has paid the annual listing fees for the year 2021-22.

31. Corporate Governance

Your Company has been complying with the principals of good Corporate Governance over the years and is committed to the highest standards of compliance. Pursuant to regulation 15(2) of the SEBI (LODR) Regulations 2015, w.e.f. 25/01/2019 Company's shares are listed on the Main board i.e. NSE and therefore the Provisions and Regulations relating to Corporate Governance were effective from said date. The Report on Corporate Governance is attached as Annexure 'VI'.

32. Installation of New Plant and Machinery into Existing Line of Business:

The Company have completed the installation Work for new plant and machinery at its existing factory at Plot No. 2070, Rajnagar Patiya, Behind GEB Sub-station, SantejKhatraj Road, Santej – 382721. Tal: Kalol, Dist: Gandhinagar, which also includes upgradation of some of existing machinery. The Company will produce Copper busbar, copper strips, copper plates, copper wire to be used in electric cable. It is to be noted that the Company is already producing busbar from its Existing plant. The new plant and machinery will help the company to reduce production cost and also to improve quality.

33. Increase in Capital/Bonus Issue

The paid up Equity Share Capital of the Company is increased from Rs. 11,37,16,000/- (Rupees Eleven Crores Thirty-seven Lakhs Sixteen Thousand only) to Rs. 17,05,74,000/- (Rupees Seventeen Crores Five Lakhs Seventy Four Thousand only).

The Company has issued and allotted 56,85,800 Equity Shares of Rs.10/- (Rupee Ten only) each as Bonus Shares in the proportion of 1 (One) New Equity Shares for every 2 (Two) existing Equity Shares on 07th October, 2020.

34. Secretarial Standards:

The Company has complied with Secretarial Standards issued by the Institute of Company Secretaries of India on Board Meetings and General Meetings.

35. Acknowledgement:

The Directors place on record their sincere thanks to the Bankers, business associates, consultants, customers, and employees for their continued support extended to your Companies activities during the year under review. Your Directors also acknowledges gratefully the shareholders for their support and confidence reposed on your Company.

Date : 03/08/2021

Place : Santej

For and on behalf of board of directors

Satishkumar A Mehta
Chairman & Managing Director
(DIN: 01958984)

Annexure- "I"

FORM NO. MGT 9

EXTRACT OF ANNUAL RETURN OF SAGARDEEP ALLOYS LIMITED

As on financial year ended on 31.03.2019

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

I. REGISTRATION & OTHER DETAILS:

1	CIN	U29253GJ2007PLC050007
2	Registration Date	13/02/2007
3	Name of the Company	Sagardeep Alloys Limited
4	Category/Sub-category of the Company	Company Limited by shares Non-Government Company
5	Address of the Registered office & contact details	Plot no. 2070, Rajnagar Patia, Santej, Khatraj Road, SantejKalol, Gandhinagar - 382721.
6	Whether listed company	Yes
7	Name, Address & contact details of the Registrar & Transfer Agent, if any.	Linkintime Private limited C-101, 247 Park, L.B.S. Marg, Vikhroli (West), Mumbai - 400 083.

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

S. No.	Name and Description of main products / services	NIC Code of the Product/ service	% to total turnover of the company
1	Manufacture of Basic precious and Non ferrous- alloys	2720	84.16%
2	Whole sale of Metals and Metal Ores	5142	15.84%

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

Sr. No.	Name & Address of the Company	CIN	Holding/ Subsidiary/ Associate	% of Shares held	Applicable Section under Companies Act, 2013
1	Sagardeep Engineers Private Ltd	U29100GJ2011PTC063479	Wholly Owned Subsidiary	100	2(87) (ii)

IV. SHARE HOLDING PATTERN

A) Category wise Shareholding-

Category of Shareholders	Shareholding at the beginning of the year- 2020				Shareholding at the end of the year - 2021				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
Shareholding of Promoter and Promoter Group									
Indian									
Individuals / Hindu Undivided Family	7738100	0	7738100	68.0476	11607150	0	11607150	68.0476	0.0000
Central Government/ State Government(s)	0	0	0	0.0000	0	0	0	0.0000	0.0000
Financial Institutions / Banks	0	0	0	0.0000	0	0	0	0.0000	0.0000
Any Other (Specify) Bodies Corporate	633500	0	633500	5.5709	950250	0	950250	5.5709	0.0000
Sub Total (A)(1)	8371600	0	8371600	73.6185	12557400	0	12557400	73.6185	0.0000
Foreign									
Individuals (Non-Resident)									
Individuals/Foreign Individuals)	0	0	0	0.0000	0	0	0	0.0000	0.0000
Government	0	0	0	0.0000	0	0	0	0.0000	0.0000
Institutions	0	0	0	0.0000	0	0	0	0.0000	0.0000
Foreign Portfolio Investor	0	0	0	0.0000	0	0	0	0.0000	0.0000
Any Other (Specify)									
Sub Total (A)(2)	0	0	0	0.0000	0	0	0	0.0000	0.0000
Total Shareholding of Promoter and Promoter Group (A)=(A)(1)+(A)(2)	8371600	0	8371600	73.6185	12557400	0	12557400	73.6185	0.0000
Public Shareholding									
Institutions									
Mutual Funds / UTI	0	0	0	0.0000	0	0	0	0.0000	0.0000
Venture Capital Funds	0	0	0	0.0000	0	0	0	0.0000	0.0000
Alternate Investment Funds	0	0	0	0.0000	0	0	0	0.0000	0.0000
Foreign Venture Capital Investors	0	0	0	0.0000	0	0	0	0.0000	0.0000
Foreign Portfolio Investor	0	0	0	0.0000	0	0	0	0.0000	0.0000
Financial Institutions / Banks	0	0	0	0.0000	0	0	0	0.0000	0.0000
Insurance Companies	0	0	0	0.0000	0	0	0	0.0000	0.0000
Provident Funds/Pension Funds	0	0	0	0.0000	0	0	0	0.0000	0.0000
Any Other (Specify)									
Sub Total (B)(1)	0	0	0	0.0000	0	0	0	0.0000	0.0000
Central Government/ State Government(s)/ President of India									
Sub Total (B)(2)	0	0	0	0.0000	0	0	0	0.0000	0.0000

A) Category wise Shareholding- (Contd.....)

Category of Shareholders	Shareholding at the beginning of the year- 2020				Shareholding at the end of the year - 2021				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
Non-Institutions									
Individuals									
Individual shareholders holding nominal share capital upto Rs. 1 lakh.	660602	0	660602	5.8092	1261588	0	1261588	7.3961	1.5869
Individual shareholders holding nominal share capital in excess of Rs. 1 lakh	2110840	0	2110840	18.5624	2787910	0	2787910	16.3443	(2.2181)
NBFCs registered with RBI	0	0	0	0.0000	0	0	0	0.0000	0.0000
Overseas Depositories (holding DRs)(balancing figure)	0	0	0	0.0000	0	0	0	0.0000	0.0000
Any Other (Specify)									
Hindu Undivided Family	136977	0	136977	1.2046	202442	0	202442	1.1868	(0.0178)
Non Resident Indians (Non Repat)	100	0	100	0.0009	1966	0	1966	'0.0115	'0.0106
Non Resident Indians (Repat)	8803	0	8803	0.0774	11856	0	11856	0.0695	(0.0079)
Clearing Member	1124	0	1124	0.0099	44723	0	44723	0.2622	0.2523
Bodies Corporate	81554	0	81554	0.7172	189515	0	189515	1.1110	0.3938
Sub Total (B)(3)	3000000	0	3000000	26.3815	4500000	0	4500000	'26.3815	'0.000
Total Public Shareholding (B)=(B)(1)+(B)(2)+(B)(3)	3000000	0	3000000	26.3815	3000000	0	3000000	26.3815	0.0000
Total (A)+(B)	11371600	0	11371600	100.000	17057400	0	17057400	100.000	0.0000
Non Promoter - Non Public									
Custodian/DR Holder	0	0	0	'0.0000	0	0	0	0.0000	0.0000
Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)	0	0	0	'0.0000	0	0	0	0.0000	0.0000
Total (A)+(B)+(C)	11371600	0	11371600	100.000	17057400	0	17057400	100.000	0.0000

B) Shareholding of Promoter-

Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% Change in shareholding during the year
	No. of Shares held	% of total Shares of the company	% of Shares Pledged /encumbered to total shares	No. of Shares held	% of total Shares of the company	% of Shares Pledged /encumbered to total shares	
JAYESHKUMAR ASHMAL MEHTA	1751500	15.4024	0.0000	2627250	15.4024	0.0000	0.0000
SATISH KUMAR ASAMAL MEHTA	1578550	13.8815	0.0000	2367825	13.8815	0.0000	0.0000
ASAMAL SIREMAL MEHTA	1466950	12.9001	0.0000	2200425	12.9001	0.0000	0.0000
UGAMDEVI ASHMAL MEHTA	1040600	9.1509	0.0000	1560900	9.1509	0.0000	0.0000
SAGARDEEP ENGINEERS PRIVATE LIMITED	633500	5.5709	0.0000	950250	5.5709	0.0000	0.0000
AASHMALJI SIREMALJI MEHTA (HUF)	549000	4.8278	0.0000	823500	4.8278	0.0000	0.0000
SANGITA SATISH KUMAR MEHTA	329500	2.8976	0.0000	494250	2.8976	0.0000	0.0000
REKHA JAYESHKUMAR MEHTA	287000	2.5238	0.0000	430500	2.5238	0.0000	0.0000
SATISH A MEHTA (HUF)	219000	1.9259	0.0000	328500	1.9259	0.0000	0.0000
JAYESH ASHMALJI MEHTA (HUF)	207000	1.8203	0.0000	310500	1.8203	0.0000	0.0000
HARISH AASHMLJI MEHTA	128000	1.1256	0.0000	192000	1.1256	0.0000	0.0000
RAMESH ASMALJI MEHTA	102000	0.8970	0.0000	153000	0.8970	0.0000	0.0000
RINIKA HARISHKUMAR MEHTA	79000	0.6947	0.0000	118500	0.6947	0.0000	0.0000
Total	8371600	73.6185	0.0000	12557400	73.6185	0.0000	0.0000

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

Sr. No.	Name & Type of Transaction	Shareholding at the beginning of the year - 2020		Transactions during the year		Cumulative Shareholding at the end of the year - 2021	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
1	JAYESHKUMAR ASHMAL MEHTA	1751500	10.2683			1751500	10.2683
	TRANSFER			16 Oct 2020	875750	2627250	15.4024
	AT THE END OF THE YEAR					2627250	15.4024
2	SATISH KUMAR ASAMAL MEHTA	1578550	9.2543			1578550	9.2543
	TRANSFER			16 Oct 2020	789275	2367825	13.8815
	AT THE END OF THE YEAR					2367825	13.8815
3	ASAMAL SIREMAL MEHTA	1466950	8.6001			1466950	8.6001
	TRANSFER			16 Oct 2020	733475	2200425	12.9001
	AT THE END OF THE YEAR					2200425	12.9001
4	MEHTA UGAMBEN ASAMAL	1040600	6.1006			1040600	6.1006
	TRANSFER			16 Oct 2020	520300	1560900	9.1509
	AT THE END OF THE YEAR					1560900	9.1509
5	SAGARDEEP ENGINEERS PRIVATE LIMITED	633500	3.7139			633500	3.7139
	TRANSFER			16 Oct 2020	316750	950250	5.5709
	AT THE END OF THE YEAR					950250	5.5709
6	MEHTA AASHMALJI SIREMALJI HUF	549000	3.2185			549000	3.2185
	TRANSFER			16 Oct 2020	316750	823500	4.8278
	AT THE END OF THE YEAR					823500	4.8278
7	SANGITA S MEHTA	329500	1.9317			329500	1.9317
	TRANSFER			16 Oct 2020	164750	494250	2.8976
	AT THE END OF THE YEAR					494250	2.8976
8	REKHA J MEHTA	287000	1.6826			287000	1.6826
	TRANSFER			16 Oct 2020	143500	430500	2.5238
	AT THE END OF THE YEAR					430500	2.5238
9	SATISH A MEHTA HUF	219000	1.2839			219000	1.2839
	TRANSFER			16 Oct 2020	109500	328500	1.9259
	AT THE END OF THE YEAR					328500	1.9259

Sr. No.	Name & Type of Transaction	Shareholding at the beginning of the year - 2020		Transactions during the year		Cumulative Shareholding at the end of the year - 2021	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
10	JAYESH ASHMALJI MEHTA HUF	207000	1.2135			207000	1.2135
	TRANSFER			16 Oct 2020	103500	310500	1.8203
	AT THE END OF THE YEAR					310500	1.8203
11	MEHTA HARISH AASHMALJI	128000	0.7504			128000	0.7504
	TRANSFER			16 Oct 2020	64000	192000	1.1256
	AT THE END OF THE YEAR					192000	1.1256
12	RAMESHBHAI ASAMAL MEHTA	102000	0.5980			102000	0.5980
	TRANSFER			16 Oct 2020	51000	153000	0.8970
	AT THE END OF THE YEAR					153000	0.8970
13	RINIKA HARISHKUMAR MEHTA	79000	0.4631			79000	0.4631
	TRANSFER			16 Oct 2020	39500	118500	0.6947
	AT THE END OF THE YEAR					118500	0.6947

Note:

1. Paid up Share Capital of the Company (Face Value Rs. 10.00) at the end of the year is 17057400 Shares.
2. % of total Shares of the Company is based on the paid up Capital of the Company at the end of the Year.

D) Shareholding Pattern of top ten Shareholders:

(Other than Directors, Promoters and Holders of GDRs and ADRs):

Sr. No.	Name & Type of Transaction	Shareholding at the beginning of the year - 2020		Transactions during the year		Cumulative Shareholding at the end of the year - 2021	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
1	ASHOK DEVJIBHAI PARMAR	522885	3.0654			522885	3.0654
	Transfer			31 Jul 2020	(51000)	471885	2.7665
	Transfer			07 Aug 2020	(8000)	463885	2.7196
	Transfer			14 Aug 2020	(30950)	432935	2.5381
	Transfer			28 Aug 2020	(48162)	384773	2.2558

Sr. No.	Name & Type of Transaction	Shareholding at the beginning of the year - 2020		Transactions during the year		Cumulative Shareholding at the end of the year - 2021	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
	Transfer			16 Oct 2020	192386	577159	3.3836
	Transfer			15 Jan 2021	(25317)	551842	3.2352
	AT THE END OF THE YEAR					551842	3.2352
2	NILESH JASHVANTLAL PATEL	132000	0.7739			132000	0.7739
	Transfer			16 Oct 2020	66000	198000	1.1608
	AT THE END OF THE YEAR					198000	1.1608
3	KAILASHBEN MAHENDRABHAI PATEL	0	0.0000			0	0.0000
	Transfer			05 Feb 2021	35500	35500	0.2081
	Transfer			12 Feb 2021	79000	114500	0.6713
	Transfer			19 Feb 2021	4500	119000	0.6976
	AT THE END OF THE YEAR					119000	0.6976
4	MUKESH S INANI	78000	0.4573			78000	0.4573
	Transfer			16 Oct 2020	39000	117000	0.6859
	Transfer			12 Feb 2021	(6000)	111000	0.6507
	AT THE END OF THE YEAR					111000	0.6507
5	G S KOTHARI HUF .	76180	0.4466			76180	0.4466
	Transfer			10 Apr 2020	10	76190	0.4467
	Transfer			24 Apr 2020	(17)	76173	0.4466
	Transfer			01 May 2020	14	76187	0.4467
	Transfer			08 May 2020	(35)	76152	0.4464
	Transfer			15 May 2020	30	76182	0.4466
	Transfer			30 Jun 2020	(600)	75582	0.4431
	Transfer			17 Jul 2020	(1024)	74558	0.4371
	Transfer			24 Jul 2020	(1000)	73558	0.4312
	Transfer			16 Oct 2020	36779	110337	0.6469
	AT THE END OF THE YEAR					110337	0.6469
6	DANGEE DUMS LIMITED	0	0.0000			0	0.0000
	Transfer			25 Dec 2020	94734	94734	0.5554
	Transfer			08 Jan 2021	13457	108191	0.6343
	Transfer			15 Jan 2021	121	108312	0.6350
	AT THE END OF THE YEAR					108312	0.6350
7	MANSI MUNJAL PATEL	0	0.0000			0	0.0000
	Transfer			12 Feb 2021	12000	12000	0.0704
	Transfer			19 Feb 2021	32500	44500	0.2609
	Transfer			26 Feb 2021	63000	107500	0.6302
	AT THE END OF THE YEAR					107500	0.6302

Sr. No.	Name & Type of Transaction	Shareholding at the beginning of the year - 2020		Transactions during the year		Cumulative Shareholding at the end of the year - 2021	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
8	SIMA MUKESH INANI	72000	0.4221			72000	0.4221
	Transfer			16 Oct 2020	36000	108000	0.6332
	Transfer			12 Feb 2021	(7000)	101000	0.5921
	AT THE END OF THE YEAR					101000	0.5921
9	INANI SURESHKUMAR R	170000	0.9966			170000	0.9966
	Transfer			19 Jun 2020	(55000)	115000	0.6742
	Transfer			17 Jul 2020	(26000)	89000	0.5218
	Transfer			24 Jul 2020	(30000)	59000	0.3459
	Transfer			16 Oct 2020	29500	88500	0.5188
	Transfer			11 Dec 2020	2000	90500	0.5306
	AT THE END OF THE YEAR					90500	0.5306
10	JASHWANTLAL MANILAL PATEL	108000	0.6332			108000	0.6332
	Transfer			28 Aug 2020	(50000)	58000	0.3400
	Transfer			16 Oct 2020	29000	87000	0.5100
	AT THE END OF THE YEAR					87000	0.5100
11	INANI LADULAL MADANLAL	60000	0.3518			60000	0.3518
	Transfer			16 Oct 2020	30000	90000	0.5276
	Transfer			12 Feb 2021	(6000)	84000	0.4925
	AT THE END OF THE YEAR					84000	0.4925
12	KAVITA LADULAL INANI	60000	0.3518			60000	0.3518
	Transfer			16 Oct 2020	30000	90000	0.5276
	Transfer			12 Feb 2021	(6000)	84000	0.4925
	AT THE END OF THE YEAR					84000	0.4925
13	KADDI SHANKARAPPA	81667	0.4788			81667	0.4788
	Transfer			05 Jun 2020	(2480)	79187	0.4642
	Transfer			12 Jun 2020	(13109)	66078	0.3874
	Transfer			19 Jun 2020	(5507)	60571	0.3551
	Transfer			26 Jun 2020	(15063)	45508	0.2668
	Transfer			24 Jul 2020	(10000)	35508	0.2082
	Transfer			28 Aug 2020	(26500)	9008	0.0528
	Transfer			16 Oct 2020	4504	13512	0.0792
AT THE END OF THE YEAR					13512	0.0792	

Note:

1. Paid up Share Capital of the Company (Face Value Rs. 10.00) at the end of the year is 17057400 Shares.
2. % of total Shares of the Company is based on the paid up Capital of the Company at the end of the Year.

E) Shareholding of Directors and Key Managerial Personnel:

Sr. No.	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	Satishkumar Asamal Mehta				
	At the beginning of the year	1578550	13.88	2367825	13.8815
	Date wise Increase / Decrease in Shareholding during the year	-	-	-	-
	At the end of the year	1578550	13.88	2367825	13.8815
2	Jayeshkumar A Mehta				
	At the beginning of the year	1751500	15.40	2627250	15.4024
	Date wise Increase / Decrease in Shareholding during the year	-	-	-	-
	At the end of the year	1751500	15.40	2627250	15.4024
3	Hemendra B Patel	-	-	-	-
	At the beginning of the year	-	-	-	-
	Date wise Increase / Decrease in Shareholding during the year	-	-	-	-
	At the end of the year	-	-	-	-
4	Vinita P Maheshwari	-	-	-	-
	At the beginning of the year	-	-	-	-
	Date wise Increase / Decrease in Shareholding during the year	-	-	-	-
	At the end of the year	-	-	-	-
5	Jitendrakumar Patel				
	At the beginning of the year				
	Date wise Increase / Decrease in Shareholding during the year				
	At the end of the year				
6	Krishnakant Somani	-	-	-	-
	At the beginning of the year	-	-	-	-
	Date wise Increase / Decrease in Shareholding during the year	-	-	-	-
	At the end of the year	-	-	-	-
7	Nayan Pitroda *	-	-	-	-
	At the beginning of the year	-	-	-	-
	Date wise Increase / Decrease in Shareholding during the year	-	-	-	-
	At the end of the year	-	-	-	-

Sr. No.	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
8	Priya Raval*	-	-	-	-
	At the beginning of the year	-	-	-	-
	Date wise Increase / Decrease in Shareholding during the year	-	-	-	-
	At the end of the year	-	-	-	-
9.	Ankit Sanchiher**	-	-	-	-
	At the beginning of the year	-	-	-	-
	Date wise Increase / Decrease in Shareholding during the year	-	-	-	-
	At the end of the year	-	-	-	-

*Nayan Pitroda Ceased from post of company secretary w.e.f 16.10.2020

*Priya rawal Appointed as Company Secretary from 26.10.2020 and ceased w.e.f. 26.06.2021

**Ankit Sanchiher appointed as Company secretary w.e.f. 01.07.2021

V. INDEBTEDNESS

(Indebtedness of the Company including interest outstanding/accrued but not due for payment)
(Rs. In Lakhs)

Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	994.39	-	-	994.39
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	994.39	-	-	994.39
Change in Indebtedness during the financial year				
• Addition	195.00	-	-	195.00
• Reduction		-	-	
Net Change	195.00	-	-	195.00
Indebtedness at the end of the financial year				
i) Principal Amount	1189.39	-	-	1189.39
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	1189.39	-	-	1189.39

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL
A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

Sr. No.	Particulars of Remuneration	Name of director MD/WTD		Total Amount Total
		Satish A Mehta (MD)	Jayesh A Mehta (WTD)	
1	Gross salary			
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	9,00,000/-	9,00,000/-	-
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	-	-	-
2	Stock Option	-	-	
3	Sweat Equity	-	-	
4	Commission- as % of profit- others, specify...	-	-	
5	Others, please specify	-	-	
	Total (A)	9,00,000/-	9,00,000/-	18,00,000/-
	Ceiling as per the Act*			84.00 lacs

* Due to inadequacy of Profit for the year 2020-21 and pursuant to Section 197 of the Companies Act, 2013 & Schedule V, the ceiling limit is being calculated amounting to Rs.84 Lacs on the basis of effective capital given in the Part –II of Schedule V.

B. Remuneration to other directors

Sr. No.	Particulars of Remuneration	Name of Directors				Total Amount
		Mr. Hemendra B Patel	Mr. Jitendrakumar Patel	Mrs. Vinita P Maheshwari	Mr. Parimal Patwa	
1	Independent Directors	✓	✓	✓		
	Fee for attending board committee meetings	-	-	-	-	-
	Commission	-	-	-	-	-
	Others, please specify	-	-	-	-	-
	Total (1)	-	-	-	-	-
2	Other Non-Executive Directors	-	-	-	✓	-
	Fee for attending board committee meetings	-	-	-	-	-
	Commission	-	-	-	-	-
	Others, please specify	-	-	-	-	-
	Total (2)	-	-	-	-	-
	Total (B)=(1+2)	-	-	-	-	-
	Total Managerial Remuneration	-	-	-	-	-
	Overall Ceiling as per the Act	Rs. 1,00,000/- per meeting				

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

Sr.	Particulars of Remuneration	Key Managerial Personnel			Total
		Mr. Krishnakant Somani CFO	Mr. Nayan Pitroda* CS	Ms. Priya Raval CS	
1	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	3,87,588	2,05,994	1,29,994	7,23,576
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-		-	-
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	-		-	-
2	Stock Option	-		-	-
3	Sweat Equity	-		-	-
4	Commission	-		-	-
	- as % of profit	-		-	-
	Others, specify...	-		-	-
5	Others, please specify				
	Total	387588	205994	129994	723576

*Nayan Pitroda Ceased from post of company secretary w.e.f 16.10.2020

Priya rawal Appointed as Company Secretary from 26.10.2020 and ceased w.e.f. 26.06.2021

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
			NONE		
B. DIRECTORS					
			NONE		
C. OTHER OFFICERS IN DEFAULT					
			NONE		

Date : 03/08/2021

Place : Santej

For and on behalf of board of directors

Satishkumar A Mehta
Chairman & Managing Director
(DIN: 01958984)

Form No. MR-3

SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED 31st March, 2021

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

To,
The Members,
SAGARDEEP ALLOYS LIMITED,

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **SAGARDEEP ALLOYS LIMITED (CIN:L29253GJ2007PLC050007)** (hereinafter called "the Company"). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on **March 31, 2021** ('Audit Period') complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on **March 31, 2021** according to the provisions of:

- i. The Companies Act, 2013 (the Act) and the rules made there under.
- ii. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- iii. The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- iv. Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowing. **(Not Applicable to the company during the audit period)**
- v. The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-
 - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 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 **(Not Applicable to the company during the audit period);**
 - (i) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to the company during the audit period);**

- (ii) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (iii) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **(Not Applicable to the company during the audit period);**
- (iv) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 **(Not Applicable to the company during the audit period);**

I have relied on the representations made by the Company and its officers for systems and mechanism formed by the Company for compliances of other specific applicable Acts, Laws and Regulations to the Company as mentioned hereunder;

- a) The Employees' Provident Funds and Miscellaneous Provisions Act, 1952
- b) The Factories Act, 1948
- c) The Minimum Wages Act, 1948, and rules made there under

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

- (v) Secretarial Standards issued by The Institute of Company Secretaries of India;
- (vi) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 **(to the extent applicable to subsidiary of listed Company)**

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above and subject to the following observations;

The Company has violated the provisions of Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the criteria applicable to top 2000 Companies. The Company failed to appoint a director to have at least 6 directors latest by 1st April, 2020 and finally complied with the said Regulation by appointing a new Non-executive Director effective from 22/05/2020 and therefore NSE has imposed fine on the Company of Rs. 2,55,000/- for non-compliance of 51 days.

I further report that:

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

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

Board takes decision by majority of directors while the dissenting directors' views are captured and recorded as part of the minutes.

I further report that:

There are adequate systems and processes in the company commensurate with the size and operations of the company to monitor and ensure compliance with applicable Laws, Rules, Regulations and guidelines.

I further report that the during the period, the Company has issued and allotted 56,85,800 Equity Shares of Rs.10/- (Rupee Ten only) each as Bonus Shares in the proportion of 1 (One) New Equity Shares for every 2 (Two) existing Equity Shares on 07th October, 2020, however there were no other instances of:

- (i) Public/Rights of Shares/Preferential Issue of Shares/debentures/sweat equity
- (ii) Redemption/buy-back of securities.
- (iii) Merger/ amalgamation etc.
- (iv) Foreign technical collaborations.

**For, Khandelwal Devesh & Associates
Company Secretaries**

**Devesh Khandelwal
Proprietor
FCS: 6897
COP: 4202**

**Place : Ahmedabad
Date : 13.07.2021**

UDIN: F006897C000625713

Note: This report is to be read with my letter of even date which is annexed as Annexure herewith and forms and integral part of this report.

Annexure to Secretarial Audit Report

To,
The Members,
SAGARDEEP ALLOYS LIMITED,

My report of even date is to be read along with this letter.

1. Maintenance of secretarial records is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required, I have obtained the Management representations about the compliance of Laws, Rules and Regulations and happening of events etc.
5. The compliance of the provisions of corporate and other applicable Laws, Rules, Regulations, Standards is the responsibility of management. My examination was limited to the verification of procedures on test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

**For, Khandelwal Devesh & Associates
Company Secretaries**

**Devesh Khandelwal
Proprietor
FCS: 6897
COP: 4202**

UDIN: F006897C000625713

**Place : Ahmedabad
Date : 13.07.2021**

Annexure-III

**Secretarial Compliance Report of Sagardeep Alloys Limited
for the financial year ended March 31, 2021**

We, **Khandelwal Devesh & Associates**, Company Secretaries, have examined:

- a) All the documents and records made available to us and explanation provided by Sagardeep Alloys Limited (“the listed entity”),
- b) The filings/ submissions made by the listed entity to the stock exchanges,
- c) Website of the listed entity,
- d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended on March 31, 2021 (“Review Period”) in respect of compliance with the provisions of:
 - a) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
 - b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);

The specific regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
 - c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable during the review period)**
 - e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable during the review period)**
 - f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable during the review period)**
 - g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable during the review period)**
 - h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;
- and circulars/ guidelines issued thereunder;

and based on the above examination, We, hereby report that, during the period under review:

- a) The listed entity has complied with all the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matter specified below:

Sr. No.	Compliance Requirement (Regulations/ Circulars/ Guidelines including specific clause)	Deviation	Observations/ remarks of the Practicing Company Secretary, if any
1	Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015- Top 2000 entity as to have 6 directors on Board	Violation of Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	As per Annexure A

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.
- c) The following are the details of actions taken against the listed entity/its promoters/directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of Violation	Details of action taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary, if any
1	National Stock Exchange of India Limited	Violation of Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The NSE has imposed fine on the Company of Rs. 2,55,000/-	As per Annexure A

- d) There are no observation made in previous report.

For, Khandelwal Devesh & Associates
Company Secretaries

Devesh Khandelwal
Proprietor
FCS: 6897
COP: 4202

Place : Ahmedabad
Date : 15.06.2021

UDIN: F006897C000625713

ANNEXURE A**OBSERVATIONS OF PRACTICING COMPANY SECRETARY**

- The Company has failed to appoint a director to have at least 6 directors and accordingly violated the provisions of Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the criteria applicable to top 2000 Companies.
- The NSE has issued Show Cause Notice dated August 20, 2020.
- The Company has submitted necessary reply and Mr. Nayan Pitroda, Company Secretary & Compliance Officer of the Company appeared before the Committee on behalf of the Company.
- However, the Committee noted that the Company has failed to comply with requirement of Regulation 17 (1) (c) of having six Directors on the Board of the Company from April 01, 2020 to May 21, 2020 and hence imposed fine of the Company, which were duly paid by the Company.

**For, Khandelwal Devesh & Associates
Company Secretaries**

**Devesh Khandelwal
Proprietor
FCS: 6897
COP: 4202**

UDIN: F006897C000625713

**Place : Ahmedabad
Date : 15.06.2021**

Annexure- "IV"

The ratio of the remuneration of each director to the median employee's remuneration and other details in terms of sub-section 12 of Section 197 read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014:

S.N.	Requirements	Disclosure	
		I.	The ratio of the remuneration of each director to the median remuneration of the employees for the financial year
		WTD	5.76 times
II.	The percentage increase in remuneration of each director, CFO, CEO, CS in the financial year	MD	Nil
		WTD	Nil
		CS	Nil
		CFO	NIL
III.	The percentage increase in the median remuneration of employees in the financial year	NIL	
IV.	The number of permanent employees on the rolls of the Company as on 31st March, 2021	15	
V.	Average percentile increases already made in the salaries of employees other than the managerial personnel in the last financial year and its comparison with the percentile increase in the managerial remuneration and justification thereof and point out if there are any exceptional circumstances for increase in the managerial remuneration	Nil	
VI.	Affirmation that the remuneration is as per the remuneration policy of the company	Yes, it is confirmed	

Regd Office:

Plot No. 2070, Rajnagar Patiya,
Santej Khatraj Road,
Santej Kalol,
Gandhinagar 382721

Date : 03/08/2021

Place : Santej

**By Order of the Board of Directors
For, Sagardeep Alloys Limited**

Sd/-

Satishkumar Mehta

Chairman & Managing Director
(DIN: 01958984)

MANAGEMENT'S DISCUSSION AND ANALYSIS

INDUSTRY STRUCTURE & DEVELOPMENT

The size of Indian copper industry (consumption of refined copper per annum) is around half a million tones which constitutes only 3 percent of the world copper market. Sterlite Industries, Hindalco Industries and Hindustan Copper are major producers of refined copper in India. India, a major exporter of refined copper till a few years ago, is set to become a net importer in recent years due to disturbance of production in various plants because of various environmental concerns. In fact, copper as a metal came in use of man much earlier than iron. Copper has been used for making utensils and coins since long. Being a good conductor of electricity and ductile, it is extensively used in a vast variety of electrical machinery, wires and cables. It is also an important metal used by automobile and defense industries. Further, it is alloyed with iron and nickel to make stainless steel, with nickel to make 'morel metal' and with aluminium to make 'duralumin'. When alloyed with zinc it is known as 'brass' and with tin 'bronze'. Copper ore is found in ancient as well as in younger rock formations and occurs as veins, as dissemination and as bedded deposits. Mining for copper is a costly and a tedious affair because most of the copper ores contain a small percentage of the metal. Against the international average of metal content (in the ore) of 2.5 per cent, Indian ore grade averages less than one per cent.

SEGEMENT WISE PERFORMANCE

Our Company's operations belong to a single segment and therefore no segment wise performance given.

OPPORTUNITIES AND THREATS

Our success as an organization depends on our ability to identify opportunities and leverage them while mitigating the risks that arise while conducting our business. During the financial year 2020-21, the Company has completed the installation of new plant and machinery to expand the product base in copper and copper alloy products and also to increase its production capacity in Copper Busbar. The Company is eyeing good opportunity in coming years and is expecting to increase its production utilization to 80% in very near future years. The addition of new machinery and also upgradation of some of few existing machinery will improve the quality of the products and will also help to reduce production cost. These will help the Company to compete much better and will also help to improve its margin. The Company is also now able to produce copper wire to be used by the producers of electric cable. Various restrictions and lock-downs caused due to ongoing pandemic of Covid-19 has affected the financial performance of the Company negatively and resulted in not expected growth of turnover and profitability in the Financial Year 2020-21. During the year, the import of Copper also get affected due to disturbances worldwide because of the pandemic and such disturbances resulted into price rise of main raw material i.e. copper scrap of the Company and increased the working capital requirement of the Company. Price rise in copper scrap also effected the price of our products and buyers waited for their Orders and these all affected the financial performance of the Company. Looking to the present improvements in industrial sentiments in India and Worldwide, the Management is very optimistic in positive improvement of turnover and profit margin in current as well as coming years. The Company is continuously exploring all available opportunity to expand its market reach in products relating to Copper and Copper Alloy. Further, the Company is also in process to add new products at its recently taken on lease factory land and shed to produce Copper Sulphate and Ferrous Sulphate. These new products will improve the turnover and profitability of the Company in coming years. Out of these two products, the Company has already commenced commercial production of Copper Sulphate with a production capacity of 25MT/Month, which are of Agriculture and Chemical Grade. Production of Ferrous Sulphate will be commenced in near future.

The Management see risk in raising price of metals including copper which can affect the profitability of the Company. Price rise in copper will also result into increase in working capital cost and slow growth in sales and lower capacity utilization. We all know that the threat and risk of present on-going Covid-19 is not completely ruled out and any future outbreaks of this pandemic will result into economic disturbances and in that case performance of your Company will also get affected.

OUTLOOK, RISKS & CONCERNS

Our Outlook, risks and concerns are as follows:

- We are seeing very good business opportunity for Metal Sector in coming Years and this will also result into positive improvement of our Company.
- The Company has started commercial production of Copper Sulphate during the current year and copper scrap is one of the main ingredient of it and this will result into improvement of turnover and profitability in coming years.
- The Copper Sulphate produced by the Company are presently sold to local traders who are selling it to users of Agriculture and Chemical and both these sectors are also improving their performance.
- A large part of our revenue depends on our top clients and loss of any one of major client may lead to negative impact on our business.
- Our success depends on our top management and key personnel and our ability to attract and retain them.
- The Management see risk in current ongoing pandemic and any future outbreaks will affect the financial positions and growth opportunity of the Company.
- Price volatility of metal sector including copper can affect the performance of the Company negatively.

INTERNAL CONTROL SYSTEM AND ADEQUACY

The Company has an adequate internal control system commensurate with its size and the nature of its business in order to achieve efficiency in operation and optimum utilization of resources. These controls ensure safeguarding of assets, reduction and detection of fraud and error, adequacy and completeness of the accounting records and timely preparation of reliable financial information.

FINANCIAL AND OPERATIONAL PERFORMANCE

Financial and Operational performance is provided in Board of Directors Report and same can be referred in point no 1 of the director report.

HUMAN RESOURCES AND INDUSTRIAL RELATIONS

The industrial relations remained cordial throughout the year. The employees of the Company have extended a very productive cooperation in the efforts of the management to carry the Company to greater heights. Continuous training down the line is a normal feature in the Company to upgrade the skills and knowledge of the employees and workmen of the Company. The Management took this opportunity to thank all of its employees including laborers for their continuing support in this pandemic and helped Company to continue its business operation in this odd time period.

CAUTIONARY STATEMENT

Statement in this report describing the Company's objectives, expectations or predictions may be forward looking statements within the meaning of applicable securities laws and regulations. Actual results may differ materially from those expressed in the statement. Important factors that could influence the company's operations include economic conditions affecting demand / supply and price condition in the domestic markets in which the company operates, changes in the government regulations, tax laws and other statutes and other incidental factors.

Regd Office:

Plot No. 2070, Rajnagar Patiya,
Santej Khatraj Road,
Santej Kalol,
Gandhinagar 382721

Date : 03/08/2021

Place : Santej

**By Order of the Board of Directors
For, Sagardeep Alloys Limited**

Sd/-
Satishkumar Mehta
Chairman & Managing Director
(DIN: 01958984)

Corporate Governance Report

CORPORATE GOVERNANCE

The Company believes that sound Corporate Governance is crucial for enhancing and retaining investor trust and your Company always seeks to ensure that its performance goals are met accordingly. Corporate Governance is a set of principles, processes and systems which govern a company. The elements of Corporate Governance are independence, transparency, accountability, responsibility, compliance, ethics, values and trust. Corporate Governance enables an organization to perform efficiently and ethically generate long term wealth and create value for all its stakeholders.

The Company has established systems and procedures to ensure that its Board of Directors is well informed and well equipped to fulfill its overall responsibilities and to provide management with the strategic direction needed to create long term shareholders' value. The Company has adopted many ethical and transparent governance practices even before they were mandated by law. The Company has always worked towards building trust with shareholders, employees, customers, suppliers and other stakeholders based on the principles of good corporate governance.

1. COMPANY'S CORPORATE GOVERNANCE PHILOSOPHY

In line with the Sagardeep Group philosophy, your Company firmly believes in adherence to good corporate governance practices and constant efforts are made to improve such practices and to adopt emerging best practices. Your Company is committed to continuously scaling up its corporate governance standards. The Company's essential character revolves around values based on transparency, integrity, professionalism and accountability. The Company has adopted a Code of Conduct for its employees including the Managing Director and the Executive Directors. In addition, the Company has adopted a Code of Conduct for its non-executive directors which include Code of Conduct for Independent Directors which suitably incorporates the duties of independent directors as laid down in the Act.

CORPORATE GOVERNANCE GUIDELINES

The Management continuously strives to follow the global best practices and timely disclosure of accurate information pertaining to financials & performance in accordance with good governance practices. The Company has a strong legacy of fair, transparent and ethical governance practices.

2. BOARD OF DIRECTORS

a. Composition of the Board:

The Board of Directors along with its committees provide the requisite leadership and guidance to the Company's senior management team and also direct, supervise and closely monitor the performance of the Company.

The Company's policy is to have an appropriate mix of Executive, Non-Executive & Independent Directors. As on March 31, 2021, the Board comprises of 6 (Six) Directors, of which, 2 (Two) are Executive Directors, 1 (One) is Non-Executive Director and 3 (Three) are Independent Directors. The Board is chaired by Mr. Satish Kumar A. Mehta, Managing Director. The Composition of the Board is in conformity with the provisions of the Act and Regulation 17 of the LODR. Further Board had appointed Mr. Parimal Patwa as Additional Director under the category of Non Independent, Non-Executive and Non Promoter Director as on 22nd May, 2020 and his appointment has been confirmed by shareholders in Annual General Meeting held on 27th August, 2020.

None of the Directors on the Company's Board is a member of more than 10 Committees and chairman of more than 5 Committees across all Public Limited companies including listed entities in which he/she is a Director.

Kindly refer the Board Report for other details.

b. Meetings of the Board:

The Board Meetings are held at regular intervals with a time gap of not more than 120 days between two consecutive meetings. Additional meetings are held whenever deemed necessary for the conduct of business. During the year under review, 11 board meetings were held on 11 (Eleven) times on 22/05/2020, 27/06/2020, 06/07/2020, 27/07/2020, 21/08/2020, 12/09/2020, 07/10/2020, 16/10/2020, 26/10/2020, 11/11/2020 and 08/02/2021.

All the directors of the Company have confirmed that they are not disqualified from being appointed as directors in terms of Section 164 of the Companies Act, 2013.

The Independent Directors met on 27/07/2020 and 08/02/2021 to discuss the performance evaluation of the Board, Committees, Chairman and the individual Directors.

The Company Secretary prepares the agenda and the explanatory notes, in consultation with the Chairman and circulates the same in advance to the Directors. Every Director is free to suggest the inclusion of any item(s) on the agenda. The Board meets at least once in every quarter or half year, inter alia, to review the quarterly or half yearly financial results. The Company also provides Video Conference facility, if required, for participation of the Directors at the Board/Committee Meetings. Presentations are made on business operations to the Board by the Managing Director of the Company. Senior Management Personnel are invited to provide additional inputs for the items being discussed by the Board of Directors as and when necessary.

The Minutes of the proceedings of the Meetings of the Board of Directors are noted and the draft minutes are circulated amongst the Members of the Board for their perusal. Comments, if any, received from the Directors are also incorporated in the Minutes, in consultation with the Chairman. Thereafter the minutes are signed by the Chairman of the Board at the next meeting.

The following is the composition of the Board of Directors as on March 31, 2021. The Directors strive to attend all the Board / Committee meetings. Their attendance at the Meetings held during the year and at the last AGM was as under:

Name of Director	Category	Meetings held during the year	No. of Board Meetings attended	Attendance at last AGM
Mr. Satishkumar Asamal Mehta	Chairman & Managing Director	11	11	Yes
Mr. Jayeshkumar Ashmal Mehta	Whole Time Director	11	11	Yes
Mr. Parimal Patwa	Director	11	8	No
Mr. Hemendrabhai Bhailal Patel	Independent Director	11	10	Yes
Mrs. Vinita Pankaj Maheshwari	Independent Director	11	11	Yes
Mr. Jitendrakumar Dhanjibhai Patel	Independent Director	11	11	Yes

None of the Directors hold the office of director in more than the permissible number of companies under Section 165 of the Act or Regulation 17A of the LODR.

None of the Directors hold the office of director in listed entities (whose equity and debt securities are listed).

The number of shares held by the board as on 31st March, 2021 is disclosed in Annexure "I" of the board report. The board of directors doesn't hold any convertible instruments of the company.

Number of Membership in Board, Membership and Chairman Ship in Committees excluding our Company:

Name of Director	Category	No. of Board Membership	No. of Membership in Committees	No. of Chairmanship in Committees
Mr. Satishkumar Asamal Mehta	Chairman & Managing Director	1	Nil	Nil
Mr. Jayeshkumar Ashmal Mehta	Whole Time Director	1	Nil	Nil
Mr. Parimal Patwa	Director	2	3	Nil
Mr. Hemendrabhai Bhailal Patel	Independent Director	2	Nil	Nil
Mrs. Vinita Pankaj Maheshwari	Independent Director	1	Nil	Nil
Mr. Jitendrakumar Dhanjibhai Patel	Independent Director	Nil	Nil	Nil

Relationship between the Directors:

Name of Director	Category	Relationship between the Directors
Mr. Satishkumar Asamal Mehta	Chairman & Managing Director	Brother of Mr. Jayeshkumar Ashmal Mehta
Mr. Jayeshkumar Ashmal Mehta	Whole Time Director	Brother of Mr. Satishkumar Asamal Mehta
Mr. Parimal Patwa	Non Executive Director	No Relation
Mr. Hemendrabhai Bhailal Patel	Independent Director	No Relation
Mrs. Vinita Pankaj Maheshwari	Independent Director	No Relation
Mr. Jitendrakumar Dhanjibhai Patel	Independent Director	No Relation

c. Information to the Board:

The Board of Directors has complete access to the information within the Company, which inter alia includes –

- Annual revenue budgets and capital expenditure plans
- Quarterly results and results of business segments
- Financing plans of the Company
- Minutes of meeting of Board of Directors, Audit Committee, Nomination & Remuneration Committee, Stakeholders Relationship Committee, Corporate Social Responsibility Committee and Risk Management Committee
- Details of any joint venture, acquisitions of companies or collaboration agreement
- Fatal or serious accidents, dangerous occurrences, any material effluent or pollution problems.
- Any materially relevant default, if any, in financial obligations to and by the Company or substantial non-payment for goods sold or services rendered, if any

- Any issue, which involves possible public or product liability claims of substantial nature, including any Judgment or Order, if any, which may have strictures on the conduct of the Company
- Developments in respect of human resources
- Compliance or Non-compliance of any regulatory, statutory nature or listing requirements and investor service such as non-payment of dividend, delay in share transfer, etc., if any
- The Board has identified the following skills/ expertise/ competencies fundamental for the effective functioning of the Company which are currently available with the Board

Skill Area	Description
Leadership	Ability to envision the future and prescribe a strategic goal for the Company, help the Company to identify possible road maps, inspire and motivate the strategy, approach, processes and other such key deliverables and mentor the leadership team to channelize its energy/ efforts in appropriate direction.
Strategy and planning	Ability to think strategically; identify and critically assess strategic opportunities and threats.
Global Experience / International Exposure	Ability to have access and understand business models of global corporations, relate to the developments with respect to leading global corporations and assist the Company to adapt to the local environment, understand the geo political dynamics and its relations to the Company's strategies and business prospects and have a network of contacts in global corporations and industry worldwide.
Governance, Risk Management and Compliance	Commitment, belief and experience in the application of corporate governance principles and setting up corporate governance practices to support the Company's robust legal, risk and compliance systems and governance policies/practices.
Engineering Research & Development	Domain knowledge in businesses and closely follow the technology trends in the ER&D industry and focus on key technology areas that impact the various verticals we operate viz. digital engineering, mobility and augmented reality, IOT, automation of Knowledge, robotics, autonomous & near-autonomous vehicles, imaging and video.
Finance, Accounts & Audit	Qualifications and/or experience in accounting and/or finance or the ability to understand financial policies, disclosure practices, financial statements and critically assess financial viability and performance
Relationship with Clients/ Customers	Experience in engaging with management of businesses and organizations and other customers to assess business needs and ability to maintain positive relationships with clients / customers over time.
Stakeholder Engagement & Industry advocacy	Ability to engage with key stakeholders including relevant industry investor and business customers to effectively engage/network and communicate with them.
Contributor and collaborator	The ability to critically analyze complex and detailed information, deal appropriately with key issues and suggest solutions to problems.

A Chart Setting out the Skills of the Board of Director as on March 31, 2021 is as under: -

(We have referred the skills by numbers 1: Leadership, 2: Strategy and planning, 3: Global Experience /International Exposure, 4: Governance, Risk Management and Compliance, 5: Engineering Research

& Development, 6: Finance, Accounts & Audit, 7: Relationship with Clients/ Customers, 8: Stakeholder Engagement & Industry advocacy and 9: Contributor and collaborator)

Name of Director	Category	Area of Skill Area/Expertise/Competence								
		1	2	3	4	5	6	7	8	9
Mr. Satishkumar Asamal Mehta	Chairman & Managing Director	✓	✓	✓	✓	✓	✓	✓	✓	✓
Mr. Jayeshkumar Ashmal Mehta	Whole Time Director	✓	✓	✓	✓	✓	✓	✓	✓	✓
Mr. Parimal Patwa	Director	✓		✓	✓		✓	✓	✓	✓
Mr. Hemendrabhai Bhailal Patel	Independent Director	✓	✓		✓	✓	✓		✓	✓
Mrs. Vinita Pankaj Maheshwari	Independent Director	✓		✓	✓	✓	✓	✓		✓
Mr. Jitendrakumar Dhanjibhai Patel	Independent Director	✓		✓	✓	✓			✓	✓

CODE OF CONDUCT FOR BOARD & SENIOR MANAGEMENT PERSONNEL

Your Company has adopted a Code of Conduct for Board Members & Senior Management Personnel and the declaration from the Managing Director, stating that all the Directors and the Senior Management Personnel of your Company have affirmed compliance with the Code of Conduct has been included in this Report. The Code has been posted on your Company's website at www.sagardeep.com.

BOARD COMMITTEES

The Board currently has the following three Committees:

- 1) Audit Committee,
- 2) Nomination and Remuneration Committee,
- 3) Stakeholders' Relationship Committee.

The terms of reference of the Board Committees are in compliance with the provisions of the Act the LODR and are also decided by the Board from time to time. The Board is responsible for constituting, assigning and appointing the members of the Committees. Draft minutes of the committee meetings are circulated to the members of those committees for their comments and thereafter, confirmed in its next meeting, in terms of Secretarial Standard on Meeting of the Board of Directors (SS-1) issued by the Institute of Company Secretaries of India.

The Board of Directors also takes note of the minutes of the committee meetings held in the previous quarter, at its meetings. The brief description of terms of reference of the Committees, the composition of the Committees including the number of meetings held during the financial year and the related attendance are provided below.

Audit Committee

● Terms of Reference

1. Oversight of the Issuer's financial reporting process and the disclosure of its financial information to ensure that the financial statement is correct, sufficient and credible.
2. Recommending to the Board, the appointment, re-appointment and, if required, the replacement or removal of the statutory auditor and the fixation of audit fees.

3. Review and monitor the auditor's independence and performance, and effectiveness of audit process.
4. Approval of payment to statutory auditors for any other services rendered by the statutory auditors.
5. Examination of the financial statement and the auditors' report thereon.
6. Reviewing, with the management, the annual financial statements before submission to the board for approval, with particular reference to:
 - a. Matters required being included in the Director's Responsibility Statement to be included in the Board's report.
 - b. Changes, if any, in accounting policies and practices and reasons for the same
 - c. Major accounting entries involving estimates based on the exercise of judgment by management
 - d. Significant adjustments made in the financial statements arising out of audit findings
 - e. Compliance with listing and other legal requirements relating to financial statements
 - f. Disclosure of any related party transactions
 - g. Qualifications in the draft audit report.
7. Reviewing, with the management, the half yearly financial statements before submission to the board for approval.
8. Approval or any subsequent modification of transactions of the company with related parties;
9. Scrutiny of inter-corporate loans and investments;
10. Valuation of undertakings or assets of the company, wherever it is necessary;
11. Evaluation of internal financial controls and risk management systems;
12. Reviewing, with the management, the statement of uses / application of funds raised through an issue (public issue, rights issue, preferential issue, etc.), the statement of funds utilized for purposes other than those stated in the offer document/prospectus/ notice and the report submitted by the monitoring agency monitoring the utilization of proceeds of a public or rights issue, and making appropriate recommendations to the Board to take up steps in this matter.
13. Reviewing, with the management, performance of statutory and internal auditors, and adequacy of the internal control systems.
14. Reviewing the adequacy of internal audit function, if any, including the structure of the internal audit department, staffing and seniority of the official heading the department, reporting structure coverage and frequency of internal audit.
15. Discussion with internal auditors any significant findings and follow up there on.
16. Reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the board.
17. Discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post-audit discussion to ascertain any area of concern.
18. To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of nonpayment of declared dividends) and

creditors.

19. To review the functioning of the Whistle Blower mechanism, in case the same is Existing.
20. Approval of appointment of CFO (i.e., the whole-time Finance Director or any other person heading the finance function or discharging that function) after assessing the qualifications, experience & background, etc. of the candidate.
21. The Audit Committee shall mandatorily review the following information:
 - a. Management discussion and analysis of financial condition and results of operations;
 - b. Statement of significant related party transactions (as defined by the audit committee), submitted by management;
 - c. Management letters / letters of internal control weaknesses issued by the statutory auditors;
 - d. Internal audit reports relating to internal control weaknesses;
 - e. The appointment, removal and terms of remuneration of the Chief internal auditor shall be subject to review by the Audit Committee
 - f. Carrying out any other function as is mentioned in the terms of reference of the Audit Committee and as required to be carried out as per applicable law including listing agreement.

Composition

As on March 31, 2021 the Audit Committee is comprising of two Independent Directors and One Executive Director. The Chairman of the Committee is an Independent Director.

Meetings

During the year ended March 31, 2021, Audit Committee met 6 (Six) times 27/06/2020, 21/08/2020, 12/09/2020, 07/10/2020, 11/11/2020 and 08/02/2021.

Name of Director	Category	Meetings held during the year	No. of Meetings attended
Mr. Jitendrakumar Dhanjibhai Patel	Chairman	6	6
Mr. Satishkumar Asamal Mehta	Member	6	6
Mrs. Vinita Pankaj Maheshwari	Member	6	6

Meetings held during the year are expressed as number of meetings eligible to attend.

All the members of Audit Committee are financially literate and have accounting and financial matters experience.

The Managing Director and CFO of the Company are permanent invitees of the Meetings of Audit Committee. Statutory and Internal Auditors or their representatives are permanent invitees for the meetings of the Committee. The Company Secretary is the Secretary to the Committee.

Internal Audit:

M/s. Vishwas Sharma & Associates are the Internal Auditors of the Company. Over a period, auditors have gained knowledge about the businesses of the Company, its systems & procedures. They are reviewing from time to time, Company's systems of internal controls covering financial, operational, compliance, IT applications, etc. and presentations were made to the Audit Committee on quarterly basis covering the scope of their audit and their findings. To maintain its objectivity and independence, the Internal Auditor reports to the Chairman of the Audit Committee and significant audit observations, comments and corrective actions thereon are presented to the Audit Committee in its meeting.

M/s Vishwas Sharma & Associates resigned from the Internal Auditor of the Company w.e.f. 15th June, 2021. The Audit Committee recommended and the Board of Directors at their meeting held on 13th July 2021 appointed M/s Amit Uttamchandani & Associates, chartered accountant as an Internal Auditor w.e.f. 13th July, 2021

Nomination and Remuneration Committee

- **Terms of Reference**

1. To formulate the criteria for determining qualifications, positive attributes and independence of a director and recommend to the Board a policy relating to the level and composition of remuneration of the directors, key managerial personnel and other employees.
2. Formulation of criteria for evaluation of independent directors and the Board.
3. To ensure that the relationship of remuneration to performance is clear and meets appropriate performance benchmarks.
4. Devising a policy on Board diversity.
5. Identifying persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down, and recommend to the Board their appointment and removal.
6. To carry out any other function as required to be carried out as per applicable law including listing agreement.

Composition

As on March 31, 2021 the NRC comprised of three Independent Directors. The Chairman of the Committee is an Independent Director.

Meetings

During the year ended March 31, 2021, the NRC committee met 3 (Three) times 22/05/2020, 27/07/2020 and 26/10/2020.

Name of Director	Category	Meetings held during the year	No. of Meetings attended
Mr. JitendrakumarDhanjibhai Patel	Chairman	3	3
Mr. HemendrabhaiBhailalPatel	Member	3	3
Mrs. Vinita Pankaj Maheshwari	Member	3	3

- **Performance Evaluation Criteria For Independent Directors**

While screening, selecting and recommending to the Board new members, the NRC ensures that the Board is objective, there is absence of conflict of interest, ensures availability of diverse perspectives, business experience, legal, financial & other expertise, integrity, managerial qualities, practical wisdom, ability to read & understand financial statements, commitment to ethical standards and values of the Company and ensure healthy debates & sound decisions.

While evaluating the suitability of a Director for re-appointment, besides the above criteria, the NRC considers the past performance, attendance & participation in and contribution to the activities of the Board by the Director.

The Independent Directors comply with the definition of Independent Directors as given under Section 149(6) of the Act and Regulation 16(1)(b) of the LODR. While appointing/re-appointing any Independent Directors/ Non-Executive Directors on the Board, the NRC considers the criteria as laid down in the Act and the LODR.

All the Independent Directors give a certificate confirming that they meet the “independence criteria” as mentioned in Section 149(6) of the Act and the LODR.

The Board has taken on record the declaration and confirmation submitted by the Independent Directors after assessing the veracity of the same.

Further, the Board is of the opinion that the Independent Directors fulfill the conditions specified in the LODR and are independent of the management.

REMUNERATION OF DIRECTORS:

Remuneration Policy

The remuneration of the Board members is based on the Company’s size & global presence, its economic & financial position, industrial trends, compensation paid by the peer companies, etc. Compensation reflects each Board member’s responsibility and performance. The level of compensation to Executive Directors is designed to be competitive in the market for highly qualified executives.

The Whole Time Directors are paid remuneration by way of salary, perquisites, variable pay and commission, wherever applicable based on recommendation of the NRC, approval of the Board and the shareholders. The commission is based on the performance of the business/ function as well as other qualitative factors. The commission is calculated with reference to net profits of the Company in the financial year subject to overall ceilings stipulated under Section 197 of the Act.

There were no pecuniary relationships or transactions of the Non-Executive Directors vis-à-vis Company

Details of Remuneration Paid/Payable to Directors for the Year Ended March 31, 2021.

Salient features of the policy on remuneration of executive and non-executive directors are as under:

(a) Executive Directors

The Board of Directors in consultation with the Nomination and Remuneration Committee decides on the remuneration payable to the Managing Director / Whole Time Director. The total remuneration to the Managing Director comprises fixed component consisting of salary and perquisites in accordance with Company’s policy and a profit linked incentive.

The details of remuneration paid/payable to the Executive Directors are as follows:

Name of Director	Category	Salary
Mr. Satishkumar Asamal Mehta	Chairman & Managing Director	Rs. 9,00,000/-
Mr. Jayeshkumar Ashmal Mehta	Whole Time Director	Rs. 9,00,000/-

Notice period for termination of appointment of Managing Director and other Whole-time Directors is three months on either side.

(b) Independent Directors/Non-Executive Director:

Non-Executive Directors can be paid sitting fees for attending the Board and Committee meetings. The reimbursement of actual expense directly related to the travel and out-of-pocket expenses, if any, incurred by them is made

The detail of remuneration paid/payable to the Independent Director/Non-Executive Directors is as follows:

Name of Director	Category	Salary
Mr. Parimal Patwa	Non Executive-Director	Nil
Mr. Hemendrabhai BhailalPatel	Independent Director	Nil
Mrs. Vinita Pankaj Maheshwari	Independent Director	Nil
Mr. Jitendrakumar Dhanjibhai Patel	Independent Director	Nil

Stakeholders' Relationship Committee

- **Terms of Reference**

1. To specifically look into the timely redressal of shareholder and investors including complaints in respect of transfer of shares, non-receipt of balance sheet, non-receipt of declared dividends etc
2. To review and approve transfer or transmission of shares & other securities
3. To review and approve issue of duplicate share certificate on split/consolidation/renewal etc
4. To carry out any other function as required to be carried out as per applicable law including listing agreement.

Composition

The Stakeholders' Relationship Committee (SRC) as on March 31, 2021, comprised of three Independent Directors as its members. The Chairman of the Committee is a Non-Executive Director Independent Director of the Company.

Meetings

During the year ended March 31, 2021, the SRC committee met 2 (Two) time on 21/08/2020 and 07/10/2020.

The attendance of Members at the Meetings was as follows:

Name of Director	Category	Meetings held during the year	No. of Meetings attended
Mrs. Vinita Pankaj Maheshwari	Chairman	2	2
Mr. JitendrakumarDhanjibhai Patel	Member	2	2
Mr. HemendrabhaiBhailalPatel	Member	2	2

Meetings held during the year are expressed as number of meetings eligible to attend.

NUMBER OF REQUESTS/COMPLAINTS

During the year, the Company didn't receive any complaints.

The details of the Complaints received by the company and its RTA are as follows.

Particulars	Opening Balance	Received	Resolved	Pending
SEBI	0	3	3	0
Stock Exchange	-	-	-	-
Dividend Related	-	-	-	-
Transmission/ Transfer	-	-	-	-
Demat/Remat	-	-	-	-

COMPLIANCE OFFICER

Mr. Nayan P. Pitroda ceased to be company secretary and compliance officer of the Company w.e.f. 16/10/2020. The board appointed Ms. Priya A Rawal as company secretary and compliance officer w.e.f. 26/10/2020 to fill the vacancy arose due to his resignation.

Further Ms. Priya A Rawal resigned as a company secretary and compliance officer w.e.f. 26/06/2021 and board appointed Mr. Ankit Sanchiher as company secretary and compliance officer of the company w.e.f. 01/07/2021.

**DETAILS OF DIRECTORS SEEKING APPOINTMENT / RE-APPOINTMENT AS REQUIRED UNDER
REGULATION 36 OF THE SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS)
REGULATIONS 2015**

*(In pursuance of Regulation 36(3) of the Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015)*

Name of Director	SATISHKUMAR ASAMAL MEHTA	JAYESHKUMAR A MEHTA
DIN	01958984	02156140
Date of Birth	18/03/1977	03/08/1979
Date of Appointment	13/02/2007	05/05/2008
Relationship Between Directors inter se	Brother of Jayesh A Mehta	Brother of Mr. Satishkumar A Mehta
Expertise in Specific functional area	Administrative, Accounts and Finance	Sales & Marketing
Qualification	B.Com	HSC
Other Board Membership*	0	0
Committee Membership in other public companies	NIL	NIL
Number of Shares held in the Company	2367825	2627250

*Pvt. Companies excluded

Other information:

Directors' Familiarization Program

All directors are aware and are also updated as and when required of their responsibilities, roles and liabilities.

The Board of Directors has complete access to the information within the Company. Minutes of all committees are being included as a part of Agenda to the Board. Systems, procedures and resources are in place to ensure that every Director is supplied, in a timely manner, with precise and concise information in a form and of a quality appropriate to effectively enable / discharge his / her duties. The Directors are given time to study the data and contribute effectively to the Board discussions.

Presentations are made regularly to the Board / NRC / Audit Committee (AC) where Directors get an opportunity to interact with senior management. Presentations, inter alia, cover business strategies, management structure, HR policy, succession planning, quarterly and annual results, budgets, review of Internal Audit, Corporate Social Responsibility and risk management framework etc.

Independent Directors through their interactions and deliberations give suggestions for improving overall effectiveness of the Board and its Committees. Independent Directors have the freedom to interact with the Company's management.

As part of the appointment letter issued to Independent Directors, the Company has stated that it will facilitate attending seminars/programs/conferences designed to train directors to enhance their role as an Independent Director. The details of Directors' Familiarization Program are uploaded on website of the Company i.e. www.sagardeep.com.

SUBSIDIARY COMPANY

The Company has formulated a policy for determining Material Subsidiary and Sagardeep Engineers Private Limited comes under the purview of the unlisted material subsidiary as per criteria given under "Explanation to Regulation 24(1) of the SEBI Listing Regulations". Mr. Hemendrabhai Bhailal Patel, Independent Director of the Company, has been nominated as a Director on the Board of Sagardeep Alloys Limited. The Audit Committee of the Company reviews the Financial Statements and Investments made by unlisted subsidiary company and the minutes of the unlisted subsidiary companies are being placed periodically at the Board Meeting of the Company.

POSTAL BALLOT

During the year, pursuant to Section 110 of the Companies Act, 2013 read with the Companies (Management and Administration) Rules, 2014 (including any statutory amendment(s) or re-enactment(s) made thereunder), your Company passed the following resolution through postal ballot as per the details below:

Date of Postal ballot Notice : 21.08.2020
 Date of declaration of result : 27.09.2020
 Voting period : 28.08.2020 to 26.09.2020
 Date of approval : 26.09.2020

Name of resolution	Type of resolution	No. of votes polled	Votes cast in favor		Votes cast against	
			No of Votes	%	No of Votes	%
ADOPTION OF NEW SET OF ARTICLES OF ASSOCIATION OF THE COMPANY	Special	8731600	8731600	100 %	0	0.00
ISSUE OF BONUS SHARES	Special	8731600	8731600	100 %	0	0.00

GENERAL BODY MEETINGS

The last Three (3) Annual General Meetings of the Company were held as under:

Financial Year	Date	Venue	Time	No. of Special Resolution Passed
2019-20	27th August, 2020	Through Video Conferencing / Other Audio-Visual Means	11.30 A.M.	2
2018-19	25th September, 2019	Plot No. 2070, Rajnagar Patiya, Santej Khatraj Road, Santej Kalol Gandhinagar GJ 382721 In	11.30 A.M.	No
2017-2018	25th July, 2018	205, Pittaliya Bumba, Nr. Madhuram Cinema, GheeKatha, Ahmedabad-380001	11.30 A.M.	1

The following Special Resolutions were passed by the members during the past three Annual General Meetings:

Annual General Meeting held on 27th August 2020

- Re-appointment of Mr. Patel HemendrabhaiBhailal (DIN: 01827562) as an Independent Director.
- Re-appointment of Mrs. Vinita Pankaj Maheshwari (DIN: 07187365) as an Independent Women Director.

Annual General Meeting Held on 25th July, 2018

- To shift the registered office of the company

Special Resolutions passed through Postal Balloton 27/09/2020

- To Adoption Of New Set Of Articles Of Association Of The Company
- To Issue Of Bonus Shares

MEANS OF COMMUNICATION

Financial Results	The quarterly, half-yearly and annual results are published in two newspaper i.e. 'Free Press' in English and 'Lok Mitra' in Gujarati and are displayed on the website of the Company www.sdalloys.com .
Website	The Company's website www.sdalloys.com provides comprehensive information about its portfolio of businesses. Section on "Investors" serves to inform and service the Shareholders allowing them to access information at their convenience. The quarterly shareholding pattern of the Company is available on the website of the Company as well as the stock exchanges. The entire Annual Report and Accounts of the Company will also be made available on the websites of the Stock Exchanges. Annual Report and accounts of the Company and its subsidiaries will be available on the website of the Company in downloadable format
Filing with Stock Exchanges	Information to Stock Exchanges is now being also filed online on NEAPS for NSE
Annual Report	Annual Report is circulated to all the members and all others like auditors, secretarial auditor, equity analysts, etc
Presentations/ Investor call made to Institutional Investors and Analysts	The schedule of analyst/institutional investor meets and presentations if made to them are placed on the website of the Company. The quarterly Earning Conference call transcript is made available to the investors on the Company's website

Compliance Monitoring System

The statutory compliance has become a catalyst for Corporate Governance. A good statutory compliance system has become vital for effective conduct of business operations. As a major portion of the Company's business is conducted abroad, apart from ensuring compliance with Indian statutes, the Company also complies with the statutes of the countries where the Company has presence.

With a view to strengthen this system, the Company has taken steps to automate the said system and has framed a web-based portal which will provide the users a web-based access, controls based on a defined authorization matrix. Besides connecting all the Compliance owners across time zones to a common corporate platform, the portal is expected to serve as a repository of the compliance exercise yielding substantial saving in resources and efforts for tracking compliance. The Company is taking steps to build this Statutory Compliance Monitoring system.

GENERAL SHAREHOLDERS' INFORMATION

ANNUAL GENERAL MEETING

The AGM of the Company to be convened on Friday, 17th September 2021 at 12.30 p.m. through Video Conferencing / Other Audio-Visual Means. The detailed procedure to attend and vote in AGM is provide to notes of Notice of Annual General Meeting.

FINANCIAL YEAR

The financial year of the Company is from April 1 to March 31

FINANCIAL CALENDAR

Annual Results of 2020-21	15th June ,2021
Mailing of Annual Reports*	21st August, 2021
First Quarter Results*	14th August, 2021
Annual General Meeting	17th September, 2021
Second Quarter results*	14th November, 2021
Third Quarter results*	14th February, 2021
Fourth Quarter* / Annual results	30th May,2022

*Tentative Dates

BOOK CLOSURE

The dates of book closure are from Friday 10th September, 2021 to Thursday 16th September, 2021

DIVIDEND

The Board of Directors of the Company had adopted the Dividend Distribution Policy in line with the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015. The Policy is uploaded on the Company's website at www.sdalloys.com

The Dividend, if declared, will be paid within the statutory time limit to the eligible members of the Company.

LISTING OF EQUITY SHARES ON STOCK EXCHANGES

The equity shares of the company is listed on National Stock Exchange (NSE).

LISTING FEES TO STOCK EXCHANGES

The Company has paid the Listing Fees for the year 2021-2022 to the above Stock Exchanges.

CUSTODIAL FEES TO DEPOSITORIES

The Company has paid custodial fees for the year 2020-2021 to National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL).

RECONCILIATION OF SHARE CAPITAL AUDIT

A practicing Company Secretary carried out secretarial audit in each of the quarters in the financial year 2020-21, to reconcile the total admitted capital with National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL) and total issued and listed capital. The audit reports confirm that the total issued / paid up capital is in agreement with the total number of shares in physical form and the total number of dematerialized shares held with depositories.

DETAILS OF NON-COMPLIANCE

There was no non-compliance during the year and no penalties were imposed or strictures passed on the Company by the Stock Exchanges, SEBI or any other Statutory Authority except mentioned hereunder.

- The NSE has imposed fine on the Company of Rs. 2,55,000/- as the Company has failed to appoint a director to have at least 6 directors and accordingly violated the provisions of Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the criteria applicable to top 2000 Companies. The NSE has imposed the fine for non-compliance of 51 days of the said regulation and the Company has complied with the said Regulation by appointment of Mr. Parimal Patwa as non-executive director w.e.f. 22/05/2020.

A practicing Company Secretary has certified the compliance of the conditions of Corporate Governance and annexed the certificate with the Directors' Report and sent the same to all the shareholders of the Company. The certificate shall also be sent to all the concerned Stock Exchanges along with the Annual Report filed by the Company.

STOCK CODE/SYMBOL:

Symbol(NSE)	SAGARDEEP
ISIN	INE976T01013
Corporate Identification Number	L29253GJ2007PLC050007

DISTRIBUTION OF SHAREHOLDING AS ON 31.03.2021:

Sr. No.	Shareholding of S hares Shareholders	Number of Shareholders	% of Total Shares	Share	% of Total Capital
1	1 to 500	2692	84.2830	267699	1.5694
2	501 to 1000	170	5.3225	124093	0.7275
3	1001 to 2000	118	3.6944	166536	0.9763
4	2001 to 3000	40	1.2523	99942	0.5859
5	3001 to 4000	17	0.5322	59370	0.3481
6	4001 to 5000	12	0.3757	54962	0.3222
7	5001 to 10000	70	2.1916	554768	3.2524
8	10001 to above	75	2.3482	15730030	92.2182
	TOTAL	3194	100.0000	17057400	100.0000

Kindly refer Annexure 'I' of the board report Categories of equity shareholding, Promoter Shareholding, Director & KMP Shareholding and Top Ten Equity Shareholders holding as on 31st March, 2021.

STOCK MARKET DATA FOR THE YEAR 2020-2021:

Month	SAGARDEP Stock Price		
	High	Low	Month Close
2020			
April	79.80	53.20	69.00
May	79.90	57.00	79.90
June	113.45	77.00	111.00
July	136.00	110.10	133.35
August	147.90	116.80	118.20
September	112.30	49.70	61.40
October	64.45	40.05	48.60
November	51.00	31.60	40.95
December	43.80	35.00	36.80
2021			
January	41.00	32.80	40.05
February	49.20	38.55	44.50
March	48.40	29.30	32.40

PLANT LOCATIONS

Plot No. 2070, Rajnagar Patiya, Santej Khatraj Road,
Santej Kalol Gandhinagar 382721.

ADDRESS FOR CORRESPONDENCE ADDRESS OF RTA:

Link Intime India Private Ltd

C-101, 247 Park, L.B.S. Marg, Vikhroli (West),
Mumbai – 400 083

ADDRESS OF COMPLIANCE OFFICER:

Mr. Ankit Sanchiher
Plot No. 2070, Rajnagar Patiya,
SantejKhatraj Road,
SantejKalol Gandhinagar - 382721

SHARE TRANSFER SYSTEM

The Company's investor services are handled by Link Intime India Private Limited who are the Company's RTA. Pursuant to SEBI press release dated December 3, 2018, except in case of transmission or transposition of securities, requests for effecting transfer of securities after April 1, 2019, shall not be processed by the Company unless the securities are held in the dematerialized form with a depository.

DEMATERIALIZATION OF SHARES AND LIQUIDITY

Physical shares received for dematerialization are processed and completed within a period of 21 days from the date of receipt.

As required under Regulation 40 of the LODR a certificate on half yearly basis confirming due compliance of share transfer formalities by the Company from Practicing Company Secretary has been submitted to Stock Exchanges within stipulated time.

OUTSTANDING GLOBAL DEPOSITORY RECEIPTS OR AMERICAN DEPOSITORY RECEIPTS OR WARRANTS OR ANY CONVERTIBLE INSTRUMENTS, CONVERSION DATE AND LIKELY IMPACT ON EQUITY

There are no Outstanding Global Depository Receipts or American Depository Receipts Or Warrants Or any Convertible Instruments during the financial year.

COMMODITY PRICE RISK OR FOREIGN EXCHANGE RISK AND HEDGING ACTIVITIES

Please refer to Management Discussion and Analysis Report for the same.

SHAREHOLDERS GRIEVANCES

The Company has designated an e-mail id viz. secretary@sdalloys.com to enable shareholders to contact in case of any queries/ complaints. The Company strives to resolve any complaint within 7 working days.

DISCLOSURES:

- A. During the year, there were no transactions of material nature with the Directors or the Management or relatives or the subsidiaries or related parties that had potential conflict with the interests of the Company.
- B. Details of all related party transactions form a part of the accounts as required and the same are given in financial part.
- C. The Company has followed all relevant Accounting Standards while preparing the Financial Statements.
- D. The Company has complied with the requirements of the Stock Exchanges, SEBI and other statutory authorities on all matters relating to capital markets during the last three years. No penalties or strictures have been imposed on the Company by the Stock Exchanges, SEBI or any other statutory authorities relating to the above.
- E. The Company has obtained Certificate from Mr. Devesh Khandelwal, Practicing Company Secretary confirming that Directors have not been debarred or not been disqualified from being appointed or continuing as Directors by SEBI/ MCA or any other authority.
- F. The policy for determining material subsidiaries and related party transactions is available on our website www.sdalloys.com.

VIGIL MECHANISM /WHISTLE BLOWER POLICY

Please refer point 27 of the Board Report.

STATUTORY AUDITORS

In the case of appointment of new auditors, the Audit Committee evaluates various audit firms based on approved criteria as given herein below. The Audit firms are required to make a presentation to this Committee. The Committee considers factors such as compliance with the legal provisions, number / nature / size and variation in client base, skill sets available in the firm both at partner level and staff level, international experience, systems and processes followed by the firm, training and development by the firm to its partners and staff, etc. during the process of evaluation. Based on merit and the factors mentioned above, the Committee finalizes the firm to be appointed and recommends the appointment of Auditors to the Board and shareholders for approval.

The above process was followed by the Company while appointing M/s Piyush J Shah & Co.as the Statutory Auditors of the Company.

M/s Piyush J Shah &Co., Chartered Accountants (Firm Registration No.) have been appointed as the Statutory Auditors of the Company. The particulars of payment of Statutory Auditors’fees, on consolidated basis are given below:

Particulars	Amount
Audit fees	2,00,000
Tax Audit	50,000

There is no adverse Qualification by the Auditors' of the Company, please refer not 21(1) of Directors' Report.

PROHIBITION OF INSIDER TRADING

Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (SEBI Insider Trading Regulations) the Company has adopted its Securities Dealing Code ('Code') for prevention of insider trading. The objective of the Code is to prevent dealing in the shares of the Company by an Insider while in possession of information known only to them, and not yet made publicly available by the Company, which, when made publicly available, can materially impact the price of the Company's securities. The code lays down guidelines to the identified employees and create the necessary framework for transacting in the Company's securities, seeking prior clearance for transactions wherever necessary, and a mechanism for periodical reporting of transactions. The objective of the Code is to prevent purchase and/or sale of shares of the Company by an Insider on the basis of unpublished price sensitive information. Under this Code, Designated Persons (Directors, Advisors, Officers and other concerned employees/ persons) are prevented from dealing in the Company's shares during the closure of Trading Window. To deal in securities beyond specified limit, permission of Compliance Officer is also required. All the Designated Employees are also required to disclose related information periodically as defined in the Code. Directors and designated employees who buy and sell shares of the Company are prohibited from entering into an opposite transaction i.e. sell or buy any shares the Company during the next six months following the prior transactions.

Pursuant to the enactment of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Company has suitably modified the provisions of the Code which are effective from 1st April 2019. Mr. Ankit Sanchiher, Company Secretary has been designated as the Compliance Officer. Mr. Ankit Sanchiher is the Chief Investor Relations Officer of the Company.

The Company also formulated Code of Practices and Procedures for Fair Disclosure of Unpublished Price

Sensitive Information which is available on Company's Website www.sdalloys.com

Awareness sessions/workshops on Governance practices:

Employees across the Company are being sensitized about the various policies and governance practices of the Company. The Company has in-house training workshops on Corporate Governance with the help of an external faculty covering basics of Corporate Governance as well as internal policies and compliances under Code of Conduct, Whistle Blower Policy, Sexual Harassment of Women at Workplace(Prevention, Prohibition & Redressal) Act, 2013, SEBI Insider Trading Regulations, etc.

SECRETARIAL AUDIT AS PER SEBI REQUIREMENTS:

As stipulated by SEBI, a Qualified Practicing Company Secretary carries out Reconciliation of Share Capital Audit to reconcile the total admitted capital with National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL) and the total issued and listed capital. This audit is carried out every quarter and the report thereon is submitted to the Stock Exchanges. The Audit confirms that the total Listed and Paid-up capital is in agreement with the aggregate of the total number of shares in dematerialized form and in physical form. Appropriate actions are taken to continuously improve the quality of compliance. The Company also has adequate software and systems to monitor compliance.

SECRETARIAL AUDIT AS PER COMPANIES ACT, 2013:

Pursuant to the provisions of section 204(1) of the Act. M/s Khandelwal Devesh & Associates, Company Secretaries, conducts the secretarial audit of the compliance of applicable statutory provisions and the adherence of good corporate practices by the Company.

Pursuant to the SEBI circular dated 8th February 2019, the Company has obtained an annual secretarial compliance report from M/s Khandelwal Devesh & Associates, Company Secretaries, and has submitted the same to the Stock Exchanges within the prescribed timelines.

GROUP GOVERNANCE:

Since, currently company is having only one subsidiary companies and our subsidiary is following strong governance practices as prescribed by Parent company. The Company also periodically monitors transactions in subsidiary by way of receiving checklists from these companies.

CODE OF CONDUCT

The Company has laid down a Code of Conduct for all Board members and senior management personnel. The Code of Conduct is available on the website of the Company, www.sdalloys.com. The declaration of Chief Executive Officer & Managing Director is given below:

**To the Shareholders of
Sagardeep Alloys Limited**

Sub: Compliance with Code of Conduct

In terms of requirements of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, I hereby declare and certify that all the Board members and senior management personnel of Sagardeep Alloys Limited have affirmed compliance with the code of conduct adopted by the Company for the year 2020-21.

**Place : Santej
Date : 03rd August 2021**

**Satish Mehta
Managing Director
(DIN: 01958984)**

CFO & Managing Director Certificate

To the Board of Directors of
SAGARDEEP ALLOYS LIMITED

Dear Sir/Mam,

Sub: CFO & MD Certificate

Issued in accordance with provisions of Regulation 17(8) of SEBI (Listing Obligations & Disclosure Requirements), Regulations, 2015

We have reviewed the standalone & consolidated financial statements, read with the standalone & consolidated cash flow statement of Sagardeep Alloys Limited for the year ended March 31, 2020 and that to the best of our knowledge and belief, we state that:

- a) (i) These statements do not contain any materially untrue statement or omit any material fact or contain statements that may be misleading;
- (ii) These statements present a true and fair view of the Company's affairs and are in compliance with current accounting standards, applicable laws and regulations.
- b) There are, to the best of our knowledge and belief, no transactions entered into by the Company during the year which are fraudulent, illegal or in violation of the Company's code of conduct.
- c) We accept responsibility for establishing and maintaining internal controls for financial reporting. We have evaluated the effectiveness of internal control systems of the Company pertaining to financial reporting and have disclosed to the Auditors and the Audit Committee, deficiencies, if any, in the design or operation of such internal controls of which we are aware and steps taken or proposed to be taken for rectifying these deficiencies.
- d) We have indicated to the Auditors and the Audit Committee:
 - (i) that there were no significant changes in internal controls over financial reporting during the year; and
 - (ii) that there were no significant changes in accounting policies made during the year; and
 - (iii) that there were no instances of significant fraud of which we have become aware.

Yours Sincerely,

Darshan P. Chouhan
CFO

Satish Asmal Mehata
Managing Director
(DIN: 01958984)

Date : 03th August, 2021

Place : Satej

CERTIFICATE ON CORPORATE GOVERNANCE TO THE MEMBERS OF SAGARDEEP ALLOYS LIMITED

To
The Members,
SAGARDEEP ALLOYS LIMITED,
Ahmedabad

I have examined the compliance of conditions of Corporate Governance by SAGARDEEP ALLOYS LIMITED for the Year Ended on March 31, 2021 as stipulated in Regulation 27 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.

The compliance of conditions of corporate governance is the responsibility of the management. Our examination was limited to procedures and implementation thereof, adopted by the Company for ensuring the compliance of the conditions of the Corporate Governance. It is neither an audit nor an expression of opinion on the financial statements of the Company.

In our opinion and to the best of our information and according to the explanations given to us, I certify that the Company has complied with the conditions except mentioned hereunder of Corporate Governance as stipulated in the above- mentioned Listing Regulations. We state that such compliance is neither an assurance as to the future viability of the Company nor the efficiency or effectiveness with which the management has conducted the affairs of the Company.

The Company has violated the provisions of Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the criteria applicable to top 2000 Companies. The Company failed to appoint a director to have at least 6 directors latest by 1st April, 2020 and finally complied with the said Regulation by appointing a new Non-executive Director effective from 22/05/2020 and therefore NSE has imposed fine on the Company of Rs. 2,55,000/- for non-compliance of 51 days.

For, Khandelwal Devesh & Associates
Company Secretaries

Devesh Khandelwal
Proprietor
FCS: 6897
COP: 4202

Place : Ahmedabad
Date : 13.07.2021

UDIN: F006897C000625713

CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS

(Pursuant to Regulation 34(3) and Schedule V Para C clause (10)(i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,
The Members,
SAGARDEEP ALLOYS LIMITED,
Santej Kalol,
Gandhinagar 382721

I have examined the relevant registers, records, forms, returns and disclosures received from the Directors of Sagardeep Alloys Limited (CIN: L29253GJ2007PLC050007) and having registered office Plot No. 2070 , Rajnagar Patiya , SantejKhatraj Road ,SantejKalol Gandhinagar 382721 (hereinafter referred to as “the Company”), produced before me by the Company for the purpose of issuing this Certificate, in accordance with Regulation 34(3) read with Schedule V Para C Sub Clause 10(i) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In my opinion and to the best of my information and according to the verifications (including Directors Identification Number (DIN) status at the portal www.mca.gov.in) as considered necessary and explanations furnished to me by the Company and its officers, I hereby certify that none of the Directors on the Board of the Company as stated below for the Financial year ending on 31st March, 2021 have been debarred or disqualified from being appointed or continuing as Directors of companies by the Securities and Exchange Board of India, Ministry of Corporate Affairs, or any such other Statutory Authority.

S.N.	Name of Director	DIN	Date of Appointment in Company
1.	SatishkumarAsamal Mehta	01958984	13/02/2007
2.	Mehta JayeshkumarAshmal	02156140	05/05/2008
3.	Patel HemendrabhaiBhailal	01827562	28/08/2015
4.	Vinita Pankaj Maheshwari	07187365	28/08/2015
5.	JitendrakumarDhanjibhai Patel	07369309	23/02/2017
6.	Parimal Patwa	00093852	22/05/2020

Ensuring the eligibility for the appointment / continuity of every Director on the Board is the responsibility of the management of the Company. My responsibility is to express an opinion on these based on my verification. This certificate is neither an assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the company.

For, Khandelwal Devesh & Associates
Company Secretaries

Devesh Khandelwal
Proprietor
FCS: 6897
COP: 4202
UDIN: F006897C000625713

Place : Ahmedabad
Date : 13.07.2021

AOC-1

**Statement containing silent features of the Financial Statement of Subsidiary Company
(Pursuant to first proviso to sub-section (3) of Section 129 read with rule 5 of
the Companies (Accounts) Rules, 2014)**

Part A Subsidiaries

S.N.	Particulars	
1.	Name of Subsidiary	Sagardeep Engineers Private Limited
2.	Reporting Period	01st April, 2020 to 31st March, 2021
3.	Reporting Currency	INR(₹)
4.	Country	India
5.	Capital	1,43,00,000/-
6.	Reserves	Rs. 3,59,82,840/-
7.	Total Assets	Rs. 5,25,91,652/-
8.	Total Liabilities	Rs. 23,08,812/-
9.	Total Investment	Rs. 64,75,000/-
10.	Turnover/Total Income	Rs. 3,55,000/-
11.	Profit Before Tax	Rs. 1,00,205/-
12.	Provision for Taxation	Rs. 1,27,552/-
13.	Profit after Taxation	(Rs. 27,347/-)
14.	Proposed Divided	Nil
15.	% of Shareholding	100%

Independent Auditors' Report

To,
**The Members of
Sagardeep Alloys Limited**

Report on the Audit of the Standalone Financial Statements

Opinion

We have audited the accompanying standalone financial statements of Sagardeep Alloys Limited ("the Company"), which comprise the Standalone Balance Sheet as at 31st March, 2021, the Standalone Statement of Profit and Loss (including other comprehensive income), Standalone Statement of Changes in Equity and the Standalone Cash Flows for the year then ended and notes to the standalone financial statements, including a summary of significant accounting policies and other explanatory information (hereinafter referred to as "the standalone financial statements").

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

Basis of Our Opinion

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

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 separate opinion on these matters.

We have determined that there are no key audit matters to be communicated in our report.

Other Information

The Company's management and Board of Directors are responsible for the other information. The other information comprises the information included in the Company's annual report, but does not include the standalone financial statements and our auditors' report thereon.

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

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

Management's Responsibility for The Standalone 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 standalone financial statements that give a true and fair view of the financial position, financial performance and cash flows of the Company in accordance with the accounting principles generally accepted in India including the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the standalone financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

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

Auditor's Responsibilities for the Audit of the Standalone Financial Statements

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

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

- a. Identify and assess the risks of material misstatement of the standalone financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- b. Obtain an understanding of internal financial controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company and its subsidiary companies which are companies incorporated in India, has adequate internal financial controls system in place and the operating effectiveness of such controls.
- c. Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- d. 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 ability of the Company to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the standalone financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained

up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

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

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the standalone financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

As required by the Companies (Auditor's Report) Order, 2016 ("the Order"), issued by the Central Government of India in terms of sub-section (11) of section 143 of the 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.

- A. 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 standalone balance sheet, the standalone statement of profit and loss dealt with by this Report are in agreement with the books of account.
 - d) In our opinion, the aforesaid standalone financial statements comply with the Ind AS 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 31st March, 2021, taken on record by the Board of Directors, none of the directors is disqualified as on 31st March, 2021, from being appointed as a director in terms of Section 164 (2) of the Act.
 - f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B".
 - g) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:
 - 1. The company has disclosed the impact of pending litigation on its standalone financial position in its financial statement.

2. The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
3. There was no amount which are required to be transferred, to the investor's education and protection fund by the company.

For Piyush J. Shah & Co.
Chartered Accountants
FRN: 121172W

Piyush J. Shah
Partner
M. No: 108670
UDIN: 21108670AAAAEG9837
Place: Ahmedabad
Date: 15th June, 2021

Annexure - A to the Auditors' Report

The Annexure referred to in our Independent Auditors' Report to the members of the Company on the financial statements for the Period 01-04-2020 to 31-03-2021, we report that:

- i)
 - (a) The company has maintained proper records showing full particulars, including quantitative details and situation of property, plant & equipment (fixed assets).
 - (b) The company has a regular programme of physical verification of its property, plant & equipment (fixed assets) by which fixed assets are verified in a phased manner over a period of three years. In accordance with this programme, certain fixed assets were verified during the year and no material discrepancies were noticed on such verification. In our opinion, this periodicity of physical verification is reasonable having regard to the size of the Company and the nature of its assets.
 - (c) The title deeds of immovable properties are in the name of the company.
- ii)
 - (a) As explained to us, the Inventories of finished goods, Stores & consumables, Raw Materials and Work in process goods, have been physically verified at regular interval during the year by the management.
 - (b) In our opinion and according to the information and explanations given to us, the procedures of physical verification of inventories followed by the management were reasonable and adequate in relation to the size of the company and nature of its business.
 - (c) In our opinion and according to the information and explanations given to us, the company has maintained proper records of inventories and there were no material discrepancies noticed on physical verification of inventory as compared to book records and the same has been properly dealt with in books of accounts.
- iii) The Company had granted loans to parties covered in the register maintained under section 189 of the Companies Act, 2013 ('the Act').
 - (a) In our opinion and according to the information and explanations given to us the terms and conditions of the grant of such loans are not prejudicial to the company's interest.
 - (b) There is no repayment schedule relating to the loans granted by the company, it is repayable on demand. Moreover, the company is charging interest on the loans granted.
 - (c) In respect of the said loans, there are no overdue accounts.
- iv) In our opinion and according to the information and explanations given to us in respect of loans, investments, guarantees, and security provisions of section 185 and 186 of the Companies Act, 2013 had been complied with.
- v) The company had not accepted any deposits from public, therefore the directives issued by the Reserve Bank of India and the provisions of sections 73 to 76 or any other relevant provisions of the Companies Act, 2013 and the rules framed there under, is not applicable.
- vi) The Central Government has not prescribed the maintenance of cost records under section 148(1) of the Act, for the goods supplied by the Company.
- vii)
 - (a) According to the information and explanations given to us and on the basis of our examination of the records of the Company, amounts deducted / accrued in the books of account in respect of undisputed statutory dues including provident fund, income tax, sales tax, wealth tax, service tax, duty of customs, value added tax, cess and other material statutory dues have been

regularly deposited during the year by the Company with the appropriate authorities. As explained to us, the Company did not have any dues on account of employees' state insurance and duty of excise.

According to the information and explanations given to us, no undisputed amounts payable in respect of provident fund, income tax, sales tax, wealth tax, service tax, duty of customs, value added tax, cess and other material statutory dues were in arrears as at 31st March, 2021 for a period of more than six months from the date they became payable.

- (b) According to the information and explanations given to us, there are no material dues of wealth tax, duty of customs and cess which have not been deposited with the appropriate authorities on account of any dispute.
- viii) The company had not defaulted in repayment of loans or borrowing to a financial institution, bank, Government or dues to debenture holders.
- ix) According to the information and explanations given to us the company had not raised any money by way of Initial Public Offer or Further Public Offer and term loans.
- x) According to the information and explanations given to us, no material fraud on or by the Company has been noticed or reported during the course of our audit.
- xi) According to the information and explanations given to us, managerial remuneration had been paid or provided in accordance with the requisite approvals mandated by the provisions of Section 197 read with Schedule V to the Companies Act.
- xii) In our opinion the company is not Nidhi company. Therefore, the provisions as mentioned in the Nidhi Rules, 2014 are not applicable to the company.
- xiii) In our opinion and according to the information and explanations given to us all transactions with the related parties are in compliance with sections 177 and 188 of Companies Act, 2013 where applicable and the details have been disclosed in the Financial Statements etc., as required by the applicable accounting standards.
- xiv) According to the information and explanations given to us, the company had not made preferential allotment of shares during the year/period under review and the requirement of Section 42 of the Companies Act, 2013 and other applicable provisions are therefore not applicable.
- xv) According to the information and explanations given to us the company had not entered into any non-cash transactions with directors or persons connected with him.
- xvi) In our opinion, the company is not a Non-Banking Finance Company, therefore the requirement to register under section 45-IA of the Reserve Bank of India Act, 1934 is not applicable.

For Piyush J. Shah & Co.
Chartered Accountants
FRN: 121172W

Piyush J. Shah
Partner
M. No: 108670
UDIN: 21108670AAAAEG9837
Place: Ahmedabad
Date: 15th June, 2021

Annexure - B to the Independent Auditors' Report

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

Opinion

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

Management's Responsibility for Internal Financial Controls

The Company's management and the Board of Directors are responsible for establishing and maintaining internal financial controls based on the internal financial controls with reference to financial statements criteria established by the company considering the essential components of internal control stated in the Guidance Note. 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 the 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 (hereinafter referred to as "the Act").

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 and the Standards on Auditing, prescribed under Section 143(10) of the Act, to the extent applicable to an audit of internal financial controls with reference to financial statements. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and whether 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 over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists and testing and evaluating the design and operating effectiveness of the internal control based on the assessed risk. The procedure selected depends on the auditor's judgement, including the assessment of 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 internal financial controls over financial reporting.

Meaning of Internal Financial Controls Over Financial Reporting

A company's internal financial controls over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial controls with reference to financial statements include 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 controls 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, the Company has, in all material respects, adequate internal financial controls with reference to financial statements and such internal financial controls were operating effectively as at 31st March 2021, based on the internal financial controls over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India (the "Guidance Note").

For Piyush J. Shah & Co.
Chartered Accountants
FRN: 121172W

Piyush J. Shah
Partner
M. No: 108670
UDIN: 21108670AAAAEG9837
Place: Ahmedabad
Date: 15th June, 2021

Sagardeep Alloys Limited
Standalone Balance Sheet as at 31st March, 2021

Particulars	Note	AMOUNT IN Rs. 31-Mar-2021	AMOUNT IN Rs. 31-Mar-2020
I. ASSETS			
1 Non-current assets			
(a) Property, plant & Equipment	02	106,013,137	46,870,474
(b) Capital work in progress	03	28,210,513	72,395,631
(c) Investment properties		-	-
(d) Goodwill	-	-	-
(e) Other intangible assets		-	-
(f) Intangible assets under development		-	-
(g) Biological assets other than bearer plants		-	-
(h) Financial assets			
(i) Investments in Subsidiaries	04	51,620,000	51,620,000
(ii) Trade receivables		-	-
(iii) Loans		-	-
(iv) Others	05	1,873,128	1,873,128
(i) Deferred tax assets (net)		-	-
(j) Other Non-current assets		-	-
		187,716,778	172,759,233
2 Current assets			
(a) Inventories	06	87,054,944	85,985,492
(b) Financial assets			
(i) Investments		-	-
(ii) Trade receivables	07	69,764,982	61,552,932
(iii) Cash and cash equivalents	08	504,080	311,710
(iv) Bank balance other than (iii) above	09	1,614,582	1,533,342
(v) Loans	10	24,482,038	48,295,302
(vi) Others		-	-
(c) Current tax assets (net)	11	1,287,078	1,099,787
(d) Other current assets	12	21,941,922	37,153,940
		206,649,626	235,932,505
Total Assets		394,366,404	408,691,738
II. EQUITY AND LIABILITIES			
1 Equity			
(a) Equity share capital	13	170,574,000	113,716,000
(b) Other equity	14	94,996,888	150,184,648
		265,570,888	263,900,648

Particulars	Note	AMOUNT IN Rs. 31-Mar-2021	AMOUNT IN Rs. 31-Mar-2020
2 Liabilities			
Non-current liabilities			
(a) Financial liabilities			
(i) Borrowings	15	19,500,000	-
(ii) Trade payables		-	-
(iii) Other financial liabilities (other than those specified in (ii))		-	-
(b) Provisions	16	1,437,067	-
(c) Deferred tax liabilities (net)	17	3,789,582	4,620,342
(d) Other non-current liabilities		-	-
		24,726,649	4,620,342
3 Current liabilities			
(a) Financial liabilities			
(i) Borrowings	18	46,426,323	99,439,294
(ii) Trade payables	19	45,705,551	17,226,619
(iii) Other financial liabilities (other than those specified in (ii))	20	11,076,204	22,201,262
(b) Other current liabilities		-	-
(c) Provisions	21	860,789	1,303,573
(d) Current tax liabilities (net)		-	-
		104,068,867	140,170,748
Total Liability		394,366,404	408,691,738

Summary of significant accounting policies 01 to 41

The accompanying notes are an integral part of the financial statements.

As per our report of even date

For Piyush J. Shah & Co.

Chartered Accountants

FRN :- 121172W

Piyush J. Shah

Partner

M. No.:- 108670

UDIN: 21108670AAAAEG9837

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta

Director

DIN :- 01958984

Jayesh Ashmal Mehta

Director

DIN :- 02156140

Krishnakant Somani

CFO

Priya Raval

Company Secretary

Sagardeep Alloys Limited

Standalone Profit and loss statement for the year ended 31st March, 2021

Particulars	Note	AMOUNT IN	AMOUNT IN
		Rs. 31-Mar-2021	Rs. 31-Mar-2020
I. Revenue from operations	22	654,837,929	338,026,399
II. Other Income	23	3,454,071	6,434,407
III. Total Revenue (I + II)		658,292,000	344,460,806
IV. Expenses:			
Cost of materials consumed	24	503,446,958	300,440,161
Purchase of stock in trade	25	101,207,428	1,953,122
Changes in Inventories of finished goods, stock in trade & WIP,	26	(249,929)	(7,690,787)
Employee benefits expenses	27	13,531,921	11,240,876
Finance costs	28	8,161,864	9,435,267
Depreciation and amortization expense		5,081,287	4,237,409
Other expenses	29	26,365,660	21,680,335
Total expenses (IV)		657,545,189	341,296,383
V. Profit/(Loss) before exceptional items and tax (III-IV)		746,811	3,164,423
VI. Exceptional items		-	19,496
VII. Profit/(Loss) before tax (V - VI)		746,811	3,144,927
VIII. Tax expenses			
(1) Current tax		150,715	1,009,590
(2) Deferred tax		(830,760)	(471,706)
(3) Short / (Excess) Provision		(39,126)	-
IX. Profit/(Loss) for the period from continuing operations (VII- VIII)		1,465,982	2,607,043
X. Profit/(Loss) for the period from discontinued operations		-	-
XI. Tax expenses of discontinued operations			
XII. Profit/(Loss) after tax for the period from discontinued operations (X-XI)		-	-
XIII. Profit/(Loss) for the period		1,465,982	2,607,043
XIV. Other comprehensive income			
A) (i) Items that will not be reclassified to profit or loss		102,129	-
(ii) Income tax relating to items that will not be reclassified to profit or loss		-	-
B) (i) Items that will be reclassified to profit or loss		-	-
(ii) Income tax relating to items that will be reclassified to profit or loss		-	-

**XV. Total Comprehensive income for the period (XIII+XIV)
(Comprising Profit/(Loss) and Other comprehensive
income for the period)**

		1,568,111	2,607,043
XII Earnings per equity share (for continuing operations):			
(1) Basic (Previous Year Restated)	30	0.09	0.15
(2) Diluted (Previous Year Restated)		0.09	0.15
XII Earnings per equity share (for discontinued operations):			
(1) Basic		-	-
(2) Diluted		-	-
XII Earnings per equity share (for discontinued & continuing operations):			
(1) Basic (Previous Year Restated)		0.09	0.15
(2) Diluted (Previous Year Restated)		0.09	0.15

Summary of significant accounting policies 01 to 41

**The accompanying notes are an integral part of the
financial statements.**

As per our report of even date

For Piyush J. Shah & Co.

Chartered Accountants
FRN :- 121172W

Piyush J. Shah
Partner

M. No.:- 108670

UDIN: 21108670AAAAEG9837

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta
Director

DIN :- 01958984

Jayesh Ashmal Mehta
Director

DIN :- 02156140

Krishnakant Somani
CFO

Priya Raval
Company Secretary

Sagardeep Alloys Limited

Standalone Cash Flow Statement for the Period ended 31st March, 2021

Particulars	AMOUNT IN Rs. 31-Mar-2021	AMOUNT IN Rs. 31-Mar-2020
Cash flow from operating activities:		
Net profit before tax as per statement of profit and loss	746,811	3,144,927
Adjusted for:		
Depreciation & amortization	5,081,287	4,237,409
Interest income on loans & advances given	(2,744,995)	(6,134,407)
Interest & finance costs	8,161,864	9,435,267
Operating cash flow before working capital changes	11,244,967	10,683,196
Adjusted for:		
(Increase)/ decrease in Inventories	(1,069,452)	(24,015,171)
(Increase)/ decrease in trade receivables	(8,212,050)	31,836,891
Increase/ (decrease) in trade payables	28,478,932	393,266
Increase/ (decrease) in other current assets	15,024,727	3,390,739
Increase/ (decrease) in other current liabilities	(11,125,058)	(13,034,127)
Increase/ (decrease) in long term provisions	1,437,067	-
Increase/ (decrease) in short term provisions	(310,990)	(1,653,889)
Cash generated from / (used in) operations	35,468,143	7,600,905
Income taxes paid	(39,126)	(1,009,590)
Net cash generated from/ (used in) operating activities [A]	35,429,017	6,591,315
Cash flow from investing activities:		
Purchase of property plant & equipment	(20,038,831)	(10,317,484)
Interest income on loans & advances given	2,744,995	6,134,407
(Increase)/ decrease in long term loans and advances	-	(274,448)
(Increase)/ decrease in short term loans and advances	23,813,264	4,009,420
Net cash flow from/(used) in investing activities [B]	6,519,428	(448,105)
Cash flow from financing activities:		
Increase in / Repayment of Long-Term Borrowings	19,500,000	(52,408)
Increase in / Repayment of Short-Term Borrowings	(53,012,971)	3,480,252
Interest & finance costs	(8,161,864)	(9,435,267)
Net cash flow from/(used in) financing activities [C]	(41,674,835)	(6,007,423)
Net increase/(decrease) in cash & cash equivalents [A+B+C]	273,610	135,787
Cash & cash equivalents as at beginning of the period	1,845,052	1,709,265
Cash & cash equivalents as at end of the period	2,118,662	1,845,052

Cash & Cash equivalents consist of	31-Mar-21	31-Mar-20
Cash Balance	169,195	229,269
Current Account Balance	334,885	82,441
Bank Balance (Note No. 09)	1,614,582	1,533,342
Total	2,118,662	1,845,052

Summary of significant accounting policies **01 to 41**

The accompanying notes are an integral part of the financial statements.

As per our report of even date

For Piyush J. Shah & Co.

Chartered Accountants

FRN :- 121172W

Piyush J. Shah

Partner

M. No.:- 108670

UDIN: 21108670AAAEG9837

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta

Director

DIN :- 01958984

Jayesh Ashmal Mehta

Director

DIN :- 02156140

Krishnakant Somani

CFO

Priya Raval

Company Secretary

Note: 1

Note: A

General Information:

Sagardeep Alloys Limited (CIN L29253GJ2007PLC050007) is incorporated under the Companies Act, 1956 with its registered office at Plot No. 2070, Rajnagar Patiya, Santej Khatraj Road, Santej, Kalol, Gandhinagar, Gujarat -382721.

The Company is engaged in the business of of Copper Items & Chemicals and Trading in Ferrous and Non Ferrous Metals.

The financial statements for the year ended on 31st March, 2021 are approved by the Board of Directors and authorised for issue on 15th June, 2021.

Significant Accounting Policies

1. Statement of Compliance

The company has adopted all the Ind AS and the adoption was carried out in accordance with Ind AS 101, First Time Adoption of Indian Accounting Standard. The transition was carried out from Indian Accounting Principles generally accepted in India as prescribed under section 133 of the Act read with Rule 7 of the Companies (Accounts) Rules, 2014. Reconciliations and descriptions of the effect of the transitions have been summarised in the annexers attached.

2. Basis of Preparation and Presentation

- i) The financial statements are prepared on historical cost basis in accordance with applicable Indian Accounting Standards (Ind AS) and on accounting principles of going concern except current investments which are measured at fair values. These financial statements have been prepared to comply with all material aspects with the Indian accounting standards notified under section 133 of the Act, (the "Act") read with Rule 7 of the Companies (Accounts) Rules, 2014, and the other relevant provisions of the Act.
- ii) Accounting policies have been consistently applied except where a newly issued accounting standard is initially adopted or a revision to an existing accounting standard requires a change in the accounting policies hitherto in use.
- iii) As the quarter and year figures are taken from the source and rounded to the nearest digits, the figures already reported for all the quarters during the year might not always add up to the year figures reported in this statement.
- iv) All 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 the Schedule III to the Act. Based on the nature of products and the time between the acquisition of assets for processing and their realization in cash and cash equivalents, the Company has ascertained its operating cycle as 12 months for the purpose of current classification of assets and liabilities.

3. Property, Plant and Equipments

Property, Plant and Equipment are stated at original cost (net of tax/duty credit availed) less accumulated depreciation and impairment loss-es. Cost includes cost of acquisition, construction and installation, taxes, duties, freight, other incidental expenses related to the acquisition, and pre-operative expenses including attributable borrowing costs incurred during pre-operational period.

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

- i) Land and buildings held for use in the production or supply of goods or services, or for administrative purposes, are stated in the balance sheet at deemed cost less and accumulated depreciation. Freehold land is not depreciated.
- ii) Properties in the course of construction for production, supply or administrative purposes are carried at cost, less any recognised impairment loss. Cost includes professional fees and, for qualifying assets, borrowing costs capitalised in accordance with the Company's accounting policy. Such properties are classified to the appropriate categories of property, plant and equipment when completed and ready for intended use. Depreciation of these assets, on the same basis as other property assets, commences when the assets are ready for their intended use.
- iii) Fixtures and equipment are stated at cost less accumulated depreciation and accumulated impairment losses.
- iv) An item of property, plant and equipment is derecognised upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on the disposal or retirement of an item of property, plant and equipment is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognised in profit or loss.
- v) Subsequent expenditures related to an item of Tangible Asset are added to its book value only if they increase the future benefits from the existing asset beyond its previously assessed standard of performance.
- vi) Assets which are not ready for their intended use on reporting date are carried as capital work-in-progress at cost, comprising direct cost and related incidental expenses.

Useful lives of the Property, Plant and Equipment as notified in Schedule II to the Companies Act, 2013 are as follows :

Buildings - 3 to 60 years

Plant and Equipments - 15 to 25 years

Furniture and Fixtures - 10 years

Vehicles - 8 to 10 years

Office Equipments - 5 to 10 years

4. Depreciation

- i) Depreciation on tangible Fixed Assets is provided for on basis of useful life specified in Schedule II to the Act.
- ii) Intangible assets such as Software are amortized in ten equal yearly installments commencing from the year in which the tangible benefits start accruing to the Company from such assets.
- iii) Depreciation is charged as per the provisions of Schedule II to the Act based upon useful life of assets. The useful life is adopted for the purpose of depreciation is as under.

5. Employee Benefits

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

Post Employment and Retirement benefits in the form of Gratuity are considered as defined benefit obligations and is provided for on the basis of third party actuarial valuation, using the projected unit credit method, as at the date of the Balance Sheet. Every Employee who has completed five years or more of service is entitled to Gratuity on terms not less favorable than the provisions of The Payment of Gratuity Act, 1972.

Employee benefits in the form of Provident Fund is considered as defined contribution plan and the contributions to Employees' Provident Fund Organization established under The Employees' Provident Fund and Miscellaneous Provisions Act 1952 is charged to the Statement of Profit and Loss of the year when the contributions to the respective funds are due. The Company pays provident fund contributions to publicly administered provident funds as per local regulations. The Company has no further payment obligations once the contributions have been paid.

6. Inventories

The cost of inventories have been computed to include all cost of purchases, cost of conversion and other related costs incurred in bringing the inventories to their present location and condition. The costs of Raw Materials, Stores and spare parts etc., consumed consist of purchase price including duties and taxes (other than those subsequently recoverable by the enterprise from the taxing authorities), freight inwards and other expenditure directly attributable to the procurement.

Stock of Finished goods is valued at lower of cost or net realisable value.

7. Revenue Recognition

The Company derives revenues primarily from sale of manufactured goods. Effective 01 April 2018, the Company has adopted Indian Accounting Standard 115 (Ind AS 115) - 'Revenue from contracts with customers' using the cumulative catch-up transition method, applied to contracts that were not completed as on the transition date i.e. 01 April 2018. Accordingly, the comparative amounts of revenue and the corresponding contract assets /liabilities have not been retrospectively adjusted. The effect on adoption of Ind-AS 115 was insignificant.

Sale of Goods: Revenue from sales of goods is recognized on transfer of significant risks and rewards of ownership to the customers. Revenue shown in the Statement of Profit and Loss excludes, returns, trade discounts, cash discounts, Goods & Service Tax.

Interest income is recognized on a time proportion basis taking into account the amount outstanding and the interest rate applicable.

8. Cash Flow Statement

Cash flows are reported using indirect method, whereby profit before tax is adjusted for the effects of transactions of a non-cash nature and any deferrals or accruals of past or future cash receipts or payments. The cash flow from regular revenue generating, financing and investing activities of the Company is segregated.

Cash and cash equivalents in the balance sheet comprise cash at bank, cash/cheques in hand and short term investments with an original maturity of three months or less.

9. Financial Assets

- i) The Company classifies its financial assets as those to be measured sub-sequently at fair value (either through other comprehensive income, or through profit or loss), and those to be measured at amortized cost.
- ii) Trade receivables represent receivables for goods sold by the Company upto to the end of the financial year. The amounts are generally unsecured and are usually received as per the terms of payment agreed with the customers. The amounts are presented as current assets where receivable is due within 12 months from the reporting date.
- iii) A financial asset is derecognized only when the Company has transferred the rights to receive cashflows from the financial asset, or when it has transferred substantially all the risks and rewards of the asset, or when it has transferred the control of the asset.

10. Financial Liabilities

- i) Borrowings are removed from balance sheet when the obligation specified in the contract is discharged, cancelled or expired.
- ii) Trade Payables represent liabilities for goods and services provided to the Company upto to the end of the financial year. The amounts are unsecured and are usually paid as per the terms of payment agreed with the vendors. The amounts are presented as current liabilities unless payment is not due within 12 months after the reporting period. They are recognised initially and subsequently measured at amortised cost.
- iii) Financial assets and Financial liabilities are offset and the net amount is reported in the balance sheet if there is a currently enforceable legal right to offset the recognised amounts and there is an intention to settle on a net basis, to realise the assets and settle the liabilities simultaneously.

11. Borrowing Costs

Borrowing costs directly attributable to the acquisition, construction or production of qualifying assets, which are assets that necessarily take a substantial period of time to get ready for their intended use, are added to the cost of those assets, until such time as the assets are substantially ready for their intended use. All other borrowing costs are recognised in the Statement of Profit and Loss in the period in which they are incurred. The Company determines the amount of borrowing costs eligible for capitalisation as the actual borrowing costs incurred on that borrowing during the period less any interest income earned on temporary investment of specific borrowings pending their expenditure on qualifying assets, to the extent that an entity borrows funds specifically for the purpose of obtaining a qualifying asset. In case if the Company borrows generally and uses the funds for obtaining a qualifying asset, borrowing costs eligible for capitalisation are determined by applying a capitalisation rate to the expenditures on that asset. The Company suspends capitalisation of borrowing costs during extended periods in which it suspends active development of a qualifying asset.

12. Accounting for Taxes on Income

Tax expenses comprise of current tax and deferred tax including applicable surcharge and cess.

Current Income tax is computed using the tax effect accounting method, where taxes are accrued in the same period in which the related revenue and expenses arise. A provision is made for income tax annually, based on the tax liability computed, after considering tax allowances and exemptions. Provisions are recorded when it is estimated that a liability due to disallowances or other matters is probable.

Deferred tax is provided using the balance sheet approach on temporary differences at the reporting date between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes at the reporting date. Deferred tax liabilities are recognized for all taxable temporary differences. Deferred tax assets are recognised for all deductible temporary differences, the carry forward of unused tax credits and any un used tax losses. Deferred tax assets are recognized to the extent that it is probable that taxable profits against which the deductible temporary differences, and the carry forward un used tax credits and un used tax losses can be utilized.

Deferred Tax Assets and Deferred Tax Liabilities are offset, if a legally enforceable right exists to set off current tax assets against current tax liabilities and the Deferred Tax Assets and Deferred Tax Liabilities relate to taxes on income levied by same governing taxation laws.

Deferred tax is recognised in the statement of profit and loss, except to the extent that it relates to items recognised in other comprehensive income. As such, deferred tax is also recognised in other comprehensive income.

13. Investments

Non Current investments are stated at cost. Provision for diminution in the value of Non Current investments is made only if such a decline is other than temporary.

14. Research & Development Expense

Revenue expenditure pertaining to research is charged to the Profit and Loss Statement. Development costs of products are charged to the Profit and Loss Statement if any.

15. Impairment

Assessment is done at each Balance Sheet date as to whether there is any indication that an asset may be impaired. For the purpose of assessing impairment, the smallest identifiable group of assets that generates cash inflows from continuing use that are largely independent of the cash inflows from other assets or groups of assets, is considered as a cash generating unit. If any such indication exists, an estimate of the recoverable amount of the asset/cash generating unit is made. Assets whose carrying value exceeds their recoverable amount are written down to the recoverable amount. Recoverable amount is higher of an asset's or cash generating unit's net selling price and its value in use. Value in use is the present value of estimated future cash flows expected to arise from the continuing use of an asset and from its disposal at the end of its useful life. Assessment is also done at each Balance Sheet date as to whether there is any indication that an impairment loss recognised for an asset in prior accounting periods may no longer exist or may have decreased.

16. Government Grants

- i) Grants are accounted for where it is reasonably certain that the ultimate collection will be made.
- ii) Grants relating to Fixed Assets in the nature of Project Capital Subsidy are credited to that particular project.
- iii) Others are credited to Statement of Profit and Loss.

17. Use of Estimates

The preparation of financial statements in conformity with Indian GAAP requires judgments, estimates and assumptions to be made that affect the reported amount of assets and liabilities, disclosure of contingent liabilities on the date of the financial statements and the reported amount of revenues and expenses during the reporting period. Difference between the actual results and estimates are recognized in the period in which the results are known/materialized.

18. Provisions, Contingent Liabilities and Contingent Assets

Provision is recognized in the accounts when there is a present obligation as a result of past event(s) and it is probable that an outflow of resources will be required to settle the obligation and a reliable estimate can be made. Provisions are not discounted to their present value and are determined based on the best estimate required to settle the obligation at the reporting date. These estimates are reviewed at each reporting date and adjusted to reflect the current best estimates.

Contingent liabilities are disclosed unless the possibility of outflow of resources is remote, if any. Contingent assets are neither recognized nor disclosed in the financial statements.

19. Earning Per Share

- i) Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders by the weighted average number of equity shares outstanding during the period.
- ii) For the purpose of calculating diluted earnings per share, the net profit or loss for the period attributable to equity shareholders and the weighted average number of shares outstanding during the period are adjusted for the effects of all dilutive potential equity shares.

Statement of changes in equity
For the period ended March 31, 2021

A Equity Share Capital: Amount In Rs.

Particulars	Note No.	As at 31-03-2021	As at 31-03-2020
Balance at the beginning of the year	13	113,716,000	113,716,000
Shares issued during the year		56,858,000	-
Balance at the end of the year		170,574,000	113,716,000

B Other Equity:

Particulars	Reserves & Surplus		Other Comprehensive Income	Total
	Securities premium reserves	Retained earnings		
Balance as at April 01, 2019	78,592,560	68,985,045	-	147,577,605
Profit/(Loss) for the period	-	2,607,043	-	2,607,043
Other comprehensive income for the year	-	-	-	-
Total comprehensive income for the year	-	2,607,043	-	2,607,043
Balance as at March 31, 2020	78,592,560	71,592,088	-	150,184,648
Balance as at April 01, 2020	78,592,560	71,592,088	-	150,184,648
Profit/(Loss) for the period	-	1,568,111	-	1,568,111
Other comprehensive income for the year	-	-	102,129	102,129
Utilized towards issue of Bonus Shares (Sub Note: 1)	(56,858,000)	-	-	-
Total comprehensive income for the year	(56,858,000)	1,568,111	102,129	(55,187,760)
Balance as at March 31, 2021	21,734,560	73,160,199	102,129	94,996,888

Sub Note: 1

During the period under review, the company has allotted Bonus Shares on 07th October, 2020, in the ratio of 1:2, to the shareholders holding shares as on 06th October, 2020.

The accompanying notes are an integral part of the financial statements.

As per our report of even date

For Piyush J. Shah & Co.

Chartered Accountants
FRN :- 121172W

Piyush J. Shah
Partner

M. No.:- 108670

UDIN: 21108670AAAAEG9837

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta

Director
DIN :- 01958984

Jayesh Ashmal Mehta

Director
DIN :- 02156140

Krishnakant Somani

CFO

Priya Raval

Company Secretary

02 Property, Plant and Equipment as at 31 March, 2021

Description of Assets	Useful life (In Years)	Shift of Operated	Gross Block			Accumulated Depreciation/Amortization			Net Block	
			Balance as at 1-Apr-20	Additions during the period	Deletions during the period	Balance as at 31-Mar-21	Balance as at 1-Apr-20	Deletions during the period	Balance as at 31-Mar-21	Balance as at 31-Mar-20
A Tangible Assets										
(a) Own Assets										
Buildings										
Factory at Santej	30.00	Single	6,891,969	-	-	6,891,969	2,059,649	219,157	4,613,163	4,832,320
Bandhu Samaj	30.00	Single	7,834,284	-	-	7,834,284	2,020,309	264,268	5,549,707	5,813,975
Supath 2 - Complex	30.00	Single	505,350	-	-	505,350	26,613	16,003	462,734	478,737
Shed at Rakhial	30.00	Single	1,177,190	-	-	1,177,190	363,784	41,805	771,601	813,406
Buildings others	30.00	Single	-	3,345,412	-	3,345,412	-	26,729	3,318,683	-
Shed at Jagannath Estate	30.00	Single	742,389	-	-	742,389	65,644	23,666	653,079	676,745
			17,151,182	3,345,412	-	20,496,594	4,535,999	591,628	15,368,967	12,615,183
Plant & Machinery										
Plant & Machinery	15.00	Single	15,158,836	50,217,833	-	65,376,669	8,481,278	1,837,784	55,057,607	6,677,558
Analytical Machine	15.00	Single	1,012,099	-	-	1,012,099	642,169	70,983	298,947	369,930
Crane	15.00	Single	1,050,000	-	-	1,050,000	72,695	66,500	910,805	977,305
Plant & Machinery - Lunej	15.00	Single	28,181,921	-	-	28,181,921	10,422,253	1,816,730	15,942,938	17,759,668
			45,402,856	50,217,833	-	95,620,689	19,618,395	3,791,997	72,210,297	25,784,461
Furniture & Fittings										
Almonard Air Fan	10.00	Single	80,338	-	-	80,338	5,102	7,632	67,604	75,236
Furniture & Fixtures	10.00	Single	15,604	-	-	15,604	12,325	2,498	781	3,279
			95,942	-	-	95,942	17,427	10,130	68,385	78,515
Office Equipment										
Air-Conditioner	5.00	Single	465,560	-	-	465,560	195,097	68,552	201,911	270,463
CCTV	10.00	Single	60,181	-	-	60,181	12,501	11,434	36,246	47,680
R O Plant	10.00	Single	78,000	90,750	-	168,750	24,921	21,574	122,255	53,079
Water-Cooler	10.00	Single	22,200	9,746	-	31,946	6,321	4,224	21,401	15,879
Refrigerator	10.00	Single	119,600	-	-	119,600	38,880	22,724	57,996	80,720
Water Dispenser	5.00	Single	14,700	-	-	14,700	13,965	-	735	735
Metal Detector	5.00	Single	2,200	-	-	2,200	278	418	1,504	1,922
Television	5.00	Single	15,753	-	-	15,753	1,164	2,993	11,596	14,589
Amazon Fire Stick	5.00	Single	3,389	-	-	3,389	441	643	2,305	2,948
Temperature Meter	5.00	Single	-	4,000	-	4,000	-	681	3,319	-
Mixer Grinder	5.00	Single	-	2,541	-	2,541	-	280	2,261	-
Mobile Phones	5.00	Single	191,697	41,726	-	233,423	112,449	21,498	99,476	79,248

02 Property, Plant and Equipment as at 31 March, 2021 (Contd.....)

Description of Assets	Useful life (In Years)	Shift of Operated	Gross Block			Accumulated Depreciation / Amortization			Net Block			
			Balance as at 1-Apr-20	Additions during the period	Deletions during the period	Balance as at 31-Mar-21	Balance as at 1-Apr-20	Provided during the period	Deletions during the period	Balance as at 31-Mar-21	Balance as at 31-Mar-20	
Washing Machine	5.00	Single	23,703	-	-	23,703	3,516	4,503	-	8,019	15,684	20,187
Shutter	5.00	Single	-	12,900	-	12,900	-	2,035	-	2,035	10,865	-
Sofa Chair	5.00	Single	-	6,700	-	6,700	-	303	-	303	6,397	-
Motor Vehicles			996,983	168,363	-	1,165,346	409,533	161,862	-	571,395	593,951	587,450
Motor Car	8.00	Single	4,621,926	-	-	4,621,926	3,221,647	499,671	-	3,721,318	900,608	1,400,279
Other Vehicles	10.00	Single	128,698	-	-	128,698	114,099	6,376	-	120,475	8,223	14,599
			4,750,624	-	-	4,750,624	3,335,746	506,047	-	3,841,793	908,831	1,414,878
Computers and Data Processing Units												
Computers and Printer	3.00	Single	560,191	-	-	560,191	450,744	17,098	-	467,842	92,349	109,447
Laptop	3.00	Single	-	65,678	-	65,678	-	1,402	-	1,402	64,276	-
Printer Canon LBP 151 DW	3.00	Single	-	11,424	-	11,424	-	1,124	-	1,124	10,300	-
			560,191	77,102	-	637,293	450,744	19,624	-	470,368	166,925	109,447
Land	-	-	6,280,540	10,415,240	-	16,695,780	-	-	-	-	16,695,780	6,280,540
Total (A)			75,238,318	64,223,950	-	139,462,268	28,367,844	5,081,287	-	33,449,131	106,013,137	46,870,474
B Capital Work In Progress												
Buildings												
Bandhu Samaj (WIP)	-	-	13,304,304	-	-	13,304,304	-	-	-	-	13,304,304	13,304,304
Factory Shed (WIP)	-	-	8,955,666	-	-	8,955,666	-	-	-	-	8,955,666	8,955,666
Plant & Machinery												
Plant & Machinery (WIP)	-	-	50,135,661	3,289,738	49,958,201	3,467,198	-	-	-	-	3,467,198	50,135,661
Plot No. 3529 Plant and machinery	-	-	-	2,483,345	-	2,483,345	-	-	-	-	2,483,345	-
Total (B)			72,395,631	5,773,083	49,958,201	28,210,513	-	-	-	-	28,210,513	72,395,631
Grand Total (A+B)			147,633,949	69,997,033	49,958,201	167,672,781	28,367,844	5,081,287	-	33,449,131	134,223,650	119,266,105

Sub Note: 1) Company had started its plant at Lunej, Khambhat in July, 2014 in a premise which was taken on rent. Initially, the promoters of the company were intending to purchase the whole plant including land & building but there was problem in the clearance of title deed. Therefore, the company entered into a rent agreement with the seller for using the said premise for a period of 11 months and to acquire the plant later on when the title is cleared in the name of the seller. The company invested approximately Rs. 3.00 Crores in plant & machineries for commencing its business activities. As the seller could not clear property title in his name even after completion of a year and it was apparent that seller was delaying the sale process unnecessarily, Company decided to leave the project and shut down plant. Company carried out its last transaction in June 2015 and since then Company has neither done any manufacturing nor carried out any sale transaction in business. During period from July 2014 to June 2015, company made total turnover of Rs. 83.29 Lacs (approx) and Company realized the amount of Rs. 74 Lacs (approximately). At present plant is in the possession of Land Owner and Company is planning to sold out its all assets related with plant as it is not viable for the company to do the business. In June 2015 plant possession was taken by the land owner and stocks of Rs. 9.00 Lacs (approximately) were lying in the factory. At present plant is not working but company is regularly filing its Excise Return.

03 Capital work in progress:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Capital work in progress		
Tangible Assets	5,950,543	50,135,661
Buildings	22,259,970	22,259,970
TOTAL Rs.:	28,210,513	72,395,631

Note : 1 Cost of Property, Plant & Equipement and pre-operative expenses, being technical matter, are capitalized or allocated to Capital work in progress on the basis of data certified by technical person & the Management.

04 Non-Current Investments:

	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Investments in Equity Instruments		
Shares of Wholly owned Subsidiary Companies (At Cost)	51,620,000	51,620,000
TOTAL Rs.:	51,620,000	51,620,000

Investments in Equity Instruments

Sr. No.	Name of the Company	Quoted / Unquoted
1	Sagardeep Engineers Private Limited	Unquoted

05 Financial Assets - Others:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Security Deposits	1,873,128	1,873,128
TOTAL Rs.:	1,873,128	1,873,128

06 Inventories:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Raw Material	66,710,273	65,890,750
Finished Goods	18,311,034	18,086,087
Traded Goods	70,450	69,585
Work In Progress	1,963,187	1,939,070
(Inventories are taken, valued and certified by the management)		
TOTAL Rs.:	87,054,944	85,985,492

07 Trade Receivables:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Unsecured		
Considered Good	69,764,982	61,552,932
Considered doubtful	-	-
	69,764,982	61,552,932
Less: Allowance for doubtful debts	-	-
TOTAL Rs.:	69,764,982	61,552,932

08 Cash & cash equivalents:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Cash On Hand	169,195	229,269
Balance with Banks	334,885	82,441
TOTAL Rs.:	504,080	311,710

09 Bank balance other than (08) above:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Fixed Deposits with Banks	1,614,582	1,533,342
TOTAL Rs.:	1,614,582	1,533,342

10 Loans:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Advances to Outsiders		
Loan/Advance to Outsiders	24,482,038	48,295,302
TOTAL Rs.:	24,482,038	48,295,302

11 Current tax assets:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Receivable from Government		
Advance Tax Inclu. TDS and TCS	710,388	968,911
Income Tax Refund Receivables	576,690	130,876
TOTAL Rs.:	1,287,078	1,099,787

12 Other current assets:
Trade Receivables:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Advances to Others		
Advances to Suppliers (Refer Sub Note:1)	18,810,566	27,388,493
GST Receivable	2,492,329	5,469,220
Deposit with Government	-	3,813,000
Other Receivables	450,000	320,433
Prepaid Expenses (Refer Sub Note : 2)	189,027	162,794
TOTAL Rs.:	21,941,922	37,153,940

Sub Note: 1

Advance to supplier is taken as certified by the management. No security have been given against the same.

Sub Note: 2

Prepaid expenses includes Prepaid Insurance, Memebership, Internet etc.

13 Equity share capital:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Authorized		
Equity shares 20,000,000 of Rs.10 Each	200,000,000	200,000,000
Issued, Subscribed and Paid up :		
Equity shares 17,057,400 of Rs.10 Each	170,574,000	113,716,000
TOTAL Rs.:	170,574,000	113,716,000

13.1 The Details of Shareholder holding more than 5% Shares

Name Of Shareholder	As At 31-03-2021		As At 31-03-2020	
	No. of Shares	% Held	No. of Shares	% Held
Asamalji S. Mehta	2,200,425	12.90	1,466,950	12.90
Ashok Devji Parmar	Nil	Nil	660,000	5.80
Jayesh A. Mehta	2,627,250	15.40	1,751,500	15.40
Sagardeep Engineers Pvt Ltd	950,250	5.57	633,500	5.57
Satish A. Mehta	2,376,825	13.88	1,578,550	13.88
Ugamdevi A. Mehta	1,560,900	9.15	1,040,600	9.15
	9,706,650	56.91	7,131,100	62.71

13.2 The Reconciliation of No. of shares outstanding is set out below:

Name Of Shareholder	As At 31-03-2021		As At 31-03-2020	
	No. of No.	% Held Amount In Rs.	No. of No.	% Held Amount In Rs.
At the beginning of the year	11,371,600	113,716,000	11,371,600	113,716,000
Add: Bonus Issue	5,685,800	56,858,000	-	-
Equity Shares at the end of the year	17,057,400	170,574,000	11,371,600	113,716,000

13.3 Rights, Preferences and restrictions attached to shares

Equity Share

The company has one class of equity share having a par value of Rs 10 each. Each shareholder is eligible for one vote per share held. The dividend proposed by the Board of directors is subject to the approval of shareholders in the ensuing Annual general meeting, except in case of interim dividend. In the case of liquidation, the equity shareholders are eligible to receive the remaining assets of the company after distribution of all preferential amounts, in proportion to their shareholding.

During the period under review, the company has allotted Bonus Shares on 07th October, 2020, in the ratio of 1:2, to the shareholders holding shares as on 06th October, 2020.

14 Other equity:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Profit & Loss A/c		
Opening Balance	71,592,088	68,985,045
Add: Profit for the year	1,568,111	2,607,043
Closing Balance	73,160,199	71,592,088
Other Comprehensive Income		
Opening Balance	-	-
Add: Profit for the year	102,129	-
Closing Balance	102,129	-
Share Premium Account		
Opening Balance	78,592,560	78,592,560
Add: Addition/(deletion)	(56,858,000)	-
Closing Balance	21,734,560	78,592,560
TOTAL Rs.:	94,996,888	150,184,648

Sub Note: 1

During the period under review, the company has allotted Bonus Shares on 07th October, 2020, in the ratio of 1:2, to the shareholders holding shares as on 06th October, 2020.

15 Borrowings:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Secured Borrowing:		
Emergency Credit Line Guarantee Scheme (Sub Note -1)	19,500,000	-
TOTAL Rs.:	19,500,000	-

Sub Note : 1

- Outstanding loan is given by Axis Bank based on the guidelines issued by the government of India for emergency credit line to the industries.
- Extension of charge / security interest in relation to all assets (Both Primary & Collateral) And Personal/ Corporate Guarantee of promoter / property owner at the rate of 8.75% p.a.

16 Provisions:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Provision for Employee Benefit	1,437,067	-
TOTAL Rs.:	1,437,067	-

17 Deferred Tax Liabilities

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Deferred Tax Liabilities		
DTL on Difference between written down value of property, plant and equipment and capital work-in-progress as per books of accounts and income tax	4,171,663	4,552,742
DTL on Expenses claimed for tax purpose on payment basis	(382,081)	-
DTA on Other assets	-	67,600
TOTAL Rs.:	3,789,582	4,620,342

18 Financial liabilities - Borrowings:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Loans Repayable on Demand - From Banks		
Working Capital Loans - Secured (Sub Note -1)	46,426,323	99,439,294
TOTAL Rs.:	46,426,323	99,439,294

Sub Note : 1

- i) AXIS Bank C.C. outstanding as on March 31, 2021 is secured against Hypothecation of all current assets of the company (present and future), Plant & Machinery, Furniture and Fixtures, office equipment and other class of movable assets except vehicles financed by other banks.
- ii) Collateral Security by Equitable mortgage of Factory Land & Building situated at block no. 2070, Village -Santej, Taluka Kalol, District-Gandhinagar.
- iii) Interest rate on C.C. is 7.85% and directors have given their personal guarantee for the same.

19 Financial liabilities - Trade Payables :

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Creditors for Goods	45,705,551	17,226,619
TOTAL Rs.:	45,705,551	17,226,619

Sub Note: 1

Trade Payable as on March 31, 2021 is taken as certified by management. No security have been given for the same.

Sub Note: 2

Disclosure of payable to vendors as defined under the "Micro, Small and Medium Enterprise Development Act, 2006" is based on the information available with the Company regarding the status of registration of such vendors under the said Act, as per the intimation received from them on requests made by the Company. There are no overdue principal amounts / interest payable amounts for delayed payments to such vendors at the Balance Sheet date. There are no delays in payment made to such suppliers during the year or for any earlier years and accordingly there is no interest paid or outstanding interest in this regard in respect of payment made during the year or on balance brought forward from previous year.

20 Other financial Liabilities:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Other Payables (Refer Sub Note: 1)	11,076,204	22,201,262
	11,076,204	22,201,262
Current Maturities of Long Term Debts	-	-
	-	-
TOTAL Rs.:	11,076,204	22,201,262

Sub Note : 1

Other Payables Include Creditors for Expenses and Capital Goods and Advances From Customers.

21 Current liabilities - Provisions:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Payable to Government	509,239	1,036,355
Provision for Employees	32,474	-
Payable to Others	319,076	267,218
TOTAL Rs.:	860,789	1,303,573

22 Revenue From Operations:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Revenue from Sale of Products	768,633,306	406,823,469
Revenue from Chanasma Sales	1,200,000	1,250,000
Revenue from Job Work	1,741,290	562,245
Packing and Forwarding	917,112	1,247,530
	772,491,708	409,883,244
Less: GST on Sales	117,653,779	71,856,845
TOTAL Rs.:	654,837,929	338,026,399

23 Other Income:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Interest Income	2,744,995	6,134,407
Foreign Exchange Gain	11,565	-
Rent Income	444,000	300,000
Rate Difference	76,675	-
Sundry Balances Written off	176,836	-
TOTAL Rs.:	3,454,071	6,434,407

24 Cost of Materials Consumed:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Opening Stock	65,890,750	49,566,366
Add: Purchases	503,003,465	315,881,660
Add: Labour Purchase	1,263,016	882,885
	570,157,231	366,330,911
Less :Closing Stock	66,710,273	65,890,750
TOTAL Rs.:	503,446,958	300,440,161

25 Purchase of stock in trade:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Purchases of goods	101,207,428	1,953,122
TOTAL Rs.:	101,207,428	1,953,122

26 Changes in Inventories:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
At the end of the year:		
Finished Goods	18,311,034	18,086,087
Work-In-Progress	1,963,187	1,939,070
Traded Goods	70,450	69,585
	20,344,671	20,094,742
At the beginning of the year:		
Finished Goods	18,086,087	11,520,362
Work-In-Progress	1,939,070	812,111
Traded Goods	69,585	71,482
	20,094,742	12,403,955
(Increase)/Decrease in Inventories		
Finished Goods	(224,947)	(6,565,725)
Work-In-Progress	(24,117)	(1,126,959)
Traded Goods	(865)	1,897
TOTAL Rs.:	(249,929)	(7,690,787)

27 Employee Benefit Expense:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Bonus Expenses	421,575	425,410
Director's Remuneration	1,800,000	1,800,000
Gratuity Expenses	1,673,799	-
Contribution to Provident Fund and other Funds	92,918	91,633
Salary & Wages Expenses	9,228,555	8,876,514
Staff Welfare Expenses	315,074	47,319
TOTAL Rs.:	13,531,921	11,240,876

28 Finance Cost:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Interest on Short-Term Loans from Banks	6,884,842	8,947,317
Interest on Others	-	219,288
Interest on Long-Term Loans from Banks	1,070,629	5,287
Loan Processing Fees	406	231,059
Other Borrowing Costs	205,987	32,316
TOTAL Rs.:	8,161,864	9,435,267

Sub Note: 1 Interest Expenses are net of interest capitalized in Fixed Assets.

29 Other Expenses:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
A) Manufacturing Expenses		
Other Manufacturing Expenses	619,614	974,615
Power , Fuel & Utilities Expenses	11,902,767	12,010,364
Repairs & Maintenance Expenses	1,150,474	627,809
Stores , Spares & Packing Material Consumed	28,141	3,624,195
	13,700,996	17,236,983
B) Administrative , Selling & Other Expenses		
Freight Expenses	1,110,301	857,168
Indirect Duty Expenses	8,441,422	998,311
Insurance Expenses	236,285	94,307
Labour Charges	867,632	-
Legal & Professional Fees	875,999	682,161
Loss on Foreign Exchange	-	34,936
Municipal Tax Expenses	29,535	83,091
Office Expenses	191,065	121,316
Postage , Telephone & Computer Expenses	129,376	40,897
Prior Period Expense	100,000	-
Rate Difference	-	495,536
Security Expenses	24,187	768,270
Selling & Distribution Expenses	119,767	76,359
Stationery & Printing Expenses	34,095	1,000
Statutory Audit Fees	250,000	190,000
Penalty Expenses	255,000	-
	12,664,664	4,443,352
TOTAL Rs.:	26,365,660	21,680,335

30 Earning Per Share :

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Basic Earning Per Share	0.09	0.15
Diluted Earning Per Share	0.09	0.15
Nominal Value Per Share	Rs. 10.00	Rs. 10.00

Earning Per share is calculated by dividing the Profit/(Loss) attributable to the Equity Shareholders by the weighted average number of Equity Shares outstanding during the year. The numbers used in calculating basic and diluted earning per Equity Share as stated below.

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Profit / (Loss) after taxation	1,465,982	2,607,043
Net Profit / (Loss) attributable to Equity Shareholders	1,465,982	2,607,043
Weighted Average Number of shares outstanding during the year	17,057,400	17,057,400

31 Financial and Derivative Instruments

Capital Management

- 1) The company's objective when managing capital is to:
 - Safeguard its ability to continue as a going concern so that the Company is able to provide maximum return to stakeholders and benefits for other stakeholders.
 - Maintain an optimal capital structure to reduce the cost of capital.
- The company's Board of director's reviews the capital structure on regular basis. As part of this review the board considers the cost of capital risk associated with each class of capital requirements and maintenance of adequate liquidity.

Disclosures

This section gives an overview of the significance of financial instruments for the Company and provides additional information on balance sheet items that contain financial instruments.

The details of significant accounting policies, including the criteria for recognition, the basis of measurement and the basis on which income and expenses are recognized in respect of each class of financial asset, financial liability and equity instrument are disclosed in Note provided hereunder:

Categories of Financial Instruments

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Financial Assets		
Measured at Amortised Cost		
1) Trade Receivables	69,764,982	61,552,932
2) Cash & Cash Equivalents	2,118,662	1,845,052
3) Loans	43,292,604	75,683,795
4) Other Financial Assets	23,815,050	39,027,068
5) Investments	51,620,000	51,620,000
Financial Liabilities		
Measured at Amortised Cost		
1) Borrowings	65,926,323	99,439,294
2) Trade Payables	45,705,551	17,226,619
3) Other Financial Liabilities	11,076,204	22,201,262

2) **Fair Value Measurement :**

This note provides information about how the Company determines fair values of various financial assets. Fair Value of financial assets and liabilities that are not measured at fair value (but fair value disclosures are required). Management considers that the carrying amounts of financial assets and financial liabilities recognized in the financial statements approximate their fair values.

3) **Financial Risk Management Objectives**

While ensuring liquidity is sufficient to meet Company's operational requirements, the Company's financial management committee also monitors and manages key financial risks relating to the operations of the Company by analyzing exposures by degree and magnitude of risks. These risks include market risk (including currency risk and price risk), credit risk and liquidity risk.

Market Risk

Market risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises two types of risk: interest rate, currency risk and other price risk, such as commodity price risk and equity price risk. Financial instruments affected by market risk include FVTPL investments, trade payables, trade receivables, etc.

Liquidity Risk

The Company manages liquidity risk by maintaining sufficient cash and cash equivalents including bank deposits and availability of funding through an adequate amount of committed credit facilities to meet the obligations when due.

Management monitors rolling forecasts of liquidity position and cash and cash equivalents on the basis of expected cash flows. In addition, liquidity management also involves projecting cash flows considering level of liquid assets necessary to meet obligations by matching the maturity profiles of financial assets & liabilities and monitoring balance sheet liquidity ratios.

The following tables detail the Company's remaining contractual maturity for its non-derivative financial liabilities with agreed repayment periods. The information included in 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 contractual maturity is based on the earliest date on which the Company may be required to pay.

Particulars	Due in 1 Year	Due after 1 Year	Total
As at 31 march, 2021			
Borrowings	65,926,323	-	65,926,323
Trade Payables	45,705,551	-	45,705,551
Other Financial Liabilities	11,076,204	-	11,076,204
Total	122,708,078	-	122,708,078
As at 31st March 2020			
Borrowings	99,439,294	-	99,439,294
Trade Payables	17,226,619	-	17,226,619
Other Financial Liabilities	22,201,262	-	22,201,262
Total	138,867,175	-	138,867,175

Trade Receivables

The Company has a detailed review mechanism of overdue customer receivables at various levels within organisation to ensure proper attention and focus for realisation.

Particulars	Due in 1 Year	1 year - 3 years	More than 3 Years	Total
As at 31 march, 2021				
1) Trade Receivables	69,764,982	-	-	69,764,982
2) Cash & Cash Equivalents	504,080	1,614,582	-	2,118,662
3) Loans	-	24,482,038	-	24,482,038
4) Other Financial Assets	23,815,050	-	-	23,815,050
5) Investments	-	-	51,620,000	51,620,000
Total	94,084,112	26,096,620	51,620,000	171,800,732
As at 31st March 2020				
1) Trade Receivables	61,552,932	-	-	61,552,932
2) Cash & Cash Equivalents	311,710	1,533,342	-	1,845,052
3) Loans	-	75,683,795	-	75,683,795
4) Other Financial Assets	39,027,068	-	-	39,027,068
5) Investments	-	-	51,620,000	51,620,000
Total	100,891,710	77,217,137	51,620,000	229,728,847

32 Related Party Disclosures:

32.1 Related Parties & their Relationship

As per IND AS 24, the disclosures of transactions with the related parties are given below:

- i) List of Related parties where control exists and related parties with whom transactions have taken place and relationships:

S.N.	Name of Related Parties ^{##}	Relationship
(i)	Satish Asamal Mehta	Managing Director
(ii)	Jayesh Asamal Mehta	Director
(iii)	Sagardeep Engineers Private Limited	Wholly Owned Subsidiary
(iv)	Krishnakant P. Somani	Key Managerial Person
(v)	Nayan Pitroda	Key Managerial Person
(vi)	Priya Raval	Key Managerial Person

32.2 Transactions with Related Parties

Particulars	Nature of Transaction	Amount
Satish A. Mehta	Salary	900,000
Jayesh A. Mehta	Salary	900,000
Krishnakant P. Somani	Salary	387,588
Nayan P. Pitroda	Salary	205,994
Priya A. Raval	Salary	129,994
Sagardeep Engineers Private Limited	Interest	19,550
	Borrowings	265,000
	Repayment	1,386,133

^{##}Only those related party names are mentioned with whom transactions have took place during the year.

33 Payment to Auditor :-

Particulars	For the year 2020-21	For the year 2019-20
Audit Fees	250,000	190,000

The above mention amount is excluding GST.

34 The outbreak of COVID-19 pandemic globally and in India is causing significant disturbance and slow down of economic activity, COVID 19 has caused interruption in production, supply chain disruption, unavailability of personnel, etc. during last week of March, 2020 and thereafter. The management of the Company has exercised due care in concluding significant accounting judgments and estimates in preparation of the financial results In assessing the recoverability of Trade receivables, the Company has considered subsequent recoveries, past trends, credit risk profiles of the customers and internal and external information available up to the date of issuance of these financial results. In assessing the recoverability of inventories, the Company has considered the latest selling prices, customer orders on hand and margins. Based on the above assessment, the Company is of the view that the carrying amounts of Trade receivables and inventories are expected to be realisable to the extent shown in the financial results The impact of COVID-19 may be different from the estimates as at the date of approval of these financial results and the Company will continue to closely monitor the development.

35 Certain Balance of Debtors, Creditors, Loans & Advances for Capital expenditures are non- moving / sticky . However in view of the management, the same is recoverable / payable. Hence no provision for the same is made in the books of accounts.

36 In the opinion of the Board of Directors, the current assets, loans and advances are approximately of the value stated, if realized in the ordinary course of business and the provisions for depreciation and all known and ascertained liabilities are adequate and not in excess of the amounts reasonably necessary.

37 The balance confirmation from the suppliers, customers as well as to various loans or advances given have been called for, but the same are awaited till the date of audit. Thus, the balances of receivables, trade payables as well as loans and advances have been taken as per the books of accounts submitted by the company and are subject to confirmation from the respective parties.

38 As informed to us, the Contingent Liability is NIL.

39 Previous year's figures have been regrouped and rearranged wherever necessary.

40 Segment Reporting

The Company has a business segment other than Manufacturing of Copper Pipes, however it fails to fulfil the Segment Reporting criteria. So Segment Reporting is not done.

41 Tax Reconciliation

Income Tax Recognised in statement of Profit and Loss	As at 31st March, 2021	As at 31st March, 2020
Current tax		-
In Respect of the Current year	150,715	1,009,590
Short/Excess Provision of Earlier years	(39,126)	-
Deferred Tax (Credit)/Charged	(830,760)	(471,706)
Total Income tax expense recognised in respect of continuing Operations	(719,171)	537,884

The income tax expense for the year can be reconciled to the accounting profit as follows:

Particulars	As at 31st March, 2021	As at 31st March, 2020
Profit Before Taxes	746,811	3,144,927
Enacted Tax Rate in India	26%	26%
Expected income tax benefit/(expense) at statutory tax rate	150,715	1,009,590
Effect of:		
Deferred tax(credit) /Charged	(830,760)	(471,706)
Income taxes recognised in the Statement of Profit and Loss	(680,045)	537,884

The Tax Rate used for the 2020-2021 reconciliation above is the corporate tax rate of 25% plus Cess @4% payable by corporate entities in india on taxable Profits under the indian tax laws.

Components of Deferred tax assets and Liabilities

Particulars	As at 31st March, 2021	As at 31st March, 2020
A) Deferred tax Liabilities		
Difference between book and tax depreciation	4,171,663	4,552,742
B) Deferred tax Liabilities		
Difference between book and tax depreciation	-	-
DTA on Other assets	-	-

Notes referred to herein above form an integral part of the Financial Statements

As per our report of even date

For Piyush J. Shah & Co.

Chartered Accountants

FRN :- 121172W

Piyush J. Shah

Partner

M. No.:- 108670

UDIN: 21108670AAAAEG9837

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta

Director

DIN :- 01958984

Jayesh Ashmal Mehta

Director

DIN :- 02156140

Krishnakant Somani

CFO

Priya Raval

Company Secretary

Independent Auditors' Report

To,
**The Members of
Sagardeep Alloys Limited**

Report on The Consolidated Financial Statements

We have audited the accompanying consolidated Ind AS financial statements of SAGARDEEP ALLOYS LIMITED (hereinafter referred to as "the Holding Company"), and its subsidiaries (the holding Company and its subsidiaries together referred as "the Group"), its associates and its jointly controlled entities / joint ventures and joint operations, which comprises the Consolidated Balance Sheet as at March 31, 2021, the Consolidated Profit and Loss Statement (including other comprehensive income), the Consolidated Cash Flow Statement, and the Consolidated Statement of Changes in equity, for the year then ended and notes to the consolidated financial statements, including a summary of significant accounting policies and other explanatory information (herein after referred as "the consolidated financial statements").

Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements

The Holding Company's management and Board of Directors are responsible for the preparation and presentation of these consolidated financial statements in terms of the requirements of the Companies Act, 2013 (hereinafter referred to as "the Act") that give a true and fair view of the consolidated financial position, consolidated financial performance (including other comprehensive income), consolidated cash flows of the Group and consolidated statement of changes in equity, including its Associates and jointly controlled entities / Joint Ventures and Joint Operations in accordance with the accounting principles generally accepted in India, including the Indian Accounting Standards (Ind AS) specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014. The respective management and Board of Directors of the entities included in the Group and of its Associates and jointly controlled entities / joint ventures and joint operations, are responsible for maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Group, and its Associates and its jointly controlled entities / joint ventures and joint operations and for preventing and detecting frauds and other irregularities; the selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the consolidated financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error, which have been used for the purpose of preparation of the consolidated financial statements by the management and Board of Directors of the Holding Company, as aforesaid.

In preparing the consolidated financial statements, the respective management and Board of Directors of the entities included in the Group are responsible for assessing the ability of each entity to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the respective management and Board of Directors either intends to liquidate the entity or to cease operations, or has no realistic alternative but to do so.

The respective Board of Directors of the entities included in the Group are responsible for overseeing the financial reporting process of each entity.

Auditor's Responsibilities for the Audit of the Consolidated Financial Statements

Our responsibility is to express an opinion on these consolidated financial statements based on our audit. While conducting audit, we have taken into account the provisions of the Act, the accounting standards and auditing standards and matters which are required to be included in the audit report under the provisions of the Act and Rules made thereunder. We conducted our audit in accordance with the Standards

on Auditing prescribed under the Section 143(10) of the Companies Act, 2013. Those standards required that we comply with the ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and the disclosures in the consolidated financial statements. The procedure selected depends on the auditor's judgement, including the assessment of the risk of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers the internal financial control relevant to the Holding Company's preparation of the consolidated financial statements that gives true and fair view in order to design audit procedures that are appropriate in the circumstances. An audit also includes evaluating the appropriateness of the accounting policies used and the reasonableness of the accounting estimates made by the Board of Directors of the Holding Company as well as evaluating overall presentation of the consolidated financial statements.

We believe that the audit evidence obtained by us is sufficient and appropriate to provide a basis for our audit opinion on the consolidated financial statements.

Opinion

In our opinion and to best of information and according to the explanation given to us, the aforesaid consolidated 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 consolidated state of affairs (financial position) of the Group, its associates, jointly controlled entities / joint ventures and joint operations as at 31st March, 2021 and their consolidated profit/loss (financial performance including other comprehensive income), the consolidated cash flows, and the consolidated statement of changes in equity for the year ended on that date.

Report on Other Legal and Regulatory Requirements

- A. As required by Section 143(3) of the Act, based on our audit, we report, to the extent applicable 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 of the aforesaid consolidated financial statements.
 - b) In our opinion, proper books of account as required by law relating to preparation of the aforesaid consolidated financial statement have been kept by the Company so far as it appears from our examination of those books.
 - c) The consolidated balance sheet, the consolidated statement of profit and loss, the consolidated statement of cash flow and the consolidated statement of changes in equity dealt with by this Report are in agreement with the books of account maintained for the purpose of preparation of the consolidated financial statements.
 - d) In our opinion, the aforesaid financial statements comply with the Indian Accounting Standard (Ind AS) 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 of holding company as on 31st March, 2021, taken on record by the Board of Directors of the Holding Company and the reports of the statutory auditors of its subsidiary companies, Associate Companies, jointly controlled entities / Joint Venture and joint operations incorporated in India, none of the directors of the Group is disqualified as on 31st March, 2020, from being appointed as a director in terms of Section 164 (2) of the Act.
 - f) With respect to the adequacy of the internal financial controls over financial reporting with reference to Consolidated Financial Statements of the holding company and its subsidiary

companies, Associate Companies, jointly controlled enterprise / joint ventures and Joint operations incorporated in India and the operating effectiveness of such controls, refer to our separate Report in “Annexure A”.

- g) With respect to the other matters to be included in the Auditor's Report in accordance with 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:
1. There were no pending litigations as on 31st March, 2021, which would impact the consolidated financial position of the Group, its Associates, jointly controlled entities / joint ventures and joint operations in its consolidated financial statement.
 2. The Group, its Associates, and jointly controlled entities / joint ventures and joint operations did not have any material foreseeable losses on long-term contracts including derivative contracts during the year ended March 31, 2021.
 3. There was no amount which are required to be transferred, to the investor's education and protection fund by the holding company and its subsidiary companies, associate companies, and jointly controlled entities / joint ventures and joint operations incorporated in India, during the year ended on March 31, 2021.

For Piyush J. Shah & Co.
Chartered Accountants
FRN: 121172W

Piyush J. Shah
Partner
M. No: 108670
UDIN: 21108670AAAAEH7214
Place: Ahmedabad
Date: 15th June, 2021

Annexure - A to the Auditors' Report

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

Opinion

In conjunction with our audit of the consolidated financial statements of Sagardeep Alloys Limited ("the Holding Company") as of 31st March, 2021, we have audited the internal financial controls over the consolidated financial statements of the Holding Company, its subsidiary companies, its Associate Companies and jointly controlled entities / joint ventures or joint operations incorporated in India under the Companies Act, 2013.

Management's Responsibility for Internal Financial Controls

The respective company's management and the Board of Directors, of the Holding Company, its subsidiary companies, its Associate Companies and jointly controlled entities / joint ventures or joint operations incorporated in India, are responsible for establishing and maintaining internal financial controls over financial reporting based on the criteria established by the respective company considering the essential components of internal control stated in the Guidance Note. 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 the respective 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 (hereinafter referred to as "the Act").

Auditors' Responsibility

Our responsibility is to express an opinion on the internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note and the Standards on Auditing, prescribed under section 143(10) of the Act, to the extent applicable to an audit of internal financial controls over financial reporting. 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 consolidated financial statements were 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 over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists and testing and evaluating the design and operating effectiveness of the internal control based on the assessed risk. The procedure selected depend on the auditor's judgement, including the assessment of risks of material misstatement of the consolidated 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 internal financial controls over financial reporting.

Meaning of Internal Financial Controls Over Financial Reporting

A company's internal financial controls over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial controls over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting

principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the consolidated financial statements.

Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

Opinion

In our opinion, the Holding Company, its subsidiary companies, its Associate Companies and jointly controlled entities / joint ventures or joint operations incorporated in India, have, adequate internal financial controls over consolidated financial reporting and such internal financial controls were operating effectively as at 31 March 2021, based on the internal financial controls with reference to consolidated financial statements criteria established by such companies considering the essential components of such internal controls stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India (the "Guidance Note").

Other Matters

Our aforesaid reports under Section 143(3)(i) of the Act on the adequacy and operating effectiveness of the internal financial controls over financial reporting insofar as it relates to NIL subsidiary companies, NIL associate companies and NIL jointly controlled companies, which are companies incorporated in India, is based on the corresponding reports of the auditors of such companies incorporated in India.

For Piyush J. Shah & Co.
Chartered Accountants
FRN: 121172W

Piyush J. Shah
Partner
M. No: 108670
UDIN: 21108670AAAAEH7214
Place: Ahmedabad
Date: 15th June, 2021

Sagardeep Alloys Limited
Consolidated Balance Sheet as at 31st March , 2021

Particulars	Note	AMOUNT IN Rs. 31-Mar-2021	AMOUNT IN Rs. 31-Mar-2020
I. ASSETS			
1 Non-current assets			
(a) Property, plant & Equipment	02	115,491,109	56,500,930
(b) Capital work in progress	03	52,998,456	96,656,193
(c) Investment properties		-	-
(d) Goodwill		-	-
(e) Other intangible assets		-	-
(f) Intangible assets under development		-	-
(g) Biological assets other than bearer plants		-	-
(h) Financial assets			
(i) Investments in Subsidiaries		-	-
(ii) Trade receivables		-	-
(iii) Loans	04	16,191	527,381
(iv) Others	05	1,873,128	1,873,128
(i) Deferred tax assets (net)		-	-
(j) Other Non-current assets		-	-
		170,378,884	155,557,632
2 Current assets			
(a) Inventories	06	87,054,944	85,985,492
(b) Financial assets			
(i) Investments		-	-
(ii) Trade receivables	07	81,115,713	72,814,169
(iii) Cash and cash equivalents	08	611,761	404,662
(iv) Bank balance other than (iii) above	09	1,614,582	1,533,342
(v) Loans	10	24,482,038	48,277,311
(vi) Others		-	-
(c) Current tax assets (net)	11	1,308,257	968,911
(d) Other current assets	12	22,298,077	37,440,915
		218,485,372	247,424,802
Total assets		388,864,256	402,982,434
II. EQUITY AND LIABILITIES			
1 Equity			
(a) Equity share capital	13	164,239,000	107,381,000
(b) Other equity	14	93,519,727	148,734,834
		257,758,727	256,115,834

Particulars	Note	AMOUNT IN Rs. 31-Mar-2021	AMOUNT IN Rs. 31-Mar-2020
2 Liabilities			
Non-current liabilities			
(a) Financial liabilities			
(i) Borrowings	15	20,644,320	1,131,570
(ii) Trade payables		-	-
(iii) Other financial liabilities (other than those specified in (b))		-	-
(b) Provisions	16	1,437,067	-
(c) Deferred tax liabilities (net)	17	4,749,075	5,452,282
(d) Other non-current liabilities		-	-
		26,830,462	6,583,852
3 Current liabilities			
(a) Financial liabilities			
(i) Borrowings	18	46,426,323	99,439,294
(ii) Trade payables	19	45,732,751	17,226,619
(iii) Other financial liabilities (other than those specified in (c))	20	11,076,204	22,116,981
(b) Other current liabilities		-	-
(c) Provisions	21	1,039,789	1,499,854
(d) Current tax liabilities (net)		-	-
		104,275,067	140,282,748
		388,864,256	402,982,434

Summary of significant accounting policies 01 to 39

The accompanying notes are an integral part of the financial statements.

As per our report of even date

For Piyush J. Shah & Co.

Chartered Accountants

FRN :- 121172W

Piyush J. Shah

Partner

M. No.:- 108670

UDIN: 21108670AAAAEH7214

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta

Director

DIN :- 01958984

Jayesh Ashmal Mehta

Director

DIN :- 02156140

Krishnakant Somani

CFO

Priya Raval

Company Secretary

Sagardeep Alloys Limited

Consolidated Profit and loss statement for the year ended 31st March, 2021

Particulars	Note	AMOUNT IN Rs. 31-Mar-2021	AMOUNT IN Rs. 31-Mar-2020
I. Revenue from operations	22	654,837,929	338,026,399
II. Other Income	23	3,789,521	6,680,483
III. Total Revenue (I + II)		658,627,450	344,706,882
IV. Expenses:			
Cost of materials consumed	24	503,446,958	300,395,100
Purchase of stock in trade	25	101,207,428	1,953,122
Changes in Inventories of finished goods, stock in trade & WIP,	26	(249,929)	(7,690,787)
Employee benefits expenses	27	13,531,921	11,240,876
Finance costs	28	8,163,419	9,626,942
Depreciation and amortization expense		5,233,772	4,392,344
Other expenses	29	26,446,864	21,827,261
Total expenses (IV)		657,780,433	341,744,858
V. Profit/(Loss) before exceptional items and tax (III-IV)		847,017	2,962,024
VI. Exceptional items		-	19,496
VII. Profit/(Loss) before tax (V - VI)		847,017	2,942,528
VIII. Tax expenses			
(1) Current tax		150,715	1,009,590
(2) Deferred tax		(703,207)	(3,46,821)
(3) Short / (Excess) Provision		(39,126)	-
IX. Profit/(Loss) for the period from continuing operations (VII- VIII)		1,438,635	2,279,759
X. Profit/(Loss) for the period from discontinued operations		-	-
XI. Tax expenses of discontinued operations			
XII. Profit/(Loss) after tax for the period from discontinued operations (X-XI)	-	-	-
XIII. Profit/(Loss) for the period		1,438,635	2,279,759
XIV. Other comprehensive income			
A) (i) Items that will not be reclassified to profit or loss		102,129	-
(ii) Income tax relating to items that will not be reclassified to profit or loss		-	-
B) (i) Items that will be reclassified to profit or loss			
(ii) Income tax relating to items that will be reclassified to profit or loss			

**XV. Total Comprehensive income for the period (XIII+XIV)
(Comprising Profit/(Loss) and Other comprehensive
income for the period)**

	1,540,764	2,279,759
XII Earnings per equity share (for continuing operations):		
(1) Basic (Previous Year Restated)	0.08	0.23
(2) Diluted (Previous Year Restated)	0.08	0.23
XII Earnings per equity share (for discontinued operations):		
(1) Basic	-	
(2) Diluted	-	
XII Earnings per equity share (for discontinued & continuing operations):		
(1) Basic (Previous Year Restated)	0.08	0.23
(2) Diluted (Previous Year Restated)	0.08	0.23

Summary of significant accounting policies

01 to 39

**The accompanying notes are an integral part of the
financial statements.**

As per our report of even date

For Piyush J. Shah & Co.

Chartered Accountants
FRN :- 121172W

Piyush J. Shah
Partner

M. No.:- 108670

UDIN: 21108670AAAAEH7214

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta
Director

DIN :- 01958984

Jayesh Ashmal Mehta
Director

DIN :- 02156140

Krishnakant Somani
CFO

Priya Raval
Company Secretary

Sagardeep Alloys Limited

Consolidated Cash Flow Statement for the Period ended 31st March, 2021

Particulars	AMOUNT IN Rs. 31-Mar-2021	AMOUNT IN Rs. 31-Mar-2020
Cash flow from operating activities:		
Net profit before tax as per statement of profit and loss	847,017	2,942,528
Adjusted for:		
Depreciation & amortization	5,233,772	4,392,344
Interest income on loans & advances given	(2,725,445)	(6,141,733)
Net Gain and Loss on Foreign Exchange	-	-
Interest & finance costs	8,163,419	9,626,942
Operating cash flow before working capital changes	11,518,763	10,820,081
Adjusted for:		
(Increase)/ decrease in Inventories	(1,069,452)	(24,015,171)
(Increase)/ decrease in trade receivables	(8,301,544)	78,890,662
Increase/ (decrease) in trade payables	28,506,132	(38,795,755)
Increase/ (decrease) in other current assets	14,803,492	2,672,056
Increase/ (decrease) in Financial assets	511,190	-
Increase/ (decrease) in other current liabilities	(11,040,777)	(12,882,592)
Increase/ (decrease) in long term provisions	1,437,067	-
Increase/ (decrease) in short term provisions	(328,272)	(1,572,018)
Cash generated from / (used in) operations	36,036,599	15,117,263
Income taxes paid	(39,126)	(1,257,901)
Net cash generated from/ (used in) operating activities [A]	35,997,473	13,859,362
Cash flow from investing activities:		
Purchase of property plant & equipment	(20,566,212)	(10,317,484)
Interest income on loans & advances given	2,725,445	6,141,733
(Increase)/ decrease in long term loans and advances	-	(274,448)
(Increase)/ decrease in short term loans and advances	23,795,273	6,269,688
Net cash flow from/(used) in investing activities [B]	5,954,506	1,819,489
Cash flow from financing activities:		
Increase in / Repayment of Long-Term Borrowings	19,512,750	(9,344,408)
Increase in / Repayment of Short-Term Borrowings	(53,012,971)	3,480,252
Interest & finance costs	(8,163,419)	(9,626,942)
Net cash flow from/(used in) financing activities [C]	(41,663,640)	(15,491,098)
Net increase/(decrease) in cash & cash equivalents [A+B+C]	288,339	187,753
Cash & cash equivalents as at beginning of the period	1,938,004	1,750,251
Cash & cash equivalents as at end of the period	2,226,343	1,938,004

Cash & Cash equivalents consist of	31-Mar-21	31-Mar-20
Cash Balance	194,435	95,292
Current Account Balance	417,326	309,370
Bank Balance (Note: 09)	1,614,582	1,533,342
Total	2,226,343	1,938,004

Summary of significant accounting policies 01 to 39

The accompanying notes are an integral part of the financial statements.

As per our report of even date

For Piyush J. Shah & Co.

Chartered Accountants

FRN :- 121172W

Piyush J. Shah

Partner

M. No.:- 108670

UDIN: 21108670AAAAEH7214

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta

Director

DIN :- 01958984

Jayesh Ashmal Mehta

Director

DIN :- 02156140

Krishnakant Somani

CFO

Priya Raval

Company Secretary

Note: 1

Note: A

General Information:

Sagardeep Alloys Limited (CIN L29253GJ2007PLC050007) is incorporated under the Companies Act, 1956 with its registered office at Plot No. 2070, Rajnagar Patiya, Santej Khatraj Road, Santej, Kalol, Gandhinagar, Gujarat -382721.

The Company is engaged in the business of of Copper Items & Chemicals and Trading in Ferrous and Non Ferrous Metals

The financial statements for the year ended on 31st March, 2021 are approved by the Board of Directors and authorised for issue on 15th June, 2021.

Significant Accounting Policies

1. Statement of Compliance

The company has adopted all the Ind AS and the adoption was carried out in accordance with Ind AS 101, First Time Adoption of Indian Accounting Standard. The transition was carried out from Indian Accounting Principles generally accepted in India as prescribed under section 133 of the Act read with Rule 7 of the Companies (Accounts) Rules, 2014. Reconciliations and descriptions of the effect of the transitions have been summarised in the annexers attached.

2. Basis of Preparation and Presentation

- i) The financial statements are prepared on historical cost basis in accordance with applicable Indian Accounting Standards (Ind AS) and on accounting principles of going concern except current investments which are measured at fair values. These financial statements have been prepared to comply with all material aspects with the Indian accounting standards notified under section 133 of the Act, (the "Act") read with Rule 7 of the Companies (Accounts) Rules, 2014, and the other relevant provisions of the Act.
- ii) Accounting policies have been consistently applied except where a newly issued accounting standard is initially adopted or a revision to an existing accounting standard requires a change in the accounting policies hitherto in use.
- iii) As the quarter and year figures are taken from the source and rounded to the nearest digits, the figures already reported for all the quarters during the year might not always add up to the year figures reported in this statement.
- iv) All 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 the Schedule III to the Act. Based on the nature of products and the time between the acquisition of assets for processing and their realization in cash and cash equivalents, the Company has ascertained its operating cycle as 12 months for the purpose of current classification of assets and liabilities.

3. Property, Plant and Equipments

Property, Plant and Equipment are stated at original cost (net of tax/duty credit availed) less accumulated depreciation and impairment loss-es. Cost includes cost of acquisition, construction and installation, taxes, duties, freight, other incidental expenses related to the acquisition, and pre-operative expenses including attributable borrowing costs incurred during pre-operational period.

- i) Land and buildings held for use in the production or supply of goods or services, or for administrative purposes, are stated in the balance sheet at deemed cost less and accumulated depreciation. Freehold land is not depreciated.
- ii) Properties in the course of construction for production, supply or administrative purposes are carried at cost, less any recognised impairment loss. Cost includes professional fees and, for

qualifying assets, borrowing costs capitalised in accordance with the Company's accounting policy. Such properties are classified to the appropriate categories of property, plant and equipment when completed and ready for intended use. Depreciation of these assets, on the same basis as other property assets, commences when the assets are ready for their intended use.

- iii) Fixtures and equipment are stated at cost less accumulated depreciation and accumulated impairment losses.
- iv) An item of property, plant and equipment is derecognised upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on the disposal or retirement of an item of property, plant and equipment is determined as the difference between the sales proceeds and the carrying amount of the asset and is recognised in profit or loss.
- v) Subsequent expenditures related to an item of Tangible Asset are added to its book value only if they increase the future benefits from the existing asset beyond its previously assessed standard of performance.
- Vi) Assets which are not ready for their intended use on reporting date are carried as capital work-in-progress at cost, comprising direct cost and related incidental expenses Useful lives of the Property, Plant and Equipment as notified in Schedule II to the Companies Act, 2013 are as follows :
 - Buildings - 3 to 60 years
 - Plant and Equipments - 15 to 25 years
 - Furniture and Fixtures - 10 years
 - Vehicles - 8 to 10 years
 - Office Equipments - 5 to 10 years

4. Depreciation

- i) Depreciation on tangible Fixed Assets is provided for on basis of useful life specified in Schedule II to the Act.
- ii) Intangible assets such as Software are amortized in ten equal yearly installments commencing from the year in which the tangible benefits start accruing to the Company from such assets.
- iii) Depreciation is charged as per the provisions of Schedule II to the Act based upon useful life of assets. The useful life is adopted for the purpose of depreciation is as under.

5. Employee Benefits

Short-term employee benefits are recognized as an expense at the undis-counted amount in the Statement of Profit and Loss of the year in which the related service is rendered Employee benefits in the form of Provident Fund is considered as defined contribution plan and the contributions to Employees' Provident Fund Organization established under The Employees' Provident Fund and Miscellaneous Provisions Act 1952 is charged to the Statement of Profit and Loss of the year when the contributions to the respective funds are due. The Company pays provident fund contributions to publicly administered provident funds as per local regulations. The Company has no further payment obligations once the contributions have been paid.

6. Inventories

The cost of inventories have been computed to include all cost of purchases, cost of conversion and other related costs incurred in bringing the inventories to their present location and condition. The costs of Raw Materials, Stores and spare parts etc., consumed consist of purchase price including

duties and taxes (other than those subsequently recoverable by the enterprise from the taxing authorities), freight inwards and other expenditure directly attributable to the procurement.

7. Revenue Recognition

The Company derives revenues primarily from sale of manufactured goods. Effective 01 April 2018, the Company has adopted Indian Accounting Standard 115 (Ind AS 115) - 'Revenue from contracts with customers' using the cumulative catch-up transition method, applied to contracts that were not completed as on the transition date i.e. 01 April 2018. Accordingly, the comparative amounts of revenue and the corresponding contract assets /liabilities have not been retrospectively adjusted. The effect on adoption of Ind-AS 115 was insignificant.

Sale of Goods: Revenue from sales of goods is recognized on transfer of significant risks and rewards of ownership to the customers. Revenue shown in the Statement of Profit and Loss excludes, returns, trade discounts, cash discounts, Goods & Service Tax.

Interest income is recognized on a time proportion basis taking into account the amount outstanding and the interest rate applicable.

8. Cash Flow Statement

Cash flows are reported using indirect method, whereby profit before tax is adjusted for the effects of transactions of a non-cash nature and any deferrals or accruals of past or future cash receipts or payments. The cash flow from regular revenue generating, financing and investing activities of the Company is segregated.

Cash and cash equivalents in the balance sheet comprise cash at bank, cash/cheques in hand and short term investments with an original maturity of three months or less.

9. Financial Assets

The Company classifies its financial assets as those to be measured sub-sequently at fair value (either through other comprehensive income, or through profit or loss), and those to be measured at amortized cost.

Trade receivables represent receivables for goods sold by the Company upto to the end of the financial year. The amounts are generally unsecured and are usually received as per the terms of payment agreed with the customers. The amounts are presented as current assets where receivable is due within 12 months from the reporting date.

A financial asset is derecognized only when the Company has transferred the rights to receive cashflows from the financial asset, or when it has transferred substantially all the risks and rewards of the asset, or when it has transferred the control of the asset.

10. Financial Liabilities

Borrowings are removed from balance sheet when the obligation specified in the contract is discharged, cancelled or expired.

Trade Payables represent liabilities for goods and services provided to the Company upto to the end of the financial year. The amounts are unsecured and are usually paid as per the terms of payment agreed with the vendors. The amounts are presented as current liabilities unless payment is not due within 12 months after the reporting period. They are recognised initially and subsequently measured at amortised cost.

Financial assets and Financial liabilities are offset and the net amount is reported in the balance sheet if there is a currently enforceable legal right to offset the recognised amounts and there is an intention to settle on a net basis, to realise the assets and settle the liabilities simultaneously.

11. Borrowing Costs

Borrowing costs directly attributable to the acquisition, construction or production of qualifying assets, which are assets that necessarily take a substantial period of time to get ready for their intended use, are added to the cost of those assets, until such time as the assets are substantially ready for their intended use. All other borrowing costs are recognised in the Statement of Profit and Loss in the period in which they are incurred. The Company determines the amount of borrowing costs eligible for capitalisation as the actual borrowing costs incurred on that borrowing during the period less any interest income earned on temporary investment of specific borrowings pending their expenditure on qualifying assets, to the extent that an entity borrows funds specifically for the purpose of obtaining a qualifying asset. In case if the Company borrows generally and uses the funds for obtaining a qualifying asset, borrowing costs eligible for capitalisation are determined by applying a capitalisation rate to the expenditures on that asset. The Company suspends capitalisation of borrowing costs during extended periods in which it suspends active development of a qualifying asset.

12. Accounting for Taxes on Income

Tax expenses comprise of current tax and deferred tax including applicable surcharge and cess.

Current Income tax is computed using the tax effect accounting method, where taxes are accrued in the same period in which the related revenue and expenses arise. A provision is made for income tax annually, based on the tax liability computed, after considering tax allowances and exemptions. Provisions are recorded when it is estimated that a liability due to disallowances or other matters is probable.

Deferred tax is provided using the balance sheet approach on temporary differences at the reporting date between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes at the reporting date. Deferred tax liabilities are recognized for all taxable temporary differences. Deferred tax assets are recognised for all deductible temporary differences, the carry forward of unused tax credits and any un used tax losses. Deferred tax assets are recognized to the extent that it is probable that taxable profits against which the deductible temporary differences, and the carry forward un used tax credits and un used tax losses can be utilized.

Deferred Tax Assets and Deferred Tax Liabilities are offset, if a legally enforceable right exists to set off current tax assets against current tax liabilities and the Deferred Tax Assets and Deferred Tax Liabilities relate to taxes on income levied by same governing taxation laws.

Deferred tax is recognised in the statement of profit and loss, except to the extent that it relates to items recognised in other comprehensive income. As such, deferred tax is also recognised in other comprehensive income.

13. Investments

Non Current investments are stated at cost. Provision for diminution in the value of Non Current investments is made only if such a decline is other than temporary.

14. Research & Development Expense

Revenue expenditure pertaining to research is charged to the Profit and Loss Statement. Development costs of products are charged to the Profit and Loss Statement.

15. Impairment

Assessment is done at each Balance Sheet date as to whether there is any indication that an asset may be impaired. For the purpose of assessing impairment, the smallest identifiable group of assets that generates cash inflows from continuing use that are largely independent of the cash inflows from other assets or groups of assets, is considered as a cash generating unit. If any such indication exists, an estimate of the recoverable amount of the asset/cash generating unit is made. Assets

whose carrying value exceeds their recoverable amount are written down to the recoverable amount. Recoverable amount is higher of an asset's or cash generating unit's net selling price and its value in use. Value in use is the present value of estimated future cash flows expected to arise from the continuing use of an asset and from its disposal at the end of its useful life. Assessment is also done at each Balance Sheet date as to whether there is any indication that an impairment loss recognised for an asset in prior accounting periods may no longer exist or may have decreased.

16. Government Grants

- i) Grants are accounted for where it is reasonably certain that the ultimate collection will be made.
- ii) Grants relating to Fixed Assets in the nature of Project Capital Subsidy are credited to that particular project.
- iii) Others are credited to Statement of Profit and Loss.

17. Use of Estimates

The preparation of financial statements in conformity with Indian GAAP requires judgments, estimates and assumptions to be made that affect the reported amount of assets and liabilities, disclosure of contingent liabilities on the date of the financial statements and the reported amount of revenues and expenses during the reporting period. Difference between the actual results and estimates are recognized in the period in which the results are known/materialized.

18. Provisions, Contingent Liabilities and Contingent Assets

Provision is recognized in the accounts when there is a present obligation as a result of past event(s) and it is probable that an outflow of resources will be required to settle the obligation and a reliable estimate can be made. Provisions are not discounted to their present value and are determined based on the best estimate required to settle the obligation at the reporting date. These estimates are reviewed at each reporting date and adjusted to reflect the current best estimates.

Contingent liabilities are disclosed unless the possibility of outflow of resources is remote, if any.

Contingent assets are neither recognized nor disclosed in the financial statements.

Statement of changes in equity
For the period ended March 31, 2021

A Equity Share Capital: Amount In Rs.

Particulars	Note No.	As at 31-03-2021	As at 31-03-2020
Balance at the beginning of the year	13	113,716,000	113,716,000
Shares issued during the year		5,685,800	-
Balance at the end of the year		119,401,800	113,716,000

B Other Equity:

Particulars	Reserves & Surplus			Other Compre- hensive Income	Total
	Securities premium reserves	Retained earnings	Capital Reserve		
Balance as at April 01, 2019	77,803,216	65,672,849	2,979,010	-	146,455,075
Profit/(Loss) for the period	-	22,79,759	-	-	22,79,759
Other comprehensive income for the year	-	-	-	-	-
Total comprehensive income for the year	-	22,79,759	-	-	22,79,759
Balance as at March 31, 2020	77,803,216	6,79,52,608	2,979,010	-	17,84,34,834
Balance as at April 01, 2020	77,803,216	6,79,52,608	2,979,010	-	17,84,34,834
Profit/(Loss) for the period	-	1,540,764	-	-	1,540,764
Utilized towards issue of Bonus Shares (Sub Note: 1)	-	(56,858,000)			(56,858,000)
Other comprehensive income for the year	-	-	-	102,129	102,129
Total comprehensive income for the year	-	(55,317,236)	-	102,129	(55,215,107)
Balance as at March 31, 2021	77,803,216	1,26,35,372	2,979,010	102,129	9,35,19,727

Sub Note: 1

During the period under review, the company has allotted Bonus Shares on 07th October, 2020, in the ratio of 1:2, to the shareholders holding shares as on 06th October, 2020.

For Piyush J. Shah & Co.

Chartered Accountants

FRN :- 121172W

Piyush J. Shah

Partner

M. No.:- 108670

UDIN: 21108670AAAAEH7214

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta

Director

DIN :- 01958984

Jayesh Ashmal Mehta

Director

DIN :- 02156140

Krishnakant Somani

CFO

Priya Raval

Company Secretary

02 Property, Plant and Equipment as at 31 March, 2021

Description of Assets	Useful life (In Years)	Shift of Operated	Gross Block			Accumulated Depreciation / Amortization			Net Block			
			Balance as at 1-Apr-20	Additions during the period	Deletions during the period	Balance as at 31-Mar-21	Balance provided during the period	Deletions during the period	Balance as at 1-Apr-20	Balance as at 31-Mar-21	Balance as at 31-Mar-20	
A Tangible Assets												
(a) Own Assets												
Buildings												
Factory at Santej	30.00	Single	6,891,969	-	-	6,891,969	2,059,649	219,157	-	2,278,806	4,613,163	4,832,320
Bandhu Samaj	30.00	Single	7,834,284	-	-	7,834,284	2,020,309	264,268	-	2,284,577	5,549,707	5,813,975
Supath 2-Complex	30.00	Single	505,350	-	-	505,350	26,613	16,003	-	42,616	462,734	478,737
Shed at Rakhial	30.00	Single	1,177,190	-	-	1,177,190	363,784	41,805	-	405,589	771,601	813,406
Building Others	30.00	Single	-	3,345,412	-	3,345,412	-	26,729	-	26,729	3,318,683	-
Shed at Jagannath Estate	30.00	Single	742,389	-	-	742,389	65,644	23,666	-	89,310	653,079	676,745
Golden Estate D1 to D20	60.00	-	10,317,241	-	-	10,317,241	686,785	152,484	-	839,269	9,477,972	9,630,456
			27,468,423	3,345,412	-	30,813,835	5,222,784	744,112	-	5,966,896	24,846,939	22,245,639
Plant & Machinery												
Plant & Machinery	15.00	Single	15,158,836	50,217,833	-	65,376,669	8,481,278	1,837,784	-	10,319,062	55,057,607	6,677,558
Analytical Machine	15.00	Single	1,012,099	-	-	1,012,099	642,169	70,983	-	713,152	298,947	369,930
Crane	15.00	Single	1,050,000	-	-	1,050,000	72,695	66,500	-	139,195	910,805	977,305
Plant & Machinery - Lunej	15.00	Single	28,181,921	-	-	28,181,921	10,422,253	1,816,730	-	12,238,983	15,942,938	17,759,668
			45,402,856	50,217,833	-	95,620,689	19,618,395	3,791,997	-	23,410,392	72,210,297	25,784,461
Furniture & Fittings												
Almonard Air Fan	10.00	Single	80,338	-	-	80,338	5,102	7,632	-	12,734	67,604	75,236
Furniture & Fixtures	10.00	Single	15,604	-	-	15,604	12,325	2,498	-	14,823	781	3,279
			95,942	-	-	95,942	17,427	10,130	-	27,557	68,385	78,515
Office Equipment												
Air Conditioner	5.00	Single	465,560	-	-	465,560	195,097	68,552	-	263,649	201,911	270,463
CCTV	10.00	Single	60,181	-	-	60,181	12,501	11,434	-	23,935	36,246	47,680
R O Plant	10.00	Single	78,000	90,750	-	168,750	24,921	21,574	-	46,495	122,255	53,079
Water Cooler	10.00	Single	22,200	9,746	-	31,946	6,321	4,224	-	10,545	21,401	15,879
Refrigerator	10.00	Single	119,600	-	-	119,600	38,880	22,724	-	61,604	57,996	80,720
Water Dispenser	5.00	Single	14,700	-	-	14,700	13,965	-	-	13,965	735	735
Metal Detector	5.00	Single	2,200	-	-	2,200	278	418	-	696	1,504	1,922
Television	5.00	Single	15,753	-	-	15,753	1,164	2,993	-	4,157	11,596	14,589
Amazon Fire Stick	5.00	Single	3,389	-	-	3,389	441	643	-	1,084	2,305	2,948
Temperature Meter	5.00	Single	-	4,000	-	4,000	-	681	-	681	3,319	-
Shutter	5.00	Single	-	12,900	-	12,900	-	2,035	-	2,035	10,865	-
Sofa Chair	5.00	Single	-	6,700	-	6,700	-	303	-	303	6,397	-
Mixer Grinder	5.00	Single	-	2,541	-	2,541	-	280	-	280	2,261	-
Mobile Phones	5.00	Single	191,697	41,726	-	233,423	112,449	21,498	-	133,947	99,476	79,248
Washing Machine	5.00	Single	23,703	-	-	23,703	3,516	4,503	-	8,019	15,684	20,187
			996,983	168,363	-	1,165,346	409,533	161,862	-	571,395	593,951	587,450

02 Property, Plant and Equipment as at 31 March, 2021 (Contd.....)

Description of Assets	Useful life (In Years)	Shift of Operated	Gross Block			Accumulated Depreciation / Amortization			Net Block			
			Balance as at 1-Apr-20	Additions during the period	Deletions during the period	Balance as at 31-Mar-21	Balance as at 1-Apr-20	Provided during the period	Deletions during the period	Balance as at 31-Mar-21	Balance as at 31-Mar-20	
Motor Vehicles												
Motor Car	8.00	Single	4,621,926	-	-	4,621,926	3,221,647	499,671	-	3,721,318	900,608	1,400,279
Other Vehicles	10.00	Single	128,698	-	-	128,698	114,099	6,376	-	120,475	8,223	14,599
			4,750,624	-	-	4,750,624	3,335,746	506,047	-	3,841,793	908,831	1,414,878
Computers and Data Processing Units												
Computers and Printer	3.00	Single	560,191	-	-	560,191	450,744	17,098	-	467,842	92,349	109,447
Laptop	3.00	Single	-	65,678	-	65,678	-	1,402	-	1,402	64,276	-
Printer Canon LBP 151 DW	3.00	Single	-	11,424	-	11,424	-	1,124	-	1,124	10,300	-
			560,191	77,102	-	637,293	450,744	19,624	-	470,368	166,925	109,447
Land	-	-	6,280,540	10,415,240	-	16,695,780	-	-	-	-	16,695,780	6,280,540
Total (A)			85,555,559	64,223,950	-	149,779,509	29,054,629	5,233,772	-	34,288,400	115,491,109	56,500,930
B Capital Work In Progress												
Buildings												
Bandhu Samaj (WIP)	-	-	13,304,304	-	-	13,304,304	-	-	-	-	13,304,304	13,304,304
Factory Shed (WIP)	-	-	8,955,666	-	-	8,955,666	-	-	-	-	8,955,666	8,955,666
Golden Estate D11 to D20	-	-	10,317,241	527,381	-	10,844,622	-	-	-	-	10,844,622	10,317,241
Elite Flats	-	-	-	-	-	-	-	-	-	-	-	-
Golden Estate H15 to H16	-	-	2,330,600	-	-	2,330,600	-	-	-	-	2,330,600	2,330,600
Golden Estate H3 to H4	-	-	2,330,600	-	-	2,330,600	-	-	-	-	2,330,600	2,330,600
Sindh Bank	-	-	9,282,121	-	-	9,282,121	-	-	-	-	9,282,121	9,282,121
Plant & Machinery												
Plant & Machinery (WIP)	-	-	50,135,661	3,289,738	49,958,201	3,467,198	-	-	-	-	3,467,198	50,135,661
Plot No. 3529 Plant and machinery	-	-	-	2,483,345	-	2,483,345	-	-	-	-	2,483,345	-
Total (B)			96,656,193	6,300,464	49,958,201	52,998,456	-	-	-	-	52,998,456	96,656,193
Grand Total (A+B)			182,211,752	70,524,414	49,958,201	202,777,965	29,054,629	5,233,772	-	34,288,400	168,489,565	153,157,123

Sub Note: 1) Company had started its plant at Lunej, Khambhat in July, 2014 in a premise which was taken on rent. Initially, the promoters of the company were intending to purchase the whole plant including land & building but there was problem in the clearance of title deed. Therefore, the company entered into a rent agreement with the seller for using the said premise for a period of 11 months and to acquire the plant later on when the title is cleared in the name of the seller. The company invested approximately Rs. 3.00 Crores in plant & machineries for commencing its business activities. As the seller could not clear property title in his name even after completion of a year and it was apparent that seller was delaying the sale process unnecessarily, Company decided to leave the project and shut down plant. Company carried out its last transaction in June 2015 and since then Company has neither done any manufacturing nor carried out any sale transaction in business. During period from July 2014 to June 2015, company made total turnover of Rs. 83.29 Lacs (approx) and Company realized the amount of Rs. 74 Lacs (approximately). At present, plant is in the possession of Land Owner and Company is planning to sold out its all assets related with plant as it is not viable for the company to do the business. In June 2015 plant possession was taken by the land owner and stocks of Rs. 9.00 Lacs (approximately) were lying in the factory. At present plant is not working but company is regularly filing its Excise Return.

03 Capital work in progress:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Capital work in progress		
Tangible Assets	5,950,543	46,523,032
Buildings	47,047,913	50,133,161
TOTAL Rs.:	52,998,456	96,656,193

Sub Note : 1

Cost of Fixed Assets and pre-operative expenses, being technical matter, are capitalized or allocated to Capital work in progress on the basis of data certified by technical person & the Management.

04 Financial assets - Loans

	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Advances to Outsiders	16,191	527,381
TOTAL Rs.:	16,191	527,381

05 Financial Assets - Others:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Security Deposits	1,873,128	1,873,128
TOTAL Rs.:	1,873,128	1,873,128

06 Inventories:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Raw Material	66,710,273	65,890,750
Finished Goods	18,311,034	18,086,087
Traded Goods	1,963,187	69,585
Work In Progress (Inventories are taken, valued and certified by the management)	70,450	1,939,070
TOTAL Rs.:	87,054,944	85,985,492

07 Trade Receivables:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Unsecured		
Considered Good	69,919,727	72,814,169
Considered doubtful	11,195,987	-
	81,115,713	72,814,169
Less: Allowance for doubtful debts	-	-
TOTAL Rs.:	81,115,713	72,814,169

08 Cash & cash equivalents:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Cash On Hand	194,435	95,292
Balance with Banks	417,326	309,370
TOTAL Rs.:	611,761	404,662

09 Bank balance other than (11) above:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Fixed Deposits with Banks	1,614,582	1,533,342
TOTAL Rs.:	1,614,582	1,533,342

10 Loans:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Advances to Outsiders		
Loan/Advance to Outsiders	24,482,038	48,277,311
TOTAL Rs.:	24,482,038	48,277,311

11 Current tax assets:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Receivable from Government		
Advance Tax Inclu. TDS and TCS	710,388	968,911
Income Tax Refund Receivables	597,869	-
TOTAL Rs.:	1,308,257	968,911

12 Other current assets:
Trade Receivables:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Advances to Others		
Advances to Suppliers (Refer Sub Note:1)	18,810,566	27,388,493
Other Receivables	257,827	333,275
GST Receivable	2,492,329	5,469,220
Deposit with Government (Sub Note: 2)	98,328	3,813,000
Receivables From Government	450,000	274,133
Prepaid Expenses (Sub Note : 3)	189,027	162,794
TOTAL Rs.:	22,298,077	37,440,915

Sub Note: 1

Advance to supplier is taken as certified by the management. No security have been given against the same.

Sub Note: 2

Deposit with government includes advances made under VAT Appeal made under Gujarat VAT Act.

Sub Note: 3

Prepaid expenses includes Prepaid Insurance, Memebership, Interenet etc.

13 Equity share capital:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Authorized		
Equity shares 20,000,000 of Rs.10 Each	200,000,000	200,000,000
Issued, Subscribed and Paid up :		
Equity shares 17,057,400 of Rs.10 Each	164,239,000	107,381,000
TOTAL Rs.:	164,239,000	107,381,000

13.1 The Details of Shareholder holding more than 5% Shares

Name Of Shareholder	As At 31-03-2021		As At 31-03-2020	
	No. of Shares	% Held	No. of Shares	% Held
Asamalji S. Mehta	2,200,425	13.40	1,466,950	12.90
Ashok Devji Parmar	Nil	Nil	660,000	5.80
Jayesh A. Mehta	2,627,250	16.00	1,751,500	15.40
Satish A. Mehta	2,367,825	14.42	1,578,550	13.88
Ugamdevi A. Mehta	1,560,900	9.50	1,040,600	9.15
	8,756,400	53.31	6,497,600	57.14

13.2 The Reconciliation of No. of shares outstanding is set out below:

Name Of Shareholder	As At 31-03-2021		As At 31-03-2020	
	No. of No.	% Held Amount In Rs.	No. of No.	% Held Amount In Rs.
Equity Shares at the beginning of the year	10,738,100	107,381,000	10,738,100	107,381,000
Add: Bonus Issue	5,685,800	56,858,000	-	-
Equity Shares at the end of the year	16,423,900	164,239,000	10,738,100	107,381,000

13.3 Rights, Preferences and restrictions attached to shares

Equity Share

The company has one class of equity share having a par value of Rs 10 each. Each shareholder is eligible for one vote per share held. The dividend proposed by the Board of directors is subject to the approval of shareholders in the ensuing Annual general meeting, except in case of interim dividend. In the case of liquidation, the equity shareholders are eligible to receive the remaining assets of the company after distribution of all preferential amounts, in proportion to their shareholding.

During the period under review, the company has allotted Bonus Shares on 07th October, 2020, in the ratio of 1:2, to the shareholders holding shares as on 06th October, 2020.

14 Other equity:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Profit & Loss A/c		
Opening Balance	67,952,608	65,672,849
Add: Profit for the year	1,540,764	2,279,759
Less: Utilized towards issue of Bonus Shares (Sub Note: 1)	-	-
Closing Balance	69,493,372	67,952,608
Other Comprehensive Income		
Opening Balance	-	-
Add: Profit for the year	102,129	-
Closing Balance	102,129	-
Capital Reserve		
Opening Balance	2,979,010	2,979,010
Add: Profit for the year	-	-
Closing Balance	21,734,560	78,592,560
Share Premium Account		
Opening Balance	77,803,216	77,803,216
Add: Addition/(deletion)	(56,858,000)	-
Closing Balance	20,945,216	77,803,216
TOTAL Rs.:	93,519,727	148,734,834

Sub Note: 1

During the period under review, the company has allotted Bonus Shares on 07th October, 2020, in the ratio of 1:2, to the shareholders holding shares as on 06th October, 2020.

15 Borrowings:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Secured Borrowing:		
Emergency Credit Line Scheme	19,500,000	-
Unsecured Borrowing:		
Loans From Inter Corporate	1,144,320	1,131,570
TOTAL Rs.:	20,644,320	1,131,570

16 Provisions:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Provision for Employee Benefit	1,437,067	-
TOTAL Rs.:	1,437,067	-

17 Deferred Tax Liabilities

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Deferred Tax Liabilities		
DTL on Difference between written down value of property, plant and equipment and capital work-in-progress as per books of accounts and income tax	5,131,156	5,384,682
DTL on Expenses claimed for tax purpose on payment basis	(382,081)	-
DTA on Other assets	-	67,600
TOTAL Rs.:	4,749,075	5,452,282

18 Financial liabilities - Borrowings:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Loans Repayable on Demand - From Banks		
Working Capital Loans - Secured (Sub Note -1)	46,426,323	99,439,294
TOTAL Rs.:	46,426,323	99,439,294

Sub Note : 1

- i) AXIS Bank C.C. outstanding as on March 31, 2021 is secured against Hypothecation of all current assets of the company (present and future), Plant & Machinery, Furniture and Fixtures, office equipment and other class of movable assets except vehicles financed by other banks.
- ii) Collateral Security by Equitable mortgage of Factory Land & Building situated at block no. 2070, Village -Santej, Taluka Kalol, District-Gandhinagar.
- iii) Interest rate on C.C. is 7.85% and directors have given their personal guarantee for the same.

Sub Note : 2

- i) Loan is obtained to meet the liquidity mismatch arising out of Covid 19.
- ii) Extension of charge / security interest in relation to all assets (Both Primary & Collateral) currently secured to the Bank for its existing credit facilities on a second ranking basis.
And Personal/ Corporate Guarantee of promoter / property owner.
- iii) Interest rate on loan is 8.75%.

19 Financial liabilities - Trade Payables :

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Creditors for Goods	45,732,751	17,226,619
TOTAL Rs.:	45,732,751	17,226,619

Sub Note: 1

Trade Payable as on March,31 2021 is taken as certified by management. No security have been given for the same.

Sub Note: 2

The company has sent letters asking the MSME status of the suppliers, based on the confirmation received from the suppliers, the company have classified them accordingly, remaining suppliers are kept out of MSME.

20 Other financial Liabilities:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Other Payables (Refer Sub Note: 1)	11,076,204	22,116,981
	11,076,204	22,116,981
Current Maturities of Long Term Debts	-	-
	-	-
TOTAL Rs.:	11,076,204	22,116,981

Sub Note : 1

Other Payables Include Creditors for Expenses and Capital Goods and Advances From Customers.

21 Current liabilities - Provisions:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Payable to Government	509,239	1,036,355
Provision for Employees	32,474	-
Payable to Others	498,076	463,499
TOTAL Rs.:	1,039,789	1,499,854

22 Revenue From Operations:

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Revenue from Sale of Products	768,633,306	406,823,469
Revenue from Chanasma Sales	1,200,000	1,250,000
Revenue from Job Work	1,741,290	562,245
Packing and Forwarding	917,112	1,247,530
	772,491,708	409,883,244
Less: GST on Sales	117,653,779	71,856,845
TOTAL Rs.:	654,837,929	338,026,399

23 Other Income:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Interest Income	2,725,445	6,141,733
Foreign Exchange Gain	11,565	-
Rent Income	799,000	538,750
Rate Difference	76,675	-
Sundry Balances Written off	176,836	-
TOTAL Rs:	3,789,521	6,680,483

24 Cost of Materials Consumed:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Opening Stock	65,890,750	49,566,366
Add: Purchases	503,003,465	315,881,660
Add: Labour Purchase	1,263,016	837,824
	570,157,231	366,285,850
Less :Closing Stock	66,710,273	65,890,750
TOTAL Rs.:	503,446,958	300,395,100

25 Purchase of stock in trade:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Purchases of goods	101,207,428	1,953,122
TOTAL Rs.:	101,207,428	1,953,122

26 Changes in Inventories:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
At the end of the year:		
Finished Goods	18,311,034	18,086,087
Work-In-Progress	1,963,187	1,939,070
Traded Goods	70,450	69,585
	20,344,671	20,094,742
At the beginning of the year:		
Finished Goods	18,086,087	11,520,362
Work-In-Progress	1,939,070	812,111
Traded Goods	69,585	71,482
	20,094,742	12,403,955
(Increase)/Decrease in Inventories		
Finished Goods	(224,947)	(6,565,725)
Work-In-Progress	(24,117)	(1,126,959)
Traded Goods	(865)	1,897
TOTAL Rs.:	(249,929)	(7,690,787)

27 Employee Benefit Expense:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Bonus Expenses	421,575	425,410
Director's Remuneration	1,800,000	1,800,000
Gratuity Expenses	1,673,799	-
Contribution to Provident Fund and other Funds	92,918	91,633
Salary & Wages Expenses	9,228,555	8,876,514
Staff Welfare Expenses	315,074	47,319
TOTAL Rs.:	13,531,921	11,240,876

28 Finance Cost:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Interest on Short-Term Loans from Banks	6,884,842	8,947,317
Interest on Others	-	390,646
Loan Processing Fees	406	-
Interest on Long-Term Loans from Banks	1,070,629	5,287
Other Borrowing Costs	207,542	283,692
TOTAL Rs.:	8,163,419	9,626,942

Sub Note: 1 Interest Expenses are net of interest capitalized in Fixed Assets.

29 Other Expenses:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
A) Manufacturing Expenses		
Labour Charges	867,632	45,061
Other Manufacturing Expenses	619,614	17,602
Power , Fuel & Utilities Expenses	11,902,767	12,047,965
Repairs & Maintenance Expenses	1,150,474	627,809
Stores , Spares & Packing Material Consumed	28,141	3,624,195
	14,568,628	16,362,632.35
B) Administrative , Selling & Other Expenses		
Depository Charges	-	2,500
Commission Expenses	20,500	-
Freight Expenses	1,110,301	839,566
Factory Expenses	-	742,172
Indirect Duty Expenses	8,441,422	925,230
Insurance Expenses	236,285	94,307
Legal & Professional Fees	878,399	732,125
Loss on Foreign Exchange	-	34,936
Municipal Tax Expenses	29,535	83,091

29 Other Expenses: (Contd.....)

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
B) Administrative , Selling & Other Expenses		
Office Expenses	237,569	347,731
Other Expenses	-	34,552
Prior Period Expense	100,000	-
Postage , Telephone & Computer Expenses	129,376	40,897
Penalty Expenses	255,000	73,081
Rate Difference	-	495,536
Security Expenses	24,187	768,270
Selling & Distribution Expenses	119,767	47,625
Stationery & Printing Expenses	34,095	1,000
Travelling, Conveyance & Vehicle Expenses	-	210
Statutory Audit Fees	261,800	201,800
	11,878,236	5,464,629
TOTAL Rs.:	26,446,864	21,827,261

30 Earning Per Share :

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Basic Earning Per Share	0.08	0.23
Diluted Earning Per Share	0.08	0.23
Nominal Value Per Share	Rs. 10.00	Rs. 10.00

Earning Per share is calculated by dividing the Profit/(Loss) attributable to the Equity Shareholders by the weighted average number of Equity Shares outstanding during the year. The numbers used in calculating basic and diluted earning per Equity Share as stated below:

Particulars	For the year 2020-21 Amount In Rs.	For the year 2019-20 Amount In Rs.
Profit / (Loss) after taxation	1,438,635	22,79,759
Net Profit / (Loss) attributable to Equity Shareholders	1,438,635	22,79,759
Weighted Average Number of shares outstanding during the year	17,057,400	17,057,400

31 Financial and Derivative Instruments
Capital Management

1) The company's objective when managing capital is to:

- Safeguard its ability to continue as a going concern so that the Company is able to provide maximum return to stakeholders and benefits for other stakeholders.
- Maintain an optimal capital structure to reduce the cost of capital.

The company's Board of director's reviews the capital structure on regular basis. As part of this review the board considers the cost of capital risk associated with each class of capital requirements and maintenance of adequate liquidity.

31 Financial and Derivative Instruments (Contd.....)

Disclosures

This section gives an overview of the significance of financial instruments for the Company and provides additional information on balance sheet items that contain financial instruments.

The details of significant accounting policies, including the criteria for recognition, the basis of measurement and the basis on which income and expenses are recognized in respect of each class of financial asset, financial liability and equity instrument are disclosed in Note provided hereunder:

Categories of Financial Instruments

Particulars	As At 31-03-2021 Amount In Rs.	As At 31-03-2020 Amount In Rs.
Financial Assets		
Measured at Amortised Cost		
1) Trade Receivables	81,115,713	72,814,169
2) Cash & Cash Equivalents	2,226,343	1,938,004
3) Loans	43,292,604	75,665,804
4) Other Financial Assets	1,889,319	2,400,509
5) Investments	-	-
Financial Liabilities		
Measured at Amortised Cost		
1) Borrowings	67,070,643	100,570,864
2) Trade Payables	45,732,751	17,226,619
3) Other Financial Liabilities	11,076,204	22,116,981

2) Fair Value Measurement :

This note provides information about how the Company determines fair values of various financial assets. Fair Value of financial assets and liabilities that are not measured at fair value (but fair value disclosures are required). Management considers that the carrying amounts of financial assets and financial liabilities recognized in the financial statements approximate their fair values.

3) Financial Risk Management Objectives

While ensuring liquidity is sufficient to meet Company's operational requirements, the Company's financial management committee also monitors and manages key financial risks relating to the operations of the Company by analyzing exposures by degree and magnitude of risks. These risks include market risk (including currency risk and price risk), credit risk and liquidity risk.

Market Risk

Market risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises two types of risk: interest rate, currency risk and other price risk, such as commodity price risk and equity price risk. Financial instruments affected by market risk include FVTPL investments, trade payables, trade receivables, etc.

Liquidity Risk

The Company manages liquidity risk by maintaining sufficient cash and cash equivalents including bank deposits and availability of funding through an adequate amount of committed credit facilities to meet the obligations when due.

Management monitors rolling forecasts of liquidity position and cash and cash equivalents on the basis of expected cash flows. In addition, liquidity management also involves projecting cash flows considering level of liquid assets necessary to meet obligations by matching the maturity profiles of financial assets & liabilities and monitoring balance sheet liquidity ratios.

The following tables detail the Company's remaining contractual maturity for its non-derivative financial liabilities with agreed repayment periods. The information included in 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 contractual maturity is based on the earliest date on which the Company may be required to pay.

Particulars	Due in 1 Year	Due after 1 Year	Total
As at 31 march, 2021			
Borrowings	67,070,643	-	67,070,643
Trade Payables	45,732,751	-	45,732,751
Other Financial Liabilities	11,076,204	-	11,076,204
Total	123,879,598	-	123,879,598
As at 31st March 2020			
Borrowings	100,570,864	-	100,570,864
Trade Payables	17,226,619	-	17,226,619
Other Financial Liabilities	22,116,981	-	22,116,981
Total	139,914,464	-	139,914,464

Trade Receivables

The Company has a detailed review mechanism of overdue customer receivables at various levels within organisation to ensure proper attention and focus for realisation.

Particulars	Due in 1 Year	1 year - 3 years	More than 3 Years
As at 31 March, 2021			
1) Trade Receivables	81,115,713	-	-
2) Cash & Cash Equivalents	611,761	1,614,582	-
3) Loans	-	43,292,604	-
4) Other Financial Assets	1,889,319	-	-
5) Investments	-	-	-
Total	83,616,793	44,907,186	-
As at 31st March 2020			
1) Trade Receivables	72,814,169	-	-
2) Cash & Cash Equivalents	404,662	1,533,342	-
3) Loans	-	75,665,804	-
4) Other Financial Assets	2,400,509	-	-
5) Investments	-	-	-
Total	75,619,340	77,199,146	-

32 Related Party Disclosures:

32.1 Related Parties & their Relationship

As per IND AS 24, the disclosures of transactions with the related parties are given below:

- i) List of Related parties where control exists and related parties with whom transactions have taken place and relationships:

S.N.	Name of Related Parties ^{##}	Relationship
(i)	Satish Asamal Mehta	Managing Director
(ii)	Jayesh Asamal Mehta	Director
(ii)	Krishnakant P. Somani	Key Managerial Person
(iv)	Nayan Pitroda	Key Managerial Person
(v)	Priya Raval	Key Managerial Person

32.2 Transactions with Related Parties

Particulars	Nature of Transaction	Amount
Satish A. Mehta	Salary	900,000
Jayesh A. Mehta	Salary	900,000
Krishnakant P. Somani	Salary	387,588
Nayan P. Pitroda	Salary	205,994
Priya A. Raval	Salary	129,994

^{##}Only those related party names are mentioned with whom transactions have took place during the year.

- 33** Certain Balance of Debtors, Creditors, Loans & Advances for Capital expenditures are non-moving / sticky . However in view of the management, the same is recoverable / payable. Hence no provision for the same is made in the books of accounts.
- 34** In the opinion of the Board of Directors, the current assets, loans and advances are approximately of the value stated, if realized in the ordinary course of business and the provisions for depreciation and all known and ascertained liabilities are adequate and not in excess of the amounts reasonably necessary.
- 35** The balance confirmation from the suppliers, customers as well as to various loans or advances given have been called for, but the same are awaited till the date of audit. Thus, the balances of receivables, trade payables as well as loans and advances have been taken as per the books of accounts submitted by the company and are subject to confirmation from the respective parties.
- 36** As informed to us, the Contingent Liability is NIL
- 37** Previous year's figures have been regrouped and rearranged wherever necessary.
- 38 Segment Reporting**
The Company has a business segment other than Manufacturing of Copper Pipes, however it fails to fulfil the Segment Reporting criteria. Therefore, Segment Reporting is not done.

39 Tax Reconciliation

Income Tax Recognised in statement of Profit and Loss	As at 31st March, 2021	As at 31st March, 2020
Current tax		-
In Respect of the Current year	150,715	1,009,590
Short/Excess Provision of Earlier years	(39,126)	-
Deferred Tax (Credit)/Charged	(703,207)	(3,46,821)
Total Income tax expense recognised in respect of continuing Operations	(591,618)	6,62,769

The income tax expense for the year can be reconciled to the accounting profit as follows:

Particulars	As at 31st March, 2021	As at 31st March, 2020
Profit Before Taxes	847,017	2,942,528
Enacted Tax Rate in India	26%	26%
Expected income tax benefit/(expense) at statutory tax rate	150,715	1,009,590
Effect of:		
Deferred tax(credit) /Charged	(703,207)	(3,46,821)
Income taxes recognised in the Statement of Profit and Loss	(552,492)	6,62,769

The Tax Rate used for the 2020-2021 reconciliation above is the corporate tax rate of 25% plus Cess @4% payable by corporate entities in india on taxable Profits under the indian tax laws.

Components of Deferred tax assets and Liabilities

Particulars	As at 31st March, 2021	As at 31st March, 2020
A) Deferred tax Liabilities		
Difference between book and tax depreciation	5,131,156	5,384,682
B) Deferred tax Liabilities		
Difference between book and tax depreciation	-	-
DTA on Other assets	-	-

Notes referred to herein above form an integral part of the Financial Statements

For Piyush J. Shah & Co.

Chartered Accountants

FRN :- 121172W

Piyush J. Shah

Partner

M. No.:- 108670

UDIN: 21108670AAAAEH7214

Place :- Ahmedabad

Date :- 15th June, 2021

For and on behalf of the Board of Directors

Satish Ashmal Mehta

Director

DIN :- 01958984

Jayesh Ashmal Mehta

Director

DIN :- 02156140

Krishnakant Somani

CFO

Priya Raval

Company Secretary



SAGARDEEP ALLOYS LIMITED

CIN - L29253GJ2007PLC050007

Registered Office :- Plot no. 2070, Rajnagar Patia, Santej Khatraj Road,
Santej Kalol, Gandhinagar -382721.

Phone: 079- 25626304, 25626335

E- Mail: secretary@sdalloys.com, investors@sdalloys.com

Website: www.sdalloys.com