

Kusum Industrial Gases Limited
Annual Report- 2020-2021

DIRECTORS' REPORT

To
The Members of
Kusum Industrial Gases Ltd.

Your Directors have pleasure in presenting the 39th Annual Report on the business and operations of the Company together with the Audited Financial Accounts for the year ended 31st March, 2021.

FINANCIAL RESULTS

	(Amount in Rs.)	
	Year ended March 31, 2021	Year ended March 31, 2020
Profit before exceptional items and tax	8,91,53,157	23,81,303
Less : Provision for taxation	2,31,32,300	1,06,936
Profit after taxation	6,60,20,857	22,74,367
Other Comprehensive Income	1,01,26,42,362	(52,67,90,337)
Balance brought forward from Previous year	3,87,34,31,073	4,39,88,20,598
	4,95,20,94,292	3,87,43,04,628
Appropriations		
Income Tax Adjustments	-	8,73,555
Surplus carried to balance sheet and OCI	4,95,20,94,292	3,87,34,31,073
	4,95,20,94,292	3,87,43,04,628

OPERATIONAL REVIEW

Your Company has recorded a profit after tax of Rs. 660.21 Lakhs as against Rs. 22.74 Lakhs recorded in the previous year.

FUTURE OUTLOOK

Your Directors are hopeful of a better performance during the current financial year too.

DIVIDEND

Considering the need for ploughing back the available resources into the business, your Directors do not recommend any dividend for the year ended 31st March, 2021.

RESERVES

Your Directors have not proposed any amount to be transferred to General Reserve for the year under review.

Meetings of Directors

Board Meeting

During the year 2020-21, the directors were met **Seven** times *inter-alia* to review the operations of the company and to discuss the financial results as well as the future business plans / strategy of the company. The board meetings were held on 29/06/2020; 25/08/2020; 14/09/2020; 13/10/2020; 12/11/2020; 15/12/2020 and 12/02/2021.



DIRECTORS

Presently, the Board has Two Independent (Non-Executive) Directors and One Non-Independent (Non-Executive) Director.

STATEMENT ON DECLARATION BY INDEPENDENT DIRECTORS

A statement on Declaration by Independent Directors under sub-section (6) of section 149 of the Companies Act, 2013 is attached with the report as a separate annexure.

PARTICULARS OF CONTRACTS OR ARRANGEMENTS MADE WITH RELATED PARTIES

During the year under review the company has related party transaction as disclosed in the Annual Accounts.

DIRECTORS RESPONSIBILITY STATEMENT PURSUANT TO CLAUSE (C) OF SUB SECTION (3) OF SECTION 134 OF THE COMPANIES ACT, 2013

The Directors hereby confirm:

- (i) that in the preparation of the Annual Accounts, the applicable Accounting Standards had been followed along with proper explanation relating to material departures ;
- (ii) that the Directors had selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year and of the profit of the Company for that period ;
- (iii) that the Directors had 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 irregularities ;
- (iv) That the directors had prepared the annual accounts for the period ended March 31, 2021 on a going concern basis.
- (v) That proper internal financial control have been laid down and followed by the company and that such internal financial controls are adequate and are operating effectively.
- (vi) That proper system has been devised to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

AUDITORS

The present Auditors, M/s. Ray & Co., Chartered Accountants, (Firm Registration No. 313124E) who was appointed for 5 years from the financial year 2019-20, are eligible to continue as Statutory Auditors for the financial year 2021-22 and have conveyed their eligibility and willingness to continue.

AUDITORS' REPORT

The comments by the Auditors in their report are self explanatory and in the opinion of the Board do not require any further clarification.

SECRETARIAL AUDIT REPORT

The Secretarial Auditor, K. C. Khowala, Company Secretary have carried out the Secretarial Audit for the year ended March 31, 2021 as required under the Companies Act, 2013 and the audit report is attached to this Directors Report. There is no qualification, reservation, adverse remark or disclaimer by the Secretarial Auditor in its report that requires explanation or comments by the Board.



DEPOSITS

The Company has not accepted any deposits from public or others during the year under review.

PARTICULARS OF EMPLOYEES

During the year under review, no employee was in receipt of remuneration of/or in excess of the prescribed under the Companies Act, 2013.

CONSERVATION OF ENERGY & TECHNOLOGY ABSORPTION

The Company is not carrying on any manufacturing activities, hence information regarding conservation of energy and technology absorption is not furnished.

DETAILS OF SUBSIDIARY, JOINT VENTURE OR ASSOCIATES

The Company does not have any Subsidiary, Joint venture and Associate Companies as per details given in the Annual Accounts.

PARTICULARS OF LOANS AND GUARANTEES

The Company has not given any loans or guarantee for loans taken by others under Section 186 of the Companies Act, 2013 and also not made any investments beyond the limits prescribed under the aforesaid section during the year.

FOREIGN EXCHANGE EARNINGS & OUTGO

Foreign Exchange earnings	Nil
Foreign Exchange outgo	Nil

NOMINATION AND REMUNERATION POLICY

The Nomination and Remuneration Committee of the Board comprising three directors out of which not less than one - half are independent as per the requirement of the act and has formulated the policy for appointment of Directors and Key Managerial Personnel and determination of remuneration including the criteria for determining qualification, positive attributes independence of a director and other matters as provided under sub-section (3) of section 178 of the Companies Act, 2013. In terms of the Policy, the non-executive directors and the independent directors shall not receive any remuneration, as well as they have wave their sitting fees for attending meetings of the Board and its Committees.

AUDIT COMMITTEE

The Company has duly constituted Audit Committee in place with three directors as its members. The Audit Committee had met four times during the year under review.

EXTRACT OF ANNUAL RETURN

In accordance with Section 134(3)(a) of the Companies Act, 2013, as amended vide The Companies (Amendment) Act, 2017 (notified on 31st July, 2018) the extract of the annual return is placed in the web address of the Company at www.kusumindustrialgasesltd.co.in at the following link: [MGT-9-Extract-of-Annual-Return-2021.pdf \(kusumindustrialgasesltd.co.in\)](http://www.kusumindustrialgasesltd.co.in/MGT-9-Extract-of-Annual-Return-2021.pdf)

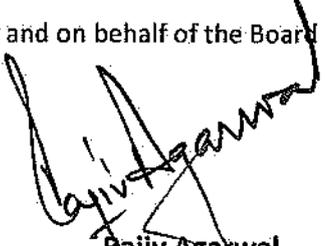
APPRECIATION

Your Directors wish to express their gratitude to the Shareholders, Bankers, Employees and all other well-wishers for their continued support and patronage.

Place : Kolkata

Dated : the 29th day of June, 2021

For and on behalf of the Board



Rajiv Agarwal
Chairman

Annexures to the Directors Report

Annexure I

Particulars pursuant to Section 134(3) of the Companies Act, 2013

A. CONSERVATION OF ENERGY

As the Company's activities do not involve, by and large, any significant level of energy consumption, no comments are necessary in respect of energy conservation and reduction of energy consumption. In any event, continuous efforts are made to conserve energy to the extent possible.

B. TECHNOLOGY ABSORPTION

As per Form B given as hereafter

FORM – B

Disclosure of particulars with respect to technology absorption forming part of the Directors' Report for the year ended March 31, 2021.

Technologies absorbed:

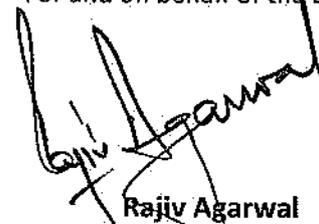
Research & development (R & D)

- | | | | |
|----|--|---|--|
| 1. | Specific areas in which R&D was carried out by the Company | : | NIL. |
| 2. | Benefit derived as a result of the above R&D | : | N.A. |
| 3. | Future plan of action | : | None |
| 4. | Expenditure on R & D | : | N.A. |
| 5. | Technology absorption, adaptation | : | Constant efforts are made by the Company to develop cost-effective new systems/technologies. |

C. FOREIGN EXCHANGE EARNING AND OUTGO

Foreign exchange earning	-	Nil
Foreign exchange outgo	-	Nil
CIF Value of Imports	-	Nil

For and on behalf of the Board


Rajiv Agarwal
Chairman

Place : Kolkata

Dated : the 29th day of June, 2021

Statement on declaration given by the independent director under sub-section (6) of section 149 of the Companies Act, 2013

The Board comprises two Independent Directors who have submitted declaration in individual capacity as follows:

- (a) He is an Independent Director and a person of integrity and possesses relevant expertise and experience;
- (b) (i) He is or was not a promoter of the company or its holding, subsidiary or associate company;
(ii) He is not related to promoters or directors in the company, its holding, subsidiary or associate company;
- (c) He has or had no pecuniary relationship with the company, its holding, subsidiary or associate company, or their promoters, or directors, during the two immediately preceding financial years or during the current financial year;
- (d) None of his relatives has or had pecuniary relationship or transaction with the company, its holding, subsidiary or associate company, or their promoters, or directors, amounting to two per cent or more of its gross turnover or total income or fifty lakh rupees or such higher amount as may be prescribed, whichever is lower, during the two immediately preceding financial years or during the current financial year;
- (e) He neither himself nor any of his relatives—
- (i) holds or has held the position of a key managerial personnel or is or has been employee of the company or its holding, subsidiary or associate company in any of the three financial years immediately preceding the current financial year;
- (ii) is or has been an employee or proprietor or a partner, in any of the three financial years immediately preceding the current financial year of—
- (A) a firm of auditors or company secretaries in practice or cost auditors of the company or its holding, subsidiary or associate company; or
- (B) any legal or a consulting firm that has or had any transaction with the company, its holding, subsidiary or associate company amounting to ten per cent or more of the gross turnover of such firm;
- (iii) holds together with his relatives two per cent or more of the total voting power of the company;
- or
- (iv) is a Chief Executive or director, by whatever name called, of any non-profit organisation that receives twenty-five percent or more of its receipts from the company, any of its promoters, directors or its holding, subsidiary or associate company or that holds two percent or more of the total voting power of the company.



Form No. MGT-9

EXTRACT OF ANNUAL RETURN

As on the financial year ended on 31/03/2021 of **Kusum Industrial Gases Ltd.**

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

I. REGISTRATION AND OTHER DETAILS:

- i) CIN:- L23201WB1983PLC035668
ii) Registration Date: 11/01/1983
iii) Name of the Company: Kusum Industrial Gases Ltd.
iv) Category/Sub-Category of the Company: - Public Limited Company
v) Address of the Registered office and contact details: P-46A, Radha Bazar Lane, 4th Floor, Kolkata - 700001
Ph: (033) 4051 3000 ; Fax: (033) 4051 3326
web-site : www.kusumindustrialgasesltd.co.in
e-mail : kusumindustrial@gmail.com
vi) Whether listed company (Yes/No) Yes - CSE Limited
vii) Name, Address and Contact details of Registrar and Transfer Agent: Niche Technologies Pvt. Ltd.
3A, Auckland Place ,7th Floor, Room No.7A & 7B, Kolkata -700017
Ph.No.-(033) 2280-6616 to 6618

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

All the business activities contributing 10 % or more of the total turnover of the company shall be stated:-

Sl. No.	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Other Financial Activity	K8	100.00

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES -

Sl. No.	NAME AND ADDRESS OF THE COMPANY	CIN/GLN	HOLDING/ SUBSIDIARY / ASSOCIATE	% of shares held	Applicable Section
As per the Balance Sheet					

KUSUM INDUSTRIAL GASES LTD.
IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)
A) Category-wise Share Holding

Category of Shareholders	No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. PROMOTERS									
(1) Indian									
a) Individual / HUF	63000	238000	301000	25.347	63000	238000	301000	25.347	0.000
b) Centran Government									
c) State Government									
d) Bodies Corporate	47480	333300	380780	32.065	47480	333300	380780	32.065	0.000
e) Banks / Financial Institutions									
f) Any Other									
Sub-total (A)(1)	110480	571300	681780	57.412	110480	571300	681780	57.412	0.000
(2) Foreign									
a) NRIs - Individuals									
b) Other - Individuals									
c) Bodies Corporate									
d) Banks / Financial Institutions									
e) Any Other									
Sub-total (A)(2)	0	0	0	0.000	0	0	0	0.000	0.000
Total Shareholding of Promoter (A) = (A)(1)+(A)(2)	110480	571300	681780	57.412	110480	571300	681780	57.412	0.000
B. PUBLIC SHAREHOLDING									
(1) Institutions									
a) Mutual Funds									
b) Banks / Financial Institutions									
c) Central Governments									
d) State Governments									
e) Venture Capital Funds									
f) Insurance Companies									
g) Foreign Institutional Investors (FII)									
h) Foreign Venture Capital Funds									
i) Others (Specify)									
Sub-total (B)(1)	0	0	0	0.000	0	0	0	0.000	0.000
(2) Non-Institutions									
a) Bodies Corporate									
i) Indian	451988	0	451988	38.062	451988	0	451988	38.062	0.000
ii) Overseas									
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs 1 lakh	19372	34380	53752	4.526	19372	34380	53752	4.526	0.000
ii) Individual shareholders holding nominal share capital in excess of Rs 1 l									
c) Others Specify									
1. NRI									
2. Overseas Corporate Bodies									
3. Foreign Nationals									
4. Clearing Members									
5. Trusts									
6. Foreign Bodies - D.R.									
Sub-total (B)(2)	471360	34380	505740	42.588	471360	34380	505740	42.588	0.000
Total Public Shareholding (B) = (B)(1)+(B)(2)	471360	34380	505740	42.588	471360	34380	505740	42.588	0.000
C. Shares held by Custodian for GDRs & ADRs									
GRAND TOTAL (A+B+C)	581840	605680	1187520	100.000	581840	605680	1187520	100.000	0.000

KUSUM INDUSTRIAL GASES LTD.**B. Shareholding of Promoters**

Sl No.	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% of change in shareholding during the year
		No. of Shares	% of total shares of the company	% of Shares Pledged/encumbered to total shares	No. of Shares	% of total shares of the company	% of Shares Pledged/encumbered to total shares	
1	ANKIT CREDITS PVT. LTD.	117380	9.884	0.000	117380	9.884	0.000	0.000
2	ANKIT SARAIYA	65000	5.474	0.000	65000	5.474	0.000	0.000
3	AVANTIKA GUPTA	59000	4.968	0.000	59000	4.968	0.000	0.000
4	ENERTECH ENGINEERS (INDIA) PVT. LTD.	57200	4.817	0.000	57200	4.817	0.000	0.000
5	P P GUPTA	59000	4.968	0.000	59000	4.968	0.000	0.000
6	PADAM PRAKASH GUPTA	59000	4.968	0.000	59000	4.968	0.000	0.000
7	RAJ PRABHA GUPTA	59000	4.968	0.000	59000	4.968	0.000	0.000
8	RAJ PROJECTS PVT. LTD.	114980	9.682	0.000	114980	9.682	0.000	0.000
9	TECHNO LEASING & FINANCE CO. PVT. LTD.	91220	7.682	0.000	91220	7.682	0.000	0.000
	T O T A L	681780	57.412	0.000	681780	57.412	0.000	0.000

KUSUM INDUSTRIAL GASES LTD.

C. Change in Promoter's Shareholding

Sl No.	Name	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	ANKIT CREDITS PVT. LTD.				
	a) At the Beginning of the Year	117380	9.884		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			117380	9.884
2	ANKIT SARAIYA				
	a) At the Beginning of the Year	65000	5.474		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			65000	5.474
3	AVANTIKA GUPTA				
	a) At the Beginning of the Year	59000	4.968		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			59000	4.968
4	ENERTECH ENGINEERS (INDIA) PVT. LTD.				
	a) At the Beginning of the Year	57200	4.817		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			57200	4.817
5	P P GUPTA				
	a) At the Beginning of the Year	59000	4.968		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			59000	4.968
6	PADAM PRAKASH GUPTA				
	a) At the Beginning of the Year	59000	4.968		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			59000	4.968
7	RAJ PRABHA GUPTA				
	a) At the Beginning of the Year	59000	4.968		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			59000	4.968
8	RAJ PROJECTS PVT. LTD.				
	a) At the Beginning of the Year	114980	9.682		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			114980	9.682
9	TECHNO LEASING & FINANCE CO. PVT. LTD.				
	a) At the Beginning of the Year	91220	7.682		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			91220	7.682
	TOTAL	681780	57.412	681780	57.412

KUSUM INDUSTRIAL GASES LTD.

D. Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holder of GDRs and ADRs) :

Sl. No.	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	AARKAY INVESTMENTS PVT. LTD.				
	a) At the Beginning of the Year	42700	3.596		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			42700	3.596
2	ASCU HEAT PUMPS PVT. LTD.				
	a) At the Beginning of the Year	41490	3.494		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			41490	3.494
3	BRIGHTSUN TRACON PRIVATE LIMITED.				
	a) At the Beginning of the Year	58300	4.909		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			58300	4.909
4	GREEN TEAK AGRO PROCESSORS PVT. LTD.				
	a) At the Beginning of the Year	25060	2.110		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			25060	2.110
5	J.P. FINANCIAL SERVICES PVT LTD				
	a) At the Beginning of the Year	58800	4.951		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			58800	4.951
6	NOBLE COMMUNICATIONS PVT LTD				
	a) At the Beginning of the Year	53000	4.463		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			53000	4.463
7	SURAKSHA PODDAR				
	a) At the Beginning of the Year	7355	0.619		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			7355	0.619
8	T M COMMERCIALS PVT. LTD.				
	a) At the Beginning of the Year	59000	4.968		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			59000	4.968
9	TECHNO INTERNATIONAL LTD				
	a) At the Beginning of the Year	55820	4.701		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			55820	4.701
10	VARANASI COMMERCIAL LTD.				
	a) At the Beginning of the Year	50000	4.210		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			50000	4.210
	T O T A L	451525	38.023	451525	38.023

KUSUM INDUSTRIAL GASES LTD.**E) Shareholding of Directors and Key Managerial Personnel**

Sl. No.	Name	Shareholding at the		Cumulative Shareholding	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	AVANTIKA GUPTA				
	a) At the Beginning of the Year	59000	4.968		
	b) Changes during the year	[NO CHANGES DURING THE YEAR]			
	c) At the End of the Year			59000	4.968
	TOTAL	59000	4.968	59000	4.968

V. INDEBTEDNESS

Indebtedness of the Company including interest outstanding/accrued but not due for payment

	Secured Loans	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at				
i) Principal Amount		0	0	0
ii) Interest due but	0	0	0	0
iii) Interest accrued	0	0	0	0
Total (i+ii+iii)		0	0	0
Change in				
* Addition	0	0	0	0
* Reduction	0	0	0	0
Net Change		0	0	
Indebtedness at				
i) Principal Amount	0	0	0	0
ii) Interest due but	0	0	0	0
iii) Interest accrued	0	0	0	0
Total (i+ii+iii)	0	0	0	0

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

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

Sl. no.	Particulars of Remuneration	Name of MD/WTD/ Manager				Total Amount
				----	---	-
1	Gross salary					
	(a) Salary as per provisions	-	-	-	-	-
	(b) Value of perquisites u/s	-	-	-	-	-
	(c) Profits in lieu of salary under	-	-	-	-	-
2	Stock Option	-	-	-	-	-
3	Sweat Equity	-	-	-	-	-
4	Commission - as % of profit	NIL				-
	others specify	-	-	-	-	-
5	Others, please specify	-	-	-	-	-
	Total (A)	-	-	-	-	-
	Ceiling as per the Act	-	-	-	-	-

B. Remuneration to other directors:

Sl. no.	Particulars of Remuneration	Name of Directors				
1	Independent Directors					
	Fee for attending board					
	Commission					0
	Others, please specify					0
	Total					0
	Total (1)	NIL				0
2	Other Non-Executive					
	Fee for attending board					
	Commission					
	Others, please specify					
	Total					0
	Total (2)					0
	Total (B)=(1+2)					0
	Total Managerial Remuneration					0
	Overall Ceiling as per the Act					0

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

Sl. no.	Particulars of Remuneration	Key Managerial Personnel			
					Total
1	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of	-	-	-	-
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income-	-	-	-	-
2	Stock Option	-	-	-	-
3	Sweat Equity	NIL			
4	Commission	-	-	-	-
	- as % of profit	-	-	-	-
	others, specify...	-	-	-	-
5	Others, please specify	-	-	-	-
	Total	0	0	0	0

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

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

K.C.KHOWALA

(Practicing Company Secretary)

SECRETARIAL AUDIT REPORT

FORM NO. MR - 3

For the Financial Year ended March 31, 2021

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

To,
The Members,
M/s Kusum Industrial Gases Ltd
P-46A, Radha Bazaar Lane, 4th Floor
Kolkata-700001
West Bengal

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

Based on my verification of the 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 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 thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-
 - a. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - b. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - c. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

27, Weston Street, 2nd Floor, Room No.: 205, Kolkata- 700 012.

Ph: 033-22114023, (M) 9831025638.

E-Mail: khowalakc_5@hotmail.com



K.C.KHOWALA

(Practicing Company Secretary)

- d. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (There were no events / instances during the Audit Period which attract the applicability of the Regulations);
 - e. The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
 - f. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (There were no events / instances during the Audit Period which attract the applicability of the Regulations);
 - g. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
 - h. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; and
 - i. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (There were no events / instances during the Audit Period which attract the applicability of the Regulations);
- (vi) All other laws applicable to the company in general. However, no Industry specific law is applicable to the Company.

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

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

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

1. The Company was required to appoint a **Company Secretary** to ensure compliance with the provision of Section 203 Of the Act, 2013 read with Clause 47 (A) of the Listing Agreement.
2. The Company was required to appoint **Key Managerial Personnel** i.e. **Chief Financial Officer** to ensure compliance with the provision of Section 203 of the Companies Act,2013.

I further report that

- a) The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors, Independent Directors and Women Directors.
- b) Adequate notice is given to all directors to schedule the Board Meetings. Agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and



K.C.KHOWALA

(Practicing Company Secretary)

obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

- c) Majority decision is carried through while the dissenting members' views are captured and recorded, if any, as part of the minutes.

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

I further report that during the Audit Period, the Company had not gone through any specific events having a major bearing on the Company's affairs in pursuance to the above referred laws, rules, regulations, guidelines, standards, etc.

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

Place: Kolkata
Date: 18th June, 2021



K. C. Khowala
Company Secretary in practice
ACS No. 4695
CP No. 2421
UDIN:A004695C000485791

K.C.KHOWALA

(Practicing Company Secretary)

"Annexure A"

(To the Secretarial Audit Report of M/s Kusum Industrial Gases Limited for the financial year ended March 31, 2021)

To,
The Members,
Kusum Industrial Gases Limited
P-46A, Radha Bazaar Lane, 4th Floor
Kolkata-700001
West Bengal

Our Secretarial Audit Report for the financial year ended March 31, 2021 of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on our 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 a opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the company.
4. Wherever required, I have obtained the management representation about the compliance of laws, rules, regulations and happening of events, etc.
5. The compliance of the provisions of corporate and other applicable laws, rules, regulations, and 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.

Place: Kolkata
Date: 18th June , 2021



K. C. Khowala
Company Secretary in practice
ACS No. 4695
CP No. 2421

UDIN:A004695C000485791

K.C.KHOWALA

(Practicing Company Secretary)

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) Regulation, 2015)

To,
The Members,
M/s Kusum Industrial Gases Ltd.
P-46A, Radha Bazaar Lane, 4th Floor
Kolkata-700001
West Bengal

I have examined the relevant registers, records, forms, returns and disclosures received from the Directors of **Kusum Industrial Gases Ltd.** having registered office at P-46A, Radha Bazaar Lane, 4th Floor Kolkata-700001, West Bengal (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) Regulation, 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 & 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, New Delhi or any such other Statutory Authority.

Sr.No.	Name of Director	DIN	Date of appointment in Company
1.	Mr.RAJIV AGARWAL	00056650	09/11/2009
2.	Mr DINESH PARAKH	00057091	30/09/2002
3.	Ms AVANTIKA GUPTA	03149138	06/08/2012

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



Place: Kolkata
Date: 18th June, 2021

Khowala

K. C. Khowala

Company Secretary in practice

ACS No. 4695

CP No. 2421

UDIN:A004695C000485857



Our Reference.....

Date.....

Independent Auditor's Report

To the Members of
KUSUM INDUSTRIAL GASES LIMITED

Report on the Audit of the Financial Statements

Opinion

1. We have audited the accompanying financial statements of Kusum Industrial Gases Limited ('the Company'), which comprise the Balance Sheet as at 31 March 2021, the Statement of Profit and Loss (including Other Comprehensive Income), the Cash Flow Statement and the Statement of Changes in Equity for the year then ended, and a summary of the significant accounting policies and other explanatory information.
2. In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the Companies Act, 2013 ('Act') in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India including Indian Accounting Standards ('Ind AS') specified under section 133 of the Act, of the state of affairs of the Company as at 31 March 2021, and its profit (including other comprehensive income), its cash flows and the changes in equity for the year ended on that date.

Basis for Opinion

3. We conducted our audit in accordance with the Standards on Auditing specified under section 143(10) of the Act. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India ('ICAI') together with the ethical requirements that are relevant to our audit of the 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.

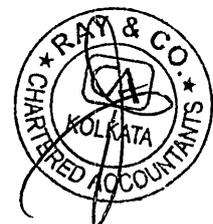
Emphasis of Matter

4. We draw attention to note no 20 of the Financial Statements as regards to the management evaluation of COVID-19 impact on the present and future performance of the company.

Further, due to the prevailing COVID-19 pandemic, the Government has ordered lock down whereby the physical movement has been restricted and as a law abiding professional, our firm is in complete compliance of the same. Thus, we could not visit the Company's office and as a result the whole audit has been conducted from a remote location through electronic media. In view thereof, no physical verification or inspection of the relevant documents and records could be possible and as such we have relied upon the soft and scanned copies of documents and the information made available to us electronically.

Our opinion is not modified in respect of this matter.

Key Audit Matter



5. 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 period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.
6. We have determined that there are no key audit matters to communicate in our report.

Information other than the Financial Statements and Auditor's Report thereon

7. The Company's Board of Directors is responsible for the other information. The other information comprises the information included in the Annual Report, but does not include the financial statements and our auditor's report thereon.

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

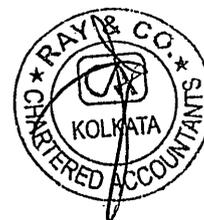
In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially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

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

8. The accompanying financial statements have been approved by the Company's Board of Directors. The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these financial statements that give a true and fair view of the financial position, financial performance including other comprehensive income, changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the Ind AS specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.
9. In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.
10. Those Board of Directors is also responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

11. Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an 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 Standards on Auditing will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

12. As part of an audit in accordance with Standards on Auditing, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:
 - Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
 - Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls with reference to financial statements in place and the operating effectiveness of such controls;
 - Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
 - Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern;
 - Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation;
13. 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.
14. 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.
15. We have relied upon the management's representation relating to the disclosures in the financial statements regarding (a) the dues to Micro, Small and Medium Enterprises (Note 18); (b) segment reporting (Note 19); (c) related party particulars (Note 21) and (d) impairment of assets (Note 22).

Report on Other Legal and Regulatory Requirements



16. Based on our audit, we report that the Company has not paid or provided for any managerial remuneration during the year. Accordingly, reporting under section 197(16) of the Act is not applicable.
17. As required by the Companies (Auditor's Report) Order, 2016 ('the Order') issued by the Central Government of India in terms of section 143(11) of the Act, we give in the Annexure A a statement on the matters specified in paragraphs 3 and 4 of the Order.
18. 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 purpose of our audit of the accompanying financial statements;
 - 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 financial statements dealt with by this report are in agreement with the books of account;
 - d) in our opinion, the aforesaid financial statements comply with Ind AS specified under section 133 of the Act;
 - e) on the basis of the written representations received from the directors and taken on record by the Board of Directors, none of the directors is disqualified as on 31 March 2021 from being appointed as a director in terms of section 164(2) of the Act;
 - f) we have also audited the internal financial controls with reference to financial statements of the Company as on 31 March 2021 in conjunction with our audit of the financial statements of the Company for the year ended on that date and our report dated 29 June 2021 as per Annexure B expressed unmodified opinion; and
 - 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 (as amended), in our opinion and to the best of our information and according to the explanations given to us:
 - i. the Company, does not have any pending litigation which would impact its financial position as at 31 March 2021;
 - ii. the Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses as at 31 March 2021; and
 - iii. there were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company during the year ended 31 March 2021.

Place: Kolkata
Date: June 29, 2021



For Ray & Co.
Chartered Accountants
Firm's Registration No.: 313124E

Subrata Roy
Partner
Membership No.: 051205
UDIN: 21051205AAAAAL6782

Annexure A to the Auditor's Report

The Annexure referred to in Independent Auditor's Report of even date to the members of KUSUM INDUSTRIAL GASES LIMITED, on the financial statements for the year ended 31st March, 2021

Based on the audit procedures performed for the purpose of reporting a true and fair view on the financial statements of the Company and taking into consideration the information and explanations given to us and the books of account and other records examined by us in the normal course of audit, we report that:

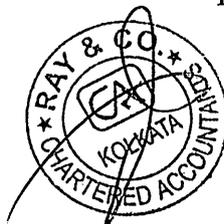
- (i) (a) The Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets.
- (b) The fixed assets have been physically verified by the management during the year and no material discrepancies were noticed on such verification. In our opinion, the frequency of verification of the fixed assets is reasonable having regard to the size of the Company and the nature of its assets.
- (c) The Company does not hold any immovable properties. Accordingly, the provisions of clause 3(ii)(c) of the Order are not applicable.
- (ii) The Company does not have any inventory. Accordingly, the provisions of clause 3(ii) of the Order are not applicable.
- (iii) (a) In our opinion the terms and conditions of grant of such loans are not, *prima facie*, prejudicial to the company's interest.
- (b) the schedule of repayment of principal has been stipulated wherein the principal amounts are repayable on demand and since the repayment of such loans has not been demanded, in our opinion, repayment of the principal amount is regular and payment of interest is regular;
- (c) there is no amount which is overdue for more than 90 days in respect of loans granted to such companies, firms, LLPs or other parties.
- (iv) The relevant provisions of sections 185 and 186 of the Act in respect of loans, investments, guarantees, and security is not applicable to the Company. Accordingly, the provisions of clause 3(iv) of the Order are not applicable.
- (v) In our opinion, the Company has not accepted any deposits within the meaning of Sections 73 to 76 of the Act and the Companies (Acceptance of Deposits) Rules, 2014 (as amended). Accordingly, the provisions of clause 3(v) of the Order are not applicable.
- (vi) To the best of our knowledge and belief, the Central Government has not specified maintenance of cost records under sub-section (1) of Section 148 of the Act, in respect of Company's products/ services. Accordingly, the provisions of clause 3(vi) of the Order are not applicable.
- (vii)(a) The Company is regular in depositing undisputed statutory dues including provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess and other material statutory dues, as applicable, to



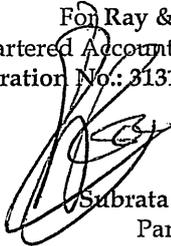
the appropriate authorities. Further, no undisputed amounts payable in respect thereof were outstanding at the year-end for a period of more than six months from the date they become payable.

- (b) There are no dues in respect of income-tax, sales-tax, service tax, duty of customs, duty of excise and value added tax that have not been deposited with the appropriate authorities on account of any dispute.
- (i) The Company has no loans or borrowings payable to a financial institution or a bank or government and no dues payable to debenture-holders during the year. Accordingly, the provisions of clause 3(viii) of the Order are not applicable.
- (ix) The Company did not raise moneys by way of initial public offer or further public offer (including debt instruments) and did not have any term loans outstanding during the year. Accordingly, the provisions of clause 3(ix) of the Order are not applicable.
- (x) No fraud by the Company or on the company by its officers or employees has been noticed or reported during the period covered by our audit.
- (xi) In our opinion, the company has not paid or provided for managerial remuneration. Accordingly, clause 3(xi) of the Order is not applicable.
- (xii) In our opinion, the Company is not a Nidhi Company. Accordingly, provisions of clause 3(xii) of the Order are not applicable.
- (xiii) In our opinion all transactions with the related parties are in compliance with Sections 177 and 188 of Act, where applicable, and the requisite details have been disclosed in the financial statements etc., as required by the applicable accounting standards.
- (xiv) During the year, the company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures.
- (xv) In our opinion, the company has not entered into any non-cash transactions with the directors or persons connected with them covered under Section 192 of the Act.
- (xvi) The company is required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934 and such registration has been obtained by the company.

Place: Kolkata
Date: June 29, 2021



For Ray & Co.
Chartered Accountants
Firm's Registration No.: 313124E


Subrata Roy
Partner
Membership No.: 051205
UDIN: 21051205AAAAAL6782

Annexure B

Independent Auditor's report on the Internal Financial Controls under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 ("the Act")

1. In conjunction with our audit of the financial statements of Kusum Industrial Gases Limited ("the Company") as of and for the year ended 31 March 2021, we have audited the internal financial controls over financial reporting (IFCoFR) of the company of as of that date.

Management's Responsibility for Internal Financial Controls

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

Auditors' Responsibility

3. Our responsibility is to express an opinion on the Company's IFCoFR based on our audit. We conducted our audit in accordance with the Standards on Auditing, issued by the Institute of Chartered Accountants of India (ICAI) and deemed to be prescribed under section 143(10) of the Act, to the extent applicable to an audit of IFCoFR, and the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (the "Guidance Note") issued by the ICAI. 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 IFCoFR were established and maintained and if such controls operated effectively in all material respects.
4. Our audit involves performing procedures to obtain audit evidence about the adequacy of the IFCoFR and their operating effectiveness. Our audit of IFCoFR included obtaining an understanding of IFCoFR, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.
5. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company's IFCoFR.

Meaning of Internal Financial Controls over Financial Reporting

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



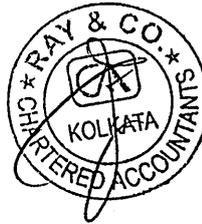
Inherent Limitations of Internal Financial Controls over Financial Reporting

7. Because of the inherent limitations of IFCoFR, 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 IFCoFR to future periods are subject to the risk that IFCoFR may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

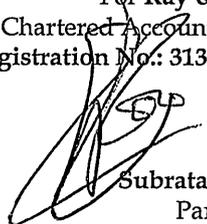
Opinion

8. In our opinion, the Company has, in all material respects, adequate internal financial controls over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31 March 2021, based the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by ICAI.

Place: Kolkata
Date: June 29, 2021



For Ray & Co.
Chartered Accountants
Firm's Registration No.: 313124E


Subrata Roy
Partner
Membership No.: 051205
UDIN: 21051205AAAAAL6782

KUSUM INDUSTRIAL GASES LIMITED

BALANCE SHEET AS AT 31ST MARCH, 2021

Particulars	Note No.	(In Rs)	
		As at Mar 31, 2021	As at Mar 31, 2020
ASSETS			
(1) Non-current assets			
(a) Property, Plant and Equipment	2	7,51,913	8,23,745
(b) Capital work-in-progress		-	-
(c) Investment Property		-	-
(d) Other Intangible Assets		-	-
(e) Financial Assets:	3		
(i) Investments		4,88,18,60,757	3,87,01,37,371
(ii) Trade Receivables		-	-
(iii) Loans		-	-
(iv) Others		2,34,010	2,34,010
(f) Deferred Tax Assets (net)	4	-	-
(g) Other Non-Current Assets	5	35,399	35,399
(2) Current assets			
(a) Inventories		-	-
(b) Financial Assets:	6		
(i) Investments		9,81,33,494	3,16,23,190
(ii) Trade Receivables		-	-
(iii) Cash and cash equivalents		10,01,605	11,61,461
(iv) Bank Balances other than (iii) above		-	-
(v) Loans		-	-
(vi) Other Financial Assets		1,01,00,000	1,01,00,000
(c) Current Tax Assets (net)	7	59,973	86,394
(d) Other current assets	8	5,19,100	6,53,820
TOTAL ASSETS		4,99,26,96,251	3,91,48,55,390
EQUITY AND LIABILITIES			
Equity			
(a) Equity Share Capital	9	1,18,75,200	1,18,75,200
(b) Other Equity	10	4,95,20,94,292	3,87,34,31,073
Liabilities			
(1) Non-current liabilities			
(a) Financial Liabilities:			
(i) Borrowings		-	-
(ii) Trade Payables		-	-
(ii) Other financial liabilities		-	-
(b) Provisions		-	-
(c) Deferred tax liabilities (net)	4	2,64,93,400	2,73,69,357
(d) Other non-current liabilities		-	-
(2) Current liabilities			
(a) Financial Liabilities:			
(i) Borrowings		-	-
(ii) Trade Payables		-	-
(iii) Other financial liabilities		-	-
(b) Other current liabilities	11	1,33,360	79,760
(c) Provisions	12	21,00,000	21,00,000
(d) Current Tax Liabilities (net)	13	-	-
TOTAL EQUITY AND LIABILITIES		4,99,26,96,252	3,91,48,55,390

Significant accounting policies and notes to financial statements 1

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

As per our report of even date

For Ray & Co.
Firm Registration No. 313124E
Chartered Accountants

Sabita Roy
Partner
M. No. 051205

UDIN: 21051205 AAAAAL6782

Kolkata
29 June, 2021



For and on behalf of the Board

Rajiv Agarwal
Rajiv Agarwal
DIN 00056650

Directors

Avantika Gupta
Avantika Gupta
DIN 03149138

KUSUM INDUSTRIAL GASES LIMITED
STATEMENT OF PROFIT AND LOSS FOR THE YEAR ENDED MARCH 31, 2021

(In Rs)

Particulars	Note No.	Year ended March 31, 2021	Year ended March 31, 2020
I. Revenue from operations		-	-
II. Other income	14	8,96,95,723	35,41,169
III. Total Income (I+II)		8,96,95,723	35,41,169
IV. Expenses			
Cost of materials consumed		-	-
Purchases of stock-in-trade		-	-
Changes in inventories of finished goods, stock-in-trade and work-in-progress		-	-
Employee benefits expense		-	-
Finance costs		-	-
Depreciation and amortisation expense	2	71,832	5,52,592
Other expenses	15	4,70,734	6,07,274
Total Expenses (IV)		5,42,566	11,59,866
V. Profit before exceptional items and tax (III-IV)		8,91,53,157	23,81,303
VI. Exceptional Items		-	-
VII. Profit/ (loss) before tax (V-VI)		8,91,53,157	23,81,303
VIII. Tax expense:			
(1) Current tax		2,30,89,281	1,67,294
MAT Credit Entitlement		-	-
(2) Deferred tax		43,019	(60,358)
IX. Profit/ (loss) for the period from continuing operations (VII-VIII)		6,60,20,857	22,74,367
X. Profit/ (loss) for the period from discontinued operations		-	-
XI. Tax expense of discontinued operations		-	-
XII. Profit/ (loss) from discontinued operations (after tax) (X-XI)		-	-
XIII. Profit/ (loss) for the period (IX+XII)		6,60,20,857	22,74,367
XIV. Other Comprehensive Income:			
A (i) Items that will not be reclassified to profit or loss		1,03,47,14,127	(52,20,91,435)
(ii) Income tax relating to items that will not be reclassified to profit or loss		2,20,71,765	46,98,902
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 (XI+XII)			
(Comprising Profit (Loss) and Other Comprehensive Income for the period)		1,12,28,06,749	(51,51,18,166)
XVI. Earning per equity share (for continuing operation):			
(1) Basic	16	55.60	1.92
(2) Diluted	16	55.60	1.92
XVII. Earning per equity share (for discontinued operation):			
(1) Basic		-	-
(2) Diluted		-	-
XVIII. Earning per equity share (for discontinued and continuing operation):			
(1) Basic		55.60	1.92
(2) Diluted		55.60	1.92

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

As per our report of even date

For Ray & Co.
 Firm Registration No. 313124E
 Chartered Accountants

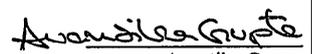

 Subrata Roy
 Partner
 M. No. 051205
 UDIN: 21051205 AAAA AL6782



Kolkata
 29 June, 2021

For and on behalf of the Board


 Rajiv Agarwal
 DIN 00056650


 Avantika Gupta
 DIN 03149138

Directors

KUSUM INDUSTRIAL GASES LIMITED

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

	31st March, 2021 Rs.	31st March, 2020 Rs.
Cash flow from operating activities		
Profit before tax	8,91,53,157	23,81,303
Non-cash adjustment to reconcile profit before tax to net cash flows		
Depreciation/amortization on continuing operation	71,832	5,52,592
Net gain/(loss) on sale of Current Investments	(11,61,421)	(16,020)
Net Unrealised gain/(loss) on Fair Valuation of Mutual Fund	(4,26,472)	(18,74,049)
Operating profit before working capital changes	<u>8,76,37,096</u>	<u>10,43,826</u>
Movements in working capital :		
Increase/(decrease) in other payables	53,590	23,200
Decrease/(increase) in other Non current assets	-	-
Decrease/(increase) in other current assets	1,34,720	(6,49,100)
Cash generated from / (used in) operations	<u>8,78,25,406</u>	<u>4,17,926</u>
Direct taxes paid (net of refunds)	(2,30,62,850)	(3,82,770)
Net Cash flow from / (used in) operating activities (A)	<u><u>6,47,62,556</u></u>	<u><u>35,156</u></u>
Cash flow from investing activities		
Proceeds from sale/(purchase) of current investments (Net)	(6,49,22,412)	1,00,000
Decrease/(increase) in long-term loans and capital advances	-	-
Net Cash flow from / (used in) investing activities (B)	<u><u>(6,49,22,412)</u></u>	<u><u>1,00,000</u></u>
Cash flow from financing activities		
Net Cash flow from / (used in) financing activities (C)	<u><u>-</u></u>	<u><u>-</u></u>
Net increase/(decrease) in cash and cash equivalents (A+B+C)	(1,59,856)	1,35,156
Cash and cash equivalents at the beginning of the year	<u>11,61,461</u>	<u>10,26,305</u>
Cash and cash equivalents at the end of the year	<u><u>10,01,605</u></u>	<u><u>11,61,461</u></u>
Components of cash and cash equivalents		
Balances with Banks		
In Current Accounts	8,45,753	10,05,459
Cash on hand	1,55,852	1,56,002
Total cash and cash equivalents	<u><u>10,01,605</u></u>	<u><u>11,61,461</u></u>

As per our report of even date

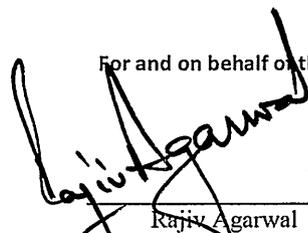
For Ray & Co.
Firm Registration No. 313124E
Chartered Accountants

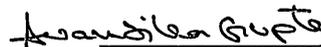

Subrata Roy
Partner



M. No. 051205
UDIN: 21051205 AAAA AL 6782
Kolkata
29 June, 2021

For and on behalf of the Board of Directors


Rajiv Agarwal
DIN 00056650


Avantika Gupta
DIN 03149138

Directors

KUSUM INDUSTRIAL GASES LIMITED

Statement of changes in Equity for the year ended March, 31, 2021

A. Equity Share Capital

	(in Rs.)
Balance as at March 31, 2020	1,18,75,200
Changes during the year	-
Balance as at March 31, 2021	1,18,75,200

B. Other Equity

Particulars	General Reserve on Amalgamation	Retained earnings	Other Comprehensive Income- equity instruments	Total
As at March 31, 2021				
Balance as at April 01, 2020	3,78,09,759	34,31,86,453	3,49,24,34,861	3,87,34,31,073
Profit for the year	-	6,60,20,857	-	6,60,20,857
Other comprehensive income for the year, net of income tax	-	-	1,01,26,42,362	1,01,26,42,362
Transfer to Retained Earning	-	-	-	-
Income Tax For Earlier Years	-	-	-	-
Balance at March 31, 2021	3,78,09,759	40,92,07,310	4,50,50,77,223	4,95,20,94,292
As at March 31, 2020				
Balance as at April 01, 2019	3,78,09,759	34,17,85,641	4,01,92,25,198	4,39,88,20,598
Profit for the year	-	22,74,367	-	22,74,367
Other comprehensive income for the year, net of income tax	-	-	(52,67,90,337)	(52,67,90,337)
Transfer to Retained Earning	-	-	-	-
Income Tax For Earlier Years	-	(8,73,555)	-	(8,73,555)
Balance at March 31, 2020	3,78,09,759	34,31,86,453	3,49,24,34,861	3,87,34,31,073

As per our report of even date

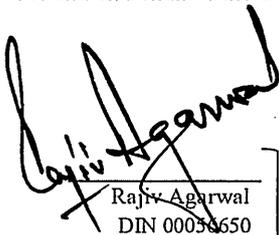
For and on behalf of the Board

For Ray & Co.
Firm Registration No. 313124E
Chartered Accountants




Shikha Roy
Partner
M. No. 051205
UDIN 21051205AAAAAL6782

Kolkata
29 June, 2021



Rajiv Agarwal
DIN 00058650

Directors



Avantika Gupta
DIN 03149138

KUSUM INDUSTRIAL GASES LIMITED

Notes to the Financial Statements for the year ended 31st March 2021

2. Property, Plant & Equipment

Particulars	Buildings	Furniture and Fixtures	Office Equipments	Air Conditioner	Electrical Fittings	Total
Gross Block						
As at March 31, 2019	20,64,981	11,36,000	33,25,434	5,21,552	21,016	70,68,983
Additions	-	-	-	-	-	-
Disposal	-	-	-	-	-	-
Adjustments	-	-	-	-	-	-
As at March 31, 2020	20,64,981	11,36,000	33,25,434	5,21,552	21,016	70,68,983
Additions	-	-	-	-	-	-
Disposal	-	-	-	-	-	-
Adjustments	-	-	-	-	-	-
As at March 31, 2021	20,64,981	11,36,000	33,25,434	5,21,552	21,016	70,68,983
Accumulated Depreciation						
As at March 31, 2019	15,56,037	9,83,543	26,70,053	4,62,175	20,838	56,92,646
Charge for the period	24,590	41,100	4,73,858	13,044	-	5,52,592
Disposal	-	-	-	-	-	-
Adjustments	-	-	-	-	-	-
As at March 31, 2020	15,80,627	10,24,643	31,43,911	4,75,219	20,838	62,45,238
Charge for the period	23,402	29,861	9,001	9,568	-	71,832
Disposal	-	-	-	-	-	-
Adjustments	-	-	-	-	-	-
As at March 31, 2021	16,04,029	10,54,504	31,52,912	4,84,787	20,838	63,17,070
Net carrying amount						
As at March 31, 2019	4,84,354	1,11,357	1,81,523	46,333	178	8,23,745
As at March 31, 2020	4,60,952	81,496	1,72,522	36,765	178	7,51,913



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1. Significant Accounting Policies**1.1 Overview of the Company**

Kusum Industrial Gases Limited ("The company") is a Core Investment Company (CIC) and does not require registration as per notification no. DNBS.PD.CC. No.274/03.02.089/2011-12 dated 11th May, 2012. As per the said notification, a Company having an asset size of more than Rs. 100 crores and less than Rs.500 crores and not accessing public funds is exempt from registration as CIC-NDSI with RBI. The company is a public limited company incorporated and domiciled in India and has its registered office at P46A, Radha Bazar Lane, Kolkata - 700001. The company has its primary listings on Calcutta Stock Exchange.

In accordance with the notification dated 16th February, 2015, issued by the Ministry of Corporate Affairs, the Company has adopted Indian Accounting Standards (referred to as "Ind AS") notified under the Companies (Indian Accounting Standards) Rules, 2015 (as amended) with effect from April 1, 2016.

1.2 Basis of preparation of Financial Statements

These financial statements have been prepared in accordance with Indian Accounting Standard (Ind AS), under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair values; the provisions of the Companies Act, 2013 ('the Act') (to the extent notified) and guidelines issued by the Securities and Exchange Board of India (SEBI). The Ind AS are prescribed under Section 133 of the Act read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 and relevant amendment rules issued there after.

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

As the operating cycle cannot be identified in normal course due to the special nature of industry, the same has been assumed to have duration of 12 months. Accordingly, all assets and liabilities have been classified as current or non-current as per the operating cycle and other criteria set out in IND AS-1 'Presentation of Financial Statements' and Schedule III to the Companies Act, 2013.

The Financial Statements are presented in Indian Rupees and all values are rounded off to the nearest two decimal except otherwise stated. The presentation and grouping of individual items in the balance sheet, the profit & loss statement and the cash flow statement, as well as the statement of changes in equity, are based on the principle of materiality.

1.3 Use of estimates and judgments

The preparation of the financial statements in conformity with IND AS requires management to make estimates, judgments and assumptions. These estimates, judgments and assumptions affect the application of accounting policies and the reported amounts of assets and liabilities, the disclosures of contingent assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the period. The application of accounting policies that require critical accounting estimates involving complex and subjective judgments and the use of assumptions in these financial statements have been disclosed in Note no. 1.5. Accounting estimates could change from period to period. Actual results could differ from those estimates. Appropriate changes in estimates are made as management becomes aware of changes in circumstances surrounding the estimates. Changes in estimates are reflected in the financial statements in the period in which changes are made and, if material, their effects are disclosed in the notes to the financial statements.

1.4 Estimation of uncertainties relating to the global health pandemic from Novel Coronavirus disease (COVID-19):

The Company has considered the possible effects that may result from the pandemic relating to COVID-19 on the carrying amounts of receivables, unbilled revenues and investment in shares and securities. In developing the assumptions relating to the possible future uncertainties in the global economic conditions because of this pandemic, the Company, as at the date of approval of these financial statements has used internal and external sources of information including credit reports and related information, economic forecasts. The Company has performed sensitivity analysis on the assumptions used and based on current estimates, expects the carrying amount of these assets will be recovered. The impact of COVID-19 on the Company's financial statements may differ from that estimated as at the date of approval of these financial statements.

1.5 Critical Accounting Estimates and Judgments**1.5.1 Property, Plant and Equipment**

On date of transition, the company has adopted the optional exception in accordance with IND AS 101 to measure Property, Plant and Equipment (PPE) at fair value and assumption of the same as deemed cost. Property, plant and equipment are stated at cost of acquisition or deemed cost on the date of transition or construction and subsequent improvements thereto less accumulated depreciation and impairment losses, if any. Cost of acquisition includes inward freight, duties and taxes (net of Cenvat availed), dismantling cost and installation expenses etc. incurred upto the installation of the assets. An item of PPE is derecognised upon disposal or when no future economic benefits are expected to arise from use. Gain or loss arising on disposal or retirement of an item of PPE is determined as the difference between the sale proceeds and the carrying amount of the asset and is recognised in the statement of Profit & Loss.

Depreciation is recognised on written down value basis over the estimated useful lives (or lease term, if shorter) in accordance with Schedule II of the Companies Act, 2013. Based on the above, useful lives as estimated for the assets considered for depreciation are as follows:

Category	Useful life
Buildings	
- Non-Factory Building (RCC Frame Structure)	60 Years
- Factory Building	30 Years
Computer equipment	
- Servers and networks	6 Years
- Others	3 Years
Furniture and fixtures, Electrical Installation and Laboratory Equipments	10 Years
Office equipment	5 Years
Vehicles	
- Motor cycles, scooters and other mopeds	10 Years
- Others	8 Years

1.5.2 Impairment of Non-financial Assets

Assets are tested for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognised for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs of disposal and value in use. For the purpose of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows which are largely independent of the cash flows from other assets or group of assets (cash-generating units). Non-financial assets that suffered an impairment are reviewed for possible reversal of the impairment at the end of each reporting period.

1.5.3 Financial Instruments

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

(i) Financial assets**Recognition and Initial Measurement:**

All financial assets are initially recognized when the company becomes a party to the contractual provisions of the instruments. A financial asset is initially measured at fair value plus, in the case of financial assets not recorded at fair value through profit or loss, transaction costs that are attributable to the acquisition of the financial asset.

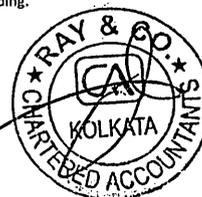
Classification and Subsequent Measurement:

For purposes of subsequent measurement, financial assets are classified in four categories:

- Measured at Amortized Cost;
- Measured at Fair Value Through Other Comprehensive Income (FVTOCI);
- Measured at Fair Value Through Profit or Loss (FVTPL);
- Equity Instruments measured at Fair Value Through Other Comprehensive Income (FVTOCI). Financial assets are not reclassified subsequent to their initial recognition, except if and in the period the Company changes its business model for managing financial assets.
- Measured at Amortized Cost: A debt instrument is measured at the amortized cost if both the following conditions are met:
 - The asset is held within a business model whose objective is achieved by both collecting contractual cash flows; and
 - The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

After initial measurement, such financial assets are subsequently measured at amortized cost using the effective interest rate (EIR) method.

- Measured at FVTOCI: A debt instrument is measured at the FVTOCI if both the following conditions are met:
 - The objective of the business model is achieved by both collecting contractual cash flows and selling the financial assets; and
 - The asset's contractual cash flows represent SPPI.



Debt Instruments meeting these criteria are measured initially at fair value plus transaction costs. They are subsequently measured at fair value with any gains or losses arising on re-measurement recognized in other comprehensive income, except for impairment gains or losses and foreign exchange gains or losses. Interest calculated using the effective interest method is recognized in the statement of profit and loss in investment income.

- Measured at FVTPL: FVTPL is a residual category for debt instruments. Any debt instrument, which does not meet the criteria for categorization as at amortized cost or as FVTOCI, is classified as FVTPL. In addition, the company may elect to designate a debt instrument, which otherwise meets amortized cost or FVTOCI criteria, as at FVTPL. Debt instruments included within the FVTPL category are measured at fair value with all changes recognized in the statement of profit and loss.

- Equity Instruments measured at FVTOCI: All equity investments in scope of Ind AS – 109 are measured at fair value. Equity instruments which are held for trading are classified as FVTPL. For all other equity instruments, the company may make an irrevocable election to present in other comprehensive income subsequent changes in the fair value. The company makes such election on an instrument by instrument basis. The classification is made on initial recognition and is irrevocable. In case the company decides to classify an equity instrument as at FVTOCI, then all fair value changes on the instrument, excluding dividends, are recognized in the OCI. There is no recycling of the amounts from OCI to P&L, even on sale of investment.

Derecognition

The Company derecognizes a financial asset on trade date only when the contractual rights to the cash flows from the asset expire, or when it transfers the financial asset and substantially all the risks and rewards of ownership of the asset to another entity.

Impairment of Financial Assets

The Company assesses on a forward looking basis the expected credit losses (ECL) in associates with its debt instruments carried at amortised cost and with the exposure arising from loan commitments and other financial assets. The company recognises a loss allowance for such losses at each reporting date.

The measurement of ECL reflects:

- An unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes;
- The time value of money; and
- Reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecast of future economic conditions.

The measurement of the ECL allowance is an area that requires the use of complex models and significant assumptions about future economic conditions and credit behaviour (e.g. the likelihood of customer defaulting and the resulting losses).

Write-off policy

The Company writes off financial assets, in whole or part, when it has exhausted all practical recovery efforts and has conducted there is no reasonable expectation of recovery.

(ii) Financial Liabilities

Recognition and Initial Measurement:

Financial liabilities are classified, at initial recognition, as at fair value through profit or loss, loans and borrowings or payables, as appropriate. All financial liabilities are recognized initially at fair value and, in the case of loans and borrowings and payables, net of directly attributable transaction costs.

Subsequent Measurement:

Financial liabilities are measured subsequently at amortized cost or FVTPL. A financial liability is classified as FVTPL if it is classified as held-for-trading, or it is a derivative or it is designated as such on initial recognition. Financial liabilities at FVTPL are measured at fair value and net gains and losses, including any interest expense, are recognized in statement of profit or loss. Other financial liabilities are subsequently measured at amortized cost using the effective interest rate method. Interest expense and foreign exchange gains and losses are recognized in statement of profit or loss. Any gain or loss on derecognition is also recognized in statement of profit or loss.

Derecognition

A financial liability is derecognized when the obligation under the liability is discharged or cancelled or expires.

Offsetting financial instruments

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

1.5.4 Inventories

Stock in trade is measured at Fair Value as per IND AS.

1.5.5 Revenue Recognition

Revenue is measured at fair value of the consideration received or receivable. Revenue is recognised when (or as) the Companies satisfy a performance obligation by transferring a promised goods or service to a customer.

(i) Interest Income

Interest income is recognised using the effective interest rate.

(ii) Dividend Income

Dividend income is recognised when the right to receive payment is established.

(iii) Income from investment

Profit / (loss) earned from sale of securities is recognised on trade date basis. The cost of securities is computed based on FIFO basis.

(iv) All other income are accounted for on accrual basis unless otherwise specified.

1.5.6 Provisions, Contingent Liabilities and Contingent Assets, legal or constructive

(i) Provisions are recognised when there is a present obligation as a result of a past event and it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and there is a reliable estimate of the amount of the obligation. Provisions are measured at the present value of management's best estimate of the expenditure required to settle the present obligation at the end of the reporting period. The discount rate used to determine the present value is a pre-tax rate that reflects current market assessments of the time value of money and the risk specific to the liability. The increase in the provision due to the passage of time is recognised as interest expense.

(ii) A disclosure for contingent liabilities is made when there is a possible obligation arising from past events, the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made. When there is a possible obligation or a present obligation and the likelihood of outflow of resources is remote, no provision or disclosure for contingent liability is made.

(iii) Contingent Assets are not recognised but are disclosed when an inflow of economic benefits is probable.

1.5.7 Investments

Investments that are readily realisable and intended to be held for not more than a year are classified as Current Investments. All other investments are classified as Long-term Investments. Under IND AS,

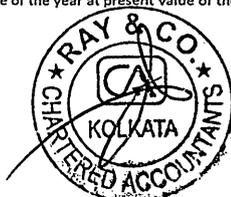
Investments are measured at fair value and accordingly, difference between the fair value and carrying value is recognised in the Statement of Profit and Loss or recognised as Other Comprehensive Income.

1.5.8 Employee Benefits

(i) Short term Employee benefits are accrued in the year services are rendered by the employees.

(ii) Contribution to defined contribution plans such as Provident Fund etc. is being made in accordance with the statute and are recognized as and when incurred. Contribution to defined benefit plans consisting of contribution to gratuity are determined at close of the year at present value of the amount payable using actuarial valuation techniques. Actuarial gain and losses arising from experience adjustments and changes in actuarial assumptions are recognized in other comprehensive income. Other costs recognised in the Statement of Profit or Loss.

(iii) Other long term employee benefits consisting of Leave encashment are determined at close of the year at present value of the amount payable using actuarial valuation techniques. The changes in the amount payable including actuarial gain or loss are recognised in the Statement of Profit or Loss.



1.5.9 Taxes on Income

Income Tax expenses comprise current tax and deferred tax charge or credit.

(i) Current Tax

Current tax is measured on the basis of estimated taxable income for the current accounting period in accordance with the applicable tax rates and the provisions of the Income Tax Act, 1961 and other applicable tax laws.

(ii) Deferred Tax

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

Deferred tax is recognized in respect of temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the corresponding amounts used for taxation purposes (i.e., tax base). Deferred tax is also recognized for carry forward of unused tax losses and unused tax credits.

Deferred tax assets are recognized to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilized.

The carrying amount of deferred tax assets is reviewed at the end of each reporting period. The Company reduces the carrying amount of a deferred tax asset to the extent that it is no longer probable that sufficient taxable profit will be available to allow the benefit of part or that entire deferred tax asset to be utilized. Any such reduction is reversed to the extent that it becomes probable that sufficient taxable profit will be available.

Deferred tax relating to items recognized outside the Statement of Profit and Loss is recognized either in other comprehensive income or in equity.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current tax assets against current tax liabilities and when they relate to income taxes levied by the same taxation authority and the Company intends to settle its current tax assets and liabilities on a net basis.

1.6 Statement of Cash Flows

Cash flows are reported using the indirect method, whereby profit for the year is adjusted for the effects of transactions of a non-cash nature, any deferrals or accruals of past or future operating cash receipts or payments and item of income or expenses associated with investing or financing cash flows. The cash flows from operating, investing and financing activities of the Company are segregated. The Company considers all highly liquid investments that are readily convertible to known amounts of cash to be cash equivalents.

1.7 Earnings per Share

Basic Earnings per share (EPS) amounts are calculated by dividing the profit for the year attributable to equity holders by the weighted average number of equity shares outstanding during the year. Diluted EPS amounts are calculated by dividing the profit attributable to equity holders adjusted for the effects of potential equity shares by the weighted average number of equity shares outstanding during the year plus the weighted average number of equity shares that would be issued on conversion of all the dilutive potential equity shares into equity shares.

	As at 31 March, 2021		As at 31 March, 2020	
	Holding	Value	Holding	Value
3 Non- Current Financial Assets				
(i) Investments				
Investments fair value through Other Comprehensive Income				
a. Equity Shares (Quoted)				
Ballarpur Industries Ltd. (F.V. Rs. 2)	6,000	6,300	6,000	2,100
Checons Ltd.	6,500	1,43,000	6,500	1,43,000
Golden Tobacco Ltd	49,091	19,58,731	49,091	9,67,093
GTL Infrastructure Ltd.	20,611	16,489	20,611	5,153
Motorol Speciality Oils Ltd.	5,03,905	2,26,757	5,03,905	2,26,757
National Steel & Agro Industries Ltd.	10,000	36,500	10,000	14,000
Nextgen Animation Media Ltd.	600	1,068	600	1,068
Octal Credit Capital Ltd.	1,00,000	4,68,000	1,00,000	4,70,000
Roofit Industries Ltd.	100	460	100	460
Silverline Technologies Ltd.	3,500	7,665	3,500	7,665
Sun Earth Ceramics Ltd.	100	130	100	130
Techno Electric & Engg. Co. Ltd. (F.V. Rs. 2)	1,45,91,000	4,47,72,48,350	1,45,91,000	3,47,26,58,000
		4,48,01,13,450		3,47,44,95,426
b. Equity Shares (Unquoted)				
Others (*)				
Ankit Credits Pvt. Ltd.	2,00,000	25,06,000	2,00,000	25,02,000
Teloijan Techno Agro Ltd (formerly known Bargarh Green Power Generating Co. Ltd.)	9,09,900	94,17,465	9,09,900	89,53,416
Binani Zinc Ltd.	1,811	-	1,811	-
Deserve Vincom Pvt. Ltd.	11,00,000	1,05,60,000	11,00,000	1,07,14,000
Direction Barter Pvt. Ltd.	11,00,000	1,05,27,000	11,00,000	1,06,81,000
Enertech Engineers (I) Pvt. Ltd.	58,000	17,56,240	58,000	17,76,540
Gagan Realdev Pvt. Ltd.	11,00,000	1,05,49,000	11,00,000	1,07,03,000
Green Teak Agro Processors Pvt. Ltd.	18,500	1,82,225	18,500	2,02,205
Horizon Vintrade Pvt Ltd	24,22,500	2,40,06,975	24,22,500	2,40,06,975
Majestic Comtrade Pvt Ltd	7,22,500	71,67,200	7,22,500	71,74,425
Navyug Infracon Pvt. Ltd.	51,000	4,42,680	51,000	4,37,580
North Dinajpur Power Ltd	3,00,000	24,81,000	3,00,000	24,93,000
Pinnacle Commedeal Pvt Ltd	22,72,500	2,25,20,475	22,72,500	2,25,20,475
Raj Projects Pvt. Ltd.	72,000	13,99,680	72,000	14,13,360
Saffron Enclave Pvt. Ltd.	2,28,000	2,21,93,520	2,28,000	1,89,55,920
Techno Birbhum Green Power Generating Co. Ltd	3,00,000	24,96,000	3,00,000	25,05,000
Techno International Ltd	9,60,000	2,51,90,400	9,60,000	2,54,68,800
Techno Leasing & Finance Co. Pvt. Ltd	2,09,500	2,02,56,555	2,09,500	2,02,69,125
Techno Power Projects Ltd	48,500	94,51,195	48,500	93,50,315
Varanasi Commercial Ltd	3,30,400	21,65,47,464	3,30,400	21,34,18,576
Varun Resources Ltd (#)	1,70,732	16,76,986	1,70,732	16,76,986
Varun Global Ltd (#)	42,683	4,19,247	42,683	4,19,247
		40,17,47,307		39,56,41,945
Total		4,88,18,60,757		3,87,01,37,371
Aggregate Amount of				
Quoted Investments		4,48,01,13,450		3,47,44,95,426
Unquoted Investments		40,17,47,307		39,56,41,945
		4,88,18,60,757		3,87,01,37,371
Investments measured through FVTOCI		4,88,18,60,757		3,87,01,37,371

(*) The breakup value of unquoted shares have been taken as on 31.03.2019.

(#) Pursuant to the Composite Scheme of Arrangement and Amalgamation as approved by the Hon'ble High Court of Judicature at Bombay, shares of Varun Resources Limited & Varun Global Limited has been issued and allotted for the erstwhile Varun Shipping Company Limited. The shares of the company are yet to be listed.



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	As at 31 March, 2021		As at 31 March, 2020	
(ii) Others				
Other Advances recoverable in cash or kind- considered good MAT Credit Entitlement		2,34,010		2,34,010
		<u>2,34,010</u>		<u>2,34,010</u>
4 Deferred Tax Assets/Liabilities (net)				
The balance comprises temporary differences attributable to:				
Deferred Tax Liabilities				
Difference between book value of depreciable assets as per books of account and written down value for tax purposes		(2,77,267)		(3,20,286)
Tax impact on Fair Value of Investments		2,67,70,667		2,76,89,643
Net Deferred Tax Liabilities		<u>2,64,93,400</u>		<u>2,73,69,357</u>
5 Other Non-Current Assets				
Security Deposit		35,399		35,399
		<u>35,399</u>		<u>35,399</u>
6 Current Financial Assets				
(i) Investments				
Investments at fair value through Profit & loss				
a. Mutual Funds (unquoted)				
Reliance Liquid Fund - Dir. - G			5,401,512	2,62,01,053
Aditya Birla Sun Life Liquid Fund - Dir. - G			16,967,547	54,22,137
ABSL Floatings Rate Fund - Dir. - G	72,829.730	4,02,07,116	-	-
ABSL Low Duration Fund - Dir. - G	2,10,282.569	5,69,20,001	-	-
ABSL Overnight Fund - Dir. - G	904.253	10,06,377	-	-
		<u>9,81,33,494</u>		<u>3,16,23,190</u>
Aggregate Amount of Unquoted Investments		<u>9,81,33,494</u>		<u>3,16,23,190</u>
		<u>9,81,33,494</u>		<u>3,16,23,190</u>
Investments measured through FVTPL		9,81,33,494		3,16,23,190
			As at 31 March, 2021	As at 31 March, 2020
(ii) Cash and Cash Equivalents				
Balances with banks in Current Accounts			8,45,753	10,05,459
Cash on hand			1,55,852	1,56,002
			<u>10,01,605</u>	<u>11,61,461</u>
(iii) Others				
Other Advances recoverable in cash or kind- considered doubtful			1,01,00,000	1,01,00,000
			<u>1,01,00,000</u>	<u>1,01,00,000</u>
7 Current Tax Assets (net)				
Income Taxes			59,973	86,394
			<u>59,973</u>	<u>86,394</u>
8 Other Current Assets				
Prepaid Expenses			1,100	5,820
Other Receivables			5,18,000	6,48,000
			<u>5,19,100</u>	<u>6,53,820</u>
9 Equity Share Capital				
a) Capital Structure				
Authorised				
13,00,000 Equity Shares of Rs. 10/- each			1,30,00,000	1,30,00,000
(Previous Year 13,00,000 Equity Shares of Rs. 10/- each)			<u>1,30,00,000</u>	<u>1,30,00,000</u>
Issued, Subscribed and Fully Paid Up				
11,87,520 Equity Shares of Rs. 10/- each			1,18,75,200	1,18,75,200
(Previous Year 11,87,520 Equity Shares of Rs. 10/- each)			<u>1,18,75,200</u>	<u>1,18,75,200</u>
b) Share Capital Reconciliation				
Equity Shares				
			31 March 2021	31 March 2020
			Nos.	Amount
Opening balance			11,87,520	1,18,75,200
Issued during the period			-	-
Closing Balance			<u>11,87,520</u>	<u>1,18,75,200</u>
c) Particulars of Equity Shareholders holding more than 5% Shares at Balance Sheet date				
			31 March 2021	31 March 2020
			Nos.	% holding
Ankit Gupta		65,000	5.47	65,000
Ankit Credits Pvt. Ltd.		1,17,380	9.88	1,17,380
Raj Projects Pvt. Ltd.		1,14,980	9.68	1,14,980
Techno Leasing & Finance Co. Pvt. Ltd.		91,220	7.68	91,220

The above shareholding represents both legal and beneficial ownership of shares.



- d) **Terms of issue of equity shares**
The Company has only one class of shares referred to as equity shares having a par value of Rs 10. Each holder of equity share is entitled to one vote per share. In the event of liquidation, the equity shareholders are eligible to receive the remaining assets of the Company, after distribution of all preferential amount, in proportion to their shareholding.
- e) No shares have been reserved for issue under options and contracts / commitments for the sale of shares/disinvestment as at the Balance Sheet date.
- f) The Company has not allotted any shares as fully paid up pursuant to contract(s) without payment being received in cash or by way of fully paid bonus shares nor has bought back any shares during the period of five years immediately preceding the date at which the Balance Sheet is prepared.
- g) No convertible securities have been issued by the Company during the year.
- h) No calls are unpaid by any Director and Officer of the Company during the year.
- i) The Company has not forfeited any shares.

	As at 31 March, 2021	As at 31 March, 2020
10 Other Equity		
(i) General Reserve on Amalgamation Balance b/f	3,78,09,759	3,78,09,759
(ii) Retained Earnings Balance at the beginning of the reporting period	34,31,86,453	34,17,85,641
Add: Income Tax Adjustments	-	(8,73,555)
Add: Total Income in accordance with IND AS	6,60,20,857	22,74,367
Add: Transfer from OCI	-	-
Net Surplus/(Deficit) at the end of the year	<u>40,92,07,310</u>	<u>34,31,86,453</u>
(iii) Other Comprehensive Income Balance at the beginning of the year	3,49,24,34,861	4,01,92,25,198
Add: Investments carried at FVTOCI	1,01,26,42,362	(52,67,90,337)
Less: Transfer to retained earnings	-	-
Equity instrument through other comprehensive income	<u>4,50,50,77,223</u>	<u>3,49,24,34,861</u>
Total	<u><u>4,95,20,94,292</u></u>	<u><u>3,87,34,31,073</u></u>

Description of nature and purpose of each reserve

General Reserve on Amalgamation

General Reserve on amalgamation represents the reserve created on amalgamation undergone by the company in the nature of merger.

Retained Earning

Created out of accretion of profits.

Other Comprehensive Income

The Company has elected to recognise changes in the fair value of certain investment in equity securities in other comprehensive income. These changes are accumulated within the FVTOCI equity investments reserve within equity. The Company transfers amounts from this reserve to retained earning when the securities are derecognised.

	As at 31 March, 2021	As at 31 March, 2020
11 Other Current Liabilities		
Other payables		
Statutory Dues Payables	3,000	5,000
Others Payables (Year end accruals for expenses)	<u>1,30,360</u>	<u>74,760</u>
	<u>1,33,360</u>	<u>79,760</u>
12 Current Provisions		
Provision for doubtful advances	<u>21,00,000</u>	<u>21,00,000</u>
	<u>21,00,000</u>	<u>21,00,000</u>
13 Current Tax Liabilities (net)		
Provision for Income Tax (net)	-	-
	-	-
14 Other Income		
Net gain/(loss) on sale of Current Investments	11,61,421	16,020
Rental Income	-	9,24,000
Dividend Income from Non-current investments	8,75,46,000	-
Unrealised Gain on Mutual Fund Investments	4,26,472	18,74,049
Interest Income on Loan	5,60,000	7,20,000
Interest income- others	1,830	1,700
Sundry Balances W/ Off	-	5,400
	<u>8,96,95,723</u>	<u>35,41,169</u>
	<u>31 March, 2021</u>	<u>31 March, 2020</u>
	Rs	Rs
15 Other Expenses		
Advertisement expenses	23,184	20,034
Auditors' Remuneration		
-Audit Fees	47,200	47,200
-Tax Audit Fees	-	-
-Certification Fees	5,900	11,800
Electricity expenses	5,810	32,310
Corporation Taxes	34,390	33,037
Listing Fees	-	29,500
Maintenance Charges of Building	1,00,030	98,400
Miscellaneous expenses	13,483	12,355
Professional charges	2,27,937	3,09,838
Rates & Taxes	<u>12,800</u>	<u>12,800</u>
	<u>4,70,734</u>	<u>6,07,274</u>



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16 Earning Per Share(EPS)

The following reflects the profit and share data used in the basic and diluted EPS computations:

	31 March, 2021	31 March, 2020
Net Profit / (Loss) attributable to equity shareholders	6,60,20,857	22,74,367
Weighted average number of equity shares in calculating EPS	11,87,520	11,87,520
Nominal value of Equity Shares	10	10
Basic & Diluted EPS	55.60	1.92

17 ACCOUNTING FOR TAXES ON INCOME

Provision for Tax is made for current and deferred taxes.

Income tax expense is recognised in the income statement except to the extent that it relates to items recognised directly in equity or other comprehensive income, in which case it is recognised directly in equity or other comprehensive income.

Current income tax for current period is provided on the taxable income and recognized at the amount expected to be paid to or recovered from the tax authorities, using the tax rates and tax laws that have been enacted or substantively enacted by the balance sheet date. Taxable income differs from 'profit before tax' as reported in the statement of profit and loss because of items of income or expense that are taxable or deductible in other years and items that are never taxable or deductible. Current tax assets and liabilities are set off and presented as net.

Deferred tax is recognised using the balance sheet method, providing for temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the corresponding amounts used for taxation purposes. Deferred tax is measured at the tax rates that have been enacted or substantively enacted.

Significant judgment is required in determination of taxability of certain income and deductibility of certain expenses during the estimation of the provision for income taxes.

The Company has significant amount of unused tax credits, since availability of future taxable income is not certain, no provision for deferred tax assets has been made under IND AS 12 'Income Taxes'.

18 DETAILS OF DUES TO MICRO AND SMALL ENTERPRISES AS PER MSMED ACT 2006

The Company has circulated confirmation for the identification of suppliers registered under the Micro, Small and Medium Enterprises Development Act, 2006. On the basis of information available with the Company under the aforesaid Act, there are no Enterprises to whom the Company owes dues which are outstanding at year end. This has been relied upon by the Auditors.

19 The Company's activities during the year were limited to Investment Activities and accordingly no separate disclosure is required in terms of Indian Accounting Standard 108, 'Operating Segments'.

20 The outbreak of COVID-19 pandemic globally is causing a slowdown of economic activity. In many countries, businesses are being forced to cease or limit their operations for long or indefinite period of time. Measures taken to contain the spread of the virus, including travel bans, quarantines, social distancing and closures of non-essential services have triggered disruptions to businesses worldwide, resulting in an economic slowdown and uncertainties pertaining to future operations. The Company has considered the possible effects on its business that may result from COVID-19 on the carrying amount of receivables, other investments and financing made by the Company as on the reporting date and income to be accrued thereupon in coming years. Based on assumptions and current estimates in view of the pandemic, the Company expects that the carrying amounts of receivables and other investments will be recovered in due course of time. Also, there is no material uncertainty on the ability of the Company to continue as a going concern and there is no material event/ circumstances due to COVID-19 as on the date of approval of the Financial Statement that requires separate adjustment or disclosure.

21 Related Party Disclosures

As per Indian Accounting Standard (Ind AS) 24 'Related Party Disclosures', the disclosure of transactions with related parties are given below:

i) Names of the related parties and description of relationship

1. Key Management Personnel (KMP) and their relatives

Mrs. Avantika Gupta	Director
Mr. Rajiv Agarwal	Director
Mr. Dinesh Parakh	Director
Mr. Ankit Saraiya	Relative of Director
Mr. P. P. Gupta	Relative of Director

ii) Details of Related Party Transactions during the year ended 31st March 2020 and balance outstanding as at 31st March 2020:

Transactions:	KMP & Relatives of KMP	
	2020 - 21	2019-20
Rent received	-	9,24,000

22 On the basis of physical verification of assets and cash generation capacity of those assets, in the management perception, there is no impairment of assets as on 31st March, 2020.

23 Financial Instrument and Related Disclosure

A. Fair Value of Financial Assets and Financial Liabilities with Fair Value Hierarchy

As at 31st March, 2021

Financial assets and financial liabilities at fair value	Level 1	Level 2	Level 3	Amortised Cost	Total
Financial assets					
Financial assets at FVTPL					
- Investments	9,81,33,494	-	-	-	9,81,33,494
Financial assets at FVTOCI					
- Investments	4,48,01,13,450	40,17,47,307	-	-	4,88,18,60,757
Financial assets at Amortised cost					
- Cash & Cash Equivalents	-	-	-	10,01,605	10,01,605
- Bank Balances other than above	-	-	-	-	-
- Loans	-	-	-	-	-
- Trade Receivables	-	-	-	-	-
- Investments	-	-	-	-	-
- Other Financial Assets	-	-	-	1,06,18,000	1,06,18,000
Total Financial assets	4,57,82,46,944	40,17,47,307	-	1,16,19,605	4,99,16,13,856
Financial Liabilities					
Financial Liabilities at Amortised Cost					
- Borrowings	-	-	-	-	-
- Trade payables	-	-	-	-	-
- Other Financial Liabilities	-	-	-	-	-
Total Financial Liabilities	-	-	-	-	-



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As at 31st March, 2020

Financial assets and financial liabilities at fair value	Level 1	Level 2	Level 3	Amortised Cost	Total
Financial assets					
Financial assets at FVTPL					
- Investments	3,16,23,190	-	-	-	3,16,23,190
Financial assets at FVTOCI					
- Investments	3,47,44,95,426	39,56,41,945	-	-	3,87,01,37,371
Financial assets at Amortised cost					
- Cash & Cash Equivalents	-	-	-	11,61,461	11,61,461
- Loans	-	-	-	-	-
- Trade Receivables	-	-	-	6,53,820	6,53,820
- Investments	-	-	-	-	-
- Other Financial Assets	-	-	-	1,01,00,000	1,01,00,000
Total Financial assets	3,50,61,18,616	39,56,41,945	-	18,15,281	3,91,36,75,842
Financial Liabilities					
Financial Liabilities at Amortised Cost					
- Borrowings	-	-	-	-	-
- Trade payables	-	-	-	-	-
- Other Financial Liabilities	-	-	-	-	-
Total Financial Liabilities	-	-	-	-	-

B. Financial Risk Management

The Company's activities expose it to a variety of financial risks, including market risk, credit risk and liquidity risk. The Company continues to focus on a system-based approach to business risk management. The Company's financial risk management process seeks to enable the early identification, evaluation and effective management of key risks facing the business. Backed by strong internal control systems, the current Risk Management System rests on policies and procedures issued by appropriate authorities; process of regular reviews / audits to set appropriate risk limits and controls; monitoring of such risks and compliance confirmation for the same.

(i) Market Risk

Market risk is the risk of any loss in future earnings, in realisable fair values or in future cash flows that may result from a change in the price of a financial instrument. The value of a financial instrument may change as a result of changes in interest rates, foreign currency exchange rates, equity price fluctuations, liquidity and other market changes. Future specific market movements cannot be normally predicted with reasonable accuracy.

Foreign currency risk

Foreign currency risk is the risk that the fair value of future cash flows of an exposure will fluctuate due to changes in foreign exchange rates. Currently the Company does not have any foreign currency exposure.

Interest rate risk

The main business of the Company is trading in goods, shares and securities. These activities expose us to interest rate risk.

Equity Price Risk

Equity price risk is related to change in market reference price of investments and stocks in equity securities held by the Company.

The fair value of quoted investments held by the Company exposes the Company to equity price risks. In general, few of these investments are not held for trading purposes. The fair value of quoted investments in equity, classified as fair value through other comprehensive income as at March 31, 2020 and March 31, 2019 was Rs. 48.63 Lakhs and Rs. 93.64 Lakhs, respectively and classified as fair value through profit & Loss as at March 31, 2020 and March 31, 2019 was Rs. 19.70 Lakhs and Rs. 36.96 Lakhs, respectively.

A 10% change in equity prices of such securities held as at March 31, 2020 and March 31, 2019, would result in an impact of Rs. 6.83 lakhs and Rs. 13.06 lakhs respectively on equity before considering tax impact (cumulatively).

(ii) Liquidity Risk

Liquidity risk is the risk that an entity will encounter difficulty in meeting obligation associated with financial liabilities that are settled by delivering cash or other financial assets. The Company mitigates its liquidity risks by ensuring timely collections of its receivables and close monitoring of its credit cycle.

The Company does not have any financial liabilities at the reporting date.

(iii) Credit Risk

Credit risk is the risk of financial loss arising from counter-party failure to repay or service debt according to the contractual terms or obligations. Credit risk encompasses both the direct risk of default and the risk of deterioration of credit worthiness as well as concentration risks.

(iv) Expected Credit Loss

Ind AS 109 outlines a 'three stages' model for impairment based on changes in credit quality since initial recognition as summarized below. The objective of the impairment requirements is to recognize life time expected credit loss (ECLs) on all financial instrument for which there have been significant increases in credit risk since initial recognition – whether assessed on an individual or collective basis.

At the reporting date, an allowance (or provision for loan and advances) is required on stage 1 assets at 12 month ECLs. If the credit risk has significantly increased since initial recognition (Stage 1), an allowance (or provision) should be recognised for the lifetime ECLs for financial instruments for which the credit risk has increased significantly since initial recognition (Stage 2) or which are credit impaired (Stage 3).

The measurement of ECL is calculated using three main components:

Probability of default represents the likelihood of a borrower defaulting on its financial obligation either over the next 12 months (12M PD) or over the remaining lifetime (Lifetime PD) of the obligation.

Exposure at Default (EAD) is the total amount of an asset the entity is exposed to at the time of default. EAD is defined based on the characteristics of the assets. EAD is dependent on the outstanding exposure of an assets sanctioned amount of loan and credit conversion factor for non-funded exposure.

Loan Given Default (LGD) is part of an assets which is lost provided the assets default. The recovery rate is derived as a ratio of discounted value of recovery cash flow (incorporating the recovery time) to total exposure of amount at the time of default.

The Company assesses when a significant increase in credit risk has occurred based on quantitative and qualitative assessments. Exposures are considered to have resulted in a significant increase in credit risk and are moved to Stage 2 when:

i. Quantitative test: Accounts that are 30 calendar days or more past due move to Stage 2 automatically. Accounts that are 90 calendar days or more past due move to Stage 3 automatically.

ii. Qualitative test: Accounts that meet the portfolio's 'high risk' criteria and are subject to closer credit monitoring. High risk customers may not be in arrears but either through an event or an observed behaviour exhibit credit distress.

iii. Reversal in Stages: Exposures will move back to Stage 2 or Stage 1 respectively, once they no longer meet the quantitative criteria set out above. For exposures classified using the qualitative test, when they no longer meet the criteria for a significant increase in credit risk and when any cure criteria used for credit risk management are met.

The definition of default for the purpose of determining ECLs has been aligned to the RBI definition of default, which considers indicators that the debtor is unlikely to pay and is no later than when the exposure is more than 90 days past due.



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24 Previous year figures have been reclassified wherever appropriate to confirm to current year's presentation.

As per our report of even date

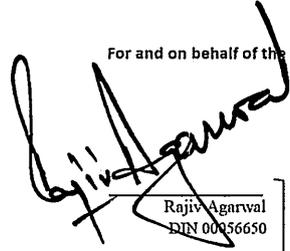
For Ray & Co.
Firm Registration No. 313124E
Chartered Accountants



Subir to Roy
Partner
M. No. 051205
UDIN: 21051205AAAAAL6782
Kolkata
29 June, 2021

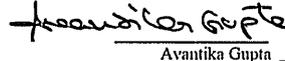


For and on behalf of the Board



Rajiv Agarwal
DIN 00456650

Directors



Avantika Gupta
DIN 03149138