



KABRA STEEL PRODUCTS LIMITED

36th
Annual Report
2018-19

KABRA STEEL PRODUCTS LIMITED

2018–2019

BOARD OF DIRECTORS

Ramawtar Kabra	Director
Rajesh Kumar Kabra	Director
Chandra Prakassh Kabra	Director
Vijay Kumar Kabra	Director
Isha Kabra	Executive Director
Jagdish Prasad Kabra	Independent Director
Vijay Kumar Parwal	Independent Director

COMPANY SECRETARY

Megha Baheti
(w.e.f. 18-03-2019)

MANAGER

Isha Kabra

CHIEF FINANCIAL OFFICER

Giriraj Kumar Mundhra

BANKERS

Canara Bank
I. D. B. I. Bank

STATUTORY AUDITOR

S.C. Soni & Co.
9, India Exchange Place
Kolkata-700 001

REGISTERED OFFICE

2, Brabourne Road
4th Floor,
Kolkata-700 001

COMPANY IDENTIFICATION No.

CIN- L27109WB1983PLC036585

NOTICE

NOTICE is hereby given that the Thirty Sixth Annual General Meeting of the Shareholders of **KABRA STEEL PRODUCTS LIMITED** will be held at the Registered Office of the Company at 2, Brabourne Road, 4th Floor, Kolkata- 700001 on Thursday, the 26nd day of September, 2019 at 3.30 P.M to transact following business:

ORDINARY BUSINESS :

1. To receive, consider and adopt the Audited Financial Statements of the Company for the year ended 31st March, 2019, with the Reports of the Board of Directors and Auditors thereon.
2. To appoint a Director in place of Sri Ramawtar Kabra (DIN: 00341280) who retires by rotation and being eligible, offers herself for re-appointment.
3. To reappoint M/s. S. C. Soni & Co., Chartered Accountants, (Membership Number : 50515) as the Statutory Auditors of the Company to hold office from the conclusion of this meeting until the conclusion of Forty One Annual General Meeting of the Company on such remuneration as may be agreed upon by the Board of Directors and Auditors.

"RESOLVED THAT pursuant to the provisions of section 139,142 and other applicable provisions, if any, of the Companies Act, 2013 read with the Companies (Audit and Auditors) Rules, 2014 ("the Act") (including any statutory modification(s) or re-enactment thereof, for the time being in force), and pursuant to the recommendation made by the Audit Committee of the Board of Directors of the Company, M/s. S. C. SONI & CO., Chartered Accountants, (Firm Registration No. 326770E) retiring Auditor be and are hereby reappointed as Statutory Auditor of the Company for a period of 5 (Five years) to hold office from the conclusion of 36th Annual General Meeting till the conclusion of 41st Annual General Meeting at a remuneration to be decided by the Board of Directors".

Registered Office :
2, Brabourne Road, 4th Floor,
Kolkata - 700001
Date : 13th August, 2019

BY ORDER OF THE BOARD
C. P. KABRA
Director
DIN NO.: 00338838

NOTES :

1. A MEMBER ENTITLED TO ATTEND AND VOTE AT THE AGM IS ENTITLED TO APPOINT A PROXY TO ATTEND AND VOTE IN THE MEETING INSTEAD OF HIMSELF/HERSELF, AND THE PROXY NEED NOT BE A MEMBER OF THE COMPANY.

Pursuant to the provisions of section 105 of the Companies Act, 2013, a person can act as a proxy on behalf of not more than 50(fifty) Members and holding in aggregate not more than (10%) of the total share capital of the Company. Members holding more than ten percent of the total share capital of the Company may appoint a single person as proxy, who shall not act as proxy for any other Member.

Proxy in order to be effective should be duly stamped, completed, signed and deposited at the Registered Office of the Company not less than forty-eight hours before the time for holding the Annual General Meeting.

2. Corporate Members intending to send their authorized representatives to attend the meeting

are requested to send a certified copy of the Board Resolution to the Company, authorizing their representatives to attend and vote on their behalf at the Annual General Meeting.

3. For the convenience of members and for proper conduct of the meeting, **entry to the place of meeting will be regulated by attendance slip, which is a part of the Notice. Members are requested to sign at the place provided on the attendance slip and hand it over at the entrance to the venue.**

Members / proxies should bring the duly filled Attendance Slip attached herewith to attend the meeting. Duplicate Attendance slip and /or copies of the Annual Report shall not be issued / available at the venue of the Meeting.

Members, who hold shares in dematerialized form, are requested to bring their Client ID and DP ID Nos. for easier identification of attendance at the meeting.

4. The Register of Directors and Key Managerial Personnel and their shareholding, maintained under Section 170 of the Companies Act, 2013, will be available for inspection by the members at the AGM.
5. Additional information, pursuant to Regulation 36 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, in respect of the directors seeking re-appointment at the Annual General Meeting as per Item No. 2 of aforesaid notice, is furnished as Annexure to the Notice. The directors have furnished declaration for their re-appointment as required under the Companies Act, 2013 and the Rules thereunder.
6. The Register of Members and the Share transfer Book of the Company shall remain closed from Friday, September 20, 2019 to Thursday, September 26, 2019 (both days inclusive) for the purpose of Annual General Meeting.
7. A member desirous of getting any information on the accounts of the Company is requested to send the queries to the Company at least 10 days in advance of the meeting.
8. Members holding shares in physical form are requested to intimate change in their registered address mentioning full address in block letters with Pin code of the Post Office and bank particulars to the Company's Registrar and Share Transfer Agent.
9. Members whose share holding is in electronic mode are requested to direct change of address notifications and updates of savings bank account details to their respective Depository Participant(s). Members are encouraged to utilize the electronic clearing system (ECS).
10. The Securities and Exchange Board of India (SEBI) has mandated the submission of Permanent Account Number (PAN) by every participant in the securities market. Members holding shares in electronic form are, therefore requested to submit their PAN to their Depository Participants with whom they are maintaining their demat accounts. Members holding share in physical form are required to submit their PAN to the Company and or its Registrars & Share Transfer Agent.
11. At present the Company's equity share are listed on the Stock Exchanges at Kolkata and listing fees for the financial year 2019-20 has been paid to the aforesaid Stock Exchange.
12. All documents referred to in accompanying Notice are open for inspection at the Registered Office of the Company on all working days between 11:00 A. M. to 1:00 P. M.

up to the date of the Annual General Meeting

13. VOTING THROUGH ELECTRONIC MEANS

- I. In compliance with provisions of Section 108 of the Companies Act, 2013, Rule 20 of the Companies (Management and Administration) Rules, 2014 as amended by the Companies (Management and Administration) Amendment Rules, 2015 and Regulation 44 of the SEBI (Listing Obligations and Disclosure Requirements),, the Company is pleased to provide members facility to exercise their right to vote on resolutions proposed to be considered at the Annual General Meeting (AGM) by electronic means and the business may be transacted through e-Voting Services. The facility of casting the votes by the members using an electronic voting system from a place other than venue of the AGM ("remote e-voting") will be provided by Central Depository Services (India) Limited (CDSL).
- II. The facility for voting through ballot paper shall be made available at the AGM and the members attending the meeting who have not cast their vote by remote e-voting shall be able to exercise their right at the meeting through ballot paper. The members who have cast their vote by remote e-voting prior to the AGM may also attend the AGM but shall not be entitled to cast their vote again.
- III. **The process and manner for remote e-voting are as under:**
 - (i) The remote e-voting period commences on **23rd September, 2019 at 9:00 A.M.** and ends on **25th September, 2019 at 5:00 P.M.**. During this period members' of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date of **19th September, 2019**. may cast their vote by remote e-voting. The remote e-voting module shall be disabled by CDSL for voting thereafter. Once the vote on a resolution is cast by the member, the member shall not be allowed to change it subsequently.
 - (ii) The shareholders should log on to the e-voting website www.evotingindia.com during the voting period
 - (iii) Click on "Shareholders" tab.
 - (iv) Now Enter your User ID
 - a. For CDSL: 16 digits beneficiary ID,
 - b. For NSDL: 8 Character DP ID followed by 8 Digits Client ID,
 - c. Members holding shares in Physical Form should enter Folio Number registered with the Company, excluding the special characters.
 - (v) Next enter the Image Verification as displayed and Click on Login.
 - (vi) If you are holding shares in demat form and had logged on to www.evotingindia.com and voted on an earlier voting of any company, then your existing password is to be used.
 - (vii) If you are a first time user follow the steps given below:

For Members holding shares in Demat Form and Physical Form

PAN	Enter your 10 digit alpha-numeric PAN issued by Income Tax Department (Applicable for both demat shareholders as well as physical shareholders)
	<ul style="list-style-type: none"> Members who have not updated their PAN with the Company/Depository Participant are requested to use the first two letters of their name and the 8 digits of the sequence number in the PAN field. In case the sequence number is less than 8 digits enter the applicable number of 0's before the number after the first two characters of the name in CAPITAL letters. Eg. If your name is Ramesh Kumar with sequence number 1 then enter RA00000001 in the PAN field.
DOB	Enter the Date of Birth as recorded in your demat account with the depository or in the company records for your folio in dd/mm/yyyy format
Bank	Enter the Bank Account Number as recorded in your demat account with the depository or in the company records for your folio.
Account Number (DBD)	<ul style="list-style-type: none"> Please Enter the DOB or Bank Account Number in order to Login.
	<ul style="list-style-type: none"> If both the details are not recorded with the depository or company then please enter the member-id / folio number in the Bank Account Number details field as mentioned in above instruction (iv), <p>(viii) After entering these details appropriately, click on "SUBMIT" tab.</p>

- (ix) Members holding shares in physical form will then directly reach the Company selection screen. However, members holding shares in demat form will now reach 'Password Creation' menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password is to be also used by the demat holders for voting for resolutions of any other company on which they are eligible to vote, provided that company opts for e-voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.
- (x) For Members holding shares in physical form, the details can be used only for e-voting on the resolutions contained in this Notice.
- (xi) Click on the EVSN for the relevant Company Name i.e. KABRA STEEL PRODUCTS LIMITED on which you choose to vote..
- (xii) On the voting page, you will see "RESOLUTION DESCRIPTION" and against the same the option "YES/NO" for voting. Select the option YES or NO as desired. The option YES implies that you assent to the Resolution and option NO implies that you dissent to the Resolution.
- (xiii) Click on the "RESOLUTIONS FILE LINK" if you wish to view the entire Resolution details.
- (xiv) After selecting the resolution you have decided to vote on, click on "SUBMIT".

A confirmation box will be displayed. If you wish to confirm your vote, click on "OK", else to change your vote, click on "CANCEL" and accordingly modify your vote.

- (xv) Once you "CONFIRM" your vote on the resolution, you will not be allowed to modify your vote.
- (xvi) You can also take out print of the voting done by you by clicking on "Click here to print" option on the Voting page.
- (xvii) If Demat account holder has forgotten the same password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.
- (xviii) Note for Institutional Shareholders & Custodians :
- Institutional shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodians are required to log on to <https://www.evotingindia.com> and register themselves as Corporates.
 - A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to helpdesk.evoting@cdslindia.com.
 - After receiving the login details they have to create a compliance user which should be created using the admin login and password. The Compliance user would be able to link the account(s) for which they wish to vote on.
 - The list of accounts should be mailed to helpdesk.evoting@cdslindia.com and on approval of the accounts they would be able to cast their vote.
 - A scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.
- (xix) In case you have any queries or issues regarding e-voting, you may refer the Frequently Asked Questions ("FAQs") and e-voting manual available at www.evotingindia.com under help section or write an email to helpdesk.evoting@cdslindia.com or contact them at 1800 200 5533.
- (xx) Shareholders can also cast their vote using CDSL's mobile app m-Voting available for android based mobiles. The m-Voting app can be downloaded from Google Play Store. iPhone and Windows phone users can download the app from the App store and the Window Phone Store respectively on or after 30th June, 2016. Please follow the instructions as prompted by the mobile app while voting on your mobile.
15. Institutional Members / Bodies Corporate (i.e. other than individuals, HUF, NRI etc..) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution / Authority letter etc. together with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote through e-mail at patnibl@yahoo.com with a copy marked to helpdesk.evoting@cdslindia.com on or before **25th September, 2019 upto 5:00 P. M.** without which the vote shall not be treated as valid.
16. The voting rights of shareholders shall be in proportion to their shares of the paid up equity share
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capital of the Company as on the cut-off date of **19th September, 2019**. A person who is not a member as on cut-off date should treat this notice for information only.

17. The notice of the Annual General Meeting will be sent to the members, whose names appear in the register of members / beneficial owners position list provided by depositories as at closing hours of business on **02nd August, 2019**.
18. The shareholders shall have one vote per equity share held by them as on the cut-off date of **19th September, 2019**. The facility of e-voting would be provided once for every folio/client id, irrespective of the number of joint holders.
19. Since the Company is required to provide members the facility to cast their vote by electronic means, shareholders of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date of **19th September, 2019** and not casting their vote electronically, may only cast their vote at the Annual General Meeting.
20. Notice of the Annual General Meeting along with attendance slip, proxy form along with the process, instructions and the manner of conducting e-voting is being sent electronically to all the members whose e-mail IDs are registered with the Company / Depository Participant(s). For members who request for a hard copy and for those who have not registered their email address, physical copies of the same are being sent through the permitted mode.
21. Investors who became members of the Company subsequent to the dispatch of the Notice / Email and holds the shares as on the cut-off date i.e. **19th September, 2019** are requested to send the written / email communication to the Company at **kspl@coalsale.co.in** by mentioning their Folio No. / DP ID and Client ID to obtain the Login-ID and Password for e-voting.
22. Mr. Babu Lal Patni, Practicing Company Secretary (Membership No. FCS 2304), has been appointed as the Scrutinizer to scrutinize the remote e-voting process and voting at the AGM in a fair and transparent manner. The Scrutinizer will submit, not later than 3 days of conclusion of the AGM, a consolidated Scrutinizer's Report of the total votes cast in favour or against, if any, to the Chairman of the Company or a person authorized by him in writing, who shall countersign the same and declare the result of the voting forthwith.
23. The Results declared along with the Scrutinizer's Report shall be placed on the Company's website www.kspl.net.in and on the website of CDSL. The same will be communicated to Calcutta Stock Exchange Limited where the shares of the Company are listed.

Registered Office :
2, Brabourne Road, 4th Floor,
Kolkata - 700001
Date : 13th August, 2019

BY ORDER OF THE BOARD
C. P. KABRA
Director
DIN NO.: 00338838

Annexure - "A"**ANNEXURE TO ITEM NOS. 2 OF THE NOTICE**

Additional Information on Directors recommended for re-appointment pursuant to Regulation 36(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and under Secretarial Standard on General Meeting (SS-2):

Information about Mr. Ramawtar Kabra :

Name of Director	Mr. Ramawtar Kabra
Director Identification No.	DIN - 00341280
Date of Birth	02-04-1951
Educational Qualification	B. COM
Expertise in specific functional areas	36 years
Chairmanship / Membership of Committees in this Company	None
Present status of Directorship in this Company	Director
Directorship in other Public Limited Companies	3
Chairmanship / Membership of Committees in other Public Limited Companies	None
Shareholding as on 31st March, 2019	10900
Seeking appointment / re-appointment	Retire by rotation and seeking re-appointment
Rotational Status	Retire by rotation

Registered Office :
2, Brabourne Road, 4th Floor,
Kolkata - 700001
Date : 13th August, 2019

BY ORDER OF THE BOARD
C. P. KABRA
Director
DIN NO.: 00338838

DIRECTORS' REPORT

Your Directors have the pleasure in presenting their Thirty Sixth Annual Report on the business and operations of your Company together with the audited financial statements of the Company for the year ended 31st March, 2019.

	(Amount in Rs.)	
<u>FINANCIAL PERFORMANCE :</u>	<u>31.03.2019</u>	<u>31.03.2018</u>
Profit / (Loss)for the year ended	(271114)	45518
Less: Provision for Taxation		
Deferred Tax (Assets)	(1957)	(3502)
Profit / (Loss)for the year after tax	(273071)	49020
Add : Surplus as per last	4558809	4509789
Surplus Carried to Balance Sheet	4285738	4558809

DIVIDEND:

Your Directors regret for not recommending Dividend on Equity Shares for the financial year 2018-19.

DEPOSITS:

During the year under review, the Company has not accepted deposits from the public falling within the ambit of Section 73 of the Companies Act, 2013 and the Rules framed thereunder.

EXTRACT OF ANNUAL RETURN:

The details forming part of the extract of the Annual Return in Form MGT-9 as required under Section 92 of the Companies Act, 2013 and Rule 12 (1) of the Companies (Management and Administration) Rules, 2014, is marked as "Annexure - A" which is annexed hereto and forms part of the Directors' Report. Form MGT-9 will be uploaded on the Company's website and can be viewed at www.kspl.net.in

SHARE CAPITAL:

The paid up Equity Share Capital as at 31st March, 2019 stood at Rs. 24.00 lacs. During the year under review, the Company has not issued shares with differential voting rights nor has granted any stock options or sweat equity. As on 31st March, 2019, none of the Directors of the Company hold instruments convertible into equity shares of the Company.

FINANCIAL STATEMENTS:

The Company has prepared its financial statements as per IND AS requirement for the financial year 2018 -19. The estimates and judgements relating to the Financial Statements are made on a prudent basis, so as to reflect in a true and fair manner, the form and substance of transactions and reasonably present the Company's state of affairs, profits and cash flows for the year ended 31st March, 2019.

MATERIAL CHANGES AND COMMITMENTS:

There are no material changes and commitments affecting the financial position of the Company which have occurred between the end of the financial year 2018-19 and the date of this Report.

CHANGE IN NATURE OF BUSINESS:

There has been no change in the nature of business of the Company during the financial year 2018-19.

PARTICULARS IN RESPECT OF CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNING AND OUTGO

The particulars in respect of conservation of energy and technology absorption are not applicable during the year under review. There is no earning and outgo in Foreign Exchange.

RESEARCH & DEVELOPMENT:

The Company has not incurred any sum in respect of Research & Development for any of its activity.

CORPORATE GOVERNANCE:

As the paid up capital of the Company is less than Rupees Ten crores and its Reserves are less than Rupees Twenty five crores, hence provisions relating to Corporate Governance are not applicable to the Company.

CORPORATE SOCIAL RESPONSIBILITY:

The Company is not required to adapt Corporate Social Responsibility Policy and to incur expenditure on it.

DIRECTOR AND KEY MANAGERIAL PERSONNEL:**Appointment**

Ms. Megha Baheti (ACS No. 30177) was appointed as Company Secretary cum Compliance Officer of the Company w.e.f. 18th March, 2019.

Retirement by Rotation

Sri Ramawtar Kabra, (DIN No. 00341280) Director retires by rotation at the ensuing Annual General Meeting and being eligible, offers himself for re-appointment.

Key Managerial Personnel (KMP)

The following are the Key Managerial Personnel of the Company

1. Mrs. Isha Kabra—Manager
2. Mr. Giriraj Kumar Mundhra—Chief Financial Officer
3. Ms. Megha Baheti—Company Secretary

None of the Directors / KMP has resigned during the year 2018-19.

DECLARATION BY INDEPENDENT DIRECTORS:

Mr. Vijay Kumar Parwal and Mr. Jagdish Prasad Kabra are Independent Directors on the Board of the Company. The Independent Directors hold office for a fixed term of five years and are not liable to retire by rotation.

The Company has received declarations from all the Independent Directors of the Company confirming that they meet the criteria of Independence as prescribed both under the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

BOARD EVALUATION:

The Board has carried out an annual evaluation of its own performance, the Directors individually as well as the evaluation of the functioning of various Committees. The Independent Directors also carried out the evaluation of the Chairman and the Non-Independent Directors.

CRITERIA FOR EVALUATION OF DIRECTORS:

For the purpose of proper evaluation, the Directors of the Company have been divided into 3 (three) categories i.e. Independent, Non-Independent & Non-Executive and Executive.

The criteria for evaluation includes factors such as engagement, strategic planning and vision, team spirit and consensus building, effective leadership, domain knowledge, management qualities, team work abilities, result / achievements, understanding and awareness, motivation / commitment / diligence, integrity / ethics / values and openness / receptivity.

NOMINATION AND REMUNERATION COMMITTEE:

The composition of the Nomination and Remuneration Committee is as follows:-

Name of the Committee Members	Nature of Directorship	Membership
Mr. Vijay Kumar Parwal	Non Exec-Independent	Chairman
Mr. Jagdish Prasad Kabra	Non Exec-Independent	Member
Mr. Ramawtar Kabra	Non Exec-Director	Member
During the year no Nomination and Remuneration Committee meetings were held..		

NUMBER OF BOARD MEETINGS:

During the year, 5 (Five) Board Meetings were convened and held on 30-05-2018, 14-08-2018, 03-11-2018, 14-02-2018 and 30-03-2019. The intervening gap between the meetings was within the period prescribed under the Companies Act, 2016 ("Act").

AUDIT COMMITTEE:

The composition of the Audit Committee is as follows:-

Name of the Committee Members	Nature of Directorship	Membership
Mr. Vijay Kumar Parwal	Non-Executive Independent Director	Chairman
Mr. Jagdish Prasad Kabra	Non-Executive Independent Director	Member
Mr. Rajesh Kumar Kabra	Executive Director	Member
During the year 4 (Four) Audit Committee meetings were held on 30-05-2018, 14-08-2018, 03-11-2018 and 14-02-2019.		

DIRECTORS RESPONSIBILITY STATEMENT:

In terms of Section 134 (5) of the Companies Act, 2013 with respect to Directors' Responsibility Statement, it is hereby confirmed:

- (a) That in the preparation of Annual Accounts, the applicable Accounting Standard has been followed alongwith proper explanations relating to material departures.
- (b) That the Directors have selected such Accounting Policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of financial year and the Statement of Profit and Loss for that period.
- (c) That the Directors have taken proper and sufficient care for maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding assets of the Company and for preventing and detecting frauds and other irregularities.
- (d) That the Directors have prepared the Annual Accounts on Going Concern Basis.
- (e) The Directors have laid down internal financial controls to be followed by the Company and that such internal financial controls are adequate and were operating effectively.
- (f) The directors had devised proper system to ensure compliance with the provisions of all applicable laws and that such system were adequate and operating effectively.

DETAILS PERTAINING TO REMUNERATION AS REQUIRED UNDER SECTION 197(12) OF THE COMPANIES ACT, 2013 READ WITH RULE 5(1) OF THE COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014.

- (i) The percentage increase in remuneration of each Director and Chief Financial Officer during the financial year 2018-19, ratio of the remuneration of each Director to the median remuneration of the employees of the Company for the financial year 2018-19 and the comparison of remuneration of each Key Managerial Personnel (KMP) against the performance of the Company are as under:

Sl. No.	Name of Director/ KMP & Designation	Remuneration of Director/ KMP for the financial year 2018-19	% increase in Remuneration in the Financial year 2018-19	Ratio of remuneration of each Director/ to median remuneration of employees
1.	Giriraj Kumar Mundhra Chief Financial Officer	112000	NIL	N.A.
2.	Isha Kabra Manager	140000	NIL	N.A.
3.	Megha Baheti Company Secretary	5419	NIL	N.A.
(ii)	The median remuneration of employees of the Company during the financial year was Rs. 112000/-. The percentage increase in the median remuneration of employees is NIL%.			

- (iii) There were 3 permanent employees on the rolls of Company as on March 31, 2019; The

percentage increase in the salary of employees from managerial personnel is NIL %.

- (iv) It is hereby affirmed that the remuneration paid is as per the Remuneration Policy for Directors, Key Managerial Personnel and other Employees.

DISCLOSURE UNDER RULE 5(2) AND 5(3) OF THE COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014

The required details are provided as below:

INFORMATION AS PER SECTION 197(12) OF THE COMPANIES ACT, 2013 READ WITH RULE 5(2)& 5(3) OF THE COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014 AND FORMING PART OF THE DIRECTORS' REPORT FOR THE YEAR ENDED 31ST MARCH.2019

- A. List of top 10 Employees :-

Name of the Employee	Designation	Remuneration Received*	Nature of Employment, whether contractual or otherwise	Qualifications and Experience	Date of commencement of employment	Age (years)	Last employment held before joining the Company	Name of the Director of the Company Who is relative
Mrs. Isha Kabra	Director cum Manager	140000	Contractual	B.Com 5 yrs	29-11-2014	37	NIL	NONE
Mr. Giriraj Kumar Mundhra	Chief Financial Officer	112000	Contractual	B.Com 6 yrs	01-04-2013	56	NIL	NONE
Ms. Megha Baheti	Company Secretary	5419	Contractual	CS 1 month	18.03.2019	28	NIL	NONE

* Remuneration includes salary, allowances, bonus and value of certain perquisites evaluated on the basis of Income Tax Act and Rules.

- A. There is no employee employed throughout the financial year who was in receipt of remuneration in excess of one crore and two lacs rupees per annum.
- B. There is no employee employed for a part of the financial year who was in receipt of remuneration in excess of eight lacs and fifty thousand rupees per annum.

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS

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

RELATED PARTY TRANSACTION:

All Related Party Transactions that were entered into during the financial year were on arm's length basis and were in the ordinary course of business. There are no materially significant related party transactions made by the Company with Promoters, Key Managerial Personnel or other designated persons which may have potential conflict with interest of the Company at large. Your Directors draw attention of the members to Notes to the financial statement which sets

out related party disclosures.

SUBSIDIARY / ASSOCIATE / JOINT VENTURE COMPANY

The Company does not has any subsidiary/associates /joint venture company during the year ended 31st March, 2019.

LISTING AGREEMENT

The Company has paid Listing fees for the financial year 2019-20 to Calcutta Stock Exchange Limited.

Calcutta Stock Exchange Limited - Scrip Code 21099

CODE OF CONDUCT:

The Company has a Code of Conduct which is applicable to directors and management personnel of the Company. The Company believes in conducting business in accordance with the highest standards of business ethics and complying with applicable laws, rules and regulations.

The Code lays down the standard procedure of business conduct which is expected to be followed by the directors and management personnel in their business dealings and in particular on matters relating integrity in the work place, in business practices and complying with applicable laws etc.

All the directors and management personnel have submitted declaration confirming compliance with the code.

ISSUE OF SHARES:

During the Financial year ended 31st March, 2019:

- i) The Company has not granted any Employees Stock Option.
- ii) The Company has not issued any Sweat Equity Shares.
- iii) The Company has not issued any equity shares with differential rights.
- iv) The Company has not allotted any bonus shares during the year.

PUBLIC ISSUE:

During the year under review your Company has not issued any securities to the public.

RISK MANAGEMENT COMMITTEE AND RISK MANAGEMENT:

The Board of Directors, during the year, constituted 'Risk Management Committee' for laying down risk assessment at minimization procedures. A Risk Management Plan has been devised which is monitored and reviewed by this Committee.

VIGIL MECHANISM/WHISTLE BLOWER POLICY:

The Company has framed a Vigil Mechanism / Whistle Blower Policy to deal with unethical behavior, actual or suspected fraud or violation of the company's code of conduct or ethics policy, if any. The Vigil Mechanism / Whistle Blower Policy has also been uploaded on the website of the Company.

SECRETARIAL STANDARDS:

The applicable Secretarial Standards i.e. SS-1 and SS-2, relating to "Meetings of the Board of Directors" and General Meetings', respectively, have been duly followed by the Company.

PREVENTION OF INSIDER TRADING:

The Company has adopted a Code of Conduct for Prevention of Insider Trading with a view to regulate trading in securities by the Directors and designated employees of the Company. The Code requires pre-clearance for dealing in the Company's shares and prohibits the purchase or sale of Company shares by the Directors and the designated employees while in possession of unpublished price sensitive information in relation to the Company and during the period when the Trading Window is closed.

All the Board of Directors and designated employees have confirmed compliance with the Code.

INTERNAL FINANCIAL CONTROLS:

The Company has in place adequate internal financial controls with reference to financial statements. During the year, such controls were tested and no reportable material weakness in the design or operation was observed.

During the year the company appointed Kshitiz & Co, Chartered Accountants, Kolkata as an Internal Auditor. The firm is authorized to by the Audit Committee to access the adequacy and compliance of internal control process, statutory requirements etc. The Audit Committee met regularly to review reports submitted by the Internal Auditor. The Audit Committee upon discussion with Internal Auditor set up applicable control measures for the Company.

MATERIAL CHANGES:

There are no material changes and commitments affecting the financial position of the company have occurred between the date financial year of the Company and date of the report. There is no change in the nature of business of the Company.

STATUTORY AUDITORS:

M/S S.C.SONI & CO., Statutory Auditors of the Company, hold office till the conclusion of the ensuing Annual General Meeting and are eligible for re-appointment. They have confirmed their eligibility to the effect that their re-appointment, if made, would be within the prescribed limits under the Act and that they are not disqualified for re-appointment. The Notes on financial statement referred to in the Auditors' Report are self-explanatory and do not call for any further comments. The Auditors' Report does not contain any qualification, reservation or adverse remark.

SECRETARIAL AUDITOR:

Pursuant to provisions of section 204 of the Companies Act, 2013 and The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 the Board has appointed Mr. Ritesh Kumar Agarwal, a Whole Time Company Secretary in Practice having Membership No. 7095, to undertake the Secretarial Audit of the Company. The Secretarial Audit Report for the financial year ended March 31, 2019 is annexed to this Report. The Secretarial Audit Report does not contain any qualification, reservation or adverse remark.

DISCLOSURE AS PER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013:

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

MEETING, ATTENDANCE OF BOARD MEETING AND ANNUAL GENERAL MEETING:

During the year 5 meeting of the Board of Directors were held i.e. on 30th May, 2018, 14th August, 2018, 03rd November, 2018, 14th February, 2019 and 30th March, 2019. The intervening gap between the meetings was within the period prescribed under the Companies Act, 2013 ("Act"). Annual General Meeting was held on 22-09-2018.

Name of Director	DIN	Attendance Particulars		Directorships in other public limited companies				Committees in which Chairman/Member of other public limited companies	
		Board Meetings	AGM	Chairman Listed	Director Unlisted	Chairman	Member		
Promoter Executive Directors									
Mr. Rajesh Kr. Kabra	00331305	2	YES	—	—	2	1	—	2
Mr. Ramawtar Kabra	00341280	5	YES	2	1	—	—	—	2
Mr. Chandra Prakassh Kabra	00338838	5	YES	—	—	1	1	—	1
Mr. Vijay Kumar Kabra	02986753	4	YES	—	—	—	1	—	—
Non-Promoter Non-Executive Directors									
Mrs. Isha Kabra	07026281	2	NO	—	—	1	—	—	—
Independent Non-Executive Directors									
Mr. Jagdish Prasad Kabra	00482014	5	YES	—	—	2	—	—	4
Mr. Vijay Kr. Parwal	00339266	5	YES	1	—	—	—	—	2
APPRECIATION:									

For and on behalf of the Board, the Directors wish to place on record their sincere appreciation for the positive co-operation received from Banks, SEBI, Shareholders, and all the staffs of the Company during the year.

Registered Office
2, Brabourne Road, 4th Floor,
Kolkata-700001
Dated : 13th August, 2019

BY ORDER OF THE BOARD
R. A. KABRA
Director
Din : 00341280

ANNEXURE TO THE DIRECTORS' REPORT**Form No. MGT - 9****EXTRACT OF ANNUAL RETURN****as on the financial year ended on 31st March, 2019**

[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 :	L27109WB1983PLC036585
ii)	Registration Date	26TH JULY, 1983
iii)	Name of the Company	KABRA STEEL PRODUCTS LIMITED
iv)	Category / Sub-Category of the Company	Company Limited by Shares/Indian Non-Government Company
v)	Address of the Registered office and contact details	2, Brabourne Road, Kolkata-700001
vi)	Whether listed company Yes / No	YES
vii)	Name, Address and Contact details of Registrar and Transfer Agent, if any	The Company does not have any Registrar and Transfer Agent

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	Coal Trading	4461	NIL

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
1		NIL			

IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)**i) Category-wise shareholding**

Category of Shareholders	No. of Shares held at the beginning of the year [As on 01-April-2018]				No. of Shares held at the end of the year [As on 31-March-2019]				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual / HUF	0	125400	125400	52.250	0	137350	137350	57.229	-4.979
b) Central Govt	0	0	0	0	0	0	0	0	0
c) State Govt (S)	0	0	0	0	0	0	0	0	0
d) Bodies Corp.	0	25000	25000	10.417	0	25000	25000	10.417	0
e) Banks / FI	0	0	0	0	0	0	0	0	0
f) Any Other ...	0	0	0	0	0	0	0	0	0
Sub-Total (A)(1):	0	150400	150400	62.667	0	162350	162350	67.646	-4.979
(2) Foreign									
a) NRIS-Individuals	0	0	0	0	0	0	0	0	0
b) Other-Individuals	0	0	0	0	0	0	0	0	0
c) Bodies Corp.	0	0	0	0	0	0	0	0	0
d) Banks / FI	0	0	0	0	0	0	0	0	0
e) Any Other	0	0	0	0	0	0	0	0	0
Sub-total (A)(2):	0	0	0	0	0	0	0	0	0
Total shareholding of Promoter (A)=(A)(1)+(A)(2)	0	150400	150400	62.667	0	162350	162350	67.646	-4.979
B. Public Shareholding									
1. Institutions									
a) Mutual Funds	0	0	0	0	0	0	0	0	0
b) Banks / FI	0	0	0	0	0	0	0	0	0
c) Central Govt	0	0	0	0	0	0	0	0	0
d) State Govt (S)	0	0	0	0	0	0	0	0	0
e) Venture Capital Funds	0	0	0	0	0	0	0	0	0
f) Insurance Companies	0	0	0	0	0	0	0	0	0
g) FIs	0	0	0	0	0	0	0	0	0
h) Foreign Venture Capital Funds	0	0	0	0	0	0	0	0	0
i) Others (specify)	0	0	0	0	0	0	0	0	0
Sub-total (B)(1):	0	0	0	0	0	0	0	0	0
Category of	No. of Shares held at the				No. of Shares held at the				% Change

Shareholders	beginning of the year [As on 01-April-2018]				end of the year [As on 31-March-2019]				during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
2. Non-Institutions									
a) Bodies Corp.									
i) Indian	0	13600	13600	5.667	0	6500	6500	2.708	2.959
ii) Overseas									
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 2 lakh	0	76000	76000	31.666	0	71150	71150	29.645	2.021
(ii) Individual shareholders holding nominal share capital in excess of Rs. 2 lakh	0	0	0	0	0	0	0	0	0
c) Others (specify)									
Sub-total (B)(2):	0	89600	89600	37.333	0	77650	77650	32.354	4.979
Total Public Shareholding (B)=(B)(1)+(B)(2)	0	89600	89600	37.333	0	77650	77650	32.354	4.979
C. Shares held by Custodian for GDRs & ADRs	0	0	0	0	0	0	0	0	0
Grand Total (A+B+C)	0	240000	240000	100	0	240000	240000	100	0

(ii) Shareholding of Promoters

Sl. No.	Shareholder's Name	Shareholding at the beginning of the year [As on 01-April-2018]			Shareholding at the end of the year [As on 31-March-2019]			
		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	% change in share holding during the year
1	Gopal Lal Kabra	12500	5.208	0	12500	5.208	0	0
2	Ramawtar Kabra	10900	4.542	0	10900	4.542	0	0
		Shareholding at the			Shareholding at the			

Sl. No.	Shareholder's Name	beginning of the year [As on 01-April-2018]			end of the year [As on 31-March-2019]			
		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	% change in share holding during the year
3	Ramawtar Badrinarayan Kabra (HUF)	3400	1.416	0	3400	1.416	0	0
4	Vijay Ramawtar Kabra (HUF)	1000	0.417	0	1000	0.417	0	0
5	Chandra Prakassh Ramawtar Kabra (HUF)	1000	0.417	0	1000	0.417	0	0
6	Rajesh Kumar Kabra	38500	16.042	0	38500	16.042	0	0
7	Rajesh Kumar Kabra (HUF)	1000	0.417	0	1000	0.417	0	0
8	Vedant Raj Kabra	0	0	0	11950	4.979	0	4.979
9	Chandra Mukhi Kabra	16500	6.875	0	16500	6.875	0	0
10	Chandra Prakassh Kabra	20850	8.687	0	20850	8.687	0	0
11	Vijay Kumar Kabra	15800	6.583	0	15800	6.583	0	0
12	Radhika Kabra	3950	1.645	0	3950	1.645	0	0
13	Kabra Commercial Limited	15000	6.250	0	15000	6.250	0	0
14	Kabra Marble Udyog Limited	1000	0.417	0	1000	0.417	0	0
15	Rajesh Manish Associates (P) Ltd	9000	3.750	0	9000	3.750	0	0
	TOTAL	150400	62.667	0	162350	62.667	0	4.979

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

Sl. No.		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	Vedant Raj Kabra	0	0	11950	4.979
	At the beginning of the year				
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	Purchased 11950 Equity Shares			
	At the End of the year (or on the date of separation, if separated during the year)	0	0	11950	4.979
(iv)	Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and	Promoters and			

Holders 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	Ashok Kumar Jhawar	0	0	11400	4.750
	At the beginning of the year				
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	Purchased 11400 Equity Shares			
	At the End of the year (or on the date of separation, if separated during the year)	0	0	11400	4.750
2	Sanjay Kabra				
	At the beginning of the year	0	0	8400	3,500
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	Purchased 8400 Equity Shares			
	At the End of the year (or on the date of separation, if separated during the year)	0	0	8400	3,500
3	Manushi Properties Limited				
	At the beginning of the year	6500	2.708	6500	2,708
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	6500	2.708	6500	2,708

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
4	Krishna Awtar Kabra				
	At the beginning of the year	5500	2.291	5500	2.291
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	5500	2.291	5500	2.291
5	Jagannath Kabra				
	At the beginning of the year	5000	2.083	5000	2.083
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	5000	2.083	5000	2.083
6	Trupati Abhinav Kakani				
	At the beginning of the year	4150	1.729	4150	1.729
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	4150	1.729	4150	1.729

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
7	Santosh Kakani				
	At the beginning of the year	3900	1.625	3900	1.625
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	3900	1.625	3900	1.625
8	Om Prakash Kakani (HUF)				
	At the beginning of the year	3850	1.604	3850	1.604
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	3850	1.604	3850	1.604
9	Santosh Devi Lahoti				
	At the beginning of the year	3600	1.500	3600	1.500
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	3600	1.500	3600	1.500

Sl. No.		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
	For Each of the Top 10 Shareholders				
10	Bhanwar Lal Bhattar				
	At the beginning of the year	3500	1.458	3500	1.458
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	3500	1.458	3500	1.458

(v) Shareholding of Directors and Key Managerial Personnel :

Sl. No.		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
	For each of the Directors & KMP				
1	Ramwatar Kabra				
	At the beginning of the year	10900	4.542	10900	4.542
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	10900	4.542	10900	4.542
2	Rajesh Kumar Kabra				
	At the beginning of the year	38500	16.042	38500	16.042
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	38500	16.042	38500	16.042

Sl. No.	For each of the Directors & KMP	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
3	Chandra Prakassh Kabra				
	At the beginning of the year	20850	8.687	20850	8.687
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	20850	8.687	20850	8.687
4.	Vijay Kumar Kabra				
	At the beginning of the year	15800	6.583	15800	6.583
	Datewise increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc):	there is no change in shareholding			
	At the End of the year (or on the date of separation, if separated during the year)	15800	6.583	15800	6.583

V. INDEBTEDNESS

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

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	6823949	0	0	6823949
ii) Interest due but not paid	0	0	0	0
iii) Interest accrued but not due	0	0	0	0
Total (i + ii +iii)	6823949	0	0	6823949
Change in Indebtedness during the financial year				
Addition	1932042	0	0	1932042
Reduction	1696280	0	0	1696280
Net Change	235762	0	0	235762
Indebtedness at the end of the financial year				
i) Principal Amount	7059711	0	0	7059711
ii) Interest due but not paid	0	0	0	0
iii) Interest accrued but not due	0	0	0	0
Total (i + ii +iii)	7059711	0	0	7059711

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

Sl. No.	Particulars of Renuneration	Name of MD / WTD / Manager				Total Amount
		Isha Kabra Manager	—	—	—	
1	Gross salary (a) Salary as per provisions contained in section 17(1) of the Income Tax Act, 1961 (b) Value of perquisites u/s 17(2) Income Tax Act,1961 (c) Profits in lieu of salary under section 17(3) Income Tax Act, 1961	140000				140000
2	Stock Option	0				
3	Sweat Equity	0				
4	Commission —as % of profit —others, specify	0				
5	Others, please specify	0				
	Total (A)	140000				140000
	Ceiling as per the Act					

B. Remuneration to other Directors :

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

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

Sl. No.	Particulars of Remuneration	Key Managerial Personnel			Total
		CEO	Company Secretary Megha Baheti	CFO Giraj Kumar Mundhra	
1	Gross Salary				
	(a) Salary as per provisions contained in section 17(1) of the Income Tax Act, 1961	0	5419	112000	117419
	(b) Value of perquisites u/s 17(2) Income Tax Act, 1961				
	(c) Profits in lieu of salary under section 17(3) Income Tax Act, 1961				
2	Stock Option	0	0	0	0
3	Sweat Equity	0	0	0	0
4	Commission—as % of profit—others, specify...	0	0	0	0
5	Others, please specify	0	0	0	0
	TOTAL		5419	112000	117419

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	—	—	—	—	—
Compounding	—	—	—	—	—
B. DIRECTORS					
Penalty	—	—	—	—	—
Punishment	—	—	—	—	—
Compounding	—	—	—	—	—
C. OTHER OFFICERS IN DEFAULT					
Penalty	—	—	—	—	—
Punishment	—	—	—	—	—
Compounding	—	—	—	—	—

FORM No MR-3
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2019
[Pursuant to section 204(1) of the Companies Act, 2013 and Rule No. 9 of the Companies
(Appointment and Remuneration of Managerial Personnel) Rules, 2014]

To,
The Members,
Kabra Steel Products Limited
2, Brabourne Road
Kolkata 700001

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by Kabra Steel Products 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 Kabra Steel Products Limited's books, papers, minute books, forms and returns filed and other records maintained by the company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the company has, during the audit period covering the financial year ended on 31st March, 2019 generally complied with the statutory provisions listed hereunder and also 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 Kabra Steel Products Limited ("the company") for the financial year ended on 31st March, 2019 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - c) *The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
 - d) *The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
 - e) *The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
 - f) *The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
 - g) *The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
 - h) *The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; and
 - i) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

* No event took place under these regulations during the audit period.

- vi) I have been informed that no other sector/ 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 The Calcutta Stock Exchange Limited.
- iii) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

During the period under review the Company has generally complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above except in some cases subject to the following observations:

- 1. The trading of the shares has been suspended by the Calcutta Stock Exchange.**
- 2. The Company does not have any Registrar and Transfer Agent.**
- 3. All the shares of the Company are in the physical form.**

I further report that

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. There was no change in composition of the Board of Directors during the year.

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

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

I further report that there are adequate systems and process 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 that there were no specific events/actions having a major bearing on the company's affairs in pursuance of the above referred laws, regulations, guidelines, standards etc referred to above.

Place: Howrah

Dated: 28th May, 2019

Signature : **RITESH KUMAR AGRAWAL**

Name of the Company **RITESH KUMAR AGRAWAL**

Secretary in practice:

ACS No. : 19119

C.P.No. : 7095

Note:

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

'Annexure A'

To,
The Members,
Kabra Steel Products Limited
2, Brabourne Road
Kolkata-700001

My report 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 my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis of my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the company.
4. Wherever required, I have obtained the Management representation about the compliance of laws, rules, and regulations and happenings of events etc.
5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of procedures on test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.

Signature:

R. K. AGRAWAL

RITESH KUMAR AGRAWAL

Practising Company Secretary

ACS No—19119

Certificate of Practice Number—7095

Date: 28th May, 2019

Place: Howrah

INDEPENDENT AUDITORS' REPORT

TO THE MEMBERS OF KABRA STEEL PRODUCTS LTD.

Report on the Financial Statements

Opinion

We have audited the standalone financial statements of KABRA STEEL PRODUCTS LTD. ("the Company"), which comprise the Balance Sheet as at 31st March 2019, and the Statement of Profit and Loss, the statement of changes in equity and the Cash Flow Statement for the year then ended, and a summary of significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at 31st March, 2019, its loss, changes in equity and its cash flows for the year ended on that date..

Basis for Opinion

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

Management's Responsibility for the Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these standalone financial statements that give a true and fair view of the state of affairs, profit / loss and changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the Accounting Standards specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

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

Auditor's Responsibility

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

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

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

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

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

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditor's Report) order, 2016 ("the order") issued by the Central Government of India in terms of sub-section (11) of section 143 of the Act, we give in the Annexure –"A" a statement on the matters specified in paragraph 3 and 4 of the order.

2. As required by Section 143 (3) of the Act, we report that:
- (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit;
 - (b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
 - (c) The Balance Sheet, the Statement of Profit and Loss, changes in equity and its Cash Flow Statement dealt with by this Report are in agreement with the books of account.
 - (d) In our opinion, the aforesaid standalone financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.
 - (e) On the basis of the written representations received from the directors as on 31st March, 2019 and taken on record by the Board of Directors, none of the directors is disqualified as on 31st March, 2019, from being appointed as a director in terms of Section 164 (2) of the Act.
 - (f) With respect to the adequacy of the internal financial controls over financial reporting of the company and the operating effectiveness of such controls, referred to our separate Report in "Annexure - "B".
 - (g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of Section 197(16) of the Act, as amended:

In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the company to its director during the year is in accordance with the provisions of Section 197 of the Act.
 - (h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:
 - (i) The Company does not have any pending litigations which would impact its financial position.
 - (ii) The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
 - (iii) There were no amounts which were required to be transferred, to the Investor Education and Protection Fund by the Company.

Kolkata
30th May, 2019

For **S. C. SONI & CO.**
Chartered Accountants
Firm Regn.No.326770E

(S. C. SONI)
Proprietor
M. No. 50515

ANNEXURE - "A" TO THE INDEPENDENT AUDITORS' REPORT

With reference to the Annexure 'A' referred to in paragraph 1 in Report on other legal and regulatory requirements of the Independent Auditor' Report to the Members of the Company on the financial statements for the year ended 31st March, 2019, we report that :

- (i) (a) The company has maintained proper records showing full particulars including quantitative details and situation of fixed assets.
- (b) As explained to us Fixed Assets have been physically verified by the management during the year at reasonable intervals and according to the information and explanations given to us no material discrepancies were noticed on such verification.
- (c) The title deeds of the immovable properties are held in the name of the Company.
- (ii) The Company has no Stock in Trade as on 31.3.2019.
- (iii) The Company has not granted any unsecured loan to Companies, Firms, limited liability partnership or other parties covered in the register maintained under section 189 of the Companies Act, 2013.
- (iv) The Company has not made any loans to the parties covered under section 185 of the Companies Act, 2013. The Company has complied with provision of Section 186 of the Companies Act, 2013 in respect of loans and investments.
- (v) The Company has not accepted any deposits from the Public during the year.
- (vi) The Company is not required to maintain cost records under the Companies (cost Records and Audit) Rules, 2014.
- (vii) (a) The Company is regular in depositing undisputed statutory dues including provident fund, employees' state insurance, income-tax, duty of customs, Goods and Service tax, cess and other statutory dues to the appropriate authorities. There is no dues as on the last day of the financial year outstanding for a period of more than six months from the date they become payable.

According to the information and explanations given to us, no undisputed amounts payable in respect of Provident fund, Employees' State Insurance, Income-tax, Sales-tax, Goods and Service tax, Service tax, Duty of Customs, Duty of Excise, Value added tax, cess and other material statutory dues were in arrears as at 31st March 2019 for a period of more than six months from the date they became payable.
- (b) There is no income tax, or Sales tax , Service tax duty of customs or duty of excise or value added tax or cess which have not been deposited with appropriate authorities on account of any dispute.
- (viii) The Company has not defaulted in repayment of loans or borrowing to a financial institution, bank, government or dues to debenture holders.
- (ix) The Company did not raise any money by way of initial public offer or further public offer (including debt instrument) and term loans during the year. Therefore this clause is not applicable.

- (x) According to the information and explanations given to us, no fraud by the Company or on the Company by its officers or employees has been noticed or reported during the year.
- (xi) According to the information and explanations given to us and based on our examination of the records of the Company, the Company has paid managerial remuneration in accordance with the requisite approvals mandated by the provisions of Section 197 read with Schedule V to the Act.
- (xii) The Company is not a Nidhi Company.
- (xiii) According to the information and explanations given to us and based on our examination of the records of the Company, transactions with the related parties are in compliance with section 177 and 188 of the Act where applicable and details of such transactions have been disclosed in the financial statements as required by the applicable accounting standards.
- (xiv) The Company has not made any preferential allotment or private placement of shares or fully or partly convertible debenture during the year under review therefore this clause is not applicable.
- (xv) The Company has not entered into any non cash transactions with directors or persons connected with them.
- (xvi) The Company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934.

Kolkata
30th May, 2019

For **S. C. SONI & CO.**
Chartered Accountants
Firm Regn.No.326770E

(S. C. SONI)
Proprietor
M. No. 50515

ANNEXURE B TO THE AUDITOR'S REPORT

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

We have audited the internal financial controls over financial reporting of **KABRA STEEL PRODUCTS LTD.** ("the Company") as of 31st March, 2019 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

Management's Responsibility for Internal Financial Controls

The Company's management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India ('ICAI'). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to the Company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditor's Responsibility

Our responsibility is to express an opinion on the Company's Internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the "Guidance Note") and the Standards on Auditing as specified under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and , both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting were established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditors' judgement, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.

Meaning of Internal Financial Controls Over Financial Reporting

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's Internal financial control

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

Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31st March, 2019, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

Kolkata
30th May, 2019

For **S. C. Soni & Co.**
Chartered Accountants
Firm Regn.No. 326770E
(S. C. Soni)
Proprietor
M.No. 50515

BALANCE SHEET AS AT 31ST MARCH 2019

	Note No.	As at 31.03.2019 Rupees	As at 31.03.2018 Rupees
<u>ASSETS</u>			
<u>Non-Current Assets</u>			
Property, Plant & Equipment	2	3,854,761	3,980,529
Non-Current Investments	3	4,180,048	4,427,573
<u>Current Assets</u>			
a) Financial Assets			
i) Cash and Cash Equivalents	4	108,542	162,878
ii) Bank Balances Other than (i) above	5	7,721,958	7,721,958
iii) Other Financial Assets	6	670,536	391,159
b) Other Current Assets			
	7	1,010,589	1,128,182
	TOTAL	17,546,434	17,812,279
<u>EQUITY AND LIABILITIES</u>			
<u>Equity</u>			
a) Equity Share Capital	8	2,400,000	2,400,000
b) Other Equity	9	7,877,180	8,269,967
<u>Liabilities</u>			
<u>Non-Current Liabilities</u>			
Deferred Tax Liabilities (Net)	10	31,709	29,752
<u>Current Liabilities</u>			
a) Financial Liabilities			
i) Borrowings	11	7,059,711	6,823,949
b) Other Current Liabilities	12	177,834	288,611
	TOTAL	17,546,434	17,812,279

Significant Accounting Policies and Other Notes — 1

As per our Report of even date
For **S. C. Soni & Co.**
Chartered Accountants
Firm Regn. No. 326770E

Rajesh Kumar Kabra
Managing Director
(DIN : 00331305)

Ramawtar Kabra
Director
(DIN : 00341280)

Kolkata
30th May, 2019

(S. C. Soni)
Proprietor
M.No.50515

Megha Baheti
Secretary

Giriraj Kumar Mundhra
Chief Financial Officer

STATEMENT OF PROFIT AND LOSS FOR THE YEAR ENDED 31ST MARCH, 2019

	Note No.	For the Year ended 31.03.2019	For the Year ended 31.03.2018
		Rupees	Rupees
<u>INCOME</u>			
Other Income	13	877,753	1,705,606
Total Income		877,753	1,705,606
<u>EXPENSES</u>			
Employee Benefit expenses	14	257,419	294,900
Finance Costs	15	553,126	896,093
Depreciation & Amortisation Exp.	2	6,052	6,052
Other Expenses	16	332,270	463,043
Total Expenses		1,148,867	1,660,088
(Loss)/ Profit Before Tax		(271,114)	45,518
<u>Tax Expense:</u>			
Deferred Tax		(1,957)	(3,502)
(Loss) / Profit for the year		(273,071)	49,020
<u>Earnings per Equity Share of Rs.10/- each</u>			
Basic and Diluted	17	(1.14)	0.20

Significant Accounting Policies and Other Notes — 1

	As per our Report of even date For S. C. Soni & Co. Chartered Accountants Firm Regn. No. 326770E	Rajesh Kumar Kabra Managing Director (DIN : 00331305)	Ramawtar Kabra Director (DIN : 00341280)
Kolkata 30th May, 2019	(S. C. Soni) Proprietor M.No.50515	Megha Baheti Secretary	Giriraj Kumar Mundhra Chief Financial Officer

**CASH FLOW STATEMENT PREPARED PURSUANT TO THE LISTING AGREEMENT
WITH THE STOCK EXCHANGE FOR THE YEAR ENDED 31ST MARCH 2019**

	For the year ended 31st March 2019		For the year ended 31st March 2018	
	Rupees	Rupees	Rupees	Rupees
A. CASH FLOW FROM OPERATING ACTIVITIES				
Net Profit as per Profit & Loss Account		(271,114)		45,518
Adjustments for				
Depreciation	6,052		6,052	
Dividend Received on Shares	(186,557)		(234,460)	
Interest Received on bank deposits, etc.	(560,644)		(809,981)	
Interest Paid on bank overdraft	553,126		792,989	
Profit on Sale of Investments	(118,960)	(306,983)	(661,165)	(906,565)
Operating Profit before change in working capital		(578,097)		(861,047)
Adjustments for				
Other Current Liabilities	(110,777)		172,283	
Other Financial Assets	(279,377)		(191,268)	
Other Current Assets	7,987	(382,167)	86,382	67,397
Cash Generated from Operations		(960,264)		(793,650)
Less : Income taxes paid (net of refunds)		109,606		(81,004)
NET CASH (USED IN) / FROM OPERATING ACTIVITIES (A)		(850,658)		(874,654)
B. CASH FLOW FROM INVESTING ACTIVITIES				
Dividend Received on Shares	186,557		234,460	
Interest Received on bank deposits, etc.	560,644		809,981	
NET CASH FROM INVESTING ACTIVITIES (B)		747,201		1,044,441
C. CASH FLOW FROM FINANCING ACTIVITIES				
Profit on Sale of Investments	118,960		661,165	
Proceed from Sale of Investments	247,525		(1,222,053)	
Increase of bank overdraft	235,762		(3,721,870)	
Interest on bank overdraft	(553,126)		(792,989)	
NET CASH FROM FINANCING ACTIVITIES (C)		49,121		(5,075,747)
NET INCREASE / (DECREASE) IN CASH AND CASH EQUIVALENTS (A+B+C)		(54,336)		(4,905,960)
CASH AND CASH EQUIVALENTS (OPENING)		7,884,836		12,790,796
CASH AND CASH EQUIVALENTS (CLOSING)		7,830,500		7,884,836
NET INCREASE / (DECREASE) IN CASH AND CASH EQUIVALENTS		(54,336)		(4,905,960)

Notes :

- Although investing activities attract tax on income arising out of these activities for the purpose of Cash Flow entire tax payment has been considered as part of operating activities only.
- Figure of the previous year have been regrouped, rearranged and reclassified wherever found necessary.

	As per our Report of even date For S. C. Soni & Co. Chartered Accountants Firm Regn. No. 326770E	Rajesh Kumar Kabra Managing Director (DIN : 00331305)	Ramawtar Kabra Director (DIN : 00341280)
Kolkata 30th May, 2019	(S. C. Soni) Proprietor M.No.50515	Megha Baheti Secretary	Giriraj Kumar Mundhra Chief Financial Officer

1) SIGNIFICANT ACCOUNTING POLICIES AND OTHER NOTES

(A) Significant Accounting Policies

1 Basis of preparation of Financial Statements:

The Financial Statements of the Company have been prepared in accordance with the Indian Accounting Standards (Ind AS) to comply with the section 133 of the Companies Act 2013 ("the 2013 Act") read with Rule 3 of the Companies (Indian Accounting Standards) Rules 2015, and Companies (Indian Accounting Standards) Rules, 2016. The financial statements were authorized for issue by the Company's Board of Directors on 30th May, 2019.

All the assets and liabilities have been classified as current or non current as per the Company's normal operating cycle and other criteria set out in Schedule III to the Act. Based on the nature of products and the time between the acquisition of assets for processing and their realization in cash and cash equivalent, the Company has ascertained the operating cycle to be 12 months.

Functional and presentation currency:

These standalone financial statements are presented in Indian rupees, which is the Company's functional currency.

2 Current Vs Non-current classifications:

The Company presents assets and liabilities in the balance sheet based on current / non-current classification.

An asset is treated as current when it satisfies below criteria:

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

All other assets are classified as non-current assets.

A liability is classified as current when it satisfies below criteria:

- i Expected to settle the liability in normal operating cycle;
- ii Held primarily for the purpose of trading;
- iii Due to be settled within twelve months after the reporting period, or
- iv. There is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period.

All other liabilities are classified as non-current liabilities.

Deferred tax assets and liabilities are classified as non-current assets and liabilities.

The operating cycle is the time between the acquisition of assets for processing and their realisation in cash and cash equivalents.

3 Property, Plant and Equipment

Useful Life

The estimated useful life of property, plant and equipment is based on a number of factors including the effects of obsolescence, demand, completion and other economic factors (such as the stability of the industry and known technological advancement) and the level of maintenance expenditure required to maintain.

Recoverable amount of property, plant, and equipment

The recoverable amount of property, plant and equipment is based on estimates and assumptions. Any changes in these assumptions may have a material impact on the measurement of the recoverable amount resulting in impairment.

Investment Properties

Property that is held for long-term rental yields or for capital appreciation or both, and that is not occupied by the Company, is classified as investment property. Investment property is measured initially at its cost, including related transaction costs and where applicable. All other repairs and maintenance costs are charged to Profit & Loss Account when incurred.

4 Borrowings Costs

General and specific borrowing costs that are directly attributable to the acquisition, construction or production of a qualifying assets are capitalised during the period of time that is required to complete and prepare the asset for its intended use or sale.

-
- 5 Stock-in-Trade**
Stock-in-Trade are stated at the lower of cost and net realizable value whichever is lower. Cost is determined on First in and First out basis.
- 6 Revenue recognition and Other; Income:**
Interest / dividend:
Interest income is recognized on a time proportion basis taking into account the amount outstanding and the rate applicable.
Dividend income is recognised when the right to receive payment is established by the balance sheet date.
- 7 Trade and other payables**
These amounts represent liabilities for goods and services provided to the Company prior to the end of financial year which are unpaid. The amounts are unsecured and are usually paid within time contracted. Trade and other payables are presented as current liabilities unless payment is not due within 12 months after the reporting period. They are recognised initially at their fair value/transaction value.
- 8 Employee Benefits**
(a) Short Term Obligations
Short term employee benefits including performance incentives, are charged to statement of profit and loss on an undiscounted, accrual basis during the period of employment.
(b) Long Term Obligations
At present no Gratuity is payable. The Company will pay the Gratuity at the time of retirement / death of employees based on the basis of policy framed by the Company. No provision is made in accounts. The same will be recognised in the year of payment and charged in Revenue account.
- 9 Income Tax and Deferred Tax:**
Management judgement is required for the calculation of provision for income taxes and deferred tax assets / liabilities. The Company reviews at each balance sheet date the carrying amount of deferred tax assets / liabilities. The factors used in estimates may differ from actual outcome which could lead to significant adjustment to the amounts reported in the financial statements.
- 10 Provisions and contingencies**
The assessments undertaken in recognising provisions and contingencies have been made in accordance with Ind AS 37, 'Provisions, Contingent Liabilities and Contingent Assets'. The evaluation of the likelihood of the contingent events has been made on the basis of best judgement by management regarding probable outflow of economic resources. Such estimation can change due to unforeseeable developments.
- 11 Cash and cash equivalents:**
Cash and cash equivalents includes cash on hand and at bank.
- 12 Segment Reporting**
The Company operates in single activity therefore there is no segment reporting
- 13 Estimated useful lives and residual value**
Depreciation is calculated using the written down value method to allocate their cost, net of their residual values on the basis of useful lives prescribed in Schedule II to the Companies Act, 2013.
- 14 Trade receivables**
Trade receivables are recognised initially at transaction price and subsequently measured at amortised cost less provision for impairment. Provision for doubtful debts are made when they became finally irrecoverable.
- 15 Claim Provision and Contingent liabilities and Contingent Assets**
Contingent liabilities are possible obligations that arise from past events and whose existence will be confirmed by the occurrence or non-occurrence of one or more future events not wholly within the control of the Company, such obligation is disclosed as contingent liability.
Contingent assets are not recognised in the financial statements since this may result in the recognition of income that may never be accrued / realised.
- 16 Earnings per share**
Basic Earnings per share
Basic earnings per share is calculated by dividing the profit / loss attributable to owners of the Company by weighted average number of equity shares outstanding during the financial year.
-

SCHEDULE - 1**(B) NOTES ON ACCOUNT :**

- (i) Fixed Deposit Certificates are not available for auditor's verification as the same is pledged to Canara Bank against the Overdraft facility provided by the said Bank.

(ii) Details of Amount paid to Auditors	31.3.2019	31.3.2018
	Amount	Amount
Statutory Audit	—	15000
Tax Matters	2950	11504
Certification and GST	9773	4690
	<u>12,723</u>	<u>31,194</u>

Statutory Audit fees of Current financial year has not been made since it will be debited in the year of payment on finalisation of accounts.

- (iii) As per management no gratuity is payable at present.
- (iv) The Company is a Small and Medium Sized Company (SMC) as defined in the General Instructions in respect of Accounting Standards notified under the Companies Act, 2013. Accordingly the Company has complied with the Accounting Standards as applicable to a Small and Medium Sized Company.
- (v) There are no Micro and Small Enterprises to which the Company owes dues. This Information as required under Micro, Small and Medium Enterprises Development Act, 2006 has been determined to the extent such parties have been identified on the basis of Information available with the Company.
- (vi) In the opinion of the Board of Directors the Current Assets, Loans and Advances are approximately of the value stated in accounts, if realised in ordinary course of business, unless otherwise stated. The provisions for all known liabilities is adequate and not in excess of the amount reasonably necessary.
- (vii) There is no disputed statutory liability which is due.

(viii) Segment Reporting

The Company is mainly engaged in financing activities and the major activities revolve around this activity, as such there is no separate reportable segment as per Accounting standard of Segment Reporting (AS-17)

(ix) Related Party Transactions (As per AS-18)**Particulars****KEY MANAGERIAL PERSONEL**

Sri Ramawtar Kabra—Director

Sri Rajesh Kumar Kabra—Director

Sri Chandra Prakassh Kabra—Director

Sri Vijay Kr. Kabra—Director

Mrs. Isha Kabra—Director

Sri Giriraj Kr. Mundhra—Chief Financial Officer

Where key Managerial personnel exercise significant influence

Jagdamba Coal House

Rajesh Manish Associates Pvt. Ltd.

Details of Transactions with related parties that have taken place during the year.

Particulars	Nature of Transaction	As at 31.03.2019		As at 31.03.2018	
		Volume of Transaction	Balance Outstanding	Volume of Transaction	Balance Outstanding
		Rs.	Rs.	Rs.	Rs.
Jagdamba Coal House	Electricity & Water Chgs.	12324	78,385 Cr.	12,016	66,061 Cr.
Rajesh Manish Associates Pvt. Ltd.	Data Processing Charges	36,000	95,753 Cr.	88200	88,200 Cr.
	Insurance Charges	1,673	1,673 Cr.	1,673	1,673 Cr.
Mrs. Isha Kabra	Managerial Remuneration	140,000	-	120,000	-
Mr. Ramawtar Kabra	Advance Taken	310,000	NIL	112,400	1,10,000 Cr.

(x) Figures of the previous year have been regrouped, rearranged, recasted and reclassified wherever found necessary.

STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31ST MARCH, 2019

a) **Equity Share Capital**

Equity shares of INR 10 each issued, subscribed and fully paid (Rs. In Lacs)

PARTICULARS	Numbers of shares	Amount
As at 31st March, 2018	240,000	24.00
As at 31st March, 2019	240,000	24.00

b) **Other Equity**

Attributable to equity holders (Rs. In Lacs)

PARTICULARS	Revaluation Reserve	Retained earnings	Total Equity
Balance as on 31st March 2018	37.11	45.59	82.70
Loss for the year	—	(2.73)	(2.73)
Adjustments	(1.20)	—	(1.20)
Balance as on 31st March 2019	35.91	42.86	78.77

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

This is the statement of changes in equity referred to in our report of even date.

Kolkata 30th May, 2019	As per our Report of even date For S. C. Soni & Co. Chartered Accountants Firm Regn. No. 326770E (S. C. Soni) Proprietor M.No.50515	Rajesh Kumar Kabra Managing Director (DIN : 00331305)	Ramawtar Kabra Director (DIN : 00341280)
		Megha Baheti Secretary	Giriraj Kumar Mundhra Chief Financial Officer

2) PROPERTY, PLANT AND EQUIPMENT :

PARTICULARS	GROSS BLOCK (AT COST)		DEPRECIATION			W.D.V.	
	As at 01.04.2018	As at 31.03.2019	Upto 31.03.2018	For the Year	Upto 31.03.2019	As at 31.03.2019	As at 31.03.2018
Tangible Assets							
Building (*)	6,766,967	6,766,967	2,830,690	125,768	2956458	3,810,509	3,936,277
Furniture & Fixture	155,394	155,394	153,631	—	153631	1,763	1,763
Electric Installation	41,698	41,698	40,746	—	40746	952	952
Office Equipments	68,424	68,424	66,409	—	66409	2,015	2,015
A.C. Machines	82,782	82,782	78,643	—	78643	4,139	4,139
Silver Utensils	35,383	35,383	—	—	—	35,383	35,383
TOTAL	7,150,648	7,150,648	3,170,119	125,768	3,295,887	3,854,761	3,980,529
Previous Year	7,150,648	7,150,648	3,044,351	125,768	3,170,119	3,980,529	4,106,297

Note :

(i) (*) Represents the cost of ownership premises at Jaipur (including Revaluation Reserve 60,00,000/- created in the accounting year ended 31st March, 2007)

(ii) Detail of depreciation on Building	31.03.2019	31.03.2018
Charged to Profit & Loss Account	6,052	6,052
Add : Adjusted with Revaluation Reserve (Refer Note No.2)	119,716	119,716
Depreciation for the year	125,768	125,768

3) NON-CURRENT INVESTMENTS : (At Cost—Other than Trade)

PARTICULARS	Face Value Rupees	31st March 2019		31st March 2018	
		Nos.	Rupees	Nos.	Rupees
(Investment in Equity Shares of joint Stock Companies)					
(A) Quoted					
PTC India Ltd.	10	1,000	88,530	—	—
Aditya Birla Capital Ltd.	10	1000	83,107	1000	83,107
Balmer Lawrie & Co. Ltd.	10	2000	437,405	1000	227,375
Canara Bank	10	600	185,010	600	185,010
Castrol India Ltd.	5	700	—	1400	291,158
GAIL (I) Ltd.	10	800	194,339	600	194,339
Godrej Consumer Products Ltd.	1	150	—	100	—
Graphite India Ltd.	2	—	—	700	254,927
Grasim Industries Ltd.	2	400	455,536	400	455,536
Himadri Speciality Chemical Ltd.	1	2000	301,878	2000	301,878
Hindustan Zinc Ltd.	2	3600	1,116,060	3600	1,116,060
Emami Ltd.	1	100	—	—	—

PARTICULARS	Face Value Rupees	31st March 2019		31st March 2018	
		Nos.	Rupees	Nos.	Rupees
Indian Oil Corporation Ltd.	10	3500	681,235	3500	681,235
Kabra Commercial Ltd.	10	63300	255,630	63300	255,630
Kabra Marbel Udyog Ltd.	10	(*)5000	20,600	(*)5000	20,600
Larsen & Toubro Ltd	2	150	170,673	150	170,673
Minolta Finance Ltd.	10	2500	11,550	2500	11,550
The Bombay Dyeing & Mfg. Co. Ltd.	2	500	137,245	500	137,245
			4,138,798		4,386,323
(B) Unquoted					
Coalsale Company Ltd.	10	1000	10,050	1000	10,050
Rajesh Manish Associates Pvt. Ltd.	10	12000	31,200	12000	31,200
Total		4,180,048			4,427,573

Note :

- (a) Market value of Quoted Investments is Rs. 45,88,350/- , Previous Year 52,24,506/-
- (b) Bonus Shares received during the year as follows:
- 1) Gail (I) Ltd. 200 Shares
 - 2) Godrej Consumer Products Ltd. 50 Shares
 - 3) Emami Ltd. 100 Shares
- (c) (*)Market Value of these shares are not available hence taken at cost while calculating total Market Value of Quoted investments.

4) CASH AND CASH EQUIVALENTS

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
In Current Accounts with Schedule Banks	60,422	61,438
Cash in hand	48,120	101,440
TOTAL	108,542	162,878

5) BANK BALANCES OTHER THAN CASH AND CASH EQUIVALENTS

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Term Deposits pledged with Bank held as security to avail Overdraft facility	7,721,958	7,721,958
TOTAL	7,721,958	7,721,958

6) OTHER CURRENT FINANCIAL ASSETS

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Current		
Security Deposits	61,367	61,367
Interest Receivable on Term Deposits	609,169	329,792
TOTAL	670,536	391,159

7) OTHER CURRENT ASSETS

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Current		
Advances recoverable in cash or in kind or for value to be received,	1,508	9,495
Tax Payments	1,009,081	1,118,687
TOTAL	1,010,589	1,128,182

8) EQUITY SHARE CAPITAL

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
(a) AUTHORISED		
2,40,000 Equity Shares of Rs. 10/- each	2,400,000	2,400,000
ISSUED, SUBSCRIBED AND PAID-UP		
2,40,000 Equity Shares of Rs. 10/- each fully paid up	2,400,000	2,400,000

(b) Reconciliation of number of equity shares of each class outstanding at the beginning and at the end of the Reporting year

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Number of Equity Shares (at the beginning of the Reporting year)	2,40,000	2,40,000
Number of Equity Shares (at the end of the Reporting year)	2,40,000	2,40,000

(c) Details of shares held by each shareholder holding more than 5% of share capital

Name of Shareholders	31-03-2019		31-03-2018	
	No. of share held	% of share capital	No. of share held	% of share capital
Gopal Lal Kabra	12500	5.21	12500	5.21
Rajesh Kumar Kabra	38500	16.04	38500	16.04
Chandra Mukhi Kabra	16500	6.87	16500	6.87
Chandra Prakassh Kabra	20850	8.69	20850	8.69
Vijay Kumar Kabra	15800	6.58	15800	6.58
Kabra Commercial Ltd.	15000	6.25	15000	6.25

(d) Rights, preference and restrictions attached to shares

The company has only one class of equity shares having at par value of Rs.10 per share. Each Shareholder is eligible for one vote per share. The dividend proposed by the Board of Directors is subject to the approval of shareholders, except in case of interim dividend. In the event of liquidation, the equity shareholders are eligible to receive the remaining assets, of the Company after distribution of all preferential amounts in proportion of their shareholding.

(e) There is no allotment of shares for consideration other than cash, allotment of bonus shares and bought back during the last five years.

9) OTHER EQUITY

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
(a) Capital Reserve		
Revaluation Reserve		
As per last Accounts	3,711,158	3,830,874
Less : Adjusted during the year	119,716	119,716
At the end of the year	3,591,442	3,711,158
(b) Surplus in Statement of Profit and Loss		
Balance at the beginning of the year	4,558,809	4,509,789
Less/ Add : (Loss) / Profit for the year	(273,071)	49,020
At the end of the year	4,285,738	4,558,809
Total (a) + (b)	7,877,180	8,269,967

10) DEFERRED TAX LIABILITIES (NET)

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
As per last Accounts	29,752	33,254
Add / (Less) : Deferred Tax Liabilities for the year	1,957	(3,502)
TOTAL	31,709	29,752

11) OTHER FINANCIAL LIABILITIES - CURRENT BORROWINGS

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Secured, considered good		
Working capital loan from Canara Bank (Secured against the pledge / lien of Fixed Deposit with bank)	7,059,711	6,823,949
TOTAL	7,059,711	6,823,949

12) OTHER CURRENT LIABILITIES

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Other payables	177,404	287,111
Statutory Dues	430	1,500
TOTAL	177,834	288,611

13) OTHER INCOME

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Income from Non Current Assets		
Dividend	186,557	234,460
Profit on Sale of Investments	118,960	661,165
Income from Current Assets		
Interest from Banks	560,644	809,981
Interest from Others	11,592	—
TOTAL	877,753	1,705,606

14) EMPLOYEE BENEFIT EXPENSES

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Salaries and Allowances	257,419	294,900
TOTAL	257,419	294,900

15) FINANCE COSTS

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Interest on Bank Overdraft	553,126	792,989
Bank Processing Charges	—	103,104
TOTAL	553,126	896,093

16) OTHER EXPENSES

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
Rent, Rates & Taxes	45,812	51,257
Telephone Expense	5,641	11,181
Printing & Stationery	10,600	7,594
Conveyance Expenses	1,155	1,343
Electric Expenses	12,324	12,016
Repairs & Maintenance	86,568	80,169
Payment to Statutory Auditors (see note in Schedule 1(B))	12,723	31,194
Insurance charges	7,245	8,293
Legal & Professional charges	49,860	47,996
General Expense	8,345	7,145
Advertisement	15,540	13,124
Data Processing Expense	36,000	120,000
Bank Charges	1,479	26,038
Sundry Expenses	38,978	45,693
TOTAL	332,270	463,043

17) EARNINGS PER SHARE (EPS)

PARTICULARS	31-03-2019 Rupees	31-03-2018 Rupees
(Loss) / Profit after Tax	(273,071)	49,020
No. of Equity Shares	240,000	240,000
Earnings per Equity share (Basic & diluted) of Rs. 10/- each	(1.14)	0.20

Signature to Notes '1' to '17'
For **S. C. Soni & Co.**
Chartered Accountants
Firm Regn. No. 326770E

Rajesh Kumar Kabra
Managing Director
(DIN : 00331305)

Ramawtar Kabra
Director
(DIN : 00341280)

Kolkata
30th May, 2019

(S. C. Soni)
Proprietor
M.No.50515

Megha Baheti
Secretary

Giriraj Kumar Mundhra
Chief Financial Officer

KABRA STEEL PRODUCTS LIMITED

CIN : L27109WB1983PLC036585

Regd. Office: 2, Brabourne Road, 4th Floor, Kolkata- 700 001

Tele: 033-2225-4263 Fax:033-22253461

E-mail: kspl@coalsale.co.in website : www.kspl.net.in

FORM NO. MGT-11

PROXY FORM

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

CIN : L27109WB1983PLC036585
Name of the Company : KABRA STEEL PRODUCTS LIMITED
Regd. Office : 4th Floor, 2, Brabourne Road, Kolkata-700 001
Name of the Members :
Registered Address :
E-Mail Id :
Folio No./Client No. :
DP ID :

I / We, being the member(s) of..... shares of the above Company, hereby appoint.

- Name Address
E-Mail Id : Signature : or failing him
- Name Address
E-Mail Id : Signature : or failing him
- Name Address
E-Mail Id : Signature : or failing him

as my our proxy to attend and vote (on a poll) for me/us on my/our behalf at the 36th AGM of the Company, to be held on Thursday, the 26th day of September, 2019 at 3.30 P. M. at 2 Brabourne Road, 4th Floor, Kolkata-700001 and at any adjournment thereof in respect of such resolution(s) as are indicated below :

Resolution No(s)	Description of Resolution	For	Against
1.	Consider and adopt of Audited Financial Statements for the financial year ended 31st March, 2019 and Reports of the Board of Directors and Auditors thereon (Ordinary Resolution)		
2.	Re-appointment of Mr. Ramawtar Kabra (Din No : 00341280) as Director (Ordinary Resolution)		
3.	Re-appointment of Auditors and to fix their remuneration (Ordinary Resolution)		

Signed this day of 2019

Signature of the Shareholder(s) Signature of Proxy(s)

Notes :This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company not less than 48 hours before the commencement of the meeting.

Affix revenue stamp Not less than Rs. 1.00

TEAR HEAR

KABRA STEEL PRODUCTS LIMITED

CIN : L27109WB1983PLC036585

Regd. Office: 2, Brabourne Road, 4th Floor, Kolkata- 700 001

Tele: 033-2225-4263 Fax:033-22253461

E-mail: kspl@coalsale.co.in website : www.kspl.net.in

ATTENDANCE SLIP

(To be handed over at the entrance of the meeting Hall) (36th Annual General Meeting - 26th September, 2019)

I hereby record my presence at the 36th Annual General Meeting of the Company held on Thursday, 26th September, 2019 at 3:30 P. M. at Regd. Office of the Company at 2 Brabourne Road, 4th Floor, Kolkata - 700001.

Full Name of the member (In BLOCK LETTERS) :

Folio No. DP ID No. Client ID No. No. of shares

Full Name of Proxy (In BLOCK LETTERS) :

Member/Proxy(s) Signature :

(Please cut here and bring the Attendance Slip duly Signed, to the meeting and hand it over at the entrance.

Duplicate slips will not be issued at the venue of the meeting.)