

KABRA STEEL PRODUCTS LIMITED

CIN- L27109WB1983PLC036585

2021 - 2022

BOARD OF DIRECTORS

<i>Ramawtar Kabra</i>	<i>Director</i>
<i>Rajesh Kumar Kabra</i>	<i>Director</i>
<i>Chandra Prakassh Kabra</i>	<i>Director</i>
<i>Vijay Kumar Kabra</i>	<i>Director</i>
<i>Isha Kabra</i>	<i>Director</i>
<i>Jagdish Prasad Kabra</i>	<i>Independent Director</i>
<i>Vijay Kumar Parwal</i>	<i>Independent Director</i>

CHIEF FINANCIAL OFFICER

Giriraj Kumar Mundhra

MANAGER

Isha Kabra

STATUTORY AUDITOR

Ranjit Jain & Co.
Diamond Heritage, Unit No.H605A, 6th Floor
16, Strand Road, Kolkata - 700 001

BANKERS

Canara Bank
I. D. B. I. Bank

REGISTERED OFFICE

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

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

NOTICE

NOTICE is hereby given that the Thirty Ninth 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 Monday, the 12th day of September, 2022 at 12: 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, 2022, with the Reports of the Board of Directors and Auditors thereon.
2. To appoint a Director in place of Sri Vijay Kumar Kabra (DIN: 02986753) who retires by rotation and being eligible, offers himself for re-appointment.

BY ORDER OF THE BOARD

Registered Office :
2, Brabourne Road, 4th Floor,
Kolkata – 700001
Date : 12th August, 2022

R. A. KABRA
Director
DIN NO.: 00341280

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.
6. The Register of Members and the Share transfer Book of the Company shall remain closed from Tuesday, September 06, 2022 to Monday , September 12, 2022 (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 utilized 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

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

CDSL e-Voting System – For e-voting and Joining Virtual meetings.

13. As you are aware, in view of the situation arising due to COVID-19 global pandemic, the general meetings of the companies shall be conducted as per the guidelines issued by the Ministry of Corporate Affairs (MCA) vide Circular No. 14/2020 dated April 8, 2020, Circular No.17/2020 dated April 13, 2020 and Circular No. 20/2020 dated May 05, 2020. The forthcoming AGM/EGM will thus be held through video conferencing (VC) or other audio visual means (OAVM). Hence, Members can attend and participate in the ensuing AGM/EGM through VC/OAVM.
14. Pursuant to the provisions of Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (as amended) and Regulation 44 of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 (as amended), and MCA Circulars dated April 08, 2020, April 13, 2020 and May 05, 2020 the Company is providing facility of remote e-voting to its Members in respect of the business to be transacted at the AGM/EGM. For this purpose, the Company has entered into an agreement with Central Depository Services (India) Limited (CDSL) for facilitating voting through electronic means, as the authorized e-Voting's agency. The facility of casting votes by a member using remote e-voting as well as the e-voting system on the date of the EGM/AGM will be provided by CDSL.
15. The Members can join the EGM/AGM in the VC/OAVM mode 15 minutes before and after the scheduled time of the commencement of the Meeting by following the procedure mentioned in the Notice. The facility of participation at the EGM/AGM through VC/OAVM will be made available to atleast 1000 members on first come first served basis. This will not include large Shareholders (Shareholders holding 2% or more shareholding), Promoters, Institutional Investors, Directors, Key Managerial Personnel, the Chairpersons of the Audit Committee, Nomination and Remuneration Committee and Stakeholders Relationship Committee, Auditors etc. who are allowed to attend the EGM/AGM without restriction on account of first come first served basis.
16. The attendance of the Members attending the AGM/EGM through VC/OAVM will be counted for the purpose of ascertaining the quorum under Section 103 of the Companies Act, 2013.
17. Pursuant to MCA Circular No. 14/2020 dated April 08, 2020, , the facility to appoint proxy to attend and cast vote for the members is not available for this AGM/EGM. However, in pursuance of Section 112 and Section 113 of the Companies Act, 2013, representatives of the members such as the President of India or the Governor of a State or body corporate can attend the AGM/EGM through VC/OAVM and cast their votes through e-voting.
18. In line with the Ministry of Corporate Affairs (MCA) Circular No. 17/2020 dated April 13, 2020, the Notice calling the AGM/EGM has been uploaded on the website of the Company at www.kspl.net.in. The Notice can also be accessed from the websites of the Stock Exchanges i.e. CSE Limited at www.cseindia.com. The AGM/EGM Notice is also disseminated on the website of CDSL (agency for providing the Remote e-Voting facility and e-voting system during the AGM/EGM) i.e. www.evotingindia.com.
19. The AGM/EGM has been convened through VC/OAVM in compliance with applicable provisions of the Companies Act, 2013 read with MCA Circular No. 14/2020 dated April 8, 2020 and MCA Circular No. 17/2020 dated April 13, 2020 and MCA Circular No. 20/2020 dated May 05, 2020.
20. In continuation of this Ministry's **General Circular No. 20/2020**, dated 05th May, 2020 and after due examination, it has been decided to allow companies whose AGMs were due to be held in the year 2020, or become due in the year 2021, to conduct their AGMs on or before 31.12.2021, in accordance with the requirements provided in paragraphs 3 and 4 of the General Circular No. 20/2020 as per MCA circular no. 02/2021 dated January,13,2021.

THE INTRUCTIONS OF SHAREHOLDERS FOR E-VOTING AND JOINING VIRTUAL MEETINGS ARE AS UNDER:

- (i) The voting period begins on **09th September, 2022 at 9:00 A.M.** and ends on **11th September, 2022 at 5:00 P.M.** During this period shareholders' of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date (record date) of **05th September, 2022** may cast their vote electronically. The e-voting module shall be disabled by CDSL for voting thereafter.
- (ii) Shareholders who have already voted prior to the meeting date would not be entitled to vote at the meeting venue.
- (iii) Pursuant to SEBI Circular No. **SEBI/HO/CFD/CMD/CIR/P/2020/242 dated 09.12.2020**, under Regulation 44 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entities are required to provide remote e-voting facility to its shareholders, in respect of all shareholders' resolutions.

However, it has been observed that the participation by the public non-institutional shareholders/retail shareholders is at a negligible level.

Currently, there are multiple e-voting service providers (ESPs) providing e-voting facility to listed entities in India. This necessitates registration on various ESPs and maintenance of multiple user IDs and passwords by the shareholders.

In order to increase the efficiency of the voting process, pursuant to a public consultation, it has been decided to enable e-voting to **all the demat account holders, by way of a single login credential, through their demat accounts/ websites of Depositories/ Depository Participants**. Demat account holders would be able to cast their vote without having to register again with the ESPs, thereby, not only facilitating seamless authentication but also enhancing ease and convenience of participating in e-voting process.

- (iv) In terms of **SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated December 9, 2020** on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Pursuant to abovesaid SEBI Circular, Login method for e-Voting and joining virtual meetings for **Individual shareholders holding securities in Demat mode CDSL/NSDL** is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in Demat mode with CDSL	<ol style="list-style-type: none"> 1) Users who have opted for CDSL Easi / Easiest facility, can login through their existing user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are https://web.cdslindia.com/myeasi/home/login or visit www.cdslindia.com and click on Login icon and select New System Myeasi. 2) After successful login the Easi / Easiest user will be able to see the e-Voting option for eligible companies where the evoting is in progress as per the information provided by company. On clicking the evoting option, the user will be able to see e-Voting page of the e-Voting service provider for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. Additionally, there is also links provided to access the system of all e-Voting Service Providers i.e. CDSL/NSDL/KARVY/LINKINTIME, so that the user can visit the e-Voting service providers' website directly. 3) If the user is not registered for Easi/Easiest, option to register is available at https://web.cdslindia.com/myeasi/Registration/EasiRegistration 4) Alternatively, the user can directly access e-Voting page by providing Demat Account Number and PAN No. from a e-Voting link available on www.cdslindia.com home page or click on https://evoting.cdslindia.com/Evoting/EvotingLogin The system will authenticate the user by sending OTP on registered Mobile & Email as recorded in the Demat Account. After successful authentication, user will be able to see the e-Voting option where the evoting is in progress and also able to directly access the system of all e-Voting Service Providers.
Individual Shareholders holding securities in demat mode with NSDL	<ol style="list-style-type: none"> 1) If you are already registered for NSDL IDeAS facility, please visit the e-Services website of NSDL. Open web browser by typing the following URL: https://eservices.nsd.com either on a Personal Computer or on a mobile. Once the home page of e-Services is launched, click on the "Beneficial Owner" icon under "Login" which is available under 'IDeAS' section. A new screen will open. You will have to enter your User ID and Password. After successful authentication, you will be able to see e-Voting services. Click on "Access to e-Voting" under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. 2) If the user is not registered for IDeAS e-Services, option to register is available at https://eservices.nsd.com. Select "Register Online for IDeAS "Portal or click at https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp 3) Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsd.com/ either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting
Individual Shareholders (holding securities in demat mode) login through their Depository Participants	<p>You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. After Successful login, you will be able to see e-Voting option. Once you click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.</p>

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

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

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

(v) Login method for e-Voting and joining virtual meetings for **Physical shareholders and shareholders other than individual holding in Demat form.**

- 1) The shareholders should log on to the e-voting website www.evotingindia.com.
- 2) Click on “Shareholders” module.
- 3) 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. Shareholders holding shares in Physical Form should enter Folio Number registered with the Company.
- 4) Next enter the Image Verification as displayed and Click on Login.
- 5) If you are holding shares in demat form and had logged on to www.evotingindia.com and voted on an earlier e-voting of any company, then your existing password is to be used.
- 6) If you are a first-time user follow the steps given below:

	For Physical shareholders and other than individual shareholders holding shares in Demat.
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"> • Shareholders who have not updated their PAN with the Company/Depository Participant are requested to use the sequence number sent by Company/RTA or contact Company/RTA.
Dividend Bank Details OR Date of Birth (DOB)	Enter the Dividend Bank Details or Date of Birth (in dd/mm/yyyy format) as recorded in your demat account or in the company records in order to login. <ul style="list-style-type: none"> • If both the details are not recorded with the depository or company, please enter the member id / folio number in the Dividend Bank details field.

- (vi) After entering these details appropriately, click on “SUBMIT” tab.
- (vii) Shareholders holding shares in physical form will then directly reach the Company selection screen. However, shareholders 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.
- (viii) For shareholders holding shares in physical form, the details can be used only for e-voting on the resolutions contained in this Notice.
- (ix) Click on the EVSN for the relevant <Company Name> on which you choose to vote.
- (x) 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.
- (xi) Click on the “RESOLUTIONS FILE LINK” if you wish to view the entire Resolution details.
- (xii) 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.
- (xiii) Once you “CONFIRM” your vote on the resolution, you will not be allowed to modify your vote.
- (xiv) You can also take a print of the votes cast by clicking on “Click here to print” option on the Voting page.
- (xv) If a demat account holder has forgotten the login password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.
- (xvi) **Additional Facility for Non – Individual Shareholders and Custodians –For Remote Voting only.**
 - Non-Individual shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodians are required to log on to www.evotingindia.com and register themselves in the “Corporates” module.
 - 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 a Compliance User 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 linked in the login 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.
- Alternatively Non Individual shareholders are required to send the relevant Board Resolution/ Authority letter etc. together with attested specimen signature of the duly authorized signatory who are authorized to vote, to the Scrutinizer and to the Company at the email address viz; contact@kcl.net.in (designated email address by company) , if they have voted from individual tab & not uploaded same in the CDSL e-voting system for the scrutinizer to verify the same.

INSTRUCTIONS FOR SHAREHOLDERS ATTENDING THE AGM/EGM THROUGH VC/OAVM & E-VOTING DURING MEETING ARE AS UNDER:

1. The procedure for attending meeting & e-Voting on the day of the AGM/ EGM is same as the instructions mentioned above for e-voting.
2. The link for VC/OAVM to attend meeting will be available where the EVSN of Company will be displayed after successful login as per the instructions mentioned above for e-voting.
3. Shareholders who have voted through Remote e-Voting will be eligible to attend the meeting. However, they will not be eligible to vote at the AGM/EGM.
4. Shareholders are encouraged to join the Meeting through Laptops / IPads for better experience.
5. Further shareholders will be required to allow Camera and use Internet with a good speed to avoid any disturbance during the meeting.
6. Please note that Participants Connecting from Mobile Devices or Tablets or through Laptop connecting via Mobile Hotspot may experience Audio/Video loss due to Fluctuation in their respective network. It is therefore recommended to use Stable Wi-Fi or LAN Connection to mitigate any kind of aforesaid glitches.
7. Shareholders who would like to express their views/ask questions during the meeting may register themselves as a speaker by sending their request in advance atleast **7 days prior to meeting** mentioning their name, demat account number/folio number, email id, mobile number at (company email id). The shareholders who do not wish to speak during the AGM but have queries may send their queries in advance **7_ days prior to meeting** mentioning their name, demat account number/folio number, email id, mobile number at (company email id). These queries will be replied to by the company suitably by email.
8. Those shareholders who have registered themselves as a speaker will only be allowed to express their views/ask questions during the meeting.
9. Only those shareholders, who are present in the AGM/EGM through VC/OAVM facility and have not casted their vote on the Resolutions through remote e-Voting and are otherwise not barred from doing so, shall be eligible to vote through e-Voting system available during the EGM/AGM.
10. If any Votes are cast by the shareholders through the e-voting available during the EGM/AGM and if the same shareholders have not participated in the meeting through VC/OAVM facility, then the votes cast by such shareholders shall be considered invalid as the facility of e-voting during the meeting is available only to the shareholders attending the meeting.

PROCESS FOR THOSE SHAREHOLDERS WHOSE EMAIL/MOBILE NO. ARE NOT REGISTERED WITH THE COMPANY/DEPOSITORIES.

1. For Physical shareholders- please provide necessary details like Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) by email to **Company/RTA kspl@coalsale.co.in**
2. For Demat shareholders -, Please update your email id & mobile no. with your respective Depository Participant (DP)
3. For Individual Demat shareholders – Please update your email id & mobile no. with your respective Depository Participant (DP) which is mandatory while e-Voting & joining virtual meetings through Depository.

If you have any queries or issues regarding attending AGM & e-Voting from the CDSL e-Voting System, you can write an email to helpdesk.evoting@cdslindia.com or contact at 022- 23058738 and 022-23058542/43.

All grievances connected with the facility for voting by electronic means may be addressed to Mr. Rakesh Dalvi, Sr. Manager, (CDSL,) Central Depository Services (India) Limited, A Wing, 25th Floor, Marathon Futurex, Mafatlal Mill Compounds, N M Joshi Marg, Lower Parel (East), Mumbai - 400013 or send an email to helpdesk.evoting@cdslindia.com or call on 022-23058542/43.

21. 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.

22.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.

BY ORDER OF THE BOARD

Registered Office :
2, Brabourne Road, 4th Floor,
Kolkata – 700001
Date : 12th August, 2022

R. A. KABRA
Director
DIN NO.: 00341280

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 Sri Vijay Kumar Kabra :

Name of Director	Sri Vijay Kumar Kabra
Director Identification No.	DIN – 02986753
Date of Birth	14-10-1985
Educational Qualification	B. Tech.
Expertise in specific functional areas	10 years
Chairmanship / Membership of Committees in this Company	None
Present status of Directorship in this Company	Director
Directorship in other Public Limited Companies	1
Chairmanship / Membership of Committees in other Public Limited Companies	None
Shareholding as on 31st March, 2022	15800
Seeking appointment / re-appointment	Retire by rotation and seeking re-appointment
Rotational Status	Retire by rotation

BY ORDER OF THE BOARD

Registered Office :
2, Brabourne Road, 4th Floor,
Kolkata – 700001
Date : 12th August, 2022

R. A. KABRA
Director
DIN NO.: 00341280

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.

1 Name Address
E-Mail Id : Signature : or failing him
2 Name Address
E-Mail Id : Signature : or failing him
3 Name Address
E-Mail Id : Signature :

as my our proxy to attend and vote (on a poll) for me/us on my/our behalf at the 39th AGM of the Company, to be held on Monday, the 12th day of September, 2022 at 12.30 P. M. at 2 Brabourne Road, 4th Floor, Kolkata- 700 001 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 31 st March, 2022 and Reports of the Board of Directors and Auditors thereon (Ordinary Resolution)		
2.	Re - appointment of Sri Vijay Kumar Kabra (Din No : 02986753) as Director (Ordinary Resolution)		

Affix revenue stamp Not less than Rs. 1.00

Signed this day of 2022

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.

----- 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) (39th Annual General Meeting – 12th September, 2022)

I hereby record my presence at the 39th Annual General Meeting of the Company held on Monday, 12th September, 2022 at 12:30 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.)

KABRA STEEL PRODUCTS LIMITED

DIRECTORS REPORT

To
The Members
Kabra Steel Products Limited

Your Directors have the pleasure in presenting their Thirty Ninth 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, 2022.

	(Amount in Rs.)	
<u>FINANCIAL PERFORMANCE:</u>	<u>31.03.2022</u>	<u>31.03.2021</u>
Profit / (Loss)for the year ended	133447	371554
Less: Tax Expenses		
i) Current Tax	27000	69897
ii) Deferred Tax	25204	(30362)
iii) (Excess)/Short provision for income tax in earlier years	4836	-
Profit / (Loss) for the year after tax	76407	332019
Add : Surplus as per last	4291853	3959834
Surplus Carried to Balance Sheet	4368260	4291853

DIVIDEND:

Your Directors regret for not recommending Dividend on Equity Shares for the financial year 2021-22.

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.

ANNUAL RETURN:

Annual Return i.e. Form MGT-7 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, 2022 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, 2022, 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 2021 -22. 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, 2022.

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 2021-22 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 2021-22.

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:

Retirement by Rotation

Sri Vijay Kumar Kabra, (DIN No. 02986753) 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

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..

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 5 (Five) Audit Committee meetings were held on 07.06.2021, 30-06-2021, 13-08-2021, 30-10-2021 and 12-02-2022.

NUMBER OF BOARD MEETINGS:

During the year, 5 (Five) Board Meetings were convened and held on 07.06.2021, 30-06-2021, 13-08-2021, 30-10-2021 and 12-02-2022. The intervening gap between the meetings was within the period prescribed under the Companies Act, 2016 (“Act”).

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 along with 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 2021-22, ratio of the remuneration of each Director to the median remuneration of the employees of the Company for the financial year 2021-22 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 2021-22	% increase in Remuneration in the Financial year 2021-22	Ratio of remuneration of each Director/ to median remuneration of employees
1.	Rajesh Kumar Kabra Director	NIL	NIL	N.A.
2.	Chandra Prakassh Kabra Director	NIL	NIL	N.A.
3.	Vijay Kumar Parwal Director	NIL	NIL	N.A.
4.	Ramawtar Kabra Director	NIL	NIL	N.A.
5..	Jagdish Prasad Kabra Director	NIL	NIL	N.A.
6.	Isha Kabra Director	NIL	NIL	N.A.
7.	Vijay Kumar Kabra Director	NIL	NIL	N.A.
8.	Isha Kabra Manager	120000	NIL	N.A.
9.	Giriraj Kumar Mundhra Chief Financial Officer	96000	NIL	N.A.

- (ii) The median remuneration of employees of the Company during the financial year was Rs. 96000 /-
The percentage increase in the median remuneration of employees is NIL %
- (iii) There were 2 permanent employees on the rolls of Company as on March 31, 2022;
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, 2022

A. List of top 10 Employees :-

Name of the Employee	Designation	Remuneration Received 31-03-2022	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	120000	Contractual	B.Com 8 yrs	29-11-2014	40	NIL	NONE
Mr. Giriraj Kumar Mundhra	Chief Financial Officer	96000	Contractual	B.Com 9 yrs	01-04-2013	59	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, 2022.

LISTING AGREEMENT

The Company is listed 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, 2022:

- 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.

There is no Risk Management Committee Meeting held during the year.

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.

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 Ranjit Jain & Co, Chartered Accountants (FRN 322505E) were appointed as Auditors of the Company for a period of 4 years at the Annual General Meeting held on 06.09.2021 to hold office till the conclusion of the 42nd Annual General Meeting to be held on 2025. They have confirmed that they are not disqualified to continue as Auditors. 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 Mrs. Dipika Jain, a Whole Time Company Secretary in Practice having Membership No. F50343, to undertake the Secretarial Audit of the Company. The Secretarial Audit Report for the financial year ended March 31, 2022 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 07th June, 2021, 30th June 2021, 13th August, 2021, 30th October, 2021 and 12th February, 2022. The intervening gap between the meetings was within the period prescribed under the Companies Act, 2013 ("Act"). Annual General Meeting was held on 06-09-2021.

Name of Director	DIN	Attendance Particulars		Directorships in other public limited companies				Committees in which Chairman/Member of other public limited companies	
		Board Meeting	AGM	Chairman		Director		Chairman	Member
				Listed	Unlisted	Listed	Unlisted		
Promoter Executive Directors									
Mr. Rajesh Kr. Kabra	00331305	4	YES	--	--	2	1	--	2
Mr. Ramawtar Kabra	00341280	5	YES	2	1	-	-	-	2
Mr. Chandra Prakassh Kabra	00338838	5	YES	--	--	2	1	--	1
Mr. Vijay Kumar Kabra	02986753	2	YES	--	--	-	1	--	--
Non- Promoter Non-Executive Directors									
Mrs. Isha Kabra	07026281	3	NO	--	--	1	--	--	--
Independent Non-Executive Directors									
Mr, Jagdish Prasad Kabra	00482014	5	NO	-	--	2	--	-	4
Mr. Vijay Kumar Parwal	00339266	5	YES	1	--	2	--	--	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 – 700 001
Dated : 12th August, 2022

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

**DIPIKA JAIN
COMPANY SECRETARY**

**51, NALINI SETT ROAD
5TH FLOOR, ROOM NO 19
KOLKATA - 700 007
TEL NO: 2259-7715/6
Email id: csjaindipika@gmail.com**

FORM No MR-3

SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

[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, 4th Floor
Kolkata – 700 001

We 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 us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon. Based on our 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, we hereby report that in our opinion, the company has, during the audit period covering the financial year ended on 31st March, 2022 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:

We 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, 2022 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. (Not applicable to the Company during the Audit Period).
- v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):

- a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- c) *The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- d) * The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to 12th August 2021) and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021(with effect from 13th August 2021);
- 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 clients;
- g) * The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (up to 9th June 2021) and The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021(with effect from 10th June 2021).
- h) *The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; and
- i) *The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from 16th August 2021).
- j) 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 on the Meetings of the Board of Directors, Committees and General Meetings issued by The Institute of Company Secretaries of India, with which the Company has generally complied with except in some cases.
- ii) The Listing Agreement entered into by the Company with CSE.
- 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 CSE and is under process for revocation.**
- 2. All the shares of the Company are in the physical form.**
- 3. The Company has not appointed Company Secretary as required under section 203 of The Companies, 2013.**

We further report that

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors, Woman Director 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.

We 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.

We 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	: Kolkata	Signature	: DIPIKA JAIN
Dated	: 25.07.2022	Name of the Company	: DIPIKA JAIN
		Secretary in practice	
		ACS No	: 30543
		C.P.No.	: 18466
		P.R No.	: 1935/2022
		UDIN	: A050343D000677398

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.

DIPIKA JAIN
COMPANY SECRETARY

51, NALINI SETT ROAD
5TH FLOOR, ROOM NO 19
KOLKATA - 700 007
TEL NO: 2259-7715/6
Email id: csjaindipika@gmail.com

‘Annexure A’

To,
The Members,
Kabra Steel Products Limited
2, Brabourne Road, 4th Floor
Kolkata-700001

Our 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. Our responsibility is to express an opinion on these secretarial records based on my audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis of my opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the company.
4. Wherever required, we 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. Our 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: Dipika Jain

Dipika Jain
Practicing Company Secretary
ACS No. 50343
C.P.No. 18466
P.R No. 1935/2022
Date: 25.07.2022
Place: Kolkata



Independent Auditor's Report

To the Members of Kabra Steel Products Limited.

Report on the Audit of the Financial Statements

Opinion

We have audited the standalone financial statements of Kabra Steel Products Limited ("the Company"), which comprise the balance sheet as at 31st March 2022, and the statement of Profit and Loss (including other comprehensive income), statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information (hereinafter referred to as the "standalone financial statements").

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

Basis for Opinion

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

Key Audit Matters

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

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

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





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

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

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

Management's Responsibility for the Financial Statements

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

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

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

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these 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 financial control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also



responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the standalone financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the standalone financial statements, including the disclosures, and whether the standalone financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Materiality is the magnitude of misstatements in the standalone financial statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the standalone financial statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the standalone financial statements.
- We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.
- We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.
- From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the standalone financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.



Report on Other Legal and Regulatory Requirements

As required by the Companies (Auditor's Report) Order, 2020 ("the Order"), issued by the Central Government of India in terms of sub-section (11) of section 143 of the Companies Act, 2013, we give in the "Annexure A" a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.

1. As required by Section 143(3) of the Act, we report that:
 - a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
 - b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
 - c) The Balance Sheet, the Statement of Profit and Loss and the Cash Flow Statement dealt with by this Report are in agreement with the relevant books of account.
 - d) In our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.

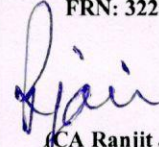
As per the management representation we report,

- no funds have been advanced or loaned or invested by the company to or in any other person(s) or entities, including foreign entities ("Intermediaries"), with the understanding that the intermediary shall whether directly or indirectly lend or invest in other persons or entities identified in any manner by or on behalf of the company (Ultimate Beneficiaries) or provide any guarantee, security or the like on behalf of ultimate beneficiaries.
- no funds have been received by the company from any person(s) or entities including foreign entities ("Funding Parties") with the understanding that such company shall whether, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the funding party (ultimate beneficiaries) or provide guarantee, security or the like on behalf of the Ultimate beneficiaries.
- Based on the audit procedures performed, we report that nothing has come to our notice that has caused us to believe that the representations given under sub-clause (i) and (ii) by the management contain any material misstatement.
- In our opinion Company has complied with section 123 of the Companies Act, 2013 with respect to dividend declared/paid during the year.
- On the basis of the written representations received from the directors as on 31st March, 2022 taken on record by the Board of Directors, none of the directors is disqualified as on 31st March, 2022 from being appointed as a director in terms of Section 164 (2) of the Act.
- With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B".
- With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended: In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Company to its directors during the year is in accordance with the provisions of section 197 of the Act.
- 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:
- The Company has disclosed the impact of pending litigations on its financial position in its standalone financial statements.



- The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts.
 - There has been no delay in transferring amounts, required to be transferred, to the Investor Education and Protection Fund by the Company.
2. As required by the Companies (Auditor's Report) Order, 2016 ("the Order"), issued by the Central Government of India in terms of sub-section (11) of section 143 of the Companies Act, 2013, we give in the "Annexure B" a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.

For Ranjit Jain & Co.
Chartered Accountants
FRN: 322505E



(CA Ranjit Jain)
(Chartered Accountant)
(Membership Number- 056597)

UDIN: 22056597AKHAQH9874



Place: Kolkata
Date: 30-05-2022

Annexure-A 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 Limited ("the Company") as of 31 March, 2022 in the conjunction with our audit of 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 company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, 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 Standard on Auditing, issued by ICAI and deemed to be prescribed 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 was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of 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 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 system 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 the financial statements in accordance with generally accepted accounting principles, and that the 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 period 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 31 March 2022, 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.

For Ranjit Jain & Co.
Chartered Accountants
FRN: 322505E



A handwritten signature in blue ink, appearing to read "Ranjit Jain".

(CA Ranjit Jain)
(Chartered Accountant)
(Membership Number- 056597)
UDIN: 22056597AKHAQM9874

Place: Kolkata
Date: 30-05-2022

Annexure - B to the Auditors' Report

(Referred to in paragraph 2 under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of even date) to the standalone Ind AS financial statements of the Company for the year ended March 31st, 2022.

We report that:

i) Property, Plant and Equipment:

- The company has maintained proper records showing full particulars, including quantitative details and situation of its Property, Plant and Equipment.
- As explained to us, Property, Plant and Equipment have been physically verified by the management at reasonable intervals; no material discrepancies were noticed on such verification.
- The title deeds of immovable properties are held in the name of the company.

ii) Inventory:

- As explained to us, inventories have been physically verified during the year by the management at reasonable intervals. No material discrepancy of 10% or more in the aggregate for each class of inventory were noticed on physical verification of stocks by the management as compared to book records.
- As Disclosed in note no. 14 .to standalone IndAS Financial Statements , The Company has been sanctioned Overdraft Facility against Term Deposits from Banks during the year.

iii) Loans, Guarantee and Advances given:

- According to the information and explanations given to us and on the basis of our examination of the books of account, the Company has not granted any loans, secured or unsecured, to companies, firms, Limited Liability Partnerships or other parties listed in the register maintained under Section 189 of the Companies Act, 2013. Consequently, the provisions of clauses iii (a), (b) and (c) of the order are not applicable to the Company.

iv) Loans, Guarantee and Advances to Director of Company:

During the year the company has not provided any loans, guarantees, advances and securities to the director of the company and the company is compliant provisions of section 185 and 186 of the Companies Act, 2013.

v) Deposits:

The Company has not accepted any deposits from the public and hence the directives issued by the Reserve Bank of India and the provisions of Sections 73 to 76 or any other relevant provisions of the Act and the Companies (Acceptance of Deposit) Rules, 2015 with regard to the deposits accepted from the public are not applicable.

vi) Maintenance of costing records:

As per information & explanation given by the management, maintenance of cost records has not been specified by the Central Government under sub-section (1) of section 148 of the Companies Act, 2013.

vii) Deposit of statutory liabilities:



- According to the records of the company, undisputed statutory dues including Provident Fund, Investor Education and Protection Fund, Employees' State Insurance, Income-tax, Gst, Sales-tax, Service Tax, Goods and Service tax, Custom Duty, Excise Duty, value added tax, cess and any other statutory dues to the extent applicable, have generally been regularly deposited with the appropriate authorities. According to the information and explanations given to us there were no outstanding statutory dues as on 31st March, 2022 for a period of more than six months from the date they became payable.
- There is no outstanding demand with the Income tax authorities:

viii) Surrendered or disclosed as income in the tax assessments:

The Company does not have any transactions to be recorded in the books of account that has been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (43 of 1961).

ix) Default in repayment of borrowings:

In our opinion and according to the information and explanations given by the management, we are of the opinion that, the Company does not have any default in repayment of dues to a financial institution, bank, Government or debenture holders.

x) Funds raised and utilisation:

Based on our audit procedures and according to the information given by the management, the company has not raised any money by way of initial public offer or further public offer, Term Loan (including debt instruments) during the year. The company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review.

xi) Fraud and whistle-blower complaints:

According to the information and explanations given to us, we report that no fraud by the company or any fraud on the Company by its officers or employees has been noticed or reported during the year.

xii) Nidhi Company:

The company is not a Nidhi Company. Therefore, clause (xii) of the order is not applicable to the company.

xiii) Related Party Transactions:

According to the information and explanations given to us, all transactions with the related parties are in compliance with sections 177 and 188 of Companies Act, 2013 wherever applicable and the details have been disclosed in the Financial Statements etc. as required by the applicable accounting standards.

xiv) Internal Audit

The company does have an internal audit system commensurate with the size and nature of its business. Reports of the Internal Auditors for the period under audit were considered by the statutory auditor.

xv) Non-Cash Transactions:

The company has not entered into non-cash transactions with directors or persons connected with him.



xvi) Registration under RBI act:

The company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934.

xvii) Cash Losses:

The company has not incurred cash losses in the financial year and in the immediately preceding financial year.

xviii) Resignation of Statutory Auditors:

There has been no instance of any resignation of the statutory auditors occurred during the year.

xix) Material uncertainty on meeting liabilities:

No material uncertainty exists as on the date of the audit report that company is capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of 1 year from the balance sheet date.

xx) This clause is not applicable to the company.

xxi) This clause is not applicable to the company.



For Ranjit Jain & Co.
Chartered Accountants
FRN: 322505E

Ranjit Jain
(CA Ranjit Jain)
(Chartered Accountant)
(Membership Number-056597)
UDIN-

22056597AKHAQH9874

KABRA STEEL PRODUCTS LIMITED

2 BRABOURNE ROAD 4TH FLOOR Kolkata WB 700001

CIN: L27109WB1983PLC036585

BALANCE SHEET AS AT 31ST MARCH 2022

PATICULARS	Note No.	As at 31st March 2022	As at 31st March 2021
ASSETS:			
NON CURRENT ASSETS:			
a) PROPERTY, PLANT AND EQUIPEMENT	2	25,53,240.00	35,91,299.00
b) FINANCIAL ASSETS:			
i) Non Current Investments	3	21,51,615.00	32,63,211.00
ii) Other Non Current Financial Assets	4	43,98,716.00	1,09,592.00
c) Deferred Tax Assets (Net)	5	-	4,793.00
Total Non Current Assets		91,03,571.00	69,68,895.00
CURRENT ASSETS			
a) FINANCIAL ASSETS:			
i) Cash and Cash Equivalents	6	3,19,533.00	2,75,754.00
ii) Other Bank Balances	7	48,255.00	76,81,265.00
iii) Other Financial Assets	8	47,669.00	12,24,459.00
b) OTHER CURRENT ASSETS	9	10,93,287.00	9,77,083.00
Total Current Assets		15,08,743.00	1,01,58,561.00
Total Assets		1,06,12,314.00	1,71,27,456.00
EQUITY & LIABILITIES			
EQUITY			
a) EQUITY SHARE CAPITAL	10	24,00,000.00	24,00,000.00
b) OTHER EQUITY	11	67,36,365.00	76,43,863.00
Total Equity		91,36,365.00	1,00,43,863.00
LIABILITIES			
NON- CURRENT LIABILITIES			
a) Deferred Tax Liabilities (Net)	12	20,411.00	-
b) Other Non Current Liabilities	13	1,60,000.00	1,60,000.00
Total Non Current Liabilities		1,80,411.00	1,60,000.00
CURRENT LIABILITIES			
a) FINANCIAL LIABILITIES			
i) Borrowings	14	11,83,640.00	65,62,772.00
ii) Other Current Financial Liabilities	15	13,501.00	2,90,024.00
b) OTHER CURRENT LIABILITIES	16	1,500.00	900.00
c) PROVISIONS	17	96,897.00	69,897.00
Total Current Liabilities		12,95,538.00	69,23,593.00
Total Liabilities		14,75,949.00	70,83,593.00
Total Equities and Liabilities		1,06,12,314.00	1,71,27,456.00

Summary of Significant Accounting Policies and Other Notes 1-21

Signed in terms of our audit report of even date.

For Ranjit Jain & CO
CHARTERED ACCOUNTANTS
FRN-322505E

CA RANJIT JAIN
PARTNER
Membership No.056597



Rajesh Kumar Kabra
Rajesh Kumar Kabra
(Director)
(DIN : 00331305)

For and on Behalf of Directors

Ramawatar Kabra
Ramawatar Kabra
(Director)
(DIN : 00341280)

Place : Kolkata

Dated: 30th May, 2022

UDIN: 20052597AKHAGH9874

KABRA STEEL PRODUCTS LIMITED

2 BRABOURNE ROAD 4TH FLOOR Kolkata WB 700001

CIN: L27109WB1983PLC036585

STATEMENT OF PROFIT & LOSS A/C FOR THE YEAR ENDED ON 31 ST MARCH 2022

Particulars	Note No.	Year Ended On 31st March 2022	Year Ended On 31st March 2021
INCOME:			
Other Income	17	12,67,189.45	15,81,805.00
Total Income(A)		12,67,189.45	15,81,805.00
EXPENSES:			
a) Employee Benefit Expenses	18	2,16,000.00	1,89,290.00
b) Finance Cost	19	4,23,402.00	5,63,272.00
c) Depreciation & Amortisation Expenses	2	54,154.00	11,666.00
d) Other Expenses	20	4,40,186.65	4,46,023.00
Total of Expenses (B)		11,33,742.65	12,10,251.00
Profit/(Loss) Before Tax		1,33,446.80	3,71,554.00
Tax Expenses:			
i) Current Tax		27,000.00	69,897.00
ii) Deffered Tax		25,204.00	(30,362.00)
iii) (Excess)/Short provision for Income tax in earlier years		4,835.98	
Profit for the Year		76,406.82	3,32,019.00
Other Comprehensive Income			
(1) Items that will not be reclassified to profit or loss (net of tax)			-
(2) Items that will be reclassified to profit or loss (net of tax)			-
Total Comprehensive Income for the year		76,406.82	3,32,019.00
Earning Per Equity Share:			
Basic & Diluted	21	0.32	1.38

Summary of Significant Accounting Policies and Other Notes 1-21

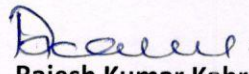
Signed in terms of our audit report of even date.

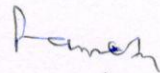
For Ranjit Jain & CO
CHARTERED ACCOUNTANTS
FRN-322505E


CA RANJIT JAIN
PARTNER
Membership No.056597



For and on Behalf of Directors


Rajesh Kumar Kabra
(Director)
(DIN : 00331305)


Ramawatar Kabra
(Director)
(DIN : 00341280)

Place : Kolkata

Dated: 30th May, 2022

UDIN: 22056597AKHAQH9874

KABRA STEEL PRODUCTS LIMITED

2 BRABOURNE ROAD 4TH FLOOR Kolkata WB 700001

CIN: L27109WB1983PLC036585

Statement of Changes in Equity for the year ended 31st of March, 2022

(A) Equity Share Capital

Particulars	Equity Share Capital	Total
Balance as on 31st March 2021	24,00,000.00	24,00,000.00
Add/Less: Changes made during the Year	-	
Balance as on 31st March 2022	24,00,000.00	24,00,000.00

(B) Other Equity

Particulars	Retained earnings	Revaluation reserve	Total Equity
Balance as on 31st March 2021	42,91,854.00	33,52,010.00	76,43,864.00
Profit/Loss Durinf the year	76,406.82		
Less: Adjustment		9,83,905.00	
Balance as on 31st March 2022	43,68,260.82	23,68,105.00	67,36,365.82

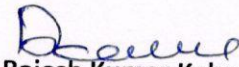
Signed in terms of our audit report of even date.

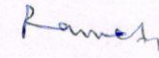
For Ranjit Jain & CO
CHARTERED ACCOUNTANTS
FRN-322505E


CA RANJIT JAIN
PARTNER
Membership No.056597



For and on Behalf of Directors


Rajesh Kumar Kabra
(Director)
(DIN : 00331305)


Ramawatar Kabra
(Director)
(DIN : 00341280)

Place : Kolkata
Dated: 30th May, 2022

UDIN: 22056597AKHAQH9874

KABRA STEEL PRODUCTS LIMITED

2 BRABOURNE ROAD 4TH FLOOR Kolkata WB 700001

CIN: L27109WB1983PLC036585

Cash Flow Statement prepared pursuant to the Listing Agreement with the Stock Exchange for the year ended 31st March 2022

Particulars	For the Year ended 31st March 2022	For the Year ended 31st March 2021
<u>A. CASH FLOW FROM OPERATING ACTIVITIES:</u>		
Net Profit as per Profit & Loss A/C	1,33,446.80	3,71,554.00
Adjustments for:		
i) Dividend Received	(1,05,855.50)	(1,74,829.00)
ii) Interest received	(5,32,278.00)	(6,04,623.00)
iii) Interest paid	4,23,402.00	5,63,272.00
iv) Profit/Loss on sale of share	(71,067.95)	(2,45,943.00)
v) Depreciation	54,154.00	11,666.00
Operating Profit before change in working capital	(98,198.65)	(78,903.00)
Decrease / (Increase) Other Financial Current Assets	11,76,790.00	(3,18,122.00)
Decrease / (Increase) Other Current Assets	(7,066.48)	1,560.00
Increase / (Decrease) Other Current Liabilities	600.00	65,027.00
Decrease / (Increase) Other Financial Current Liabilities	(2,76,523.00)	
Increase / (Decrease) Trade Payables		
Profit Before Tax	7,95,601.87	(3,30,438.00)
Less: Tax Paid	(1,13,974.00)	(37,477.00)
Income Generated from Operating Activities:	6,81,627.87	(3,67,915.00)
<u>B. CASH FLOW FROM INVESTING ACTIVITIES:</u>		
Purchase of Investments	(18,12,508.40)	
Sale of Investments	29,95,173.22	8,43,609.00
Dividend Received	1,05,855.50	1,74,829.00
Interest Received	5,32,278.00	6,04,623.00
Purchase of Property, Plant & Equipment	-	-
Income Generated from Investing Activities:	18,20,798.32	16,23,061.00
<u>C. CASH FLOW FROM FINANCING ACTIVITIES:</u>		
Borrowings	(53,79,132.00)	(5,51,102.00)
Interest Paid	(4,23,402.00)	(5,63,272.00)
Income Generated from Financing Activities:	(58,02,534.00)	(11,14,374.00)
Net Increase in Cash & Cash equivalents(A+B+C)	(33,00,108.00)	1,40,773.00
Cash and Cash equivalents(Opening)	80,05,244.00	78,64,471.00
Cash and Cash equivalents(Closing)	47,05,137.00	80,05,244.00
Net Increase in Cash & Cash Equivalents	(33,00,109.00)	1,40,773.00

Notes :

1. 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 operative activities only.

2. Figure of the previous year have been regrouped, rearranged and reclassified wherever found necessary.

Signed in terms of our audit report of even date.

For Ranjit Jain & CO
CHARTERED ACCOUNTANTS
FRN-322505E

CA RANJIT JAIN
PARTNER
Membership No.056597



For and on Behalf of Directors

Rajesh Kumar Kabra
(Director)
(DIN : 00331305)

Ramawatar Kabra
(Director)
(DIN : 00341280)

Place : Kolkata

Dated: 30th May, 2022

Notes Forming Part of Financial Statements for the year ended March 31, 2022.

1. Company overview

Kabra Steel Limited ("the Company") is a listed company incorporated in India. The Company is engaged in investing & dealing in shares & securities.

2. Significant Accounting Policies:

This note provides a list of the significant accounting policies adopted in the preparation of these financial statements. These policies have been consistently applied to all the periods presented, unless otherwise stated.

2.1 Basis of Preparation:

(i) Compliance with Ind AS

The financial statements comply in all material aspects with Indian Accounting Standards (Ind AS) notified under Section 133 of the Companies Act, 2013 (the Act) [Companies (Indian Accounting Standards) Rules, 2015] and other relevant provisions of the Act.

(ii) Historical cost convention

The financial statements have been prepared on an accrual basis and under the historical cost convention except certain financial assets and liabilities are measured at fair value (refer accounting policy regarding financial instruments).

(iii) Classification of assets and liabilities

The classification of assets and liabilities into current and non-current, wherever applicable, are based on normal operating cycles of business activities of the Company, which is twelve months.

Summary of Significant Accounting Policies:

(a) Property, Plant and Equipment:

Freehold land is carried at historical cost. All other items of Property, plant and equipment are shown at cost, less accumulated depreciation and impairment, if any. The cost of an item of property, plant and equipment comprises its cost of acquisition inclusive of inward freight, import duties, and other nonrefundable taxes or levies and any cost directly attributable to the acquisition / construction of those items; any trade discounts and rebates are deducted in arriving at the cost of acquisition.

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

Gain or losses arising on disposal of property, plant and equipment are recognised in profit or loss.

(b) Capital Work in Progress

Property, plant and equipment under construction are disclosed as capital work in progress.

(c) Depreciation and amortisation:

Depreciation has been provided based on useful life assigned to each asset in accordance with Schedule II of the Companies Act, 2013.

(d) Impairment of assets

At the date of balance sheet, if there are indications of impairment and the carrying amount of the cash generating unit exceeds its recoverable amount (the higher of the fair value less costs of disposal and value in use), an impairment loss is recognised. The carrying amount is reduced to the recoverable amount and the reduction is recognised as an impairment loss in the profit or loss. The impairment loss recognised in the prior accounting period is reversed if there has been a change in the estimate of recoverable amount. Post impairment, depreciation is provided on the revised carrying value of the impaired asset over its remaining useful life.

Reasonable assumptions are made by the management in estimating the value-in-use and fair value less costs of disposal. Management has considered the indicators required for impairment testing and estimated reliably that there is no impairment loss for the purpose of Ind AS 36.

(e) Employees Retirement Benefits:

(a) Defined Contribution Plans.

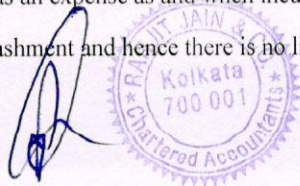
The Company has Defined Contribution Plan post employment benefit in the form of provident fund for eligible employees, which is administered by Regional Provident Fund Commissioner; Provident fund is classified as Defined Contribution Plan as the Company has no further obligation beyond making the contributions. The Company's contributions to defined Contribution Plans are charged to the Profit and Loss Account as and when incurred.

(b) Defined Benefit Plan.

The Company has Defined Benefit Plan for post employment benefit in the form of Gratuity for eligible employees, which is administered through a Group Gratuity Policy with Life Insurance Corporation of India (L.I.C). The Liability for the above Defined Benefit Plan is provided on the basis of an actuarial valuation as carried out by L.I.C. The actuarial method used for measuring the liability is the Projected Unit Credit Method.

(c) Termination Benefits, if any, are recognized as an expense as and when incurred.

The Company does not have policy of leave encashment and hence there is no liability on this account.



(f) Revenue recognition:

Revenue is measured at the fair value of the consideration received or receivable. Gross Sales are inclusive of GST, and Net of returns, Claims, and Discount etc.

Interest Income is accounted on accrual basis and dividend income is accounted on receipt basis.

Fixed deposit interest is accounted as per statement/documents issued by banks inclusive of related tax deducted at source.

(g) Taxes on Income:

Provision is made for income tax liability estimated to arise on the results for the year at the current rate of Tax in accordance with Income Tax Act, 1961.

Current and deferred tax is recognised in profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is also recognised in other comprehensive income or directly in equity, respectively

Deferred Tax arising on account of depreciation is recognised only to the extent there is a reasonable certainty of realisation.

(h) Provisions, Contingent liabilities and contingent assets:

Provisions are recognised when the Company has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources will be required to settle the obligation and the amount can be reliably estimated. Provisions are measured at the present value of management's best estimate of the expenditure required to settle the present obligation at the end of the reporting period.

A contingent liability exists when there is a possible but not probable obligation, or a present obligation that may, but probably will not, require an outflow of resources, or a present obligation whose amount cannot be estimated reliably.

All known Liabilities, wherever material, are provided for and Liabilities, which are disputed, are referred to by way of Notes on Accounts.

(i) Cash and cash equivalents

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

(j) Earnings Per Share:

Basic earnings per share is calculated by dividing the net profit for the year attributable to equity shareholders by the weighted average number of equity shares outstanding during the period. The weighted average number of equity shares outstanding during the period is adjusted for events of bonus issue; bonus element in a rights issue to existing shareholders; share split; and reverse share split (consolidation of shares).

(k) Fair value measurement:

The Company measures financial instruments at fair value at each balance sheet date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

All assets and liabilities for which fair value is measured or disclosed in the financial statement are categorised within the fair value hierarchy.

(l) Financial Instruments:

Financial assets and liabilities are recognised when the Company becomes a party to the contractual provisions of the instruments. All the financial assets and liabilities are measured initially at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial asset and financial liabilities (other than financial assets and liabilities carried at fair value through profit or loss) are added or deducted from the fair value measured on initial recognition of financial asset or financial liability.

(i) Classification and Measurement

All the financial assets are initially measured at fair value. Transaction costs that are directly attributable to the acquisition of financial asset (other than financial assets carried at fair value through profit or loss) are added to or deducted from the fair value measured on initial recognition of financial asset.

Subsequent measurement of a financial assets depends on its classification i.e., financial assets carried at amortised cost or fair value (either through other comprehensive income or through profit or loss). Such classification is determined on the basis of Company's business model for managing the financial assets and the contractual terms of the cash flows.

The Company's financial assets primarily consists of cash and cash equivalents, trade receivables, loans to employees and security deposits etc. which are classified as financial assets carried at amortised cost.

(ii) Amortised cost

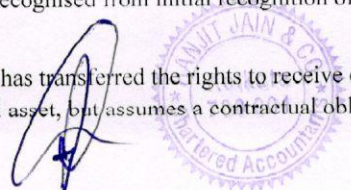
Assets that are held for collection of contractual cash flows where those cash flows represent solely payments of principal and interest are measured at amortised cost. A gain or loss on a financial assets that is subsequently measured at amortised cost is recognised in profit or loss when the asset is derecognised or impaired. Interest income from these financial assets is recognised using the effective interest rate method.

(iii) Impairment of financial assets

The Company assesses on a forward looking basis the expected credit losses associated with its assets carried at amortised cost. For trade receivables, the Company provides for lifetime expected credit losses recognised from initial recognition of the receivables.

(iv) Derecognition of financial assets

A financial asset is derecognised only when the Company has transferred the rights to receive cash flows from the financial asset or retains the contractual rights to receive the cash flows of the financial asset, but assumes a contractual obligation to pay the cash flows to one or more recipients.



(m) Cash flow statement

Cash flows are reported using the indirect method, whereby profit/ loss before tax is adjusted for the effects of transactions of a non-cash nature, any deferrals or accruals of past or future operating cash receipts or payments and item of income or expenses associated with investing or financing flows. The cash flows from operating, investing and financing activities of the Company are segregated

Notes on Accounts forming part of accounts**3. Related Party Disclosures****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 cum Manager
 Sri Vijay Kumar Parwal- Director
 Sri Jagdish Prasad Kabra- Director
 Sri Giriraj Kr. Mundhra - CFO

Details of transactions with related parties during the year

Particulars	Nature of Transaction	31.03.2022		31.03.2021	
		Volume of Transaction	Balance Outstanding	Volume of Transaction	Balance Outstanding
		Rs.	Rs.	Rs.	Rs.
Jagdamba Coal House	Electricity & Water Charges	9667	0	8894	100412 Cr.
Rajesh Manish Associates Pvt. Ltd	Data Processing Charges	35280	0	35460	169839 Cr.
	Insurance Charges	1673	0	1673	1673 Cr.
Mrs. Isha Kabra	Managerial Remuneration	120000	0	105161	0
Mr. Ramawtar Kabra	Loan taken	-211100	0	211100	211100 Cr.

4. Earnings per share

Particulars	2021-22	2020-21
Profit after tax	76406.82	332019
Net profit attributable to equity shareholders for calculation of basic and diluted EPS	76406.82	332019
Weighted average number of equity shares outstanding during the year for calculation of basic and diluted EPS (nos.)	2,40,000	2,40,000
Basic and Diluted Earnings per share (in Rs)	0.32	1.38
Nominal Value of Equity Shares (in Rs.)	10	10

5. Deferred Tax

During the year company has created and adjusted deferred tax Liability of Rs 20,411 against deferred tax Assets of Rs.4,793 on account of timing difference of depreciation as per Income Tax Act, 1961 & depreciation debited in the books of accounts as per the Company's act 2013.

6. Segment Reporting:

The Company at present is engaged in investment activities, which constitutes a single business segment.



7.Ratios :

Particulars of Ratio	2021-22	2020-21
Current Ratio	1.16	1.47
Debt Equity ratio	0.15	0.70
Debt service coverage ratio	0.83	2.32
Return on equity ratio	0.03	0.14
Inventory turnover ratio	N.A	N.A
Trade receivable turnover ratio	N.A	N.A
Trade payable turnover ratio	N.A	N.A
Net capital turnover ratio	N.A	N.A
Net Profit ratio	0.06	0.21
Return on capital employed	0.01	0.04
Return on investments	0.04	0.10

Note - As the company has no turnover, the relevant turnover related ratios has been disclosed as N.A

8)There is no undisputed statutory liability which is due.

9)As the company does not have information as to which of its creditors are registered under The Micro, Small and Medium Enterprises Development Act 2006, no disclosure of outstanding dues of micro and small enterprise have been made

10)As per management no gratuity is payable at present.

11)Statutory Audit fees is debited in the year in which Audit is completed and Accounts are finalised. For other Services by statutory Auditor payment is accounted for in the year in which such professional service are rendered.

12) Previous year's figures have been regrouped and rearranged wherever found necessary



Note No. : 2 PROPERTY, PLANT & EQUIPMENT

NAME OF ASSETS	GROSS BLOCK				DEPRECIATION				NET BLOCK		
	As on 01.04.2021	Addition during the year	Deductions during the year	As on 31.03.2022	Upto 31.03.2021	Provided for the year	Depreciation for earlier years	Adjustment on sale	Upto 31.03.2022	As on 31.03.2022	As on 31.03.2021
Tangible Asset											
Building	67,66,967.00	-	-	67,66,967.00	32,19,920.00	1,85,496.00	43,738.00	8,08,825.00	42,57,979.00	25,08,988.00	-
Furniture, fixture & Electronic Fittings	1,55,394.00	-	-	1,55,394.00	1,53,631.00	-	-	-	42,57,979.00	1,763.00	1,763.00
Electric Installation	41,698.00	-	-	41,698.00	40,746.00	-	-	-	40,746.00	952.00	952.00
A. C. Machines	82,782.00	-	-	82,782.00	78,643.00	-	-	-	78,643.00	4,139.00	4,139.00
Silver Utensils	35,383.00	-	-	35,383.00	-	-	-	-	-	35,383.00	35,383.00
Office Equipement	68,424.00	-	-	68,424.00	66,409.00	-	-	-	66,409.00	2,015.00	2,015.00
TOTAL	71,50,648.00	-	-	71,50,648.00	35,59,349.00	1,85,496.00	43,738.00	8,08,825.00	45,97,408.00	25,53,240.00	35,91,299.00
PREVIOUS YEAR	71,50,648.00	-	-	71,50,648.00	34,27,967.00	1,31,382.00	-	-	35,59,349.00	35,91,299.00	-

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

Charged to Profit & Loss Account
Add : Adjusted with Revaluation Reserve
[Refer Note No.10(a)]
Depreciation for the year

For the year ended	For the year ended
31.03.2022	31.03.2021
10,416	11,866
1,75,080	1,19,716
1,85,496	1,31,382



Note No. 3 : Non - Current Investement

Particulars	Face Value per Share	31.03.2022		31.03.2021	
		No. of Share	Amount	No. of Share	Amount
Investement in Equity Share					
Quoted (at Cost), Fully Paid-up					
Aditya Birla Capital Ltd.	10	600.00	83,107.00	1000	83,107
Balmer Lawrie & Co. Ltd.	10	3,000.00	3,63,731.00	3000	3,63,731
Rashtriya Chemicals & Fertilizers Limited	10	-	-	2,000.00	1,15,200.00
Canara Bank	10	-	-	1,600	3,36,640
CESC	10	1,000.00	77,040.00	-	-
GAIL (I) Ltd.	10	1,000.00	82,910.00	1000	82,910
Himadri Speciality Chemical Ltd.	1	2,000.00	3,01,878	2000	3,01,878
Indian Energy Exchange Limited	1	1,300.00	2,89,255	-	-
Indian Oil Corporation Ltd.	10	500.00	60,485.00	4000	7,32,940
Kabra Commercial Ltd.	10	24000	96,922	24000	96,922
Kabra Marbel Udyog Ltd.	10	5,000.00	20,600.00	5,000	20,600
Larsen & Toubro Ltd	2	200.00	1,82,917.00	200	1,82,917
Maheshwari Logistics Ltd.	10	1,000.00	78,590.00	-	-
Minolta Finance Ltd.	10	2,500.00	11,550.00	2500	11,550
ONGC Ltd.	5	-	-	2000	1,23,320
The Bombay Dyeing & Mfg. Co. Ltd.	2	-	-	500	1,37,245
Tata Consultancy Services	1	50	1,85,068	-	-
Tata Consumer Products Ltd.	1	60.00	43,312.00	1,010.00	6,33,001.00
Tata Power Company Ltd.		1,000.00	2,33,000.00	-	-
Sub-Total(A)		43,210	21,10,365	49,810	32,21,961
(B) Unquoted					
Coalsale Company Ltd.	10	1000	10,050	1000	10,050
Rajesh Manish Associates Pvt. Ltd.	10	12000	31,200	12000	31,200
Sub-Total(B)		13,000.00	41,250.00	13,000.00	41,250.00
Grand Total(A+B)			21,51,615		32,63,211
Total Market Value of Qouted Shares			26,34,947.00		31,18,525.00



Note No. 4 Other Non Current Financial Assets

Particulars	As at 31st March 2022	As at 31st March 2021
Fixed Deposit - with more than 12 Months maturity.	43,37,349.00	48,225.00
Security Deposits	61,367.00	61,367.00
	43,98,716.00	1,09,592.00

Note No. 5: Deffered Tax Assets (Net)

Particulars	As at 31st March 2022	As at 31st March 2021
On Account of Depreciation -		
As per Last Account		(25,569.00)
Add/(Less): Deffered Tax for the Year		30,362.00
Total		4,793.00

Note No. 6 Cash & Cash Equivalents

Particulars	As at 31st March 2022	As at 31st March 2021
Balance with Bank:		
In Current Account	1,16,238.01	98,459.00
Cash in hand	2,03,295.00	1,77,295.00
Total	3,19,533.00	2,75,754.00

Note No. 7 Other Bank Balances

Particulars	As at 31st March 2022	As at 31st March 2021
Term Deposits with Canara Bank - with maturity due of less than 12 months	48,255.00	76,81,265.00
Total	48,255.00	76,81,265.00

Note No. 8 Other Financial Assets

Particulars	As at 31st March 2022	As at 31st March 2021
Interest Receivable on Term Deposit	47,669.00	12,24,459.00
Total	47,669.00	12,24,459.00

Note No. 9 Other Current Assets

Particulars	As at 31st March 2022	As at 31st March 2021
Advances recoverable in cash or in kind or for value to be received,	16,619.48	9,553.00
Prepaid Expenses	-	-
Balance with Revenue Authorities	10,76,667.50	9,67,530.00
Total	10,93,287.00	9,77,083.00



Note No. : 11 Share Capital

Particulars	As at 31st March 2022	As at 31st March 2021
AUTHORISED		
2,40,000 Equity Shares of Rs.10/-each	24,00,000.00	24,00,000.00
ISSUED, SUBSCRIBED AND PAID UP		
2,40,000 Equity Shares of Rs.10/- each fully paid up	24,00,000.00	24,00,000.00

1. Reconciliation of number of shares outstanding at the beginning and end of the year

Particulars	As at 31st March 2022	As at 31st March 2021
No. of Shares at beginning of the year	2,40,000	2,40,000
Allotment of fully paid up shares during the year		-
No. of Shares at end of the year	2,40,000	2,40,000

2. Rights, preference, repayability and restriction, if any, on equity share

The Company has only one class of equity shares having a 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.

3. There was no allotment of shares for consideration other than cash, allotment of bonus shares and bought back during the last five years.

4. Equity Shares in the Company held by each shareholder holding more than 5 per cent shares and the number of equity shares held are as under

Name Of Shareholders	As at 31st March 2022		As at 31st March 2021	
	Number	% of Holding	Number	% of Holding
Mr. Rajesh Kumar Kabra	38500	16.04%	38500	16.04%
Mr. Chandra Prakassh Kabra	20850	8.69%	20850	8.69%
Mr. Chandra Mukhi Kabra	16500	6.88%	16500	6.88%
Mr. Vijay Kumar Kabra	15800	6.58%	15800	6.58%
Kabra Commercial Ltd.	15000	6.25%	15000	6.25%
Mr. Gopal lal Kabra	12500	5.21%	12500	5.21%

Details of shares held by promoters at the end of the year

Promoter name	For the year March 31, 2022		
	No. of shares	% of total shares	% change during the year



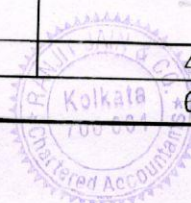
(a) Individuals/HUF

CHANDRA PRAKASH RAMAWTAR KABRA (HUF) .	1,000	0.42	0
CHANDRA PRAKASSH KABRA	20,850	8.69	0
CHANDRAMUKHI KABRA	16,500	6.88	0
GOPAL LAL KABRA	12,500	5.21	0
RADHIKA KABRA	3,950	1.65	0
RAJESH KUMAR KABRA	38,500	16.04	0
RAJESH KUMAR KABRA (HUF) .	1,000	0.42	0
RAMAWTAR BADRINARAYAN KABRA (HUF) .	3,400	1.42	0
RAMAWTAR KABRA	10,900	4.54	0
VEDANT RAJ KABRA	11,950	4.98	0
VIJAY KUMAR KABRA	15,800	6.58	0
VIJAY RAMAWTAR KABRA (HUF) .	1,000	0.42	0
(b) Any other body corporate			
KABRA COMMERCIAL LTD	15,000	6.25	0
KABRA STEEL PRODUCTS LIMITED	1,000	0.42	0
RAJESH MANISH ASSOCIATES PVT LTD	9,000	3.75	0

Promoter name	For the year March 31, 2022		
	No. of shares	% of total shares	% change during the year
(a) Individuals/HUF			
CHANDRA PRAKASH RAMAWTAR KABRA (HUF) .	1,000	0.42	0
CHANDRA PRAKASSH KABRA	20,850	8.69	0
CHANDRAMUKHI KABRA	16,500	6.88	0
GOPAL LAL KABRA	12,500	5.21	0
RADHIKA KABRA	3,950	1.65	0
RAJESH KUMAR KABRA	38,500	16.04	0
RAJESH KUMAR KABRA (HUF) .	1,000	0.42	0
RAMAWTAR BADRINARAYAN KABRA (HUF) .	3,400	1.42	0
RAMAWTAR KABRA	10,900	4.54	0
VEDANT RAJ KABRA	11,950	4.98	0
VIJAY KUMAR KABRA	15,800	6.58	0
VIJAY RAMAWTAR KABRA (HUF) .	1,000	0.42	0
(b) Any other body corporate			
KABRA COMMERCIAL LTD	15,000	6.25	0
KABRA STEEL PRODUCTS LIMITED	1,000	0.42	0
RAJESH MANISH ASSOCIATES PVT LTD	9,000	3.75	0

Note No. 11 : OTHER EQUITY

Particulars	As at 31st March 2022	As at 31st March 2021
a) Capital Reserve		
i) Revaluation Reserve		
Balance at the begning of the year	33,52,010.00	34,71,726.00
Less: Adjustment during the year	9,83,905.00	1,19,716.00
At the End of the year	23,68,105.00	33,52,010.00
b) Surplus in Statement of Profit & Loss A/C		
Balance at the begning of the year	42,91,853.00	39,59,834.00
Add: Profit/(Loss) during the year	76,406.82	3,32,019.00
At the End of the year	43,68,259.82	42,91,853.00
Total (a) + (b)	67,36,365.00	76,43,863.00



Note No. 12: Deffered Tax Assets (Net)

Particulars	As at 31st March 2022	As at 31st March 2021
On Account of Depreciation -		
As per Last Account	(4,793.00)	-
Add/(Less): Deffered Tax for the Year	25,204.00	-
Total	20,411.00	-

Note No. 13: Other Non Current Liabilities

Particulars	As at 31st March 2022	As at 31st March 2021
Security Deposit	1,60,000.00	1,60,000.00
Total	1,60,000.00	1,60,000.00

Note No. 14: Borrowings

Particulars	As at 31st March 2022	As at 31st March 2021
From Canara Bank - OD A/c.	11,83,639.50	63,51,672.00
From Directors	-	2,11,100.00
Total	11,83,640.00	65,62,772.00

Secured against Term Deposit held with Bank & personal Guranttee of Directors

Note No. 16: Other Current Liabilities

Particulars	As at 31st March 2022	As at 31st March 2021
Statutory Dues:		
i) TDS Payables	1,500.00	900.00
	1,500.00	900.00

Note No. 17: Provisions

Particulars	As at 31st March 2022	As at 31st March 2021
Provision for Income Tax A.Y. 2021-22	69,897.00	69,897.00
Provision for Income Tax A.Y. 2022-23	27,000.00	
	96,897.00	69,897.00



Note No. 15: Other current Financial Liabilities

Sl. No.	Particulars	2021-22					2020-21					
		Outstanding for following period from due date of payment					Outstanding for following period from due date of payment					
		Not Due	<1yr	1-2yr	2-3yr	>3yr	Total	Not Due	<1yr	1-2yr	2-3yr	>3yr
i)	MSME	-	-	-	-	-	-	-	-	-	-	-
ii)	Others	-	13,500.00	-	-	-	64,127.00	50,086.00	19,877.00	-	-	-
iii)	Disputed dues - MSME	-	-	-	-	-	-	-	-	1,55,934.00	-	-
iv)	Disputed Dues - Others	-	-	-	-	-	-	-	-	-	-	-
Total		13,501.00					2,90,024.00					



(Handwritten signature)

Note No. 18: Other Income

Particular	As at 31st March 2022	As at 31st March 2021
Dividend Income	1,05,855.50	1,74,829.00
Profit on Sale of Shares	71,067.95	2,45,943.00
Interest Income	5,32,278.00	6,04,623.00
Rent received	5,57,988.00	5,56,350.00
Sundry Balances written off	-	60.00
Total	12,67,189.45	15,81,805.00

Note No. 19: Employee Benefit Expenses

Particular	As at 31st March 2022	As at 31st March 2021
Director Remuneration	1,20,000.00	1,05,161.00
Salaries and allowances	96,000.00	84,129.00
Total	2,16,000.00	1,89,290.00

Note No. 20: Finance Costs

Particular	As at 31st March 2022	As at 31st March 2021
Interest to Bank	4,23,402.00	5,51,272.00
Interest to Others	-	12,000.00
Total	4,23,402.00	5,63,272.00

Note No. 21: Other Expenses

Particular	As at 31st March 2022	As at 31st March 2021
Bank Charges	6,543.35	2,838.00
Rent, Rates & Taxes	67,373.00	69,546.00
Telephone Expenses	4,659.00	4,493.00
Loss on Sale of Investment	-	-
Printing & Stationery	200.00	5,315.00
Payment to Statutory Auditors	24,000.00	35,400.00
Legal & Professional charges	61,470.00	65,910.00
General Expenses	8,650.00	8,402.00
Advertisement	22,756.00	16,380.00
Data Processing charges	36,000.00	36,000.00
Brokerage and Commission	-	40,000.00
Filing Fees	3,350.00	2,550.00
Electric expenses	52,913.00	8,894.00
Listing and Custodian Charges	28,320.00	29,303.00
Repair and Maintenance	99,060.00	99,060.00
Interest on late payment	52.00	70.00
GST Expenses	1,620.00	-
Insurance Charges	12,116.00	11,141.00
Share transaction expenses	11,104.30	10,721.00
Total	4,40,186.65	4,46,023.00

Disclosure as required by INDIAN ACCOUNTING STANDARD (IND AD) 33



Note No. 22: Earning Per Share

Particular	As at 31st March 2022	As at 31st March 2021
a) Profit after taxation for the year	76,406.82	3,32,019.00
b) No. of Equity Share	240000	240000
	0.32	1.38

Remuneration for Statutory Auditor:

Particulars	As at 31st March 2022	As at 31st March 2021
Payment to Auditor	-	-
: For Statutory Audit	15,000.00	17,700.00
: For Other Matters	12,270.00	2,550.00
	27,270.00	20,250.00

