47th ANNUAL -REPORT 2018-19

ATMA STEELS LIMITED
Works & Regd. Office : C-139 Industrial Area, Bulandshahar Road, Ghaziabad- 201009 (U.P.)
Mob. : 09310506965, 9350506966, e-mail : atmasteelsltd@rediffmail.com
Corporate CIN No. L27106UP1970PLC003353

BOARD OF DIRECTORS

HARBHAJAN SINGH
Managing Director

SANWARMAL SHARMA
Non-Executive & Non
Independent Director

HARVINDER SINGH
Non-Executive & Non
Independent Director

KEY MANAGERIAL PERSONNEL

HARBHAJAN SINGH
Managing Director

BISWESWAR PRAMANIK
Chief Financial Officer

STATUTORY AUDITORS

M/s SSVS & Company
Chartered Accountants
209, Krishna Apra Plaza, P-3, Sector-18,
Noida- 201301

BANKERS

Jammu & Kashmir Bank Limited (Ghaziabad)
Punjab National Bank (Ghaziabad)

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NOTICE

Notice is hereby given that the 47thAnnual General Meeting of the Members of **Atma Steels Limited** will be held on Monday, the 30th September, 2019 at 10.00 A.M. at C-139, Industrial Area, Bullandshahar Road, Ghaziabad-201009 (U.P.), to transact the following business:

ORDINARY BUSINESS:

1. **Adoption of Financial Statements of the Company:**

To receive, consider and adopt:

a) the Audited Standalone and Consolidated Financial Statement of the Company for the financial year ended March 31, 2019alongwith with the Reports of the Board of Directors and Auditors thereon; and

2. **Re-appointment of Mr. Harvinder Singh(DIN: 000617878) as a Director, liable to Retire by Rotation:**

To consider and if thought fit, to pass with or without modification, the following resolution as an ORDINARY RESOLUTION:

"RESOLVED THAT pursuant to the provisions of section 152 of the Companies Act, 2013 Mr. Harvinder Singh (DIN: 00617878), Director of the Company, who retires by rotation and being eligible, offers himself for re-appointment as a director of the Company."

3. **Approval to dispense with the Requirement of ratification of appointment of Statutory Auditors.**

   To consider and if thought fit, to pass with or without modification, the following resolution as an ORDINARY RESOLUTION:

"**RESOLVED THAT** pursuant to the provisions of the Companies(Amendment) Act, 2017 read together with Section 139 of the Companies Act, 2013 (as amended) and other applicable provisions, if any, and the Rules made thereunder (including any statutory modification(s) or re-enactment thereof for the time being in force) and in partial modification of the resolution passed by the members of the Company at the 45th Annual General Meeting held on 29th September, 2017, the Company hereby dispenses with the requirement of ratification of M/s. SSVS & Co., Chartered Accountants (Firm Registration No. 021648C), as Statutory Auditors of the Company at every Annual General Meeting."

SPECIAL BUSINESS:-

4. **Appointment of Mr. Sanwar Mal Sharma as a Director**

To consider and if thought fit, to pass the following Resolution as an ORDINARY RESOLUTION:

"**RESOLVED THAT** Pursuant to the provisions of Section 160 of the Companies Act, 2013, applicable provisions of Articles of Association of the Company and any other provisions as may be applicable for the time being in force, Mr. Sanwar Mal Sharma (DIN: 00427948), in respect of whom the Company has received a notice in writing under Section 160 of the Companies Act, 2013, proposing the candidature of himself for the office of Director w.e.f. 01.10.2019, be and is hereby appointed as a Director (non-executive non-independent) of the Company liable to retire by rotation.

"**RESOLVED FURTHER THAT** the Board of Directors of the Company be and is hereby authorized to do all acts and take all such steps as may be necessary, proper or expedient to give effect to this resolution."

5. To regularize the appointment of Ms. Meha Gandhi (DIN: 08535062) as Independent Director of the Company

To pass, with or without modifications, the following resolution as an ORDINARY RESOLUTION:

"RESOLVED THAT pursuant to the provisions of Section 149, 150 and 152 of Companies Act, 2013 (as amended or re-enacted from time to time) read with the Companies (Appointment and Qualification of Directors) Rules, 2014 read with Schedule IV of the Act and applicable provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Ms. Meha Gandhi (DIN: 08535062), who was appointed by the Board of Directors as an Additional Non Executive Independent Director of the Company with effect from August 14, 2019 pursuant to the provisions of section 161(1) of the Companies Act, 2013 and pursuant to the applicable Articles of Association of the company, and who holds office upto the date of this Annual General Meeting of the Company in terms of Section 161 of the Companies Act, 2013 and who has submitted a declaration that she meets the criteria for independence as provided in Section 149(6) of the Act, be and is hereby appointed as an Independent Director, not liable to retire by rotation, for a term not exceeding 5 (five) years, w.e.f. 30th September, 2019 to 2024 on the terms and conditions in the Letter of appointment to be issued by the Company."

"**RESOLVED FURTHER THAT** the Board of Directors of the Company be and is hereby authorised to do all acts and take all such steps as may be necessary, proper or expedient to give effect to this resolution."

By Order of the Board of Directors
For **Atma Steels Limited**

Sd/-
Harbhajan Singh
Managing Director
DIN: 00428647
Registered Office: C-139, Industrial Area,
Bullandshahar Road,
Ghaziabad- 201009(U.P.)
Email ID: atmasteelsltd@rediffmail.com
CIN:L27106UP1970PLC003353

Place: Ghaziabad
Date: 03.09.2019

NOTES:

a) The relevant details as required under Regulation 27(2) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015) entered into with the stock exchanges, of persons seeking appointment/reappointment as Directors under Item 3 and 4 of the Notice, are also annexed.

b) A member entitled to attend and vote at the Annual General Meeting (AGM) is entitled to appoint a proxy to attend and vote instead of himself. A proxy need not be member of the company. The instrument appointing the proxy, in order to be effective, must be deposited at the Company's Registered Office, duly completed and signed, not less than **FORTY-EIGHT HOURS** before the meeting. Proxies submitted on behalf of limited companies, societies, etc., must be supported by appropriate resolutions/authority, as applicable. A person can act as proxy on behalf of Members not exceeding fifty (50) and holding in aggregate not more than 10 % of total share capital of the Company. In case a proxy is proposed to be appointed by a Member holding more than 10% of the total share Capital of the Company carrying voting rights, then such proxy shall not act as a proxy for any other person or shareholder.

c) Corporate members intending to send their authorized representatives to attend the Meeting are requested to send to the Company a certified copy of the Board Resolution authorizing their representative to attend and vote on their behalf at the Meeting.

d) Members who have not registered their e-mail addresses so far are requested to register their e-mail addresses for receiving all communication including Annual Report, Notices, Circulars, etc. from the Company electronically.

e) In case of joint holders attending the Meeting, only such joint holder who is higher in the order of names will be entitled to vote.

f) The Register of Members and Transfer Books of the Company will be closed from Tuesday, 24.09.2019 to Monday, 30.09.2019 (both days inclusive).

g) Relevant documents referred to in the Notice and Explanatory Statement are open for inspection at the Registered Office of the Company on all working days, (except Sundays and Public Holidays) between 11.00 a.m. and 1.00 p.m. upto the date of the Meeting.

h) Members/Proxies should bring their attendance slips duly completed for attending the Meeting.

i) Members are requested to notify any change in their address, bank details, etc.:
   (i) To their Depository Participants (DPs) in respect of shares held in demat form; and
   (ii) To the Registrar & Share Transfer Agent of the Company namely SKI Capital Services Limited, 718, Dr. Joshi Road, Karol Bagh, New Delhi-110005 in respect of shares held in physical form, quoting their folio numbers.

j) The Securities and Exchange Board of India (SEBI) has mandated submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in demat form are therefore requested to submit the PAN to their Depository Participants with whom they are maintaining their demat accounts. Members holding shares in physical form can submit their PAN details to the Company & RTA of the Company.

k) The Ministry of Corporate Affairs has undertaken a 'Green Initiative in Corporate Governance' and allowed companies to share documents with its shareholders through an electronic mode. Members who have not yet registered their e-mail address are requested to support this green initiative by registering their e-mail addresses with Company in case the shares are held in physical form and with the Depository Participant in case the shares are held in demat form.

l) The facility for voting through ballot paper shall be made available at the AGM and the members attending the meeting who may exercise their right at the meeting through ballot paper.

m) Members may also note that the Notice of this Annual General Meetings and the Annual Report for the financial year 2018-19 are also available on Company's website at www.atmasteelsltd.com.

By Order of the Board of Directors
For **Atma Steels Limited**

Sd/-
Harbhajan Singh
Managing Director
DIN: 00428647

Place: Ghaziabad
Date: 03.09.2019

Registered Office: C-139, Industrial Area,
Bullandshahar Road,
Ghaziabad- 201009 (U.P.)
Email ID: atmasteelsltd@rediffmail.com
CIN:L27106UP1970PLC003353

ANNEXURE TO THE NOTICE

Explanatory Statement pursuant to Section 102 of the Companies Act, 2013:

Item No.4

Pursuant to the provisions of Section 160 of the Companies Act, 2013, Appointment of Mr. Sanwar Mal Sharma is proposed as a Director in the category of non-executive non-independent Director liable to retire by rotation.

The Company has also received a notice proposing the candidature of Mr. Sanwar Mal Sharma for the office of Director of the Company under section 160 of the Companies Act, 2013.

The Board of Directors considers that in view of the background and experience of Mr. Sanwar Mal Sharma, it would be in the interest of the Company to appoint him as Director of the Company with effect from 01.10.2019.

The Board recommends the resolutions under item no. 4 for approval by the Members.

Except Mr. Sanwar Mal Sharma, no other Director(s) or Key Managerial Personnel of the Company or their relatives is concerned or interested, financial or otherwise, in the Resolution set out at Item No. 4. Disclosure pursuant to regulation 36 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and details as required under ICSI Secretarial Standard SS-2 is stated below:

A brief profile of Director to be appointed is given below:

Mr. Sanwar Mal Sharma is a Bachelor of Commerce and Law and has a rich and varied experience of Administration and Accountancy of more than 30 years, which includes extensive experience in reconciliation and streamlining accounts.

Looking at the background and experience of Mr. Sanwar Mal Sharma, the Board of Directors is of the opinion that it would be in the interest of the Company to appoint him as a Director of the Company.

Accordingly the Board recommends the resolution of appointment of Mr. Sanwar Mal Sharma as a Director of the Company and seeks your approval to the said resolution.

Except Mr. Sanwar Mal Sharma, none of the Directors or key managerial personnel of the Company or their relatives are concerned or interested, financially or otherwise, in this Resolution. Mr. Sanwar Mal Sharma is not a director in any other listed entity. He holds 100 equity shares.

Item No. 5

The Company had, pursuant to the provisions of Section 149(1) read with Rule 3 of The Companies (Appointment and Qualification of directors) Rules, 2014, appointed Ms. Meha Gandhi, as Independent Directors, in compliance with the requirements of the Act.

Pursuant to the provisions of section 149 of the Act, which came in to effect from April 1, 2014, every listed public company is required to have at least one-third of the total number of directors as independent directors, who are not liable to retire by rotation.

Ms. Meha Gandhi, non-executive director of the Company, has given a declaration to the Board that she meets the criteria of independence as provided under section 149(6) of the Act. In the opinion of the Board, She director fulfills the conditions specified in the Act and the Rules framed thereunder for appointment as Independent Director and she is independent to the management.

In compliance with the provisions of section 149 read with Schedule IV of the Act, the appointment of her as Independent Directors is now being placed before the Members for their approval.

Accordingly the Board recommends the resolution of appointment of Ms. Meha Gandhi as an Independent Director of the Company for a period of five years with effect from 14th August, 2019 and seeks your approval to the said resolution.

Except Ms. Meha Gandhi, none of the Directors or key managerial personnel of the Company or their relatives are concerned or interested, financially or otherwise, in this Resolution.

A brief profile of the Independent Directors to be appointed is given below:

Ms. Meha Gandhi is a young and dynamic graduate and carries rich and versatile experience, which includes extensive experience in human resource management. She is a prolific speaker and versatile writer. She is empathetic and active listener as well as an innovative executive with good experience in handling the resources and putting it to get maximum output. She is also involved in various other social activities.

The Board of Director considers that in view of the background and experience of Ms. Meha Gandhi, it would be in the interest of the Company to appoint her as a Director of the Company.

By Order of the Board of Directors
For **Atma Steels Limited**

Sd/-
Harbhajan Singh
Managing Director
DIN: 00428647

Place: Ghaziabad
Date: 03.09.2019

Registered Office: C-139, Industrial Area,
Bullandshahar Road,
Ghaziabad- 201009 (U.P.)
Email ID: atmasteelsltd@rediffmail.com
CIN:L27106UP1970PLC003353

DIRECTORS' REPORT

TO,

THE MEMBERS,
ATMA STEELS LIMITED

Your Directors have great pleasure in presenting their 47th Annual Report together with the Audited Accounts of the Company for the Year ended March 31, 2019.

(In Rs.)

	Standalone	
Particular	**As at the end of current reporting period as on 31.03.2019**	**As at the end of previous reporting period as on 31.03.2018**
Revenue from Operations	Nil	Nil
Other Income	56,475	Nil
Total Income	**56,475**	**-**
Employee Benefit Expenses	519,018	469,644
Depreciation and Amortization Expenses	127,307	127,307
Finance Costs	2,184	8,703
Other Expenses	2,028,474	1,595,129
Profit before Exceptional Items and Tax	**(2,620,508)**	**(2,200,783)**
Exceptional Items	-	-
Tax expense	-	-
Current Year	-	-
Deferred Tax Credit	(39,951)	(13,522)
Mat Credit Entitlement	-	-
Profit After Tax (PAT)	**(2,580,557)**	**(2,187,261)**
Other Comprehensive Income	-	-
Total Comprehensive Income for the year	**(2,580,557)**	**(2,187,261)**
Earning per equity share 1 Basic 2. Diluted	**(0.29)**	**(0.25)**

OPERATIONS & FUTURE OUT LOOK:

The income from sale of goods is Nil. The other income mainly includes income interest from Loans & Advances.

The company was in to manufacturing activity of Cold Rolled strips in earlier years. For quite some time because of the adverse market condition and rising prices of steel, Company could not do much activity in this line. However, the Plant and Machinery became very old and the technology was also required to be upgraded. All this required a huge induction of funds which is not possible at this stage. Therefore your management decided to dispense with the manufacturing activity and has sold Substantial Fixed Asset in earlier years in order to settle the outstanding claims. Your management is now contemplating to enter into Trading activities of Iron & Steel for which the Company has applied for registration/approval. Besides this the company is also trying to carry on investment business in dealing of Shares, Bonds, and Debentures etc.

DIVIDEND:

In view of heavy accumulated losses, the Directors express their inability to recommend any dividend.

TRANSFER TO RESERVES

The Company has not transferred any amount to reserves during 2018-19 on account of losses.

CHANGES IN THE NATURE OF BUSINESS, IF ANY

There is no change in the nature of business of your company during the year under review.

DETAILS OF SUBSIDIARY AND ASSOCIATE COMPANY

Your Company does not have any subsidiary/ associates company to be reported for the year.

SHARE CAPITAL:

The paid up equity capital as on March 31, 2019 was Rs. 88,666,820/-. There has been no change in the Equity Share Capital of the Company during the year. The Company has no other type of securities except equity shares forming part of paid up capital.

TRANSFER OF AMOUNTS AND SHARES TO INVESTOR EDUCATION & PROTECTION FUND

Pursuant to the provisions of Section 124 of the, Companies Act, 2013 and Investor Education and Protection Fund Authority (Accounting Transfer and Refund) Amendment Rules, 2017, read with all relevant notifications as issued by the Ministry of Corporate Affairs from time to time all shares in respect of which dividend has remained unpaid or unclaimed for a period of seven years have been transferred by the Company, within the stipulated due date, to the Investor Education and Protection Fund (IEPF).

No dividend is lying unpaid or unclaimed for a period of seven years or more to be transferred to Investor Education and Protection Fund is under review.

MATERIAL CHANGES AND COMMITMENTS, IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY WHICH HAVE OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR AND THE DATE OF THE REPORT OF THE COMPANY TO WHICH THE FINANCIAL STATEMENTS RELATE

Except those disclosed in this Annual Report there is no material changes and commitments affecting the financial position of the Company occurred between the end of the financial year and till the date of this Report of the company to which this financial statements relates.

BOARD OF DIRECTORS

As on March 31, 2019, your Company's Board has a strength of 03 (Three) Directors comprising of Executive and Non- Executive Directors as per the Companies Act, 2013. The Chairman of the Board is an Executive Director.

The composition of the Board is as below:

Category	Number of Directors	% to Total Number of Directors

Executive Directors	1	33.33
Non –Executive, Non Independent Director	2	66.66

KEY MANAGERIAL PERSONNEL:

The following employees were designated as whole-time key managerial personnel by the Board of Directors during the year under review.

(i) Mr. Harbhajan Singh, Managing Director

(ii) Mr. Bisweswar Pramanik, Chief Financial Officer

CHANGE IN THE COMPOSITION OF BOARD AND REMUNERATION POLICY

There is no change in the composition of the Board of Directors during the year is under review.

No sitting fee was paid to the directors of the Company since there was no business activity in the company.

AUDIT COMMITTEE AND OTHER COMMITTEES

The Board declares that regulation 15 of the SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 is not applicable on your company. Thus there is no obligation to constitute Audit Committee or any other committee. The Board could not constitute Audit Committee and Nomination and Remuneration Committee as per the requirement of section 177 of Companies Act, 2013 due to no major activities.

NUMBER OF MEETINGS OF THE BOARD

During the Financial Year 2018-19, 9 (Nine) Board meetings were held. Detail of Board Meetings held during the financial year 2018-19, is given below:

S.No.	Date of Board Meeting
1	30.04.2018
2	30.05.2018
3	31.07.2018
4	01.09.2018
5	30.10.2018
6	30.11.2018
7	31.12.2018
8	21.01.2019
9	25.03.2019

DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to the provisions under Section 134(5) of the Companies Act, 2013, with respect to Directors' Responsibility Statement, the Directors confirm:

i) that in the preparation of the Annual Accounts for the year ended March 31, 2019, the applicable Indian Accounting standards (Ind AS) have been followed and that there are no material departures;

ii) that appropriate accounting policies have been selected and applied consistently and judgments and estimates that are reasonable and prudent have been made so as to give a true and fair view of the state of affairs as at March 31, 2019 and of the profit of the Company for the Financial year ended March 31, 2019;

iii) that proper and sufficient care has been taken for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;

iv) that the annual accounts for the year ended March 31,2019 have been prepared on a going concern basis;

v) that they had laid down internal financial controls to be followed by the Company and that such internal financial controls are adequate and were operating effectively; and

vi) that they had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

PARTICULARS OF REMUNERATION OF DIRECTORS AND KMPs

A statement containing the details of the Remuneration of Directors and KMPs as required under Section 197(12) of the Companies Act, 2013 read with Rule 5 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 are mentioned in MGT-9 forming as part of this Report.

EXTRACT OF ANNUAL RETURN

Pursuant to the provisions of Section 92(3) of the Companies Act, 2013 read with Rule 12 of the Companies (Management and Administration) Rules, 2014, an extract of the Annual Return in Form MGT-9 is attached as '**Annexure 1**' which forms part of this Report.

AUDITORS AND AUDITORS' REPORT

i) STATUTORY AUDITORS

Pursuant to the provisions of Section 139 of the Companies Act, 2013, and rules framed their under At the AGM held on 29th September,2017, M/s. SSVS & Co., Chartered Accountant (Firm Registration No. 021648C) 209, Krishna Apra Plaza, P-3, Sector-18, Noida- 201301 were appointed as Statutory Auditors of the Company for a period of five consecutive years.

The Company has also received a certificate from the Auditors to the effect, inter alia, that their appointment, if made, would be within the limits laid down by the Act and they are not disqualified for such appointment under the provisions of applicable laws.

The statutory auditors have submitted their Report on the Financial Statements of the Company for the FY 2018-19, which forms part of the Annual Report 2018-19. 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 contains some qualification of which management is trying to get over it. The Report of the Statutory Auditors along with notes to Schedules is a part of the Annual Report.

There have been no instances of fraud reported by the Statutory Auditors under Section 143(12) of Companies Act, 2013 read with rules framed thereunder, either to the Company or to the Central Government.

EXPLANATIONS OR COMMENTS BY THE BOARD ON QUALIFICATION, RESERVATION OR ADVERSE REMARK OR DISCLAIMER MADE

The observations of the Auditors are explained as under:

i) **Point No. (a) Basis of qualified opinion of the Report: Contingent Liabilities:** Due to non-availability of some of the supporting details from the Govt. bodies offices i.e Sales Tax, theses not to be effected in the Statement of Accounts. Efforts are being made to the same.

ii) **Point No. (b) Basis of qualified opinion of the report**: Non-compliance of AS-15: Some of the employees/ workers are illiterate and have rural background. They do not have any date of birth proof, therefore, actuarial valuation could not done.

iii) **Point No.(c) Basis of Qualified opinion of the report** : Provision for Doubtful Trade Receivable: The management is trying to recover the dues from parties.

iv) **Point No. (d) Basis of Qualified opinion of the Report**: Going Concern: As already discussed elsewhere in the report, your company has honored OTS with FI's and banks and also paid to the majority of Unsecured Creditors. The accounts have been prepared on a going concern basis as more fully explained in Note No.1(i) of Annual accounts.

v) **Point No. (e) Basis of qualified opinon on the Report**: Non Compliance of IND AS-109 "Financial Instruments":

The value of unquoted 5% Non- Cumulative Redeemable Preference Shares are shown after making provision for Diminution in Value of Investments which is more than the value comes as per fair Market Value. However management is arranging the same from approved valuer (Notes No. 5 Investments).

vi) **Point No.(a) Emphasis of Matter of the report:** The Company has already paid a sum of Rs.67.13 Lakhs upto 31.03.2019 out of Rs.127.42 Lakhs as payable to unsecured creditors as per SS-08 of the Hon'ble BIFR.

vii) **Point No. (b) Emphasis of Matter of the report**: Information regarding Micro Small and Medium enterprises: Due to non-availability of parties as per address available on records of the Company, the relevant information could not be obtained and produced to auditors. However, Company is trying to obtained information from parties.

OTHER OBSERVATIONS AS PER ANNEXURE TO THE AUDITOR'S REPORT:

viii) **Point No. (1)(a) : Fixed Asset Register:** It has explained in Note No.28 of the Balance Sheet that relevant record got mutilated and could not be retrieved properly. Hence, could not be produced. The same is being recompiled.

ix) **Point No. (7) (a) : Arrears of P.F. Liability**: Due to acute liquidity crises company could not pay the outstanding amount of P.F. Management is trying to arrange funds and settle the same.

ii) SECRETARIAL AUDITORS

Pursuant to the provisions of Section 204 of the Companies Act, 2013 read with Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, the Company has appointed M/s Naveen Gupta &

Associates, Company Secretaries, having their office at, 302, 8, Basant Complex, Sawarkar Block, Shakarpur, Delhi -110092 to undertake the Secretarial Audit functions of the Company for financial year 2018-19.

The Secretarial Audit Report submitted by M/s Naveen Gupta & Associates, in the prescribed form MR- 3 is attached as **'Annexure 2'** which forms part of this Report. In connection with the auditors' observation in the report, it is clarified that these are technical lapses as mentioned in Secretarial Audit Report.

CORPORATE GOVERNANCE

The requirement of Corporate Governance report regarding compliance with the requirements of Corporate Governance as stipulated in Listing Obligation and Disclosure Requirements) 2015 are not applicable on the company since paid up Capital of the Company is less than Rupees Ten Crores. Though company voluntarily follows many regulations set out by the law.

The Company vide its letter dated 26.06.2017 addressed to National Stock Exchange of India Limited (NSE) has suitably sought clarification/ guidance in regard to the applicability of the SEBI circular No. SEBI/HO/MRD/DSA/CIR/P/2016/110 to the Company and also has suitably submitted a way forward including a plan of action. Upon receiving the said clarification/ guidance, your Company shall suitable proceed in this regard.

CORPORATE SOCIAL RESPONSIBILITY INITIATIVES

No CSR committee is required to be constituted during the year under review as required u/s 135 of the Companies Act, 2013 and rules, 2014 made there under.

ENERGY CONSERVATION, RESEARCH AND DEVELOPMENT, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO

Pursuant to provisions of Section 134 of the Companies Act, 2013 read with Rule 8(3) of the Companies (Accounts) Rules, 2014 the details of activities in the nature of Energy Conservation, Research and Development, Technology Absorption and Foreign Exchange Earnings and Outgo is not provided since the Company is not carrying out any operations since 2015-16.

INTERNAL CONTROL SYSTEMS

The Company has an internal control system, commensurate with the size of Business.

DISCLOSURE ON DEPOSITS UNDER CHAPTER V

The Company has neither accepted nor renewed any deposits during the Financial Year 2018-19 in terms of Chapter V of the Companies Act, 2013. Further, the Company is not having any Unpaid or Unclaimed Deposits at the end of the Financial Year.

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

Under the Act, "The Sexual Harassment of women at workplace (Prevention, Prohibition and redressal) Act, 2013, every company having more than 10 employee is required to set up an Internal Complaints Committee to look into complaints relating to sexual harassment at work place of any women employee but the company does not have more than 10 employees and no women employee so, the company is not required to set up such committee.

CHANGE IN CAPITAL STRUCTURE AND LISTING OF SHARES

During the year under review there was no Change in Capital Structure and Listing of Shares. Presently Company's shares are listed on the Calcutta Stock Exchange.

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS:

The company has not given any loans or guarantees covered under the provisions of section 186 of the Companies Act, 2013. The detail of the investments made by company is given in the notes to the financial statements.

RELATED PARTY TRANSACTIONS:

During the year under review, 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.

MATERIAL ORDERS BY GOVERNING AUTHORITIES

There were no significant or material orders passed by any governing authority of the Company including regulators, courts or tribunals, which could affect the going concern status and the Company's operations in future.

INDUSTRIAL RELATIONS

Industrial relations continued to remain cordial throughout the year under review.

DIRECTORS

In accordance with the Section 152 of the Companies Act, 2013 & Articles of Association of the Company, Mr. Harvinder Singh (DIN: 00617878), Director of the Company, is liable to retire by rotation at the ensuing Annual General Meeting & being eligible offers herself for re-appointment. The Board of Directors recommends for his re-appointment as director in the ensuing AGM of the Company.

All the Directors have made necessary disclosures as required under the various provisions of the Companies Act, 2013 and SEBI (listing obligation & disclosure requirements) regulations, 2015.

BOARD EVALUATION

Pursuant to the provisions of the Companies Act, 2013 and applicable provisions of the SEBI(LODR) Regulations, 2015 the Board carries out an evaluation of its own performance, the directors individually as well as the evaluation of the working of its Board as per the manner prescribed by the regulations.

CODE OF CONDUCT

The Board of Directors has approved a Code of Conduct which is applicable to the Members of the Board and all employees in the course of day to day business activities of the company. The Company believes in "Zero Tolerance" against bribery, corruption and unethical dealings / behaviors of any form and the Board has laid down the directives to counter such acts. The code laid down by the Board is known as "code of business conduct" which forms an Appendix to the Code.

The Code lays down the standard procedure of business conduct which is expected to be followed by the Directors and the designated employees in their business dealings and in particular on matters relating to integrity in the work place, in business practices and in dealing with stakeholders. The Code gives guidance through examples on the expected behavior from an employee in a given situation and the reporting structure.

All the Board Members and the Senior Management personnel have confirmed compliance with the Code. All Management Staff were given appropriate training in this regard.

PARTICULARS OF EMPLOYEES

PARTICULARS PURSUANT TO SECTION 197(12) READ WITH RULE 5(1) OF THE COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014

There are no employees who are in receipt of emoluments as mentioned in Rule 5 (2) of the Companies (Appointment & Remuneration of Managerial Personnel) Rules, 2014.

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

Since the company is not carrying on any operational activity, your management endeavors to grab new business opportunities and maintain the belief of stakeholders in them. Taking into the view of no business activity, no view on the outlook for the current year is given under Management Discussion and Analysis Report as required by Regulation 34 read with Para B of Schedule V of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 { 'SEBI (LODR)Regulations, 2015' }.

HEALTH, SAFETY AND ENVIRONMENT PROTECTION:

The Company has complied with all the applicable environmental law and other applicable laws. The Company has been complying with the relevant laws and has been taking all necessary measures to protect the environment and maximize employees protection and safety.

ACKNOWLEDGEMENTS

Your Company and its Directors wish to extend their sincerest thanks to the Members of the Company, Bankers, State Government, Local Bodies, Customers, Suppliers, Executives, Staff and workers at all levels for their continuous co-operation and assistance.

For and on behalf of theBoard of Directors
For **Atma Steels Limited**

Sd/-

	Harvinder Singh	**Harbhajan Singh**
Place: Ghaziabad	**Director**	**Managing Director**
Date: 03.09.2019	**DIN: 00617878**	**DIN:00428647**

Registered Office: C-139, Industrial Area,
Bullandshahar Road, Ghaziabad- 201009 (U.P.)

ATMA STEELS LIMITED
Works & Regd. Office : C-139 Industrial Area, Bulandshahar Road, Ghaziabad- 201009 (U.P.)
Mob. : 09310506965, 9350506966, e-mail : atmasteelsltd@rediffmail.com
Corporate CIN No. L27106UP1970PLC003353

Annexure-1

FORM NO. MGT 9

EXTRACT OF ANNUAL RETURN

As on financial year ended on 31.03.2019
Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & Administration) Rules, 2014.

I.	**REGISTRATION & OTHER DETAILS:**	
1	CIN	**L27106UP1970PLC003353**
2	Registration Date	**22.08.1970**
3	Name of the Company	**ATMA STEELS LIMITED**
4	Category/Sub-category of the Company	**Manufacturing**
5	Address of the Registered office & contact details	**C-139, Industrial Area No, Bulandshahar Road, Ghaziabad-201009, Uttar Pradesh**
6	Whether listed company	**Yes**
7	Name, Address & contact details of the Registrar & Transfer Agent, if any.	**In House**

II.	**PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY**		
(All the business activities contributing 10 % or more of the total turnover of the company shall be stated)			
Sl. No	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
	Cold Rolled Steel Strips	7209	No operation of Manufacturing Activities

III.	**PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES**				
SL. No		**CIN/GLN**	**Holding/Subsidiary/ Associate**	**% of shares**	**Applicable Section**
		Nil			

IV. SHARE HOLDING PATTERN (Equity share capital breakup as percentage of total equity)

(i) Category-wise Share Holding

Category of Shareholders	**No. of Shares held at the beginning of the year [As on 31-March-2018]**				**No. of Shares held at the end of the year [As on 31-March-2019]**				**% Change During the year**
	Demat	**Physical**	**Total**	**% of Total Shares**	**Demat**	**Physical**	**Total**	**% of Total Shares**	
A. Promoters									
(1) Indian									
a) Individual/ HUF	0	50	50	0.00	0	50	50	0	0.00
b) Central Govt.	-	-	-	-	-	-	-	-	-
c) State Govt.(s)	-	-	-	-	-	-	-	-	-
d) Bodies Corp.	0	36,35,275	36,35,25	40.97	0	32,05,275	32,05,275	36.12	4.85
e) Banks / FI	-	-	-	-	-	-	-	-	-
f) Any other	0	4,82,900	4,82,900	5.44	0	9,12,850	9,12,850	10.29	0.00
Sub Total (A) (1)	0	41,18,225	41,18,225	46.41	0	41,18,175	41,18,175	46.41	0.00
(2) Foreign									
a) NRI Individuals , Relative & Friends	0	36,48,157	36,48,157	41.12	0	36,48,157	36,48,157	41.12	0.00
b) Other Individuals	-	-	-	-	-	-	-	-	-
c) Bodies Corp.	-	-	-	-	-	-	-	-	-
d) Any other	-	-	-	-	-	-	-	-	-
Sub Total (A) (2)	0	36,48,157	36,48,157	41.12	0	3648157	3648157	41.12	0.00
TOTAL (A)	**0**	**77,66,382**	**77,66,382**	**87.53**	**0**	**77,66,332**	**77,66,332**	**87.53**	**0.00**
B. Public Shareholding									
1. Institutions									
a) Mutual Funds	-	-	-	-					-
b) Banks / FI	0	550	550	0.01%	0	550	550	0.01%	0.00
c) Central Govt	-	50	50	0.00%	-	50	50	0	-
d) State Govt(s)	0	300	300	0.00%	0	300	300	0	0.00
e) Venture Capital Funds	-	-	-	-	-	-	-	-	-

f) Insurance Companies	-	-	-	-	-	-	-	-	-
g) FIIs	-	-	-	-	-	-	-	-	-
h) Foreign Venture Capital Funds	-	-	-	-	-	-	-	-	-
i) Others (specify)	-	-	-	-	-	-	-	-	-
Sub-total (B)(1):-	0	900	900	0.01%	0	900	900	0.01%	0.00
2. Non-Institutions									
a) Bodies Corp.									
i) Indian	0	25,900	25,900	0.29%	0	25,900	25,900	0.29%	0.00
ii) Overseas	-	-	-	-	-	-	-	-	-
b)Individuals									
(i) Individual shareholders holding nominal share capital uptoRs. 2 lakh	0	10,79,200	10,79,200	12.16%	0	13,79,250	13,79,250	15.54%	3.38
(ii) Individual shareholders holding nominalshare capital inexcess of Rs 2 lakh	-	-	-	-	-	-	-	-	-
c) Others									
i- NRI	0	450	450	0.01%	0	450	450	0.01%	0.00
ii- Clearing Members	-	-	-	-	-	-	-	-	-
iii- HUF	-	-	-	-	-	-	-	-	-
iv- NRI/OCBs	-	-	-	-	-	-	-	-	-
v- Investor Education and Protection Fund	-	-	-		-	-	-	-	-

Sub-total(B)(2)	0	1105500	1105600	12.46	0	1105500	1105600	12.46	0.00
TotalPublic Shareholding (B)=(B)(1)+(B)(2)	0	1106450	1106450	12.47	0	1106450	1106450	12.47	0.00
C. Shares held by Custodian for GDRs & ADRs	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Grand Total (A+B+C)	**0**	**8872832**	**8872832**	**100.0**	**0**	**8872832**	**8872832**	**100.0**	**0.00**

(ii) Shareholding of Promoters

Sr. No	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			
		No. of Shares	% of total Shares of the company	%of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	%of Shares Pledged/ encumbered to total shares	% change in share holding during the year
1	Harbhajan Singh	50	0	0	50	0.00%	0	NIL
2	Basant Plasto Chemicals Pvt. Ltd	2890300	32.75%	0	2890300	32.57%	0	NIL
3	Clear Investments & Trading Pvt. Ltd	174095	1.96%	0	174095	1.96%	0	NIL
4	Rozina International Pvt. Ltd	180000	2.03%	0	0	0.00%	0	2.03%
5	Punam Stock Broking Pvt. Ltd	200000	2.25%	0	0	0.00%	0	2.25%
6	Spade Trading Pvt. Ltd	86580	0.98%	0	86580	0.98%	0	NIL
7	MagnaticMangal Pvt. Ltd	50000	0.56%	0	0	0.00%	0	0.56%
8	Dheeraj Holding Pvt. Ltd	32400	0.37%	0	32400	0.37%	0	NIL

9	Harnam Investments Pvt. Ltd	21900	0.25%	0	21900	0.25%	0	NIL
10	Relative , Friends of Director	4131057	46.56%	0	4561057	51.40%	0	4.84%
	Total	7766382	87.53%	0	7766382	87.53%	0	0.00%

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

Sr. no		Shareholding at the beginning of the year		Cumulative Shareholding during the year	
1	**Gurdeep Singh Gill**	No. of shares	% of total shares	No. of shares	% of total shares
	At the beginning of the year	100	N.A.	N.A.	N.A.
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. ~~allotment~~ / transfer ~~/ bonus/ sweat equity etc~~):	-Transferred 100 eq. Shares on 30.10.2018 -Acquired 120000 on 31.12.2018 -Acquired 50000 on 25.03.2019	N.A.	N.A.	N.A.
	At the End of the year	2,00,000	2.25	2,00,000	2.25
2	**Poonam Stock Broking Pvt Ltd**				
	At the beginning of the year	2,00,000	2.25	2,00,000	2.25
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. ~~allotment~~ / transfer ~~/ bonus/ sweat equity etc~~):	-Transferred on 31.12.2018	N.A.	N.A.	N.A.
	At the End of the year	NIL	NIL	NIL	NIL
3	**Pradeep Singh Gill**				
	At the beginning of the year	50,000	0.17	N.A.	N.A.
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. ~~allotment~~ / transfer ~~/ bonus/ sweat equity etc~~):	-Transferred on 31.12.2018	N.A.	N.A.	N.A.

	At the End of the year	NIL	NIL	NIL	NIL
4	**Magnaetee Mangal Private Limited**				
	At the beginning of the year	50,000	0.34	N.A.	N.A.
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. ~~allotment~~ / transfer ~~/ bonus/ sweat equity etc~~):	-Transferred on 31.12.2018	N.A.	N.A.	N.A.
	At the End of the year	NIL	NIL	NIL	NIL
5	**Rozina International Pvt Ltd**				
	At the beginning of the year	1,80,000	2.03	N.A.	N.A.
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. ~~allotment~~ / transfer ~~/ bonus/ sweat equity etc~~):	-Transferred on 31.12.2018	N.A.	N.A.	N.A.
	At the End of the year	NIL	NIL	NIL	NIL

(iv) Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holders of GDRs and ADRs):

Sr. no	Particulars	Shareholding at the End of the year on 31.03.2019	
		No. of shares	% of total shares of the company
1.	Gurjinder Singh	11850	0.13%
2.	Gurdeep Singh Gill	8900	0.10%
3.	NeerajAhuja	6,300	0.07%
4.	Praduman Singh	5900	0.06%
5.	Sandeep V Nagda	5750	0.06%
6.	Sandhya Rani Pramanik	5750	0.06%
7.	Puneet	5100	0.06%

8.	Gaurav Kumar	4750	0.05%
9	Amarjeet Singh	3850	0.045%
10	Kamal R Bakliwal	2,200	0.03%

(v) Shareholding Pattern of Directors and KMPs

Sr. no	Particulars	Shareholding at the beginning of the year		Cumulative Shareholding	
		No. of shares	% of total shares of the company	No. of shares	% of total shares
1	**Harbhajan Singh**				
	At the beginning of the year	50	0.00	50	0.00
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. ~~allotment~~ / ~~transfer/ bonus/ sweat equity etc~~):	No change during the year	N.A.	N.A.	N.A.
	At the End of the year	50	0.00	50	0.00

(V) INDEBTEDNESS

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

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

Indebtedness at the end of the financial year **i) Principal Amount** **ii) Interest due but not paid** **iii) Interest accrued but not due**	- - -	- - -	- - -	- - -
Total (i+ii+iii)	**NIL**	**NIL**	**NIL**	**NIL**

(VI) REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. RemunerationtoManagingDirector,Whole-time-Directorsand/orManager: (Rs. In Rupees)

Sl. No.	Particulars of Remuneration	Name of MD/WTD/Manager			Total Amount
		Harbhajan Singh			
1.	Gross alary (a)Salary as per provisions containedinsection17(1) of the Income-tax Act,1961 (b)Value of perquisites u/s 17(2)Income-tax Act,1961 (c)Profits in lieu of salary undersection17(3)Income- taxAct,1961	NIL	NIL	NIL	NIL
2.	Stock Option	NIL	NIL	NIL	NIL
3.	Sweat Equity	NIL	NIL	NIL	NIL
4.	Commission - as % of profit - others specify…	NIL	NIL	NIL	NIL
5.	Others, please specify	NIL	NIL	NIL	NIL
6.	Total(A)	NIL	NIL	NIL	NIL

B. Remuneration to other directors:

Sl. No.	**Particulars of Remuneration**	**Name of the Directors**				**Total Amount**
	Independent Directors ·Fee for attending board committee meetings ·Commission ·Others, please specify	-	-	-	-	-
-	-	-	-	-	-	-
	Other Non-Executive Directors ·Fee for attending board committee meetings ·Commission ·Others, please specify	-	-	-	-	-

	Total(2)	Nil	NIL	NIL	NIL	NIL
	Total(B)=(1+2)	NIL	NIL	NIL	NIL	NIL
	Total Managerial Remuneration	NIL	NIL	NIL	NIL	NIL
	Overall Ceiling as per the Act	N/A	N/A	N/A	N/A	N/A

C. Remuneration to Key Managerial Personnel Other Than MD/Manager/WTD:(Rs. In Rupees)

Sl. no.	**Particulars of Remuneration**	**Key Managerial Personnel**		
		Company Secretary	**CFO**	**Total**
1.	Gross salary (a)Salary as per provisions contained in section17(1)of the Income-tax Act,1961 (b)Value of perquisites u/s 17(2)Income-tax Act,1961 (c)Profits in lieu of salary under section 17(3)Income-tax Act,1961	NIL NIL NIL	138953 NIL NIL	138953 NIL NIL
2.	Stock Option	NIL	NIL	NIL
3.	Sweat Equity	NIL	NIL	NIL
4.	Commission - as % of profit -others, specify	NIL	NIL	NIL
5.	Others, please specify	NIL	9188	NIL
6.	Total	**NIL**	**148141**	**NIL**

VII) PENALTIES/PUNISHMENT/COMPOUNDINGOFOFFENCES:

Type	Section of the companies Act	Brief description	Details of Penalty/ Punishment/Compounding fees imposed	Authority[RD /NCLT/Court]	Appeal made. If any(give details)
A.Company: NIL					
Penalty					
Punishment					
Compounding					
B. Directors: NIL					
Penalty					
Punishment					
Compounding					
C. Other Officers In Default: NIL					
Penalty					
Punishment					

Compounding					

For and on behalf of theBoard of Directors
For **Atma Steels Limited**

Sd/-

Place: Ghaziabad
Date: 03.09.2019

Harvinder Singh
Director
DIN: 00617878

Harbhajan Singh
Managing Director
DIN:00428647

Registered Office: C-139, Industrial Area,
Bullandshahar Road, Ghaziabad- 201009 (U.P.)

Annexure-2

FORM NO. MR-3
SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2019
[Pursuant to section 204(1) of the Companies Act, 2013 and Rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014]

To,
The Members,
Atma Steels Limited
C-139, Industrial Area, Bulandshahar Road,
Ghaziabad, Uttar Pradesh-201009

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Atma Steels Limited** (hereinafter called the company). The 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 **Atma Steels 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, 2019** complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by **Atma Steels Limited** (the Company) for the financial year ended on **31st March, 2019** according to the provisions of:

- **i.** The Companies Act, 2013 (the Act) and the rules made thereunder;
- **ii.** The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made hereunder;
- **iii.** The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder; Company have all the shares in physical form, company has not registered with any depositories;
- **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 as the company has not entered into any foreign transactions during the year.**
- **v.** The Acts, Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act');

Due to heavy losses and Skeleton staff and no business activities in the Company, many of compliance of listing agreement could not be made.

vi. OTHER LAWS SPECIFICALLY APPLICABLE TO THE COMPANY AS IDENTIFIED BY THE MANAGEMNT

(i) The Payment of Wages Act, 1936 and rules made thereunder,
(ii) Minimum Wages Act, 1948 and the rules made thereunder,
(iii) Employees' State Insurance Act, 1948 and rules made thereunder,
(iv) The Employees Provident Fund and Miscellaneous Provisions Act, 1952 and the rules made thereunder,
(v) The Payment of Gratuity Act, 1972 and rules made thereunder,
(vi) The Equal Remuneration Act, 1976 and rules made thereunder,
(vii) Maternity Benefit Act, 1961 and rules made thereunder,
(viii) The Air (Prevention and Control of Pollution) Act, 1981 and rules made thereunder

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

(ix) Secretarial Standards issued by the **Institute of Company Secretaries of India (ICSI)**.
(x) These Secretarial Standards were not effective till the last day of the audit period.
(xi) The Listing Agreement entered into by the company with Bombay Stock Exchange and some other stock exchange;

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

We further report that:

THE BOARD OF DIRECTORS OF THE COMPANY IS NOT DULY CONSTITUTED WITH PROPER BALANCE OF EXECUTIVE DIRECTORS, NON-EXECUTIVE DIRECTORS AND INDEPENDENT DIRECTORS. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Adequate notices are 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 and there were no dissenting members' on any resolution.

We further report that there are adequate systems and processes in the Company.

Commensurate with the size and operations of the company to monitor and ensure compliances with applicable laws, rules, regulations and guidelines

And we further submit that:-

(i) Maintenance of secretarial record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our Audit.

(ii) 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. We believe that the processes and practices, we followed provide a reasonable basis our opinion.

(iii) We have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.

(iv) Where ever required, we have obtained the Management representation about the compliance of laws, rules, and regulations and happening of events etc.

(v) The Compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of the management. Our examination was limited to the verification of the procedures on test basis.

(vi) The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For Naveen Gupta & Associates
Company Secretaries

Naveen Gupta
Proprietor
C P : 2795
M.No: 4425

Place: New Delhi
Dated: 26th August, 2019

ATMA STEELS LIMITED
Works & Regd. Office : C-139 Industrial Area, Bulandshahar Road, Ghaziabad- 201009 (U.P.)
Mob. : 09310506965, 9350506966, e-mail : atmasteelsltd@rediffmail.com
Corporate CIN No. L27106UP1970PLC003353

INDEPENDENT AUDITOR'S REPORT

TO THE SHAREHOLDERS OF ATMA STEELS LIMITED

Report on the Audit of the Financial Statements

Qualified Opinion

We have audited the accompanying financial statements of **ATMA STEELS LIMITED** ("the Company"), which comprise the Balance Sheet as at March 31, 2019, the Statement of Profit and Loss and the Statement of Changes in Equity and the Statement of Cash Flows for the year ended on that date and notes to financial statement including a summary of the significant accounting policies and other explanatory information (hereinafter referred to as "the financial statements").

In our opinion and to the best of our information and according to the explanations given to us ,except for the matters described in the Basis for Qualified Opinion wherein effect of basis of qualification given under para (a) to (e) is presently unascertainable, the aforesaid 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 accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2019, the profit, changes in equity and its cash flows for the year ended on that date.

Basis for Qualified Opinion

a) *Supporting details in respect of contingent Liabilities, as required by the Mandatory Indian Accounting Standard –IND AS-37 'Provision, Contingent Liabilities and Contingent Asset' have not been made available to us as such we are not in a position to comment on the correctness of the said liability and provision thereof, if required.*

b) *The company is not providing for Retirement benefits as per actuarial basis as required by the mandatory Indian Accounting Standard –IND AS -19 -"Employee Benefit" issued by the Institute of Chartered Accountants of India, amount whereof are presently unascertainable.*

c) *Opening provision of Rs. 1796144/- (Previous year Rs. 1796144/-) for doubtful Trade Receivable has been made for which we are unable to comment on the adequacy of such provision for doubtful recovery.*

d) *Regarding presentation of accounts on the principle of going concern concept basis despite substantial disposal of fixed assets of the company and discontinues of business activities, which raises doubt that the company may continue as going concern* .However *management believes that the going concern assumption is*

   appropriate as more fully explained in note no1(i) of significant accounting policies and no adjustments have been made in the financial statements for the year ended March 31, 2019.

e) *The company is not valuing its investment at fair value which is in contravention to IND AS -109 "Financial Instruments".*

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

Emphasis On Matter

1. Non-furnishing of information in respect of dues of Micro, Small and Medium Enterprises as per Note No.32

2. We invite attention to Note No. 25 regarding part payment to unsecured creditors for trade and expenses as per the approved rehabilitation scheme by BIFR.

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. Key audit matters are selected from matters communicated with those charge with governance, but are not intended to represent all matters that were discussed with them. The auditors' procedures relating to these matters were designed in the context of the audit of the standalone financial statements as a whole.

However, there are no Key audit matters to report.

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 Annexure 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, changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India including the accounting standards specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the financial 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 are 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 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 controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.

Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern.

If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

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

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our 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

1. As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government in terms of Section 143(11) of the Act, we give in "Annexure A" a statement on the matters specified in paragraphs 3 and 4 of the Order.
2. As required by Section 143(3) of the Act, based on our audit we report that:

   a) *Except the matters described in paras- (a) to (e) of the Basis of Qualified Opinion*, We have obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit.

   b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.

   c) The Balance Sheet, the Statement of Profit and Loss, Statement of Changes in Equity and the Statement of Cash Flow dealt with by this Report are in agreement with the relevant books of account.

   d) In our opinion, e*xcept the matters described in paras- (a) to (e) of the Basis of Qualified Opinion* the aforesaid financial statements comply with Ind AS specified under Section 133 of the Act, read with relevant rules issued there under

   e) On the basis of the written representations received from the directors as on March 31, 2019 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2019 from being appointed as a director in terms of Section 164 (2) of the Act.

   f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B ".

   g) With respect to the other matters to be included in the Auditor's Report in accordance with 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, No remuneration has been paid to the Directors of the company.

   h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended in our opinion and to the best of our information and according to the explanations given to us:

      i. The Company has disclosed the impact of pending litigations on its financial position in its financial statements.(Refer Note no 18 of the financial statement).

ii. The Company did not have any long term contracts including derivative contracts for which there were any material foreseeable losses.

iii. The company was not required to transfer, any amount to the Investor Education and Protection Fund.

For SSVS &Co
Chartered Accountants,
Firm Registration No.021648C

Place: NOIDA
Dated :30/05/2019

S/d-
(VIPUL SHARMA) F.C.A
Partner
M.No.74437

1. **ANNEXURE TO THE AUDITORS' REPORT**

(Referred to in paragraph (1) of our Report on other Legal and Regulatory requirements section of our report of even date)

1) a.) The Company has maintained proper records to show full particulars including quantitative details and situation of its fixed assets. **However, the records up to 31.03.1997 got mutilated and could not be retrieved and verified**

   b.)The existing fixed assets of the company have been physically verified during the year by the management at reasonable intervals and no material discrepancies between the book records and the physical inventory have been noticed on such verification.

   c.)The title deeds of the immovable property as disclosed in the fixed assets (Note No.4 to the financial statements) are held in the name of the company .

2) a) The physical verification of inventory has been conducted by the management at reasonable intervals.

   b) On the basis of our examination, in our opinion, discrepancies noticed on such physical verification of inventory as compared to the book records were not material and have been properly dealt with in the books of account

3) According to information made available to us, the company has not granted any loan , secured or unsecured to companies , firm or other parties covered in the register maintained under section 189 of the Act ,accordingly Para 3(iii)(a) & (b) of the Order are not applicable to the company.

4) In our opinion and according to the information and explanations given to us, no loan ,investment ,guarantees and security stated under section185 and 186 of the Companies Act ,2013 have been given /made by the company therefore, para 3(iv) of the order is not applicable.

5) On the basis of information and explanations given to us and our scrutiny of company's records, in our opinion, the company has not accepted any public deposits within the meaning of section 73 to 76 or any other relevant provisions of the Act and the rules frames there under. The directives issued by the Reserve Bank of India are not applicable to the company.

6) To the best of our knowledge and belief and according to information given to us, Central Government has not prescribed the maintenance of cost records under sub-section (1) of section 148 of the Companies Act, 2013 for the products of the Company.

7) (a) According to the information and explanation given to us the company is generally regular in depositing with appropriate authorities the undisputed statutory dues including Income-tax, Sales-tax, Service tax, Custom Duty, Excise Duty except Employees provident fund.The undisputed statutory liabilities towards Employees Provident fund amounting to Rs. 473212/- plus applicable interest were outstanding as on 31st March, 2019 which have not been deposited with the appropriate authorities and there were in arrears for a period of more than six months from the date they become payable.

   (b) According to the information and explanation given to us, details of dues of Trade Tax which have not been deposited as on 31 March, 2019 on account of any dispute are given below:

PARTICULARS	Financial year to which matter pertain	m where matter is pending	Amount(in rupees)
Trade Tax Laws	1982-83 to 1984-85	Deputy Commissioner	3166196/-
Trade Tax Laws	2006-2007	Deputy Commissioner	1138364/-
		Total	4304560/-

Further as already pointed out in Para(a) of the Basis of qualified opinion of our report, supporting documents in respect of some of the aforesaid liabilities have not been made available to us, and therefore, the correctness of these liabilities could not be verified.

In respect of Income Tax, Excise duty, Custom Duty and Cess it has been informed that there are no dues which have not been deposited on account of any dispute.

8) Based on our examination and according to the information and explanations given to us, the company has not borrowed from any financial institution, Banks, government or issued any debenture.

9) Based upon the audit procedures performed and the information and explanations given by the management, the company has not raised moneys by way of initial public offer or further public offer including debt instruments. No term loan was taken during the year.

10) During the course of our examination of the books and records of the company, carried out in accordance with the generally accepted auditing practices in India, and according to the information and explanation given to us, we have neither come across any instance of material fraud by the company or on the Company by its officers or employees noticed or reported during the year nor have we been informed of any such case by the management.

11) Based upon the audit procedures performed and the information and explanations given by the management, the managerial remuneration has been paid or provided in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Companies Act, 2013.

12) In our opinion, the Company is not a Nidhi Company. Therefore, the provisions of clause 4 (xii) of the Order are not applicable to the Company.

13) In our opinion, all transactions with the related parties are in compliance with section 177 and 188 of Companies Act, 2013 and the details have been disclosed in the Financial Statements as required by the applicable accounting standards (AS 18), Related Party Disclosures specified under section 133 of the Act, read with rule 7 of the companies (accounts) Rules 2014.

14) Based upon the audit procedures performed and the information and explanations given by the management, the company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review. Accordingly, the provisions of clause 3 (xiv) of the Order are not applicable to the Company and hence not commented upon.

15) Based upon the audit procedures performed and the information and explanations given by the management, during the year the company has not entered into any non-cash transactions with directors or persons connected with him. Accordingly, the provisions of clause 3 (xv) of the Order are not applicable to the Company and hence not commented upon.

16) In our opinion, the company is not required to be registered under section 45 IA of the Reserve Bank of India Act, 1934 and accordingly, the provisions of clause 3 (xvi) of the Order are not applicable to the Company and hence not commented upon.

ATMA STEELS LIMITED
Works & Regd. Office : C-139 Industrial Area, Bulandshahar Road, Ghaziabad- 201009 (U.P.)
Mob. : 09310506965, 9350506966, e-mail : atmasteelsltd@rediffmail.com
Corporate CIN No. L27106UP1970PLC003353

For SSVS &Co
Chartered Accountants,
Firm Registration No.00852C

Place: NOIDA
Dated : 30/05/2019

S/d-
(VIPUL SHARMA) F.C.A
Partner
M.No.74437

Annexure - B to the Auditors' Report

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

We have audited the internal financial controls over financial reporting of **ATMA STEELS LIMITED** ("the Company") as at 31 March, 2019 in conjunction with our audit of the Ind As financial statements of the Company for the period 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, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditors' Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the "Guidance Note") and the Standards on Auditing, 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 the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.
We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.

Meaning of the Internal Financial Controls over the Financial Reporting

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

Inherent Limitations of Internal Financial Controls over Financial Reporting

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

Opinion

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

For SSVS &Co
Chartered Accountants,
Firm Registration No.00852C

S/d-
(VIPUL SHARMA) F.C.A
Partner
M.No.74437

Place: NOIDA
Dated :30/05/2019

BALANCE SHEET AS AT 31ST MARCH, 2019

Particulars	As at 31 March 2019	As at 31 March 2018
Assets		
Non-current assets		
Property, plant and equipment	1,695,780	29,251,489
Financial assets		
- Investments	7,000,503	8,000,503
Income-tax assets (net)	234,287	59,787
Other non-current assets	12,000,000	12,000,000
Total non-current assets	**20,930,570**	**49,311,779**
Current assets		
Financial assets		
- Inventory	-	-
- Trade receivables	124,307	124,307
- Cash and cash equivalents	3,202,004	2,333,050
Other current assets	44,756,853	29,657,183
Total current assets	**48,083,163**	**32,114,540**
Assets classified as held for Sale	27,428,402	
Total assets	**96,442,135**	**81,426,318**
Equity and liabilities		
Equity		
Equity share capital	88,666,820	88,666,820
Other equity	(17,458,562)	(14,878,004
Total equity	**71,208,258**	**73,788,816**
Liabilities		
Non-current liabilities		
Deferred tax liablities (net)	120,729	160,680
Total non-current liabilities	**120,729**	**160,680**
Current liabilities		
Financial liabilities		
- Trade Payables	6,029,166	6,029,166
Other current liabilities	1,221,643	1,232,769
Provisions	237,839	214,887
Total current liabilities		

	7,488,648	**7,476,822**
Total liabilities	**7,609,377**	**7,637,502**
Liabilities for Assets classified as held for sale	17,624,500	-
Total equity and liabilities	**96,442,135**	**81,426,318**

The accompanying notes form an integral part of these financial statements

As per our report of even date
For SSVS & Co.
Chartered Accountants
Firm Registration No.: 021648C

HARBHAJAN SINGH
Managing Director
DIN : 00428647

SANWAR MAL
Director
DIN:00427948

(VIPUL SHARMA)
Partner
Membership No. 74437

BISWESWAR PRAMANIK
CFO
PAN No. ANYPP0205D

Place : Noida
Date : 30/05/2019

Statement of Profit and Loss for the year ended 31 March 2019

Amount (Rs)

Particulars	**For the year ended 31 March 2019**	**For the year ended 31 March 2018**
Income		
Revenue from operations	-	-
Other income	56,475	-
Total income	**56,475**	**-**
Expenses		
Employee benefits expense	519,018	469,644
Finance costs	2,184	8,703
Depreciation and amortization expense	127,307	127,307
Other expenses	2,028,474	1,595,129
Total expenses	**2,676,983**	**2,200,783**
Profit/(loss) before exceptional items and tax	(2,620,508)	(2,200,783)
Profit before tax	**(2,620,508)**	**(2,200,783)**
Tax expense:		
Current tax		
Tax of earlier periods		
Deferred tax	(39,951)	(13,522)
Less: MAT credit entitlement		
Income tax expense	**(39,951)**	**(13,522)**
Profit for the year	**(2,580,557)**	**(2,187,261)**
Other comprehensive income		
Items not to be reclassified to profit or loss in subsequent periods		
Re-measurement gains/ (losses) on defined benefit plans		
Foreign exchange (loss)		
Income tax related to item that will not be reclassified to profit and loss		
Net other comprehensive (expense) not to be reclassified to profit or loss in subsequent periods	-	-
Items to be reclassified to profit or loss in subsequent periods	-	

		-
Other comprehensive income/ (expense) for the year	**-**	**-**
Total comprehensive income for the year	**(2,580,557)**	**(2,187,261)**
Earnings per equity share		
Basic and diluted earnings per equity shares (Nominal value per share 10)	**(0.29)**	**(0.25)**

The accompanying notes form an integral part of these financial statements

As per our report of even date

For SSVS & Co.
Chartered Accountants
Firm Registration No.: 021648C

HARBHAJAN SINGH
Managing Director
DIN : 00428647

SANWAR MAL
Director
DIN:00427948

(VIPUL SHARMA)
Partner
Membership No. 74437

BISWESWAR PRAMANIK
CFO
PAN No. ANYPP0205D

Place : Noida
Date : 30/05/2019

Notes to standalone financial statements for the year ended 31 March 2019

1. Corporate information

Atma Steel Limited ('the Company') is a Limited Company, domiciled in India under the provision of the Companies Act having its registered office at C-139, Industrial Area, Bulandsahar Road, Ghaziabad -201009 India. The Company is engaged in the business of Cold Rolled Strips.

2.1. Statement of Compliance with Ind AS

The financial statements of the Company have been prepared to comply with the Indian Accounting Standards ('Ind AS') notified under Companies (Indian Accounting Standards) Rules, 2015(as amended with effect from 1st April , 2016) read with Section 133 of the Companies Act, 2013, read together with paragraph 7 of the Companies (Accounts) Rule , 2014 (Indian GAAP).

All the Ind AS issued and notified by the Ministry of Corporate Affairs under the companies (Indian Account Standards) Rules 2015 (As amended) till the financial statements are approved for issue by the Board of Directors has been considered in preparing these financial statements.

2.2 Basis of preparation

The financial statements have been prepared on the historical cost basis, except for certain financial instruments (including derivative instruments) which are measured at fair values at the end of each reporting period, as explained in the accounting policies below.

The financial statements are presented in Indian rupees (INR) and all values are presented in full, except otherwise indicated.

2.3 Recent accounting pronouncements

Ind AS 116 Leases : On March 30, 2019, Ministry of Corporate Affairs has notified Ind AS 116, Leases. Ind AS 116 will replace the existing leases Standard, Ind AS 17 Leases, and related Interpretations. The Standard sets out the principles for the recognition, measurement, presentation and disclosure of leases for both parties to a contract i.e., the lessee and the lessor. Ind AS 116 introduces a single lessee accounting model and requires a lessee to recognize assets and liabilities for all leases with a term of more than twelve months, unless the underlying asset is of low value. Currently, operating lease expenses are charged to the statement of Profit & Loss. The Standard also contains enhanced disclosure requirements for lessees. Ind AS 116 substantially carries forward the lessor accounting requirements in Ind AS 17.

The effective date for adoption of Ind AS 116 is annual periods beginning on or after April 1, 2019. The standard permits two possible methods of transition:

• Full retrospective – Retrospectively to each prior period presented applying Ind AS 8 Accounting Policies, Changes in Accounting Estimates and Errors

• Modified retrospective – Retrospectively, with the cumulative effect of initially applying the Standard recognized at the date of initial application.

Under modified retrospective approach, the lessee records the lease liability as the present value of the remaining lease payments, discounted at the incremental borrowing rate and the right of use asset either as

• Its carrying amount as if the standard had been applied since the commencement date, but discounted at lessee's incremental borrowing rate at the date of initial application or

• An amount equal to the lease liability, adjusted by the amount of any prepaid or accrued lease payments related to that lease recognized under Ind AS 17 immediately before the date of initial application.

Certain practical expedients are available under both the methods.

On completion of evaluation of the effect of adoption of Ind AS 116, the Company is proposing to use the 'Modified Retrospective Approach' for transitioning to Ind AS 116, and take the cumulative adjustment to retained earnings, on the date of initial application (April 1, 2019). Accordingly, comparatives for the year ended March 31, 2019 will not be retrospectively adjusted. The Company has elected certain available practical expedients on transition.

Ind AS 12 Appendix C, Uncertainty over Income Tax Treatments : On March 30, 2019, Ministry of Corporate Affairs has notified Ind AS 12 Appendix C, Uncertainty over Income Tax Treatments which is to be applied while performing the determination of taxable profit (or loss), tax bases, unused tax losses, unused tax credits and tax rates, when there is uncertainty over income tax treatments under Ind AS 12. According to the appendix, companies need to determine the probability of the relevant tax authority accepting each tax treatment, or group of tax treatments, that the companies have used or plan to use in their income tax filing which has to be considered to compute the most likely amount or the expected value of the tax treatment when determining taxable profit (tax loss), tax bases, unused tax losses, unused tax credits and tax rates.

The standard permits two possible methods of transition - i) Full retrospective approach – Under this approach, Appendix C will be applied retrospectively to each prior reporting period presented in accordance with Ind AS 8 – Accounting Policies, Changes in Accounting Estimates and Errors, without using hindsight and ii) Retrospectively with cumulative effect of initially applying Appendix C recognized by adjusting equity on initial application, without adjusting comparatives.

The effective date for adoption of Ind AS 12 Appendix C is annual periods beginning on or after April 1, 2019. The Company will adopt the standard on April 1, 2019 and has decided to adjust the cumulative effect in equity on the date of initial application i.e. April 1, 2019 without adjusting comparatives.

The effect on adoption of Ind AS 12 Appendix C would be insignificant in the standalone financial statements.

Amendment to Ind AS 12 – Income taxes :On March 30, 2019, Ministry of Corporate Affairs issued amendments to the guidance in Ind AS 12, 'Income Taxes', in connection with accounting for dividend distribution taxes.

The amendment clarifies that an entity shall recognise the income tax consequences of dividends in profit or loss, other comprehensive income or equity according to where the entity originally recognised those past transactions or events.

Effective date for application of this amendment is annual period beginning on or after April 1, 2019. The Company is currently evaluating the effect of this amendment on the financial statements.

Amendment to Ind AS 19 – plan amendment, curtailment or settlement- On March 30, 2019, Ministry of Corporate Affairs issued amendments to Ind AS 19, 'Employee Benefits',in connection with accounting for plan amendments, curtailments and settlements.

The amendments require an entity:

• to use updated assumptions to determine current service cost and net interest for the remainder of the period after a plan amendment, curtailment or settlement; and
• to recognise in profit or loss as part of past service cost, or a gain or loss on settlement, any reduction in a surplus, even if that surplus was not previously recognised because of the impact of the asset ceiling.

Effective date for application of this amendment is annual period beginning on or after April 1, 2019. The Company does not have any impact on account of this amendment.

3. Summary of significant accounting policies

3.1. Current Vs Non current classification

The company presents assets and liabilities in the Balance Sheet base on current/non-current classification.

An asset is treated as current when it is:
i) expected to be realized or intended to be sold or consumed in normal operating cycle,
ii) held primarily for the purpose of trading,
iii) expected to be realised within twelve months after the reporting period,
iv) cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period, or
v) carrying current portion of non-current financial assets.
All other assets are classified as non-current.
A liability is current when:
i) it is expected to be settled in normal operating cycle,
ii) it is held primarily for the purpose of trading,
iii) it is due to be settled within twelve months after the reporting period,
iv) there is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period, or
v) it includes current portion of non-current financial liabilities.
All other liabilities are classified as non-current.

3.2.Revenue recognition

Revenue is recognised to the extent that it is probable that the economic benefits will flow to the Company and the revenue can be reliably measured, regardless of when the payment is being made. Revenue is measured at the fair value of the consideration received or receivable net of discounts, taking into account contractually defined terms and inclusive of excise duty, taking into account contractually defined terms of payment excluding taxes or duties collected on behalf of the government.

Income from project and services

Revenue from long term service contracts is recognized using the proportionate completion method, and recognised net of service tax. Completion is determined as a proportion of cost incurred till date to the total estimated contract cost. Provision is made for any loss in the period in which it is foreseen. Billing in excess of contract revenue has been reflected as 'Billing in excess of revenues' under 'Other liabilities' in the Balance Sheet. In case of contracts where payments have been received in advance, revenue is deferred until the related service is complete as per the terms of the agreement with the customers and shown as "Unbilled revenue" under other current assets.
In case of other service contracts, revenue is recognized when services are rendered. In case of services are rendered as per the terms of contract.

Interest income

Interest income is recognized using effective interest method (EIR). EIR is the rate that exactly discounts the estimated future cash payments or receipts over the expected life of the financial instrument or a shorter period, where appropriate, to the gross amount of the financial asset or to the amortized cost of a financial liability. When calculating the EIR, the Company estimates the expected cash flows by considering all the contractual terms of the financial instrument but doesn't consider the expected credit losses. Interest income is included in the other income in the Statement of Profit and Loss.

Dividend income

Dividend income from investments is recognized when the shareholder's rights to receive payment have been established.

3.3. Cash and cash equivalents

Cash and cash equivalents in the balance sheet comprise cash at banks and on hand and short-term deposits with an original maturity of three months or less, which are subject to an insignificant risk of changes in value.

For the purpose of the statement of cash flows, cash and cash equivalents consist of cash and short-term deposits, as defined above, net of outstanding bank overdrafts as they are considered an integral part of the Company's cash management.

3.4. Property, plant and equipment (PPE) and Investment property

Under the previous GAAP (Indian GAAP), fixed assets are stated at cost net of accumulated depreciation and accumulated impairment losses, if any. The cost comprises the purchase price, borrowing costs, if capitalization criteria are met, and directly attributable cost of bringing the asset to its working condition for the intended use.

Property, plant and equipment are stated at cost of acquisition or construction net of accumulated depreciation and impairment loss (if any). All significant costs relating to the acquisition and installation of property, plant and equipment are capitalized. Subsequent costs are included in the asset's carrying amount or recognized as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Company and the cost of the item can be measured reliably. The carrying amount of the replaced part is derecognized. All other repairs and maintenance are charged to the Statement of Profit and Loss during the financial period in which they are incurred.

Borrowing cost relating to acquisition / construction of property, plant and equipment which take substantial period of time to get ready for its intended use are also included to the extent they relate to the period till such assets are ready to be put to use.

Depreciation And Amortization

Depreciation is charged on basis of useful life of assets on Straight Line Method which are as follows:

Asset Category	Life in Year	Basis For Useful life
Building	60	Life as prescribed under Schedule-II of Companies Act ,2013
Air Conditioner	5	
Generator	15	
Plant & Machinery	15	
Furniture & Fixture	10	
Office Equipments	10	

Electric Installations	10	
Vehicles	8	
Computers	5	
TubeWell	5	

Freehold land is carried at cost.

An item of property, plant and equipment and any significant part initially recognized is derecognized upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the Statement of Profit and Loss when the asset is derecognized.
Transfers are made to (or from) investment property only when there is a change in use. Transfers between investment property, owner-occupied property and inventories are at carrying amount of the property transferred. These assesement is carried out at each financial reporting date
The residual values, useful lives and methods of depreciation of property, plant are reviewed at each financial year end and adjusted prospectively, if appropriate.

3.5. Intangible assets

Intangible assets are recognised when it is probable that the future economic benefits that are attributable to the assets will flow to the Company and the cost of the assets can be measured reliably.
Intangible assets acquired separately are measured on initial recognition at cost. The cost of intangible assets acquired in a business combination is their fair value at the date of acquisition. Following initial recognition, intangible assets are carried at cost less any accumulated amortization and accumulated impairment losses. Internally generated intangibles, excluding capitalised development costs, are not capitalised and the related expenditure is reflected in profit or loss in the period in which the expenditure is incurred.
The useful lives of intangible assets are assessed as either finite or indefinite.
Intangible assets with finite lives are amortised over the useful economic life and assessed for impairment whenever there is an indication that the intangible asset may be impaired. The amortisation period and the amortisation method for an intangible asset with a finite useful life are reviewed at least at the end of each reporting period. Changes in the expected useful life or the expected pattern of consumption of future economic benefits embodied in the asset are considered to modify the amortisation period or method, as appropriate, and are treated as changes in accounting estimates. The amortisation expense on intangible assets with finite lives is recognised in the statement of profit and loss unless such expenditure forms part of carrying value of another asset.

Intangible assets with indefinite useful lives are not amortised, but are tested for impairment annually, either individually or at the cash-generating unit level. The assessment of indefinite life is reviewed annually to determine whether the indefinite life continues to be supportable. If not, the change in useful life from indefinite to finite is made on a prospective basis
Gains or losses arising from derecognition of an intangible asset are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognised in the statement of profit or loss when the asset is derecognised.
Intangible assets with finite life are amortized on a written down value basis as per SLM over the estimated useful economic life of 7 years.

3.6. Employees benefits
Short term employee benefits

Short term benefits comprise of employee costs such as salaries, bonuses, and accumulated absents are accrued in the year in which the associated services are rendered by employees of the Company and are measured at the amounts expected to be paid when the liabilities are settled. The liabilities are presented as current employee benefit obligations in the balance sheet.

Compensated absences

Provision for compensated absence is determined using the projected unit credit method with actuarial valuation being carried out at each balance sheet date. Accumulated leave, which is e expected to be utilised within the next twelve months, is treated as short term employee benefits.

Other long term employee benefits

The liabilities which are not expected to be settled wholly within 12 months after the end of the period in which the employees render the related service are classified as long term employee benefits. They are therefore measured as the present value of expected future payments to be made in respect of services provided by employees up to the end of the reporting period using the projected unit credit method. The benefits are discounted using the market yields of Indian Government at the end of the reporting period that have terms approximating to the terms of the related obligation. Remeasurements as a result of experience adjustments and changes in actuarial assumptions are recognised in the statement of profit and loss.

3.7. Borrowing costs

Borrowing costs directly attributable to the acquisition, construction or production of an asset that necessarily takes a substantial period of time to get ready for its intended use or sale are capitalised as part of the cost of the asset. All other borrowing costs are expensed in the period in which they occur. Borrowing costs consist of interest and other costs that an entity incurs in connection with the borrowing of funds. Borrowing cost also includes exchange differences to the extent regarded as an adjustment to the borrowing costs.

3.8. Leases

The determination of whether an arrangement is (or contains) a lease is based on the substance of the arrangement at the inception of the lease. The arrangement is, or contains, a lease if fulfilment of the arrangement is dependent on the use of a specific asset or assets and the arrangement conveys a right to use the asset or assets, even if that right is not explicitly specified in an arrangement.

For arrangements entered into prior to the date of transition,.the Company has determined whether the arrangement contains lease on the basis of facts and circumstances existing on the date of transition.

3.9.The Company as a lessee

A lease is classified at the inception date as a finance lease or an operating lease. A lease that transfers substantially all the risks and rewards incidental to ownership to the Company is classified as a finance lease. Assets acquired on leases where substantial risks and rewards incidental to ownership are not transferred to the Company are classified as operating leases.

Finance leases are capitalised at the commencement of the lease at the inception date fair value of the leased property or, if lower, at the present value of the minimum lease payments. Lease payments are apportioned between finance charges and reduction of the lease liability so as to achieve a constant rate of interest on the remaining balance of the liability. Finance charges are recognised in finance costs in the statement of profit and loss, unless they are directly attributable to qualifying assets, in which case they are capitalized in accordance with the Company’s general policy on the borrowing costs. Contingent rentals are recognised as expenses in the periods in which they are incurred.

A leased asset is depreciated over the useful life of the asset. However, if there is no reasonable certainty that the Company will obtain ownership by the end of the lease term, the asset is depreciated over the shorter of the estimated useful life of the asset and the lease term.
Operating lease payments are recognised as an expense in the statement of profit and loss on a straight-line basis over the lease term after considering effects of escalation unless the payments are structured to increase in line with general inflation to compensate for lessors expected inflationary cost increase.

The Company as a lessor

Leases in which the Company does not transfer substantially all the risks and rewards of ownership of an asset are classified as operating leases. Rental income from operating lease is recognised on a straight-line basis over the term of the relevant lease unless the payments are structured to increase in line with general inflation to compensate expected inflationary cost increase. Initial direct costs incurred in negotiating and arranging an operating lease are added to the carrying amount of the leased asset and recognised over the lease term on the same basis as rental income. Contingent rents are recognised as revenue in the period in which they are earned.

Leases are classified as finance leases when substantially all of the risks and rewards of ownership are transferred from the Company to the lessee. Amounts due from lessees under finance leases are recorded as receivables at the Company's net investment in the leases. Finance lease income is allocated to accounting periods so as to reflect a constant periodic rate of return on the net investment outstanding in respect of the lease.

3.10. Earnings per share

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

3.11. Segment reporting

The chief operational decision maker monitors the operating results of its business segments separately for the purpose of making decisions about resource allocation and performance assessment. Segment performance is evaluated based on profit or loss and is measured consistently with profit or loss in the financial statements.
In accordance with the Ind-As 108 -" Operating segments" , the company has determined its business segment as business process outsourcing. Since there are no other business segments in which the company operates, there are no reportable segments. Therefore, the segment revenue, results, segment assets, segment liabilities, total cost incurred to acquire segment assets, depreciation charge are all as is reflected in the financial statement.

3.12. Taxes

The tax expense for the period comprises current and deferred tax. Tax is recognized in the statement of Profit and Loss, except to the extent that it relates to items recognized in other comprehensive income or directly in equity. In this case, the tax is also recognized in other comprehensive income or directly in equity, respectively.

Current income tax

Current tax is measured at the amount expected to be paid to the tax authorities in accordance with the taxation laws prevailing and applicable for the relevant assessment year. Management periodically evaluates positions taken in tax returns with respect to situations in which applicable tax regulation is subject to interpretation. It establishes provisions where appropriate on the basis of amounts expected to be paid to the tax authorities.

Deferred tax

Deferred income taxes are recognized for the future tax consequences attributable to temporary differences between the financial statement carrying amounts of existing assets and liabilities and their tax bases in the financial statements. The effect on deferred tax assets and liabilities of a change in the tax rates is recognized using the tax rates and tax laws that have been enacted or substantively enacted by the Balance Sheet date. Deferred tax liabilities are recognized for all taxable temporary differences, except when the deferred tax liability arises from the initial recognition of an asset or liability in a transaction that affects neither the accounting profit nor taxable profit or loss.

Deferred tax assets are recognized for all deductible temporary differences, the carry forward of unused tax credits and any unused tax losses. Deferred tax assets are recognized to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilized, except when the deferred tax asset relating to the deductible temporary difference arises from the initial recognition of an asset or liability in a transaction that affects neither the accounting profit nor taxable profit or loss.

Deferred tax assets are recognized only to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilized. Deferred tax assets and deferred tax liabilities are offset, if a legally enforceable right exists to set-off current tax assets against current tax liabilities and the deferred tax assets and deferred tax liabilities relate to the same taxable entity and the same taxation authority.

The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient future taxable profit will be available to allow all or part of the deferred tax asset to be utilized. Unrecognized deferred tax assets are re-assessed at each reporting date and are recognized to the extent that it has become probable that future taxable profits will allow the deferred tax asset to be recovered.

3.14. Impairment of non-financial assets

At each balance sheet date, the Company reviews the carrying values of its property, plant and equipment and intangible assets to determine whether there is any indication that the carrying value of those assets may not be recoverable through continuing use. If any such indication exists, the recoverable amount of the asset is reviewed in order to determine the extent of impairment loss (if any). Where the asset does not generate cash flows that are independent from other assets, the Company estimates the recoverable amount of the cash generating unit to which the asset belongs.

Recoverable amount is the higher of fair value less costs to sell and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset for which the estimates of future cash flows have not been adjusted. An impairment loss is recognized in the statement of profit and loss as and when the carrying value of an asset exceeds its recoverable amount.

Where an impairment loss subsequently reverses, the carrying value of the asset (or cash generating unit) is increased to the revised estimate of its recoverable amount so that the increased carrying value does not exceed the carrying value that would have been determined had no impairment loss been recognized for the asset (or cash generating unit) in prior years. A reversal of an impairment loss is recognized in the statement of profit and loss immediately

3.15. Provisions, contingent liabilities, contingent assets and commitments

A provision are recognized when there is a present legal or constructive obligation as a result of past event; it is probable that an outflow of resources will be required to settle the obligation, and in respect of which a reliable estimate can be made. These are reviewed at each Balance Sheet date and adjusted to reflect the current best estimates. A disclosure for a contingent liability is made where there is a possible obligation arising out of past event, the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation arising out of past event where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made.

If the effect of the time value of money is material, provisions are discounted using a current pre-tax rate that reflects, when appropriate, the risks specific to the liability. When discounting is used, the increase in the provision due to the passage of time is recognized as a finance cost.

3.16. Foreign currency transactions

The standalone financial statements are presented in currency INR, which is also the functional currency of the Company. Functional currency is the currency of the primary economic environment in which the entity operates.
In preparing the financial statements, transactions in currencies other than the Company's functional currency are recorded at the rates of exchange prevailing on the date of the transaction. At the end of each reporting period, monetary items denominated in foreign currencies are re-translated at the rates prevailing at the end of the reporting period. Non-monetary items carried at fair value that are denominated in foreign currencies are retranslated at the rates prevailing on the date when the fair value was determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are not translated.

3.17. Fair value measurement

The Company measures financial instruments, such as, investments and derivatives, 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. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:
> In the principal market for the asset or liability, or

> In the absence of a principal market, in the most advantageous market for the asset or liability
The principal or the most advantageous market must be accessible by the Company.
The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Company uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorized within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

> Level 1 — Quoted (unadjusted) market prices in active markets for identical assets or liabilities
> Level 2 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable
> Level 3 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable

For assets and liabilities that are recognized in the financial statements on a recurring basis, the Company determines whether transfers have occurred between levels in the hierarchy by re-assessing categorization (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period.

The Company's Management determines the policies and procedures for both recurring fair value measurement, such as derivative instruments and unquoted/quoted financial assets measured at fair value.

External valuers are involved for valuation of unquoted financial assets and financial liabilities. Involvement of external valuers is decided upon annually by the Management. Selection criteria include market knowledge, reputation, independence and whether professional standards are maintained. The Management decides, after discussions with The Company’s external valuers, which valuation techniques and inputs to use for each case.

At each reporting date, the Company analyses the movements in the values of assets and liabilities which are required to be remeasured or re-assessed as per the Company’s accounting policies. For this analysis, the Company verifies the major inputs applied in the latest valuation by agreeing the information in the valuation computation to contracts and other relevant documents.

The Company, in conjunction with the Company’s external valuers, also compares the change in the fair value of each asset and liability with relevant external sources to determine whether the change is reasonable on a yearly basis.

For the purpose of fair value disclosures, the Company has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability and the level of the fair value hierarchy as explained above.

3.18. Financial instruments

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

Financial assets

Initial recognition and measurement

All financial assets are recognized initially at fair value plus, in the case of financial assets not recorded at fair value through profit or loss, transaction costs that are attributable to the acquisition of the financial asset.

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

A) Debt instruments
i) Debt instruments at amortised cost
A 'debt instrument' is measured at the amortised cost if both the following conditions are met:

(a) The asset is held within a business model whose objective is to hold assets for collecting contractual cash flows, and
(b)Contractual terms of the asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

This category is the most relevant to the Company. After initial measurement, such financial assets are subsequently measured at amortised cost using the effective interest rate (EIR) method. Amortised cost is calculated by taking into account any discount or premium on acquisition and fees or costs that are an integral part of the EIR. The EIR amortisation is included in finance income in the profit or loss. The losses arising from impairment are recognised in the profit or loss. This category generally applies to loans, security deposits given, trade and other receivables.

ii) Debt instrument at FVTOCI

A debt instrument is subsequently measured at fair value through other comprehensive income if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. The Company has not classified any financial asset into this category.

iii) Debt instrument at FVTPL

FVTPL is a residual category for debt instruments. Any debt instrument, which does not meet the criteria for categorization as at amortized cost or as FVTOCI, is classified as at FVTPL.

In addition, the Company may elect to designate a debt instrument, which otherwise meets amortized cost or FVTOCI criteria, as at FVTPL. However, such election is allowed only if doing so reduces or eliminates a measurement or recognition inconsistency (referred to as 'accounting mismatch').

Debt instruments included within the FVTPL category are measured at fair value with all changes recognized in the P&L.

B) Equity instruments

All equity instruments are subsequently measured at fair value in the balance sheet,with value changes recognised in statement of profit and loss,except for those equity instruments for which the Company has elected to present value changes in " other comprehensive income". If an equity instrument is not held for trading, the Company may make an irrevocable election for its investments which are classified as equity instruments to present the subsequent changes in fair value in other comprehensive income. The Company makes such election on an instrument by instrument basis.

If the Company decides to classify an equity instrument as at FVTOCI, then all fair value changes on the instrument, excluding dividends, are recognized in the OCI. There is no recycling of the amounts from OCI to P&L, even on sale of investment. However, The Company may transfer the cumulative gain or loss within equity.

The Company has elected to present all equity instruments, other than those in subsidiary, through FVTPL and all subsequent changes are recognized in Statement of Profit and Loss.

Derecognition

A financial asset (or, where applicable, a part of a financial asset or part of a group of similar financial assets) is primarily derecognized (i.e. removed from the Company's balance sheet) when:

> The rights to receive cash flows from the asset have expired, or
> The Company has transferred its rights to receive cash flows from the asset or has assumed an obligation to pay the received cash flows in full without material delay to a third party under a 'pass-through' arrangement; and either (a) the Company has transferred substantially all the risks and rewards of the asset, or (b) the Company has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.

When the Company has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement, it evaluates if and to what extent it has retained the risks and rewards of ownership. When it has neither transferred nor retained .

Continuing involvement that takes the form of a guarantee over the transferred asset is measured at the lower of the original carrying

Impairment of financial assets

The Company applies expected credit loss (ECL) model for measurement and recognition of impairment loss on the following financial assets and credit risk exposure;

a) Financial assets that are debt instruments, and are measured at amortised cost e.g. loans, debt securities, deposits, trade receivables and bank balances
b) Financial assets that are debt instruments and are measured as at other comprehensive income (FVTOCI)
c) Lease receivables under Ind AS 17
d) Trade receivables or any contractual right to receive cash or another financial asset that result from transactions that are within the

The Company follows 'simplified approach' for recognition of impairment loss allowance on:

> Trade receivables or contract revenue receivables; and
> All lease receivables resulting from transactions within the scope of Ind AS 17
Under the simplified approach the Company does not track changes in credit risk. Rather, it recognises impairment loss allowance based on lifetime ECLs at each reporting date, right from its initial recognition.

For recognition of impairment loss on other financial assets and risk exposure, the Company determines that whether there has been a significant increase in the credit risk said initial recognition. If credit risk has not increased significantly, 12 month ECL is used to provide for impairment loss. However, if credit risk has increased significantly, lifetime ECL is used. If in subsequent period the credit risk reduces since initial recognition, then the entity reverts to recognizing impairment loss allowance based on 12 month ECL.

As a practical expedient, the Company uses a provision matrix to determine impairment loss allowance on portfolio of its trade receivables. The matrix is based on its historically observed default rates over the expected life of the trade receivables and is adjusted for forward looking estimates. At every reporting date, the historical observed default rates are updated and changes in the forward looking estimates are analyzed. The Company has presumed that default doesn't occur later than when a financial asset is 90 days past due.

ECL is the difference between all contracted cash flows that are due to the Company in accordance with the contract and all the cash.

Financial liabilities

Initial recognition and measurement

All financial liabilities are initially recognized at fair value. The Company's financial liabilities include trade and other payables, loans and borrowings including bank overdraft and derivative financial instruments.

Subsequent measurement

Subsequent measurement of financial liabilities depends on their classification as fair value through Profit and loss or at amortized cost.
All changes in fair value of financial liabilities classified as FVTPL is recognized in the Statement of Profit and Loss. Amortized cost

Derecognition

A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as the derecognition of the original liability and the recognition of a new liability. The difference in the respective carrying amounts is recognised in the statement of profit or loss.

Reclassification of financial instruments

After initial recognition, no reclassification is made for financial assets which are equity instruments. For financial assets, which are debt instruments, a reclassification is made only if there is a change in the business model for managing those assets. Changes to the business model are expected to be infrequent. If the Company reclassifies the financial assets, it applies the reclassification prospectively from the reclassification date which is the first day of the immediately next reporting period following the change in the business model.

Offsetting financial assets and financial liabilities

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

3.20. Related party transactions

Disclosure of transactions with Related Parties, as required by Ind-As 24 "Related Party Disclosures" has been set out in a separate note. Related parties as defined under Ind-As 24 have been identified on the basis of representations made by key managerial personnel and information available with the Company.

ATMA STEELS LIMITED
Works & Regd. Office : C-139 Industrial Area, Bulandshahar Road, Ghaziabad- 201009 (U.P.)
Mob. : 09310506965, 9350506966, e-mail : atmasteelsltd@rediffmail.com
Corporate CIN No. L27106UP1970PLC003353

CASH FLOW STATEMENT FOR THE YEAR ENDED 31.03.2019

(Amt in Rs)

	Year ended 31.03.2019	Year ended 31.03.2018
A) Cash flow from operating activities:		
Profit before tax	(2,620,508)	(2,200,783)
Adjustments for :		
Depreciation and amortization expense	127,307	127,307
Interest income	(56,475)	-
Provision for Investments	1,000,000	1,000,000
Operating profit before working capital changes	**(1,549,676)**	**(1,073,476)**
Adjustments for changes in working capital :		
(Increase) in trade receivables		**3679**
Movement in other assets	**(15,099,670)**	
Increase in trade payables		(45,601)
Increase in other liabilities	22,952	-
Increase in Liabilities for Assets Classified as Held for Sale	17,624,500	-
Decrease in other liabilities	(11,126)	-
Cash flow from/ (used in) operations	**986,979**	**(41,922)**
Income taxes paid	(174,500)	
Net cash flow from/(used in) operating activities	**812,479**	**(1,115,398)**
B) Cash flow from investing activities:		
Purchase of fixed assets (including capital work-in-progress, capital advances and intangibles under development)	-	-
Proceeds from sale of fixed assets	-	-
Purchase of investments	-	-
Proceeds from sale of investments	-	-
Net proceeds (to)/from loans and advances	-	-
Net proceeds (to)/from deposits	-	-

Dividend received	-	-
Interest received	56,475	-
Net cash (used in)/flow from investing activities	**56,475**	**-**
C) Cash flow from financing activities:		
Net (repayment)/proceeds from short-term borrowings	-	-
Proceeds from long-term borrowings	-	-
Repayment of long-term borrowings	-	-
Interest paid	- -	-
Net cash (used in)/flow from financing activities:		**-**
D) Net increase in cash and cash equivalents	**868,954**	**(1,115,398)**
Cash and cash equivalents at the beginning of the year (refer note 10)	**2,333,050**	**3,448,448**
Cash and cash equivalents at the end of the year	**3,202,004**	**2,333,050**

The accompanying notes form an integral part of these financials statements.

As per our report of even date.
For SSVS & Co.
Chartered Accountants

Firm Registration No.: 021648C

(VIPUL SHARMA)
Partner
Membership No. 74437

Place: Noida
Date: 30/05/2019

Sd/-
HARBHAJAN SINGH
Managing Director
DIN : 00428647

Sd/-
SANWAR MAL SHARMA
Director
DIN - 00427948

BISWESWAR PRAMANIK
CFO
PAN- ANYPP0205D

ATMA STEELS LIMITED

Works & Regd. Office : C-139 Industrial Area, Bulandshahar Road, Ghaziabad- 201009 (U.P.)
Mob. : 09310506965, 9350506966, e-mail : atmasteelsltd@rediffmail.com
Corporate CIN No. L27106UP1970PLC003353

NOTES TO STANDALONE FINANCIAL STATEMENT
FOR THE YEAR ENDED 31.03.2019

4 Property Plant And Equipment

	G R O S S B L O C K					NET BLOCK	
DESCRIPTION OF ASSETS	**As on 31.03.2018**	**Additions**	**Deductions**	**As on 31.03.2019**	**Upto 31.03.2019**	**As on 31.03.2019**	**As on 31.03.2018**
Leasehold Land	746615	-	-	746615	-	746615	746,615
Freehold Land	27469074	-	27,428,402.00	40672	-	40672	27,469,074
Factory Buildings	190375	-	-	190375	14388	175987	180,783
Plant & Machinery	-	-	-	-	-	-	
Diesel Generating Sets	57127	-	-	57127	28824	28303	37,911
Electric Fittings	74993	-	-	74993	31524	43469	53,977
Office Equipments	280080	-	-	280080	3123	276957	276,957
Tube-Well	3386	-	-	3386	-	3386	3,386
Vehicles	36059	-	-	36059	-	36059	36,059
Scooter/ Motor Cycle	82157	-	-	82157	31797	50360	60,796
Motor Car Toyata Etios	569849	-	-	569849	275877	293972	385,931
TOTAL RS.	**29509715**	**-**	**27,428,402**	**2081313**	**385533**	**1695780**	**29251489**
PREVIOUS YEAR .	**29509715**	**-**	**-**	**29509715**	**258226**	**29251489**	**29378796**

		As at 31 March 2019	**As at 31 March 2018**
5	**Investments**		
	Non current investments		
	100 Equity Shares of Hind Lever Chemicals Ltd.of Rs.10/- each fully paid up,(Merged with Tata Chemicals Ltd)	503	503
	(Aggregate Market Value of Quoted Investment Rs.58880/- Previous year Rs.67715/-)		
	Unquoted :		
	100000 (Previous Year Nill) 5% Non Cumulative Readeemable Preference Shares of Spade Trading Pvt. Ltd of Rs. 100/- each fully paid up	10,000,000	10,000,000
	Less: Provision for Diminution in Value of Investment	3,000,000	2,000,000

		7,000,503	**8,000,503**
	Aggregate market value of quoted investments		
	Aggregate amount of unquoted investments		
6	**Income-tax assets**		
	Advance income tax (net of provision)	234,287	59,787
		234,287	**59,787**
7	**Other non current assets**		
	Capital Advances	12,000,000	12,000,000
		12,000,000	**12,000,000**
8	**Inventory**		
		-	
			-
9	**Trade receivables**		
	Unsecured		
	Trade Receivables outstanding for a period exceeding six months	124,307	124,307
	Considered Good	1,796,144	1,796,144
	Considered Doubtful	1,920,451	1,920,451
	Less: Provision for Doubtful Trade Receivable	1,796,144	1,796,144
		124,307	**124,307**
	Break up for security details		
	Unsecured, considered good	124,307	124,307
	Unsecured, considered doubtful	(1,920,451)	(1,920,451)
	Provision for doubtful debts	1,920,451	1,920,451
		124,307	**124,307**
10	**Cash and cash equivalents**		
	Balance with Banks		
	In Current Accounts	26,665	43,875
	Cash in Hand	3,175,339	2,289,175
		3,202,004	**2,333,050**
11	**Other current assets**		
	Advances recoverable in cash or in kind	40,172,113	25,040,621
	Prepaid expenses	2,550	1,264
	Due from Employee	1,167,220	1,203,220
	Secuity Deposit(Rs. 973558/- + Rs.221824/-)	1,195,379	1,195,379
	Balances with statutory/ Government authorities	2,219,591	2,216,699
		44,756,853	29,657,183
		44,756,853	**29,657,183**

12	**Share capital**	**As at 31 March 2019**	**As at 31 March 2018**

A). Authorized, issued, subscribed and paid up share capital

Authorised

Equity Share Capital		
10000000 Equity Shares of Rs.10/- each	100,000,000	100,000,000
(Previous year 10000000 Equity Shares of Rs.10/- each)		
Non Cumulative Redeemable Preferenace Shares		
4500000 preference share of Rs.10/- each	45,000,000	45,000,000
(previous year 4500000) pref.shares of Rs.10/- each	**145,000,000**	**145,000,000**
Issued, Subscribed & Paid-up Capital		
Equity Share Capital		
8872832 Equity Shares of Rs.10/- each fully paid up	88,728,320	88,728,320
Less: Calls in Arrears	(61,500)	(61,500)
	88,666,820	**88,666,820**

c) **Shares in the company held by each shareholders holding more than 5% shares**

Name of Equity Shareholders	**Percentage(%)**	**No. of Shares held**
Shri.Gurbachan Singh Grewal	10.05%	891,840
Shri. Ram Pokhrel	5.04%	447,500
Smt.Ritu Kaur Rekhi.	7.28%	645,620
Shri. Devender S.Rekhi.	5.03%	446,010
Shri Karamjit Singh Simi	5.16%	458,177
M/S.Basant Plasto Chemicals Pvt.Ltd.	32.57%	2,890,300

d) There are Nil number of shares (Previous Year Nil) reserved for issue under option and contracts/commitment for the sale of shares/disinvestment including the terms and amounts.

e) For the period of five years immediately preceeding the date at which the balance sheet is prepared

Particulars	No.of Shares
Aggregate number and class of shares allotted as fully paid up pursuant to Contract(s) without payment being received in cash	Nil
Aggregate number and class of shares allotted as fully paid up by way of bonus shares	Nil
Aggregate number and class of shares bought back	Nil

f) There are no securities (Previous Year no) convertible into Equity/Preferential shares.

g) There are calls unpaid of Rs.61500/-(Previous Year RS.61500/-) by Shareholders as on balance sheet date

		As At	As At
h)	**Reconciliation of No. of Shares Outstanding:**	**31.03.2019**	**31.03.2018**
	Opening Balance	8,872,832	8,872,832
	Issued during the year	-	-
	Closing Balance	8,872,832	8,872,832

13	**Other equity**		
(i)	**Retained earnings**		
	Opening balance	(33,458,804)	(31,271,543)
	Add: Profits for the year	(2,580,557)	(2,187,261)
	Closing balance	**(36,039,361)**	**(33,458,804)**
(v)	**Securities Premium**		
	Opening balance	18,580,800	18,580,800
	Movement for the year		
	Closing balance	**18,580,800**	**18,580,800**
	Total	**(17,458,562)**	**(14,878,004)**

14	**Deferred tax assets (net)**		
	Deferred tax assets		
	Provision for gratuity		
	Depreciation and Amortisation Expenses		
	Asset retirement obligations	-	-
	Unamortized portion of government grant	-	-
	Fair value adjustment of interest free loans to subsidiaries	-	-
		-	-
	Deferred tax liabilities		
	Depreciation	120,729	160,680
		-	-
		120,729	160,680
	Net deferred tax	**120,729**	**160,680**

15	**Trade payables**		
	Total outstanding due to micro enterprises and small enterprises (refer note 32)	-	
	Total outstanding due of creditors other than micro enterprises and small enterprises		
		6,029,166	**6,029,166**
16	**Other current liabilities**		
	Statutory dues	646,901	647,925
	other liabilites	574,742	584,844
		1,221,643	**1,232,769**
17	**Current provisions**		
	Provision for employee benefits	237,839	214,887
		237,839	**214,887**
18	**Contigent Liabilities**		
	1) Disputed Sales Tax Demand	4,304,560	4,304,560
	2) Central Excise Demand	1,520,565	1,520,565
	3) Liquidated damages on ESIC	153,277	153,277
	4) Calcutta Stock Exchange	576,362	-
		6,554,764	**5,978,402**

19	**Revenue from operations**	**For the year ended 31 March 2019**	**For the year ended 31 March 2018**
	Sale of Products	-	-
	Net Sales	-	-
20	**Other income**		
	Interest Income	56,475	-
	Sales of Defective Store material		

		-	-
	Liabilities no Longer Required	-	-
	Reversal in Dimination in Value of Stock	-	-
		56,475	**-**
21	**Employee benefits expense**		
	Salaries & Wages	445,632	402,740
	Contribution to Provident and other funds	73,386	66,904
	Staff Welfare	-	-
		519,018	**469,644**
22	**Finance costs**		
	Bank Charges	2,184	8,703
		2,184	**8,703**
23	**Other expenses**		
	Administrative and Other Expenses		
	Rates and Taxes	72,765	69,300
	Printing and Stationery	83,974	35,239
	Postage, Courier and Telephones	313,041	149,698
	Travelling and Conveyance	63,807	85,431
	Fees and Subscription	3,090	10,455
	Legal and Professional Charges	79,406	84,634
	Auditors' Remuneration	30,000	29,500
	Office & Other Administration Expenses	362,032	130,872
	Diminution in Value of Investment	1,000,000	1,000,000
	Director Travelling Exp.	20,359	-

	2,028,474	**1,595,129**

24 Income tax profit and loss section

	-	-
(a) Income tax recognised in statement of profit and loss:		
Current income tax		
Adjustment in respect of previous years		
MAT credit entitlement		
Deffered tax:		
Relating to origination and reversal of temporary differences	**(39,951)**	**(13,522)**
Income tax expenses reported in statement of profit and loss	**(39,951)**	**(13,522)**
(b) Income tax recognised in other comprehensive income		
Current Income tax	-	-
Net gain/(loss) on re-measurement of defined benefit plans	-	-
Classification of income-tax recognized in other comprehensive income		
Income-taxes related to items that will not be reclassified to Profit and Loss		
Income-taxes related to items that will be reclassified to Profit and Loss	-	-

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

Accounting profit before tax	**(2,620,508)**	**(2,200,783)**
Income tax rate as per Income Tax Act 1961, 31 March 2019	26%	30.9%
	(681,332)	(680,042)
Adjustment in respect of:		
Current income tax of previous year		
Non-deductible expenses for tax purpose	5,289	12,033
Other adjustment	636,092	654,487

Income tax reported in statement of profit and loss	**(39,951)**	**(13,522)**

25 As per Sanctioned Scheme dated 12.02.2008 of the Hon'ble BIFR the company was required to make the payment of Rs.12742442/- to unsecured creditor for Trade and Expenses within three year (without interest) w.e.f 01.10.2007. However, the company could not make the payment as aforesaid and accordingly the sum of Rs. 6029166/- (Previous year Rs 6029166 /-) is over due and payable as on 31.03.2018 management of the Company is trying to arrange funds to make the payment to creditors as early as possible.

26 In the opinion of the Board and to the best of their knowledge and belief, the value on realization of current assets, loans and advances in the ordinary course of business, subject to provision made for diminution in the value of inventories would not be less than the amount at which they are stated in the Balance Sheet.

27 Fixed Assets Register up to 31.03.1997 which was lying in the factory is got mutilated and could not be retrieved properly. Hence could not be produced. The same is being recompiled. However physical verification of fixed assets has been made as on 31.03.2019. Likewise physical verification of inventories has also been made by the company as on 31.03.2019.

28 Balances of parties appearing under Sundry Debtors, Sundry Creditors, Advance to Suppliers and other claims are subject to confirmation, Reconciliation and adjustment, if any. The adjustment, if any, on confirmation/reconciliation shall be made in the subsequent year, the effect thereof on assets, liabilities and loss for the year cannot be ascertained.

29 Deputy Secretary. IT and Electronics, Department of Industrial Development, Govt. of U.P vide its affidavit dated 05.07.2010 filed before the Hon'ble High Court Allahabad, Lucknow along-with minutes of the meeting of Sachiv Samiti stating in Para 3 of its affidavit that the concessions and reliefs sought by the Company under the BIFR Sanctioned Scheme have been provided in so far as they fall within the Policy frame work of Government. Accordingly in earlier years M.C.G charges amounting to Rs. 4,27,30,000/- were not considered as liability including contingent liability in the Annual Accounts of the Company. The Company has requested department to refunded (PVVNL) their Security Deposit of Rs. 9,73,555/-, but it was informed that the decision on M.C.G. charges of Rs. 4,27,30,000/- which was taken earlier is incomplete and as such refund of security deposit , is not possible till the resolution of the above referred charges. Thus the liability may arise in future on the company.

30 **Related Party Disclosures**:

Key Management Personnel

Shri.Harbhajan Singh - Managing Director of the Company
Shri Sanwar Mal Sharma - Director of the Company

Enterprises significantly influenced by the Directors/its relative : Basant Plasto Chemicals Pvt.Ltd.
During the year there is no transaction with Related Parties.

31 Deferred Tax Assets:

The company has substantial amount of carry forward of Losses under Income-tax Act in view of uncertainty of realization, no deferred tax assets has been recognized in conformity with the provision of Indian Accounting Standard 12 "Income Taxes" issued by the Institute of Chartered Accountants of India.

32 The Company is in the process of identifying its suppliers as Micro, Small, and Medium enterprises as defined under the "Micro, Small & Medium enterprises Development Act, 2006". However the Company has not received any information Communication from their suppliers regarding applicability of said Act to them. Therefore no such disclosure under the said Act has been furnished.

33 IAS-36 Impairment of Assets being mandatory by the Institute of Chartered Accountants of India the company has carried out an exercise to ascertain the impairment, if any, in the company value of its fixed assets. However no such case found.

34 **Earning per Share (EPS)**

(In Rupees)

Particulars	Current Year	Previous Year
Net Profit/ (Loss) after Tax	(2580557)	(2187261)
(i) Basic Weighted Average number of Shares outstanding (ii) Diluted weighted Average number of Equity share	 8872832 8872832	 8872832 8872832
Basic Earning Per Shares	(0.29)	(0.25)
Diluted Earning per Share	(0.29)	(0.25)

35 **Financial Risk Framework**

The Company's financial liabilities comprise, capital creditors and trade and other payables. The main purpose of these financial liabilities is to finance the Company's operations. The Company's financial assets include trade and other receivables, cash and cash equivalents.

The Company is exposed to market risk, credit risk and liquidity risk. The Company's senior management overseas the management of these risks. The Company's senior management provides assurance that the company's financial risks activities, are governed by appropriate policies and risk objectives. All derivative activities for risk management purpose are carried out by teams that have appropriate skills, experience and supervision. The Board of Directors reviews and agrees policies for managing g each of these risks, which are summarized below:

A. Market risk

Market risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market price. Market risk comprises three types of risk interest rate risk, currency risk and other risks, such as regulatory risk and commodity price risk.

i) Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. Since there are no loan liabilities, the company is not exposing to interest rate risk

ii) Foreign currency risk

Foreign currency risk is the risk that the fair value or future cash flows of an exposure will fluctuate because of changes in foreign exchange rates, The company is not expose to foreign currency risk.

B. Credit risk

Credit risk is the risk that counterparty will default on its obligations under a Contractual arrangement leading to a financial loss.

Financial assets are written off when there is no reasonable expectation of recovery, however, the company continues to attempt to recover the receivables. Where recoveries are made, these are recognized in the statement of profit and loss.

The ageing of trade receivable is given below:

	Particulars	**Up to 6 Months**	**More than 6 Months**	**More than one year**
a) b)	As at 31.03.2019 Gross carrying Amount Expected Credit Loss @			 1920451 1796144
a) b)	As at 31.03.2018 Gross carrying Amount Expected Credit Loss @			 1920451 1796144
a) b)	As at 1.04.2017 Gross carrying Amount Expected Credit Loss @			 1920451 1796144

Following table summarizes the change in loss allowances measured using life time expected credit loss model. No significant changes in the estimation techniques or assumption were made during the period.

Particulars	ECL for Trade Receivables
01.04.2017 Provision /Reversal during the year	1796144
31.03.2018 Provision /Reversal during the year	1796144
31.03.2019 Provision /Reversal during the year	1796144

Balances with Banks – Other Financial Assets

Credit risk from balances with banks is managed in accordance with Company's policy. Company considers factors such as track record, size of the institution, market reputation and service standards to select the banks with which term deposits are maintained. Generally, term deposits are maintained with banks with which Company has also availed borrowings.

C Liquidity risk

i) Liquidity Risk Management

Liquidity risk is the risk that a company may encounter difficulties in meeting its obligations associated with financial liabilities that are settled by delivering cash or other financial assets. The Company's objective is to maintain optimum levels of liquidity to meet its cash and its collateral requirements. The company's Management is responsible for liquidity, funding as well as settlement. Management monitors the company's net liquidity position through rolling, forecast on the basis of expected cash flow.

ii) Maturities of financial liabilities

The table below provides undiscounted cash flows towards financial liabilities into relevant maturity based on the remaining period at the balance sheet to the contractual maturity date.

Non derivative financial instruments

Particulars	As At 31.03.2019 Carrying amount	Less than one year	More than one year and less than three years	More than Three Years	Total
Trade and Other Payable	6029166			6029166	6029166

Particulars	As At 31.03.2018 Carrying amount	Less than one year	More than one year and less than three years	More than Three Years	Total
Trade and Other Payable	6029166			6029166	6029166

36 **Capital Management**

a) Risk Management

For the purpose of the Company's capital management, capital includes issued equity capital, securities premium and all other equity reserves attributable to the equity shareholder of the Company. The Primary objective of capital management is to maximize shareholder value and also to maintain an optimum capital structure and to safeguard its ability to continue at a going concern.

The Company's Capital management objectives are to maintain equity including all reserve to protect economic viability and to finance any growth opportunities that may be available in future so as to maximize shareholder value.
The Company manages its capital structure and makes adjustments in the amount of dividends, return on capital to shareholders, issue new shares or sell assets to reduce debts.

b) **Loan Covenants:**

In order to achieve this overall objective the Company's capital management, amongst other things, aims to ensure that it meets financial covenants attached to the interest bearing loans and borrowing that define capital structure requirements. The company has compiled with these covenants and there have been no breaches in the financial covenants of any interest – bearing loans and borrowings.
No changes were made in the objectives, policies or processes for managing capital during the year ended 31st March 2019.

37 The Previous year figure have been reworked, regrouped, rearranged and reclassified wherever necessary amounts and other disclosures for the preceding year including figures as are included as an integral part of the current year financial statements and are to be read in relation to the amounts and other disclosers relating to the current year.

On Behalf of Board Of Directors

Sd/-	**Sd/-**	**Sd/-**
(Harbhajan Singh)	**(Harvinder Singh)**	**(Bisweswar Pramanik)**
Managing Director	**Director**	**CFO**
DIN : 00428947	**DIN : 00617878**	**PAN:ANYPP0205D**

As per our Report of even date
For SSVS & CO
Chartered Accountants
Firm Reg No : 021648C

(Vipul Sharma)

Partner
M.No 74437

Place : Noida
Date : 30.05.2019

ATMA STEELS LIMITED
Works & Regd. Office : C-139 Industrial Area, Bulandshahar Road, Ghaziabad- 201009 (U.P.)
Mob. : 09310506965, 9350506966, e-mail : atmasteelsltd@rediffmail.com
Corporate CIN No. L27106UP1970PLC003353

Form No.-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: L27106UP1970PLC003353
Name of the Company: ATMA STEELS LIMITED
Registered office: C-139, Industrial Area, Bullandshahar Road, Ghaziabad- 201009 (U.P.)

Name of the Member(s): Registered address: E-mail Id: Folio No./ Client ID: DP ID:

I/ We being the member(s) holding _______Shares of the above named company, hereby appoint:

1. _________________of _______________________________ having e-mail ID: _____________________________or failing him
2. _________________of_______________________________having e-mail ID: __________________________or failing him
3. _________________of_______________________________having e-mail ID: __________________________or failing him

And whose signature are appended below as my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at 47thAnnual General Meeting of members of the Company, to be held on Monday, 30th September, 2019 at the 10:00 A.M at registered office of the Company situated at C-139, Industrial Area, Bullandshahar Road, Ghaziabad- 201009 (U.P.), and at any adjournment thereof in respect of such resolutions as are indicated below:

Sl. No.	RESOLUTIONS
	ORDINARY BUSINESS
1.	Adoption of Financial Statements of the Company for the financial year ended 31st March, 2019
2.	Re-appointment of Mr. Harvinder Singh as a Director, liable to Retire by Rotation
3.	Approval to dispense with the Requirement of ratification of appointment of Statutary Auditors
	SPECIAL BUSINESS
4.	Appointment of Mr. Sanwar Mal Sharma as a Director
5.	To regularize the appointment of Ms. Meha Gandhi (DIN: 08535062) as Independent Director of the Company

Signed this _______ Day of_________2019

Signature of Member

Affix Revenue Stamp

_________________ _______________________ ____________________

Signature of Ist Proxy Holder   Signature of IIndProxy holder   Signature of IIIrd Proxy holder

Note: 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 before the commencement of the Meeting.

ATMA STEELS LIMITED

Works & Regd. Office : C-139 Industrial Area, Bulandshahar Road, Ghaziabad- 201009 (U.P.)
Mob. : 09310506965, 9350506966, e-mail : atmasteelsltd@rediffmail.com
Corporate CIN No. L27106UP1970PLC003353

ATTENDANCE SLIP

(Annual General Meeting): Monday, 30th September, 2019 at the 10:00 A.M
(Please fill in the Attendance Slip and hand it over at the entrance of the meeting hall)

Date:		Time :	
Place:			

Signature of the Shareholder/ Proxy/Representative present	

Regd. Folio		DP ID & Client ID	
(If not dematerialized)		(If dematerialized)	
Name of the Shareholder			
Number of Shares			

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Road Map