DRAFT RED HERRING PROSPECTUS
Dated: September 12, 2018
(The Draft Red Herring Prospectus will be updated upon filing with the RoC)
Please read Section 32 of the Companies Act, 2013
Book Built Issue

GOEL TMT
AAPKE GHAR KO DE LAMBI UMAR

SHRI BAJRANG POWER AND ISPAT LIMITED

Our Company was incorporated on July 25, 2002 at Gwalior as a public limited company under the Companies Act, 1956 pursuant to a certificate of incorporation issued by the Registrar of Companies, Madhya Pradesh & Chhattisgarh. Our Company received the certificate for commencement of business dated February 5, 2004, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh. For further details of our Company, see "*History and Certain Corporate Matters*" on page 185.

Registered Office: Village Borjhara, Guma Road, Urla Growth Center, Raipur-493 221, Chhattisgarh
Tel: 0771-4288019/4288029/4288039; **Fax**: 0771-4288123
E-mail: cs@goelgroup.co.in; **Website**: www.sbpil.co.in
Contact Person: Parul Verma, Company Secretary and Compliance Officer
Corporate Identity Number: U27106CT2002PLC015184

OUR PROMOTERS:
Suresh Goel, Rajendra Goel, Narendra Goel, Anand Goel, Atlanta Securities Private Limited (ASPL) and Banka Finance & Securities Private Limited. (BFSPL)

INITIAL PUBLIC OFFERING OF UP TO [●] EQUITY SHARES OF FACE VALUE OF ₹ 10 EACH ("EQUITY SHARES") OF SHRI BAJRANG POWER AND ISPAT LIMITED ("OUR COMPANY" OR THE "ISSUER") FOR CASH AT A PRICE OF ₹ [●] PER EQUITY SHARE (INCLUDING A SHARE PREMIUM OF ₹ [●] PER EQUITY SHARE) (THE "ISSUE PRICE") AGGREGATING UP TO ₹ 5,000 MILLION. THE ISSUE WILL CONSTITUTE UP TO [●] % OF THE POST-ISSUE PAID-UP EQUITY SHARE CAPITAL OF OUR COMPANY.

THE FACE VALUE OF EACH EQUITY SHARE IS ₹ 10 EACH. THE ISSUE PRICE IS [●] TIMES THE FACE VALUE OF THE EQUITY SHARES. THE PRICE BAND AND THE MINIMUM BID LOT WILL BE DECIDED BY OUR COMPANY IN CONSULTATION WITH THE BRLMS AND WILL BE ADVERTISED IN [●]EDITIONS OF [●] (A WIDELY CIRCULATED ENGLISH NATIONAL DAILY NEWSPAPER), [●] EDITIONS OF [●] (A WIDELY CIRCULATED HINDI NATIONAL DAILY NEWSPAPER) AND [●] EDITION OF [●] (A WIDELY CIRCULATED [●] DAILY NEWSPAPER, [●] BEING THE REGIONAL LANGUAGE OF CHHATTISGARH, WHERE OUR REGISTERED OFFICE IS LOCATED) AT LEAST FIVE WORKING DAYS PRIOR TO THE BID/ISSUE OPENING DATE AND SHALL BE MADE AVAILABLE TO BSE LIMITED ("BSE") AND NATIONAL STOCK EXCHANGE OF INDIA LIMITED ("NSE", AND TOGETHER WITH BSE, THE "STOCK EXCHANGES") FOR UPLOADING ON THEIR RESPECTIVE WEBSITES.

In case of any revision to the Price Band, the Bid/Issue Period will be extended by at least three additional Working Days after such revision of the Price Band, subject to the total Bid/ Issue Period not exceeding 10 Working Days. Any revision in the Price Band and the revised Bid/Issue Period, if applicable, will be widely disseminated by notification to the Stock Exchanges, by issuing a press release, and also by indicating the change on the website of the BRLMs and at the terminals of the other members of the Syndicate and by intimation to the Designated Intermediaries (as defined below).

In terms of Rule 19(2)(b) of the Securities Contracts (Regulations) Rules, 1957 ("**SCRR**") and in accordance with Regulation 26(1) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009, as amended (the "**SEBI ICDR Regulations**"), this Issue is being made through the Book Building Process, wherein not more than 50% of the Issue shall be available for allocation on a proportionate basis to Qualified Institutional Buyers ("**QIBs**") (the "**QIB Portion**"), provided that our Company in consultation with the BRLMs may allocate up to 60% of the QIB Portion to Anchor Investors on a discretionary basis ("**Anchor Investor Portion**"). One-third of the Anchor Investor Portion shall be reserved for domestic Mutual Funds, subject to valid Bids being received from the domestic Mutual Funds at or above the Anchor Investor Allocation Price. 5% of the QIB Portion (excluding the Anchor Investor Portion) shall be available for allocation on a proportionate basis to Mutual Funds only, and the remainder of the QIB Portion shall be available for allocation on a proportionate basis to all QIB Bidders (other than Anchor Investors), including Mutual Funds, subject to valid Bids being received at or above the Issue Price. Further, not less than 15% of the Issue shall be available for allocation on a proportionate basis to Non-Institutional Bidders and not less than 35% of the Issue shall be available for allocation to Retail Individual Bidders in accordance with the SEBI ICDR Regulations subject to valid Bids being received at or above the Issue Price. All potential Bidders, other than Anchor Investors, are mandatorily required to participate in the Issue through an Application Supported by Blocked Amount ("**ASBA**") process by providing details of their respective bank account which will be blocked by the Self Certified Syndicate Banks ("**SCSBs**"). Anchor Investors are not permitted to participate in the Anchor Investor Portion through the ASBA Process. For details, see "*Issue Procedure*" on page 542.

RISK IN RELATION TO THE FIRST ISSUE

This being the first public issue of our Company, there has been no formal market for the Equity Shares of our Company. The face value of the Equity Shares is ₹ 10 and the Floor Price is [●] times the face value and the Cap Price is [●] times the face value. The Issue Price (determined and justified by our Company in consultation with the BRLMs as stated under "*Basis for Issue Price*" on page 118) should not be taken to be indicative of the market price of the Equity Shares after the Equity Shares are listed. No assurance can be given regarding an active or sustained trading in the Equity Shares or regarding the price at which the Equity Shares will be traded after listing.

GENERAL RISKS

Investments in equity and equity-related securities involve a degree of risk and investors should not invest any funds in the Issue unless they can afford to take the risk of losing their entire investment. Investors are advised to read the risk factors carefully before taking an investment decision in the Issue. For taking an investment decision, investors must rely on their own examination of our Company and the Issue, including the risks involved. The Equity Shares in the Issue have not been recommended or approved by the Securities and Exchange Board of India ("**SEBI**"), nor does SEBI guarantee the accuracy or adequacy of the contents of this Draft Red Herring Prospectus. Specific attention of the investors is invited to "*Risk Factors*" on page 22.

ISSUER'S ABSOLUTE RESPONSIBILITY

Our Company, having made all reasonable inquiries, accepts responsibility for and confirms that this Draft Red Herring Prospectus contains all information with regard to our Company and the Issue, which is material in the context of the Issue, that the information contained in this Draft Red Herring Prospectus is true and correct in all material aspects and is not misleading in any material respect, that the opinions and intentions expressed herein are honestly held and that there are no other facts, the omission of which makes this Draft Red Herring Prospectus as a whole or any of such information or the expression of any such opinions or intentions misleading in any material respect.

LISTING

The Equity Shares offered through the Red Herring Prospectus are proposed to be listed on the BSE and the NSE. Our Company has received an 'in-principle' approval from the BSE and the NSE for the listing of the Equity Shares pursuant to letters dated [●] and [●], respectively. For the purposes of the Issue, the Designated Stock Exchange shall be [●]. A copy of the Red Herring Prospectus and the Prospectus shall be delivered for registration to the RoC in accordance with Section 26(4) of the Companies Act, 2013. For details of the material contracts and documents available for inspection from the date of the Red Herring Prospectus up to the Bid/ Issue Closing Date, see "*Material Contracts and Documents for Inspection*" on page 594.

BRLMs			REGISTRAR TO THE ISSUE
IDBI capital	Equirus	SBI Capital Markets Limited	LINKIntime
IDBI Capital Markets & Securities Limited 3rd Floor, Mafatlal Centre, Nariman Point, Mumbai – 400 021. Telephone: +91 22 4322 1212 Facsimile: +91 22 2285 0785 E-mail: ipo.sbpil@idbicapital.com Investor grievance e-mail: redressal@idbicapital.com Website: www.idbicapital.com Contact Person: Sumit Singh / Priyankar Shetty SEBI Registration No.: INM000010866	**Equirus Capital Private Limited** 12th Floor, C Wing, Marathon Futurex, N M Joshi Marg, Lower Parel, Mumbai - 400 013 Telephone: +91-(0) 22-43320600 Facsimile: +91-(0) 22-43320601 E-mail: project.sbpil@equirus.com Investor grievance e-mail: investorsgrievance@equirus.com Website: www.equirus.com Contact Person: Pavan Naik / Gaurav Phadke SEBI Registration No.: INM000011286	**SBI Capital Markets Limited** 202, Maker Tower 'E', Cuffe Parade, Mumbai – 400 005, Maharashtra, India. Telephone: + 91 (22) 2217 8300 Facsimile: + 91 (22) 2218 8332 E-mail: sbpil.ipo@sbicaps.com Investor grievance e-mail: investor.relations@sbicaps.com Website: www.sbicaps.com Contact Person: Janardhan Wagle/ T Mounika SEBI Registration No.: INM000003531	**Link Intime India Private Limited** C-101, 1st Floor, 247 Park, Lal Bhadur Shastri Marg, Vikhroli (West), Mumbai 400 083 Telephone: +91 022 49186200 Facsimile +91 022 49186195 Email: sbpil.ipo@linkintime.co.in Investor grievance e-mail: sbpil.ipo@linkintime.co.in Website: www.linkintime.co.in Contact Person: Ms. Shanti Gopalkrishnan SEBI Regn. Number: INR000004058

BID/ISSUE PROGRAMME	
BID/ISSUE OPENS ON	[●]*
BID/ISSUE CLOSES ON	[●]**

* *Our Company may, in consultation with the BRLMs, consider participation by Anchor Investors in accordance with the SEBI ICDR Regulations. The Anchor Investor Bid/Issue Period shall be one Working Day prior to the Bid/Issue Opening Date.*
** *Our Company may in consultation with the BRLMs, consider closing the Bid/Issue Period for QIBs one Working Day prior to the Bid/Issue Closing Date in accordance with the SEBI ICDR Regulations.*

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TABLE OF CONTENTS

SECTION I: GENERAL

DEFINITIONS AND ABBREVIATIONS

This Draft Red Herring Prospectus uses certain definitions and abbreviations which, unless the context otherwise indicates or implies, shall have the meaning as provided below. References to any legislation, act, regulation, rules, guidelines or policies shall be to such legislation, act or regulation, as amended from time to time.

The words and expressions used in this Draft Red Herring Prospectus but not defined herein, shall have, to the extent applicable, the meanings ascribed to such terms under the Companies Act, the SEBI ICDR Regulations, the SEBI Listing Regulations, the SCRA, the Depositories Act or the rules and regulations made thereunder.

Notwithstanding the foregoing, terms used in "Statement of Tax Benefits", "Regulations and Policies", "Restated Financial Statements", "Main Provisions of Articles of Association", "Outstanding Litigation and Other Material Developments", and "Issue Procedure – Part B" on pages 123, 180, 228, 588, 464 and 542 *respectively, shall have the meaning ascribed to such terms in such sections.*

General Terms

Term	Description
"our Company", "the Company" or "the Issuer"	Shri Bajrang Power and Ispat Limited, a company incorporated under the Companies Act, 1956 and having its registered office at Village Borjhara, Guma Road, Urla Growth Center, Raipur-493 221, Chhattisgarh.
"we", "us" or "our"	Unless the context otherwise indicates or implies, our Company, together with its Subsidiaries *(as defined below)*, on a consolidated basis.

Company Related Terms

Term	Description
Articles of Association or AoA	Articles of association of our Company, as amended
ASPL	Atlanta Securities Private Limited
Audit Committee	The audit committee of our Company, constituted in accordance with the applicable provisions of the Companies Act, 2013 and the SEBI Listing Regulations, as described in "*Our Management*" on page 194.
Auditors/Statutory Auditors	Statutory auditors of our Company, being S S S D & Co Chartered Accountants (Firm registration number 020203C)
BFSPL	Banka Finance & Securities Private Limited.
Board/Board of Directors	Board of directors of our Company or a duly constituted committee thereof.
CCCML	Chhattisgarh Captive Coal Mining Limited
Chief Financial Officer/ CFO	Chief financial officer of our Company
Consortium Lenders	Consortium of State Bank of India, Bank of Baroda, Karnataka Bank, Bank of India, L&T Infrastructure Finance Company Limited and L&T Fincorp Limited. (Our Company has repaid the term loan of L&T Infrastructure Finance Company Limited and L&T Fincorp Limited as on June 7, 2018 and these entities are not part of the Consortium Lenders as on date).
Corporate Promoters	Atlanta Securities Private Limited and Banka Finance & Securities Private Limited.
Corporate Social Responsibility Committee	The corporate social responsibility committee of our Company, constituted in accordance with the applicable provisions of the Companies Act, 2013, as disclosed in "*Our Management*" on page 194.
CSERC	Chhattisgarh State Electricity Regulatory Commission
CSPDL	Chhattisgarh State Power Distribution Company Limited
Director(s)	Director(s) on the Board of our Company
Equity Shares	Equity shares of our Company of face value of ₹10 each
Executive Directors	Executive directors of our Company i.e. Narendra Goel, Shravan Kumar Goyal, Suresh Goel, Rajendra Goel and Anand Goel

Term	Description
GPIL	Godawari Power and Ispat Limited
Group Companies	Companies which are covered under the applicable accounting standards and other companies as considered material by our Board, if any, in accordance with the Materiality Policy. For details, see "Our Group Companies" on page 219.
HERC	Haryana Electricity Regulatory Commission
IAHEPL	I.A. Hydro Energy Private Limited
ICRA Report	Report titled "Industry Overview: Iron and Steel" dated August 30, 2018 by ICRA Limited.
IEL	Ind Energy Limited.
Independent Directors	Independent director(s) of our Company.
Individual Promoters	Suresh Goel, Rajendra Goel, Narendra Goel and Anand Goel
IPO Committee	The committee of the Board of Directors as described in "*Our Management*" on page 194.
JVA	Joint Venture Agreement
JVC	Joint Venture Company
KMP/ Key Management Personnel	Key management personnel of our Company in terms of Regulation 2(1)(s) of the SEBI ICDR Regulations and Section 2(51) of the Companies Act, 2013 and as disclosed in *"Our Management – Key Management Personnel"* on page 203.
Materiality Policy	The policy adopted by our Board pursuant to its resolution dated September 2, 2018 for identification of Group Companies and outstanding material litigation in respect of our Company, pursuant to the requirements of the SEBI ICDR Regulations.
Memorandum of Association or MoA	Memorandum of association of our Company, as amended
Nomination and Remuneration Committee	The nomination and remuneration committee of our Company, constituted in accordance with the applicable provisions of the Companies Act, 2013 and the SEBI Listing Regulations, as disclosed in "*Our Management*" on page 194.
Non-executive Directors	Non-executive director(s) of our Company
PPA	Power Purchase Agreement
Promoter Group	The persons and entities constituting the promoter group of our Company in terms of Regulation 2(1)(zb) of the SEBI ICDR Regulations. For details, see "*Our Promoters and Promoter Group*" on page 211.
Promoters	The promoters of our Company namely, Suresh Goel, Rajendra Goel, Narendra Goel, Anand Goel, Atlanta Securities Private Limited and Banka Finance & Securities Private Limited.
Registered Office	The registered office of our Company located at Village Borjhara, Guma Road, Urla Growth Center, Raipur - 493 221, Chhattisgarh.
Registrar of Companies/RoC	Registrar of Companies, Bilaspur, Chhattisgarh.
Restated Consolidated Financial Statements	The restated consolidated financial information of our Company, which comprises: (i) the restated consolidated statement of assets and liabilities, the restated consolidated statement of profit and loss (including other comprehensive income), the restated consolidated statement of changes in equity and the restated consolidated statement of cash flow as at and for the Financial Years ended March 31, 2018, March 31, 2017 and March 31, 2016, together with the annexures and notes thereto of the Company, its Subsidiaries, Joint Venture and Associate ("**Group**"), prepared in accordance with the IND AS, Companies Act 2013 and restated in accordance with the SEBI ICDR Regulations, and the Guidance Note on Reports in Company Prospectuses, 2016, issued by the ICAI ("Prospectus Guidance Note" and such summary statements, the "**Restated Consolidated IND AS Financial Information**"); and (ii) the restated consolidated summary statements of assets and liabilities at March 31, 2015 and March 31, 2014 and the restated consolidated summary statements of profit and loss and cash flows for the Fiscals 2015

Term	Description
	and 2014 of the Group, taken together, prepared in accordance with the Companies Act, 2013 and the Indian GAAP and restated in accordance with the SEBI ICDR Regulations and the Prospectus Guidance Note (the "**Restated Consolidated Indian GAAP Financial Information**").
Restated Financial Statements	Collectively, the Restated Consolidated Financial Statements and Restated Standalone Financial Statements.
Restated Standalone Financial Statements	The restated standalone financial information of our Company, which comprises: (i) the restated standalone statement of assets and liabilities, the restated standalone statement of profit and loss (including other comprehensive income), the restated standalone statement of changes in equity and the restated standalone statement of cash flow as at and for the Financial Years ended March 31, 2018, March 31, 2017 and March 31, 2016, together with the annexures and notes thereto of the Company, prepared in accordance with the IND AS, Companies Act 2013 and restated in accordance with the SEBI ICDR Regulations, and the Prospectus Guidance Note, (the "**Restated Standalone IND AS Financial Information**"); and (ii) the restated standalone summary statements of assets and liabilities at March 31, 2015 and March 31, 2014 and the restated standalone summary statements of profit and loss and cash flows for the Financial Years 2015 and 2014 of the Company, prepared in accordance with the Companies Act, 2013 and the Indian GAAP and restated in accordance with the SEBI ICDR Regulations and the Prospectus Guidance Note (the "**Restated Standalone Indian GAAP Financial Information**").
SBAL	Shri Bajrang Alloys Limited
SBEPL	Shri Bajrang Energy Private Limited.
SBHEPL	Shri Bajrang Hydro Energy Private Limited
SBIPL	Shri Bajrang Ispat & Plywood Limited
SBMMPL	S.B. Multimedia Private Limited
SBMPL	Shri Bajrang Metallics and Power Limited
SBSPL	Shri Bajrang Steel & Power Limited
Scheme	Scheme of amalgamation between our Company and Shri Bajrang Metallics & Power Limited approved by the High Court of Chhattisgarh, by an order dated November 14, 2011. For further details, please see "*History and Certain Corporate Matters*" on page 185
Shareholders	The holders of the equity shares of our Company from time to time.
SIPL	Shimmer Investments Private Limited
SML	Swastik Mercantile Limited
SNIL	Shree Nakoda Ispat Limited
Stakeholders' Relationship Committee	The stakeholders' relationship committee of our Company, constituted in accordance with the applicable provisions of the Companies Act, 2013 and the SEBI Listing Regulations, as described in "*Our Management*" on page 194.
Subsidiaries	Subsidiaries of our Company, namely, Shri Bajrang Energy Private Limited and I.A. Hydro Energy Private Limited.
Unit I	Our Company's manufacturing unit at Borjhara, Raipur
Unit II	Our Company's manufacturing unit at Gondawara, Raipur
Unit III	Our Company's manufacturing unit at Tilda, Raipur
VGL	Vandana Global Limited

Issue Related Terms

Term	Description
Acknowledgement Slip	The slip or document issued by a Designated Intermediary to a Bidder as proof of registration of the Bid cum Application Form
Allot/Allotment/Allotted	Unless the context otherwise requires, allotment of Equity Shares pursuant to the Issue and to the Allotees.
Allotment Advice	Note or advice or intimation of Allotment sent to the Bidders who have

Term	Description
	been or are to be Allotted the Equity Shares after the Basis of Allotment has been approved by the Designated Stock Exchange.
Allottee	A successful Bidder to whom the Equity Shares are Allotted.
Anchor Investor	A Qualified Institutional Buyer, applying under the Anchor Investor Portion in accordance with the requirements specified in the SEBI ICDR Regulations and the Red Herring Prospectus.
Anchor Investor Allocation Price	The price at which Equity Shares will be allocated to Anchor Investors in terms of the Red Herring Prospectus and the Prospectus, which will be decided by our Company in consultation with the BRLMs.
Anchor Investor Application Form	The form used by an Anchor Investor to make a Bid in the Anchor Investor Portion and which will be considered as an application for Allotment in terms of the Red Herring Prospectus and Prospectus.
Anchor Investor Bid/Issue Period	The day, being one Working Day prior to the Bid/Issue Opening Date, on which Bids by Anchor Investors shall be submitted and allocation to Anchor Investors shall be completed.
Anchor Investor Issue Price	Final price at which the Equity Shares will be Allotted to Anchor Investors in terms of the Red Herring Prospectus and the Prospectus, which will be equal to or higher than the Issue Price but not higher than the Cap Price. The Anchor Investor Issue Price will be decided by our Company in consultation with the BRLMs.
Anchor Investor Pay-in Date	With respect to Anchor Investor(s), it shall be the Anchor Investor Bid/Issue Period, and in the event the Anchor Investor Allocation Price is lower than the Issue Price, not later than two Working Days after the Bid Issue Closing Date.
Anchor Investor Portion	Up to 60% of the QIB Portion which may be allocated by our Company in consultation with the BRLMs, to Anchor Investors on a discretionary basis in accordance with the SEBI ICDR Regulations. One-third of the Anchor Investor Portion shall be reserved for domestic Mutual Funds, subject to valid Bids being received from domestic Mutual Funds at or above the Anchor Investor Allocation Price, which price shall be determined by Our Company in consultation with the BRLMs.
Application Supported by Blocked Amount or ASBA	An application, whether physical or electronic, used by ASBA Bidders to make a Bid and authorize an SCSB to block the Bid Amount in the ASBA Account.
ASBA Account	A bank account maintained with an SCSB and specified in the ASBA Form submitted by ASBA Bidders for blocking the Bid Amount mentioned in the ASBA Form.
ASBA Bid	A Bid made by an ASBA Bidder.
ASBA Bidders	All Bidders except Anchor Investors
ASBA Form	An application form, whether physical or electronic, used by ASBA Bidders which will be considered as the application for Allotment in terms of the Red Herring Prospectus and the Prospectus
Banker(s) to the Issue/Escrow Collection Bank(s)	Banks which are clearing members and registered with SEBI as bankers to an issue and with whom the Escrow Accounts will be opened, in this case being [●]
Basis of Allotment	Basis on which Equity Shares will be Allotted to successful Bidders under the Issue and which is described in "*Issue Procedure*" on page 542.
Bid	An indication to make an Issue during the Bid/Issue Period by an ASBA Bidder pursuant to submission of the ASBA Form, or during the Anchor Investor Bid/Issue Period by an Anchor Investor pursuant to submission of the Anchor Investor Application Form, to subscribe to or purchase the Equity Shares of our Company at a price within the Price Band, including all revisions and modifications thereto as permitted under the SEBI ICDR Regulations and in terms of the Red Herring Prospectus and the Bid cum Application Form. The term "Bidding" shall be construed accordingly.
Bid Amount	The highest value of optional Bids indicated in the Bid cum Application

Term	Description
	Form and payable by the Bidder or blocked in the ASBA Account of the Bidder, as the case may be, upon submission of the Bid
Bid cum Application Form	The Anchor Investor Application Form or the ASBA Form, as the context requires
Bid Lot	[●] Equity Shares in the multiples of [●] Equity Shares
Bid/Issue Closing Date	Except in relation to any Bids received from the Anchor Investors, the date after which the Designated Intermediaries will not accept any Bids, for the Issue, which shall be notified in [●]editions of [●] (a widely circulated english national daily newspaper), [●] editions of [●] (a widely circulated hindi national daily newspaper) and [●] edition of [●] (a widely circulated [●] daily newspaper, [●] being the regional language of chhattisgarh, where our registered office is located) and in case of any revision, the revised Bid/ Issue Closing Date also to be notified on the website and terminals of the Syndicate and SCSBs, as required under the SEBI ICDR Regulations being [●]. Our Company may, in consultation with the BRLMs, consider closing the Bid/Issue Period for the QIB Category one Working Day prior to the Bid/Issue Closing Date in accordance with the SEBI ICDR Regulations.
Bid/Issue Opening Date	Except in relation to any Bids received from the Anchor Investors, the date on which the Designated Intermediaries shall start accepting Bids, for the Issue, which shall be notified in [●]editions of [●] (a widely circulated english national daily newspaper), [●] editions of [●] (a widely circulated hindi national daily newspaper) and [●] edition of [●] (a widely circulated [●] daily newspaper, [●] being the regional language of chhattisgarh, where our registered office is located) and in case of any revision, the revised Bid/ Issue Opening Date also to be notified on the website and terminals of the Syndicate and SCSBs, as required under the SEBI ICDR Regulations, being [●]
Bid/Issue Period	Except in relation to Anchor Investors, the period between the Bid/Issue Opening Date and the Bid/Issue Closing Date, inclusive of both days, during which prospective Bidders can submit their Bids, including any revisions thereof
Bidder	Any prospective investor who makes a Bid pursuant to the terms of the Red Herring Prospectus and the Bid cum Application Form and unless otherwise stated or implied, includes an Anchor Investor
Bidding Centers	Centers at which at the Designated Intermediaries shall accept the ASBA Forms, i.e, Designated Branch for SCSBs, Specified Locations for Syndicate, Broker Centres for Registered Brokers, Designated RTA Locations for RTAs and Designated CDP Locations for CDPs
Book Building Process	Book building process, as provided in Schedule XI of the SEBI ICDR Regulations, in terms of which the Issue is being made
Book Running Lead Managers/ BRLMs	The book running lead managers to the Issue, namely, IDBI Capital Markets & Securities Limited, Equirus Capital Private Limited and SBI Capital Markets Limited.
Broker Centres	Broker centres notified by the Stock Exchanges where Bidders can submit the ASBA Forms to a Registered Broker. The details of such Broker Centres, along with the names and contact details of the Registered Broker are available on the respective websites of the Stock Exchanges (www.bseindia.com and www.nseindia.com).
CAN/Confirmation of Allocation Note	Notice or intimation of allocation of the Equity Shares sent to Anchor Investors, who have been allocated the Equity Shares, after the Anchor Investor Bid/Issue Period
Cap Price	The higher end of the Price Band, above which the Issue Price and the Anchor Investor Issue Price will not be finalised and above which no Bids will be accepted.
Cash Escrow Agreement	The agreement to be entered into by our Company, the Registrar to the Issue, the BRLMs, the Syndicate Members, the Escrow Collection Bank(s) and the Refund Bank(s) for collection of the Bid Amounts from Anchor

Term	Description
	Investors, transfer of funds to the Public Issue Account and where applicable, refunds of the amounts collected, on the terms and conditions thereof.
Client ID	Client identification number maintained with one of the Depositories in relation to demat account
Collecting Depository Participant or CDP	A depository participant as defined under the Depositories Act, 1996, registered with SEBI and who is eligible to procure Bids at the Designated CDP Locations in terms of circular no. CIR/CFD/POLICYCELL/11/2015 dated November 10, 2015 issued by SEBI , as per the list available on the website of the Stock Exchanges, www.bseindia.com and www.nseindia.com, as updated from time to time.
Cut-off Price	The Issue Price, finalised by our Company in consultation with the BRLMs, which shall be any price within the Price Band. Only Retail Individual Bidders are entitled to Bid at the Cut-off Price. QIBs and Non- Institutional Bidders are not entitled to Bid at the Cut-off Price
Demographic Details	Details of the Bidders including the Bidder's address, name of the Bidder's father/husband, investor status, occupation and bank account details.
Designated Branches	Such branches of the SCSBs which shall collect the ASBA Forms, a list of which is available on the website of SEBI at http://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognised=yes Intermediaries or at such other website as may be prescribed by SEBI from time to time.
Designated CDP Locations	Such locations of the CDPs where Bidders can submit the ASBA Forms. The details of such Designated CDP Locations, along with names and contact details of the Collecting Depository Participants eligible to accept ASBA Forms are available on the respective websites of the Stock Exchanges (www.bseindia.com and www.nseindia.com)
Designated Date	The date on which funds are transferred from the Anchor Investor Escrow Account and the instructions are given to the SCSBs to unblock the ASBA Accounts and transfer the amounts blocked by the SCSBs from the ASBA Accounts, as the case may be, to the Public Issue Account or the Refund Account, as appropriate, in terms of the Red Herring Prospectus and the aforesaid transfer and instructions shall be issued only after finalization of Basis of Allotment in consultation with the Designated Stock Exchange.
Designated Intermediaries	Syndicate, sub-syndicate/agents, SCSBs, Registered Brokers, CDPs and RTAs, who are authorized to collect ASBA Forms from the ASBA Bidders, in relation to the Issue.
Designated RTA Locations	Such locations of the RTAs where Bidders can submit the ASBA Forms to RTAs. The details of such Designated RTA Locations, along with names and contact details of the RTAs eligible to accept ASBA Forms are available on the respective websites of the Stock Exchanges (www.bseindia.com and www.nseindia.com).
Designated Stock Exchange	[●]
Draft Red Herring Prospectus or DRHP	This Draft Red Herring Prospectus dated September 12, 2018, issued in accordance with the SEBI ICDR Regulations, which does not contain complete particulars of the price at which the Equity Shares will be Allotted and the size of the Issue, including any addendum or corrigendum thereto..
Eligible FPI(s)	FPIs from such jurisdictions outside India where it is not unlawful to make an Issue / invitation under the Issue and in relation to whom this Draft Red Herring Prospectus constitutes an invitation to purchase the Equity Shares offered thereby.
Eligible NRI(s)	NRI(s) from jurisdictions outside India where it is not unlawful to make an Issue or invitation under the Issue and in relation to whom the ASBA Form and the Red Herring Prospectus will constitute an invitation to subscribe

Term	Description
	to or to purchase the Equity Shares.
Equirus	Equirus Capital Private Limited
Escrow Account	An Account opened with the Escrow Collection Bank(s) and in whose favour the Bidders (excluding the ASBA Bidders) will transfer money through direct credit/NEFT/RTGS/ in respect of the Bid Amount when submitting a Bid
First Bidder	Bidder whose name shall be mentioned in the Bid cum Application Form or the Revision Form and in case of joint Bids, whose name shall also appear as the first holder of the beneficiary account held in joint names
Floor Price	The lower end of the Price Band, subject to any revision thereto, at or above which the Issue Price and the Anchor Investor Issue Price will be finalised and below which no Bids will be accepted.
General Information Document/GID	The General Information Document prepared and issued in accordance with the circular (CIR/CFD/DIL/12/2013) dated October 23, 2013 notified by SEBI, suitably modified pursuant to the circulars (CIR/CFD/POLICYCELL/III/2015) dated November 10, 2015 and SEBI/HO/CFD/DIL/CIR/P/2016/26) dated January 21, 2016 and (SEBI/HO/CFD/DIL2/CIR/P/2018/22) dated February 15, 2018, notified by SEBI included in "*Issue Procedure*" on page 542.
IDBI Capital	IDBI Capital Markets & Securities Limited
Issue	The public issue of up to [●] Equity Shares of face value of ₹ 10 each for cash at a price of ₹ [●] each, aggregating up to ₹ 5,000 million.
Issue Agreement	The agreement dated September 12, 2018 among our Company and the BRLMs, pursuant to which certain arrangements are agreed to in relation to the Issue.
Issue Price	The final price at which Equity Shares will be Allotted to Bidders other than Anchor Investors. Equity Shares will be Allotted to Anchor Investors at the Anchor Investor Issue Price in terms of the Red Herring Prospectus. The Issue Price will be decided by our Company in consultation with the BRLMs on the Pricing Date.
Issue Proceeds	The proceeds of the Issue that are available to our Company.
Maximum RIB Allottees	Maximum number of RIBs who can be allotted the minimum Bid Lot. This is computed by dividing the total number of Equity Shares available for Allotment to RIBs by the minimum Bid Lot, subject to valid Bids being received at or above the Issue Price
Monitoring Agency	[●]
Mutual Fund Portion	5% of the QIB Portion (excluding the Anchor Investor Portion), or [●] Equity Shares which shall be available for allocation to Mutual Funds only.
Mutual Funds	Mutual funds registered with SEBI under the Securities and Exchange Board of India (Mutual Funds) Regulations, 1996
Net Proceeds	The proceeds of the Issue less Issue expenses. For further information about use of the Issue Proceeds and the Issue expenses, see "*Objects of the Issue*" on page 111.
Net QIB Portion	The portion of the QIB Portion less the number of Equity Shares Allotted to the Anchor Investors.
Non-Institutional Bidder/NIBs	All Bidders that are not QIBs or Retail Individual Bidders and who have Bid for Equity Shares for an amount more than ₹ 200,000. (but not including NRIs other than Eligible NRIs).
Non-Institutional Portion	The portion of the Issue being not less than 15% of the Issue consisting of [●] Equity Shares which shall be available for allocation on a proportionate basis to Non- Institutional Bidders, subject to valid Bids being received at or above the Issue Price.
Non-Resident	A person resident outside India, as defined under FEMA and includes a non-resident Indian, FPIs and FVCIs.
Price Band	Price band of a minimum price of ₹ [●] per Equity Share (Floor Price) and the maximum price of ₹ [●] per Equity Share (Cap Price) including any revisions thereof.

Term	Description
	The Price Band and the minimum Bid Lot size for the Issue will be decided by our Company in consultation with the BRLMs, and will be advertised, at least five Working Days prior to the Bid/Issue Opening Date, which shall be notified in [●]editions of [●] (a widely circulated english national daily newspaper), [●] editions of [●] (a widely circulated hindi national daily newspaper) and [●] edition of [●] (a widely circulated [●] daily newspaper, [●] being the regional language of chhattisgarh, where our registered office is located).
Pricing Date	The date on which our Company in consultation with the BRLMs, will finalise the Issue Price
Prospectus	The Prospectus to be filed with the RoC on or after the Pricing Date in accordance with Section 26 of the Companies Act, 2013, and the SEBI ICDR Regulations containing, *inter alia*, the Issue Price that is determined at the end of the Book Building Process, the size of the Issue and certain other information, including any addenda or corrigenda thereto
Public Issue Account Bank	Bank which is a clearing member and registered with SEBI as a banker to an issue and with whom the Public Issue Account will be opened, in this case being [●]
Public Issue Account(s)	Bank account to be opened with under Section 40(3) of the Companies Act, 2013 to receive monies from the Anchor Investor Escrow Account and ASBA Accounts on the Designated Date
QIB Category/QIB Portion	The portion of the Issue (including the Anchor Investor Portion) being not more than 50% of the Issue consisting of [●] Equity Shares which shall be Allotted to QIBs (including Anchor Investors) subject to valid Bids being received at or above the Issue Price.
Qualified Institutional Buyers or QIBs or QIB Bidders	Qualified institutional buyers as defined under Regulation 2(1)(zd) of the SEBI ICDR Regulations.
Red Herring Prospectus or RHP	The Red Herring Prospectus to be issued in accordance with Section 32 of the Companies Act, 2013 and the provisions of the SEBI ICDR Regulations, which will not have complete particulars of the price at which the Equity Shares will be offered and the size of the Issue including any addenda or corrigenda thereto. The Red Herring Prospectus will be registered with the RoC at least three days before the Bid/Issue Opening Date and will become the Prospectus upon filing with the RoC on or after the Pricing Date
Refund Account(s)	The account opened with the Refund Bank, from which refunds, if any, of the whole or part of the Bid Amount shall be made.
Refund Bank(s)	Bank which is a clearing member and registered with SEBI as a banker to an issue and with whom the Refund Account will be opened, in this case being [●]
Registered Brokers	Stock brokers registered with the stock exchanges having nationwide terminals, other than the BRLMs and the Syndicate Members and eligible to procure Bids in terms of Circular No. CIR/CFD/14/2012 dated October 4, 2012 issued by SEBI
Registrar Agreement	Agreement dated September 7, 2018 entered into among our Company, the Registrar to the Issue, in relation to the responsibilities and obligations of the Registrar to the Issue pertaining to the Issue.
Registrar to the Issue/Registrar	Link Intime India Private Limited
Registrar and Share Transfer Agents or RTAs	Registrar and share transfer agents registered with SEBI and eligible to procure Bids at the Designated RTA Locations in terms of circular no. CIR/CFD/POLICYCELL/11/2015 dated November 10, 2015 issued by SEBI
Retail Individual Bidder(s)/ /RIB(s)/Retail Individual Investor/RII	Individual Bidders who have Bid for the Equity Shares for an amount not more than ₹ 200,000 in any of the bidding options in the Issue (including HUFs applying through their Karta and Eligible NRIs and does not include NRIs other than Eligible NRIs)
Retail Portion	The portion of the Issue being not less than 35% of the Issue consisting of [●] Equity Shares which shall be available for allocation to Retail

Term	Description
	Individual Bidders) in accordance with the SEBI ICDR Regulations, subject to valid Bids being received at or above the Issue Price.
Revision Form	Form used by the Bidders to modify the quantity of the Equity Shares or the Bid Amount in any of their ASBA Form(s) or any previous Revision Form(s). QIB Bidders and Non-Institutional Bidders are not allowed to withdraw or lower their Bids (in terms of quantity of Equity Shares or the Bid Amount) at any stage. Retail Individual Bidders can revise their Bids during the Bid/Issue Period and withdraw their Bids until Bid/Issue Closing Date
SBICAP	SBI Capital Markets Limited
Self-Certified Syndicate Bank(s) or SCSB(s)	The banks registered with SEBI, offering services in relation to ASBA, a list of which is available on the website of SEBI at http://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognised=yes and updated from time to time.
Specified Locations	Bidding centres where the Syndicate shall accept Bid cum Application Form from Bidders.
Stock Exchanges	Collectively, the NSE & the BSE
Syndicate	Collectively, the BRLMs and the Syndicate Members
Syndicate Agreement	The agreement to be entered into among the BRLMs, the Syndicate Members and our Company in relation to collection of Bid cum Application Forms by Syndicate.
Syndicate Members	Intermediaries registered with SEBI who are permitted to carry out activities as an underwriter, namely, [●]
Syndicate/Members of Syndicate	The BRLMs and the Syndicate Members.
Underwriters	[●]
Underwriting Agreement	The agreement dated [●] among the Underwriters and our Company to be entered into on or after the Pricing Date.
Wilful Defaulter	A company or person categorised as a wilful defaulter by any bank or financial institution or consortium thereof, in accordance with the guidelines on wilful defaulters issued by the Reserve Bank of India and includes any company whose director or promoter is categorised as such.
Working Day	All days, other than second and fourth Saturday of a month, Sunday or a public holiday, on which commercial banks in Mumbai are open for business; provided however, with reference to (a) announcement of Price Band; and (b) Bid/Issue Period, “Working Day” shall mean all days, excluding all Saturdays, Sundays and public holidays, on which commercial banks in Mumbai are open for business; and with reference to the time period between the Bid/Issue Closing Date and the listing of the Equity Shares on the Stock Exchanges, “Working Day” shall mean all trading days of Stock Exchanges, excluding Sundays and bank holidays, as per the SEBI Circular SEBI/HO/CFD/DIL/CIR/P/2016/26 dated January 21, 2016.

Technical/Industry Related Terms

Term	Description
Air Act	Air (Prevention and Control of Pollution) Act, 1981
CCM	Continuous Casting Machine
CCS	Cold Crushing Strength
CEA	Central Electricity Authority
CER	Certified Emission Reduction
CLRA Act	Contract Labour (Regulation and Abolition) Act, 1970
DCS	Distributed Control System
DG set	Diesel Generator set
DMI&SP	Policy on Preference to Domestically Manufactured Iron & Steel Products
DRI plant	Direct Reduced Iron plant
DTA	Deferred tax assets
EAF	Electric Arc Furnace
EBITDA	Earnings before interest, tax, depreciation and amortization
Electricity Act	The Electricity Act, 2003
Environment Protection Act	The Environment Protection Act, 1986
ERP	Enterprise resource planning
Factories Act	The Factories Act, 1948
FSA	Fuel Supply Agreements
FE	Iron
GDP	Gross domestic product
GVA	Gross value added
Ha	Hectare
Hazardous Chemical Rules	Manufacture, Storage and Import of Hazardous Chemical Rules, 1989
Hazardous Wastes Rules	Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016
IPRs	Intellectual property rights
Kva	Kilo Volt Amperes
LRF	Ladle Refining Furnace
MC Rules	Mineral Concession Rules, 1960
MCD Rules	Mineral Conservation and Development Rules, 1988
Mines Labour Welfare Fund Act	The Iron Ore Mines, Manganese Ore Mines and Chrome Ore Mines Labour Welfare Fund Act, 1976
MMDR Act	Mines and Minerals (Development and Regulations) Act, 1957
MT	Metric Tonnes
MTPA	Metric Tonnes Per Annum
Mva	Mega Volt Amp
MW	MegaWatt
NMDC	National Mineral Development Corporation
No.'s	Number
PLI Act	The Public Liability Insurance Act, 1991
R&D	Research and development
SAF	Submerged Arc Furnace
TPA	Tonnes Per Annum
TPD	Tons Per Day
SRTMI	Steel Research and Technology Mission of India
UNDP	United Nations' Global Development Network
UNDP-GEF	United Nations Development Programme Global Environmental Finance Unit
Water Act	The Water (Prevention and Control of Pollution) Act, 1974
WHRB	Waste Heat Recovery Boilers
Workmen's Compensation Act	The Workmen's Compensation Act, 1923
y-o-y	Year over year

Conventional Terms/Abbreviations

Term	Description
₹/Rs./Rupees/INR	Indian Rupees
AIF(s)	Alternative Investment Fund as defined in and registered with SEBI and under the Securities and Exchange Board of India (Alternative Investments Funds) Regulations, 2012
Air Act	Air (Prevention and Control of Pollution) Act, 1981
AS/Accounting Standards	Accounting Standards issued by the Institute of Chartered Accountants of India
Bn/bn	Billion
BSE	BSE Limited
CAGR	Compounded Annual Growth Rate
Category I foreign portfolio investors	FPIs who are registered as "Category I foreign portfolio investors" under the SEBI FPI Regulations
Category II foreign portfolio investors	FPIs who are registered as "Category II foreign portfolio investors" under the SEBI FPI Regulations
Category III foreign portfolio investors	FPIs who are registered as "Category III foreign portfolio investors" under the SEBI FPI Regulations
CCI	Competition Commission of India
CDSL	Central Depository Services (India) Limited
Companies Act	Companies Act, 1956 and the Companies Act, 2013, as applicable
Companies Act, 1956	Companies Act, 1956 (without reference to the provisions thereof that have ceased to have effect upon notification of the sections of the Companies Act, 2013) along with the relevant rules made thereunder.
Companies Act, 2013	Companies Act, 2013, to the extent in force pursuant to the notification of the Notified Sections, along with the relevant rules, regulations, clarifications, circulars and notifications issued thereunder.
Copyright Act	Copyright Act, 1957
CSR	Corporate social responsibility
Depositories	NSDL and CDSL
Depositories Act	Depositories Act, 1996
DIN	Director Identification Number
DP ID	Depository Participant's Identification
DP/Depository Participant	A depository participant as defined under the Depositories Act
EGM	Extraordinary General Meeting
Environment Protection Act	The Environment Protection Act 1986
EPS	Earnings per share
Factories Act	Factories Act, 1948
FDI	Foreign Direct Investment
FDI Policy	The extant Consolidated Foreign Direct Investment Policy notified by Department of Industrial Policy & Promotion from time to time, in this case the Consolidated Foreign Direct Investment Policy notified by notification D/o IPP F. No. 5(1)/2017-FC-1 dated the August 28, 2017 effective from August 28, 2017
FEMA	Foreign Exchange Management Act, 1999, read with rules and regulations thereunder
FEMA Regulations	Foreign Exchange Management (Transfer or Issue of Security by a Person Resident Outside India) Regulations, 2017
Financial Year/Fiscal//fiscal/ Fiscal Year/FY	Unless stated otherwise, the period of 12 months ending March 31 of that particular year
FPI(s)	Foreign Portfolio Investors as defined under the SEBI FPI Regulations.
FVCI	Foreign Venture Capital Investors as defined and registered under the SEBI FVCI Regulations.
GoI/Government/ Central Government	Government of India
GST	Goods and Service Tax
ICAI	The Institute of Chartered Accountants of India

Term	Description
ICSI	The Institute of Company Secretaries of India
Income Tax Act/IT Act	Income Tax Act, 1961
Ind AS	Indian Accounting Standards
India	Republic of India
Indian GAAP	Generally Accepted Accounting Principles in India
Industrial Disputes Act	Industrial Disputes Act, 1947
Industrial Disputes Amendment Act	Industrial Disputes (Amendment) Act, 2010
IPO	Initial public offering
IST	Indian Standard Time
Listing Agreement	Erstwhile listing agreement which is consolidated and streamlined as Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
M.Phil	Master of Philosophy
M.Tech	Master of Technology
MCA	Ministry of Corporate Affairs, Government of India
Mn/mn	Million
Mutual Funds	Mutual funds registered with SEBI under the Securities and Exchange Board of India (Mutual Funds) Regulations, 1996
N.A./NA	Not applicable
NACH	National Automated Clearing House
NAV	Net asset value
NEFT	National Electronic Fund Transfer
Notified Sections	The sections of the Companies Act, 2013 that were notified by the Ministry of Corporate Affairs, Government of India
NR	Non-resident
NRE Account	Non-Resident External Account
NRI	A person resident outside India, who is a citizen of India as defined under the Foreign Exchange Management (Deposit) Regulations, 2016 or an 'Overseas Citizen of India' cardholder within the meaning of section 7(A) of the Citizenship Act, 1955
NRO Account	Non-Resident Ordinary Account
NSDL	National Securities Depository Limited
NSE	National Stock Exchange of India Limited
OCB/Overseas Corporate Body	A company, partnership, society or other corporate body owned directly or indirectly to the extent of at least 60% by NRIs including overseas trusts, in which not less than 60% of beneficial interest is irrevocably held by NRIs directly or indirectly and which was in existence on October 3, 2003 and immediately before such date had taken benefits under the general permission granted to OCBs under FEMA. OCBs are not allowed to invest in the Issue
p.a.	Per annum
P/E Ratio	Price/Earnings Ratio
PAN	Permanent Account Number
RBI	Reserve Bank of India
Regulation S	Regulation S under the Securities Act
RTGS	Real Time Gross Settlement
SCRA	Securities Contracts (Regulation) Act, 1956
SCRR	Securities Contracts (Regulation) Rules, 1957
SEBI	Securities and Exchange Board of India constituted under the SEBI Act, 1992
SEBI Act	Securities and Exchange Board of India Act 1992
SEBI AIF Regulations	Securities and Exchange Board of India (Alternative Investments Funds) Regulations, 2012
SEBI FPI Regulations	Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014
SEBI FVCI Regulations	Securities and Exchange Board of India (Foreign Venture Capital

Term	Description
	Investors) Regulations, 2000
SEBI ICDR Regulations	Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009
SEBI Listing Regulations	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
SEBI VCF Regulations	Securities and Exchange Board of India (Venture Capital Fund) Regulations, 1996
Securities Act	U.S. Securities Act of 1933, as amended
SICA	Sick Industrial Companies (Special Provisions) Act, 1985
State Government	The government of a state in India
STT	Securities Transaction Tax
Takeover Regulations	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
Trademarks Act	Trademarks Act, 1999
U.S./USA/United States	United States of America
US GAAP	Generally Accepted Accounting Principles in the United States of America
USD/US$	United States Dollars
VCFs	Venture Capital Funds as defined in and registered with SEBI under the SEBI VCF Regulations
Workmen’s Compensation Act	Workmen’s Compensation Act, 1923

CERTAIN CONVENTIONS, PRESENTATION OF FINANCIAL, INDUSTRY AND MARKET DATA

Certain Conventions

All references to "India" contained in this Draft Red Herring Prospectus are to the Republic of India.

Unless stated otherwise, all references to page numbers in this Draft Red Herring Prospectus are to the page numbers of this Draft Red Herring Prospectus.

Financial Data

Unless stated otherwise, the financial information in this Draft Red Herring Prospectus is derived from Restated Financial Statements of our Company as at and for the Financial Years 2017 - 2018, 2016 - 2017 and 2015 - 2016 prepared in accordance with Ind AS and for Financial Years 2014 - 2015 and 2013 - 2014 prepared in accordance with Indian GAAP and examined by the Auditor in accordance with the requirements of Section 26(1)(b) of the Companies Act, 2013 and relevant provisions of the SEBI ICDR Regulations.

In this Draft Red Herring Prospectus, any discrepancies in any table between the total and the sums of the amounts listed are due to rounding off. All figures in decimals have been rounded off to the second decimal and all percentage figures have been rounded off to two decimal places.

Our Company's financial year commences on April 1 and ends on March 31 of the next year. Accordingly, all references to a particular financial year, unless stated otherwise, are to the 12 month period ended on March 31 of that year.

There are significant differences between Ind AS, U.S. GAAP and IFRS. There are significant differences between Ind AS and US GAAP and IFRS. Our Company does not provide reconciliation of its financial information to IFRS or US GAAP. Our Company does not provide reconciliation of its financial information to IFRS or U.S. GAAP. Our Company has not attempted to explain those differences or quantify their impact on the financial data included in this Draft Red Herring Prospectus and it is urged that you consult your own advisors regarding such differences and their impact on our financial data. For details in connection with risks involving differences between Ind AS, US GAAP and IFRS see *"Risk Factors"* on page 22. Accordingly, the degree to which the financial information included in this Draft Red Herring Prospectus will provide meaningful information is entirely dependent on the reader's level of familiarity with Indian accounting policies and practices, the Companies Act, the Ind AS and the SEBI ICDR Regulations. Any reliance by persons not familiar with Indian accounting policies and practices on the financial disclosures presented in this Draft Red Herring Prospectus should accordingly be limited.

EBITDA presented in this Draft Red Herring Prospectus is a supplemental measure of our performance and liquidity that is not required by, or presented in accordance with, Ind AS, IFRS or US GAAP. Furthermore, EBITDA is not a measurement of our financial performance or liquidity under Ind AS, IFRS or US GAAP and should not be considered as an alternative to net profit/loss, revenue from operations or any other performance measures derived in accordance with Ind AS, IFRS or US GAAP or as an alternative to cash flow from operations or as a measure of our liquidity. In addition, EBITDA is not a standardised term, hence a direct comparison of EBITDA between companies may not be possible. Other companies may calculate EBITDA differently from us, limiting its usefulness as a comparative measure.

Unless the context otherwise indicates, any percentage amounts, as set forth in "*Risk Factors*", "*Our Business*", "*Management's Discussion and Analysis of Financial Conditional and Results of Operations*" on pages 22.,162., and 431., respectively, and elsewhere in this Draft Red Herring Prospectus have been calculated on the basis of our Restated Financial Statements.

Currency and Units of Presentation

All references to:

- "Rupees" or "Rs." or "INR" or "₹" are to Indian Rupee, the official currency of the Republic of India;
- "USD" or "US$" are to United States Dollar, the official currency of the United States; and
- "EUR" or "€" are to Euro, the official currency of the Eurozone.

Our Company has presented certain numerical information in this Draft Red Herring Prospectus in "million" units. One million represents 1,000,000 and one billion represents 1,000,000,000. All the numbers in this Draft Red Herring Prospectus are in million or in whole numbers where the numbers have been too small to present in million.

In this Draft Red Herring Prospectus, any discrepancies in any table between the total and the sums of the amounts listed are due to rounding off. All figures used in this Draft Red Herring Prospectus, including those that have been derived from our Restated Financial Statements, in decimals have been rounded off to the second decimal and all percentage figures have been rounded off to two decimal places. However, where any figures may have been sourced from third-party industry reports, such figures may be rounded off to its first decimal to conform to their respective sources.

Exchange Rates

This Draft Red Herring Prospectus contains conversion of certain other currency amounts into Indian Rupees that have been presented solely to comply with the SEBI ICDR Regulations. These conversions should not be construed as a representation that these currency amounts could have been, or can be converted into Indian Rupees, at any particular rate.

The following table sets forth, for the periods indicated, information with respect to the exchange rates of the currencies used in this Draft Red Herring Prospectus into Indian Rupee:

(Amount in ₹, unless otherwise specified)

Currency	As on March 31, 2018	As on March 31, 2017	As on March 31, 2016	As on March 31, 2015	As on March 31, 2014
1 US$	65.04	64.84	66.33	62.59	60.09
1 Eur	80.62	69.25	75.09	67.51	82.58

Source: RBI Reference Rate
In the event that March 31 of any of the respective years is a public holiday, the previous calendar day not being a public holiday has been considered.

Industry and Market Data

Unless stated otherwise, industry and market data used in this Draft Red Herring Prospectus has been obtained or derived from the report titled "Industry Overview: Iron and Steel" dated August 30, 2018 by ICRA Limited "**ICRA Report**" and publicly available information as well as other industry publications and sources. The ICRA Report has been prepared at the request of our Company and includes the following disclaimer:

"All information contained herein has been obtained by ICRA from sources believed by it to be accurate and reliable. Although reasonable care has been taken to ensure that the information herein is true, such information is provided 'as is' without any warranty of any kind, and ICRA in particular, makes no representation or warranty, express or implied, as to the accuracy, timeliness or completeness of any such information. Also, ICRA or any of its group companies, while publishing or otherwise disseminating other reports may have presented data, analyses and/or opinions that may be inconsistent with the data, analyses and/or opinions presented in this publication. All information contained herein must be construed solely as statements of opinion, and ICRA shall not be liable for any losses incurred by users from any use of this publication or its contents. Also, ICRA provides credit rating and other permissible services to the company which are provided at arms-length basis."

For risks in relation to commissioned reports, see *"Risk Factors – We have commissioned an industry report from ICRA Limited which has been used for industry related data in this Draft Red Herring Prospectus. Such data has not been independently verified by us"* on page 47.

Certain information in the "*Summary of Our Business*", and "*Our Business*" beginning on pages 57 and 162 has been obtained from various industry sources identified in these sections.

Industry publications generally state that the information contained in such publications has been obtained from publicly available documents from various sources believed to be reliable but their accuracy and completeness are not guaranteed and their reliability cannot be assured. Accordingly, no investment decisions should be based on such information. Although we believe the industry and market data used in this Draft Red Herring Prospectus is reliable, it has not been independently verified by us, the BRLMs or any of their affiliates or advisors. The data used in these sources may have been re-classified by us for the purposes of presentation. Data from these sources may also not be comparable.

The extent to which the market and industry data used in this Draft Red Herring Prospectus is meaningful depends on the reader's familiarity with and understanding of the methodologies used in compiling such data. There are no standard data gathering methodologies in the industry in which business of our Company is conducted, and methodologies and assumptions may vary widely among different industry sources.

Such data involves risks, uncertainties and numerous assumptions and is subject to change based on various factors, including those discussed in "*Risk Factors*" on page 22. Accordingly, investment decisions should not be based solely on such information. In accordance with the SEBI ICDR Regulations, the section "*Basis for Issue Price*" on page 118 includes information relating to our peer-group companies. Such information has been derived from publicly available sources, and neither we nor the BRLMs have independently verified such information.

FORWARD-LOOKING STATEMENTS

This Draft Red Herring Prospectus contains certain "forward-looking statements". These forward-looking statements generally can be identified by words or phrases such as "aim", "anticipate", "believe", "expect", "estimate", "intend", "objective", "plan", "seek", "propose", "project", "will", "going forward", "will continue", "will pursue" or other words or phrases of similar import. Similarly, statements that describe our strategies, objectives, plans or goals are also forward-looking statements. All forward- looking statements are subject to risks, uncertainties and assumptions about us that could cause actual results to differ materially from those contemplated by the relevant forward-looking statement.

Actual results may differ materially from those suggested by forward-looking statements due to risks or uncertainties associated with expectations relating to, *inter alia*, regulatory changes pertaining to the industry in India in which we operate and our ability to respond to them, our ability to successfully implement our strategy, our growth and expansion, technological changes, our exposure to market risks, general economic and political conditions in India which have an impact on its business activities or investments, the monetary and fiscal policies of India, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices, the performance of the financial markets in India and globally, changes in domestic laws, regulations and taxes and changes in competition in the industries in which we operate. Certain important factors that could cause actual results to differ materially from our expectations include, but are not limited to, the following:

1. Availability of coal for our operations at competitive prices and in a timely manner.

2. The steel industry is highly cyclical, and a decrease in steel prices may have a material adverse effect on our business, results of operations, prospects and financial condition.

3. Our ability to recover the mineral reserves of the mines to which we have access.

4. Deficiency in product and services, by any of our dealers or distributors.

5. Inability to obtain, renew or maintain the statutory and regulatory permits and approvals required to operate our business.

6. Delay in project implementation.

7. Government policy, changes in laws and regulations and adverse outcome in any legal proceedings involving us.

8. Downgrading in our credit rating increasing our borrowing costs.

9. Unexpected loss, shutdown or slowdown of operations at any of our facilities.

10. Developments in the competitive environment in the steel industry, such as consolidation among our competitors.

For further discussion on factors that could cause actual results to differ from expectations, see "*Risk Factors*", "*Our Business*" and "*Management's Discussion and Analysis of Financial Condition and Results of Operations*" on pages 22, 162 and 431., respectively. By their nature, certain market risk disclosures are only estimates and could be materially different from what actually occurs in the future. As a result, actual gains or losses could materially differ from those that have been estimated. There can be no assurance to investors that the expectations reflected in these forward-looking statements will prove to be correct. Given these uncertainties, investors are cautioned not to place undue reliance on such forward-looking statements and not to regard such statements to be a guarantee of our future performance.

Forward-looking statements reflect current views as of the date of this Draft Red Herring Prospectus and are not a guarantee of future performance. These statements are based on our management's beliefs and assumptions, which in turn are based on currently available information. Although we believe the assumptions upon which these forward-looking statements are based are reasonable, any of these assumptions could prove to be inaccurate, and the forward-looking statements based on these assumptions could be incorrect. Neither our Company, our Directors, the BRLMs nor any of their respective affiliates have any obligation to, and do not intend to, update or otherwise revise any statements reflecting circumstances arising after the date hereof or to reflect the occurrence of underlying events, even if the underlying assumptions do not come to fruition. In accordance with the SEBI ICDR Regulations, our Company, the BRLMs will ensure that the investors in India are informed of material developments from the date of registration of the Red Herring Prospectus with the RoC until the time of grant of listing and trading permission by the Stock Exchanges.

SECTION II: RISK FACTORS

An investment in Equity Shares involves a high degree of risk. You should carefully consider all the information in this Draft Red Herring Prospectus, including the risks and uncertainties described below, before making an investment in our Equity Shares. The risks described below are not the only ones relevant to us or our Equity Shares, the industry and segments in which we currently operate or propose to operate. Additional risks and uncertainties, not presently known to us or that we currently deem immaterial may also impair our businesses, results of operations, financial condition and cash flows. If any of the following risks, or other risks that are not currently known or are currently deemed immaterial, actually occur, our businesses, results of operations, financial condition and cash flows could suffer, the trading price of our Equity Shares could decline and you may lose all or part of your investment. To obtain a complete understanding of our Company, prospective investors should read this section in conjunction with "Our Business", "Industry Overview" and "Management's Discussion and Analysis of Financial Condition and Results of Operations" on pages 162, 125 and 431, respectively, as well as the financial, statistical and other information contained in this Draft Red Herring Prospectus. In making an investment decision, prospective investors must rely on their own examination of us and the terms of the Issue including the merits and risks involved. You should consult your tax, financial and legal advisers about the particular consequences to you of an investment in our Equity Shares.

Prospective investors should pay particular attention to the fact that our Company is incorporated under the laws of India and is subject to a legal and regulatory environment, which may differ in certain respects from that of other countries. This Draft Red Herring Prospectus also contains forward-looking statements that involve risks, assumptions, estimates and uncertainties. Our actual results could differ materially from those anticipated in these forward-looking statements as a result of certain factors, including the considerations described below and elsewhere in this Draft Red Herring Prospectus. For details, see "Forward-Looking Statements" on page 20. Unless specified or quantified in the relevant risk factors below, we are not in a position to quantify the financial or other implications of any of the risks described in this section.

In this section, any reference to the "Company" refers to Shri Bajrang Power and Ispat Limited on an unconsolidated basis. In this section, any reference to "we", "us" or "our" refers to Shri Bajrang Power and Ispat Limited and its Subsidiaries on a consolidated basis. Unless the context requires otherwise, all financial information included herein is based on our Restated Consolidated Financial Statements included in "Restated Financial Statements" beginning on page 228.

Internal Risk Factors

Risk factors in connection with our business:

1. **There are criminal proceedings pending against our Company. Any unfavorable decision in such proceedings, individually or in the aggregate, may adversely affect our business, prospects, results of operations, financial condition and reputation.**

   There are outstanding criminal proceedings involving our Company at different levels of adjudication before various courts, tribunals and other authorities. The details of such outstanding criminal proceedings are as follows:

	Initiated by	Initiated against	Forum along with the Suit etc. Number (if any)	Details of the notice/ relief/prayers/claims along with details of any orders/decrees/directions as passed, (including any interim relief granted and/or applied for)	Amount involved ₹ in millions	Current Status
1.	Inspector of Factories	Our Company and an Officer of the Company	Before the Judicial Magistrate, First Class, Tilda	Claims associated with an industrial accident.	No monetary claim is involved	The matter is pending hearing and final disposal

Any adverse order or direction in these cases by the concerned authorities, even though not quantifiable, could have a material adverse impact on our business and reputation. Our business, financial condition, results of operations and prospects could be materially and adversely affected as a result of these proceedings. For further details, refer to "*Outstanding Litigation and Material Developments*" on page 464.

2. **The Supreme Court of India had cancelled the allocation of coal blocks which were allocated to us in the past. We rely on coal for the manufacture of our products and we procure coal from various sources. We may not be able to ensure the availability of coal for our operations at competitive prices and in a timely manner, which in turn could have an adverse effect on our operations and profitability.**

Our steel production facilities, as well as our captive and independent power production facilities, are dependent on coal as a raw material. In Financial Year 2017 - 2018, we procured the majority of our coal requirements from South Eastern Coalfields Limited and domestic purchases. The quality/grade of the coal that we acquire, may be different than what we originally expected, and hence our coal requirements may be higher than what we had originally anticipated. We have faced numerous hurdles in connection with our mining activities, such as delays in receiving regulatory approvals, associated legal proceedings, delays in execution of mining leases and receipt of mining plans, as well as de-allocation of coal blocks. In the year 2014, allocation of our coal blocks was cancelled by the Supreme Court. Such issues have resulted in, and may continue to result in, delays in our production schedules. For a variety of reasons, we may not be able to continuously obtain the required quality of coal from our suppliers, in a timely manner and on favourable terms. As such, we cannot assure you that we will be able to obtain coal in sufficient quantities, in a timely manner, at the expected quality, and/or on acceptable and favourable terms.

We have executed long term coal supply agreements with South Eastern Coalfields Limited to purchase various grades of coal. On account of this we may have to procure a fixed quantity of coal which may be more than what is required for our operations. Any such failure to procure the fixed quantity as specified under our long term agreements may lead to an event of default, which would jeopardize our future procurement through such long term coal linkages and we may also be liable to pay compensation to South Eastern Coalfields Limited in terms of the long-term coal supply agreements.

We may also have to purchase coal at a significantly higher spot prices from the market for carrying out our operations, or we may be reliant on one or a limited number of suppliers, forcing us to accept higher prices or less advantageous terms. Moreover, any disruption of our suppliers' operations or breakdown of our relationship with such suppliers, could adversely impact our operations and profitability. Changes in the demand supply scenario of the domestic and global coal markets, and any operational and/or business disruptions for coal providers, may also adversely impact our operations and profitability. Third party contracts to procure coal, also exposes us to credit, settlement, operational and reputational risks. If, for any reason, we are unable to procure sufficient coal of requisite quantity and quality, and at acceptable prices, it could disrupt our production, increase our power costs or reduce our production volumes, which in turn would adversely impact our operations and profitability.

3. **If we are unable to compensate for any future increase in our raw material costs by raising our product prices, or if the supply of raw materials is interrupted, our operations, goodwill and profitability, could be adversely affected.**

Our expenditure on raw materials consumed was ₹ 12,745.79 million in Fiscal 2018, out of our total expenditure of ₹ 17,990.60 million in Fiscal 2018, on a consolidated basis. The principal raw materials we require for production of steel are iron ore, billets, coal and dolomite. The uninterrupted supply of raw materials is fundamental to our business and our profit margins. The price and availability of these raw materials, are subject to market conditions which can be negatively affected, by a number of factors beyond our control, including interruptions in production by suppliers, industry trends, transport logistics and costs, weather, and natural disasters.

We procure most of our raw materials domestically and are therefore susceptible to fluctuations in the supply and market price of raw materials in India. Accordingly, our supply of raw materials may be adversely affected by factors such as changes in India's economic, fiscal, export-import and monetary policies, political and financial instability, decline in growth rates of the economy, changing consumer preferences and excess capacity.

Although we seek to optimize our stocks of raw materials, we may not always be able to safeguard against unanticipated interruptions in raw material supply, or substantial increases in raw material costs. There is no assurance that we will be able to compensate for any future increase in raw material costs, by raising our product prices, and our inability in this regard could adversely impact our operations and profitability.

4. **Two of our manufacturing facilities, (namely Unit I and Unit III), are located on land which we lease from state governments. These leases are for long tenures, namely 99 years. However, after the tenure of these leases lapses, any failure to renew these leases on favourable terms or at all, could negatively impact our results of operations and financial condition.**

Our operations are dependent upon the following leasehold assets, as leased from government entities: **(1)** an iron ore mine located in the Uttar Bastar Kanker district at Chhattisgarh; **(2)** a manganese ore mine located in the Vizianagaram district, in Andhra Pradesh; **(3)** the land on which Unit I and Unit III are located; and, **(4)** our registered office at Borjhara, Raipur.

Renewing these leases in a favourable and timely manner, is subject to various contingencies, such as renewed negotiations on commercials, and additionally, the mining leases granted to us have to be in compliance with the Mines and Minerals (Development and Regulation) Act, 1957. The renewal of these leases could be delayed for a variety of reasons. If these leases are not renewed in a timely manner, or if they are renegotiated on terms that are less advantageous to us, we may be forced to pay higher rental fees or royalties under these leases, and in some cases we may be compelled to relocate our assets. For minerals extracted through mining leases, changes to lease terms could force us to purchase such minerals in the open market where prices may be significantly higher. Any of these factors could in turn adversely affect our growth, operations, and profitability.

5. **Financials statements of our Joint Venture company have not been audited for Finanical Year 2017-2018.**

As on date the Restated Consolidated Financial Statements included in the Draft Red Herring Prospectus also includes financials of our Joint Venture, being CCCML in which we have a holding of 19.75 %. However, the financial statements for the Financial Year 2017-2018 for this Joint Venture have not been audited by the auditor of that Joint Venture. Although, the board of CCCML and the Board of Directors of our Company has approved the financial statements for the Financial Year 2017-2018, we are not sure if the audit will have any material impact on the Restated Consolidated Financials Statements.

6. **We are dependent on our manufacturing facilities and power plants. We may face disruptions to our manufacturing schedules to various factors, including, labor issues, accidents, and irregular supplies of raw materials. While we have not experienced any labor unrest, we can not assure you that we will not face any such problems in the future. Such disruptions could have an adverse effect on our operations, growth, and profitability.**

Our facilities are subject to operating risks, such as the breakdown or failure of equipment, power supply or processes, performance below expected levels of output or efficiency, obsolescence, labour disputes, natural disasters, industrial accidents and the need to comply with new directives of the relevant government authorities. For example there was loss of the fixed assets of our Company, in the Financial Year 2018 on account of fire accident at Unit III at Tilda and fire incident in the iron ore mines at Uttar Bastar Kanker district in the Financial Year 2016.

Further, we are required to carry out planned shutdowns of our various plants and mines for routine and preventative maintenance, statutory inspections and testing. We also need to shut down our various plants and mines, from time to time, for capacity expansions, enhancements and equipment upgrades. Any disruptions in the operations of our facilities may have a material adverse impact on our business, financial condition and results of operations. While we take precautions to minimize the risk of any significant operational problems at our facilities, there can be no assurance that our business, financial condition and results of operations will not be adversely affected by disruptions caused by operational problems at our facilities.

As at July 31, 2018, we had more than 2,823 full-time employees and approximately 431 contract labourers at various locations. While we consider our current labour relations to be good, and we have measures in place aimed at maintaining balanced employee relations, there can be no assurance that we will not experience future disruptions in our operations, due to disputes or other problems with our employees. Moreover, we are subject to stringent labour laws, and any violation of these laws may lead regulators or other authorities to order a suspension of some or all of our operations. Any of the foregoing events could adversely affect our business and results of operations.

7. We rely on third parties for the implementation of various aspects of our business, including the proposed expansion at Unit III in Tilda, and are therefore exposed to execution risks, in connection with obtaining quality services, equipment and supplies, in a timely manner, and on favourable terms.

We rely on the availability of skilled and experienced contractors, and specialist agencies, for the implementation of our expansion plans, and for operating various aspects of our business. Further, we have no prior operating history of operating mines. We do not have direct control over the timing or quality of the services and supplies provided by such third parties. Third party contracts expose us to various risks, including credit risks, settlement risks, operational risks, legal risks and reputational risks. The execution risks we face include the following:

- contractors hired by us may not be able to complete construction and installation on time, and within budgeted costs, or to the agreed specifications and standards;
- delays in the delivery of equipment, or achieving commissioning by the scheduled completion date, may increase our estimated costs and cause our budgets to be exceeded;
- we may not be able to recover the amounts that we have invested in construction contracts if the assumptions contained in the feasibility studies for these projects do not materialize;
- we may rely on third party service providers for conducting exploration and mining operations
- we may not be able to pass on certain risks to our contractors such as unforeseen and unfavourable site and geological conditions;
- our contractors may engage contract laborers to complete specified assignments, and although we do not engage such laborers directly, we may be held responsible under applicable Indian laws for, inter-alia, wage payments to such laborers, should our contractors default on the same.

While we attempt to monitor the implementation of various aspects of our business that have been contracted to other agencies, and to manage our risk through performance guarantees, contractual indemnities, disclosures, confidentiality obligations, and limitations of liability, it may not be possible for us to protect ourselves from all possible risks arising from third party default, or to enforce such contractual protections and recover the full amount of any losses that may be suffered by us as a result of any delay or shortfall in performance. In the event of a material failure or disruption in committed services or supplies, we cannot be certain that we will be able to make alternative arrangements in a reasonable time, on commercially favourable terms, or at all. As a result, our business, results of operations and financial condition may be adversely affected.

We cannot be certain that such skilled and experienced contractors and agencies will continue to be available to us at reasonable rates in the future. Any deterioration in our relationships with our identified suppliers, and any failure to renegotiate acceptable terms, may result in our incurring substantial additional costs, beyond our budgeted expenditure, in identifying and entering into alternative arrangements with other suppliers. Further, third party defaults that disrupt or otherwise affect our operations, if not adequately resolved or cured in a timely manner, could render us liable to regulatory intervention, cause damage to our reputation, and adversely affect our business, results of operations and financial condition.

8. **Our estimates of our Indian mineral reserves and the mineral reserves of the mines over which we have mining rights, are subject to assumptions. While we believe that the actual amounts of such reserves will typically not be materially less than what is estimated, we can not assure you of the same. If the actual amounts of such reserves are materially less than what is estimated, or if we are unable to gain access to sufficient mineral reserves, our results of operations and financial condition may be adversely affected.**

Our estimates of our iron ore and manganese ore resources are subject to probabilities and assumptions which are based on, inter-alia, the interpretation of geological data and projected rates of production in the future. In addition, no independent third- party reports have been generated to ascertain the level of mineral reserves located at our existing mining sites. Actual reserves and production levels may differ significantly from reserve estimates. Furthermore, it may take many years from the initial phase of exploration, before production is possible, during which time the economic feasibility of exploiting such reserves may change. There can be no assurance that the relevant mines will produce raw materials at the estimated amounts or at all. We may be forced to purchase such minerals in the open market if the quality, quantity or accessibility of such reserves is overestimated. Prices of minerals in the open market may significantly exceed the cost at which we might otherwise be able to extract these minerals, which would cause costs to increase and consequently adversely affect our businesses, results of operations, financial condition and prospects.

9. **Our mining steel, power, and mining operations, involve dangerous processes, that can cause personal injury and loss of life, severe damage to and destruction of property, equipment or the environment, as a result of which, we could suffer material liabilities, loss of revenues and increased expenses. Further, our mining operations are however subject to other risks, including those related to operational dangers and environmental issues.**

We currently operate iron ore and manganese ore mines in India. Our steel, power and mining operations are inherently hazardous. Hazards associated with our operations include accidents involving, the moving and operating of heavy machinery, the handling of raw materials and finished products, the handling of materials which are heated to extreme temperatures, such as molten steel, blast furnaces, ovens and boilers, the handling of flammable materials such as furnace oil, operating and maintaining electrical systems, managing other hazardous materials and, managing the human exposure to hazardous materials, (whether through inhalation, contact or otherwise). In addition, there have been claims that the high-voltage transmission of electricity can have an adverse effect on the health of people who spend time near transmission infrastructure.

These operations are subject to hazards and risks normally associated with the exploration, development and production of natural resources, including industrial accidents, such as explosions, fires, transportation interruptions and inclement weather. These operations are also subject to hazards and risks, relating to negative environmental consequences, such as those resulting from tailings and sludge disposal, effluent management, and rehabilitation of land disturbed during mining processes. The occurrence of any of the events mentioned above, or similar events, could delay production, increase production costs and result in death or injury to persons, damage to property and enhanced liabilities, some or all of which may not be covered by insurance. Such hazards and risks could substantially harm our reputation, operations and profitability.

In addition, environmental awareness throughout the world, including in India and other emerging markets, has grown significantly in recent years, and opposition to mining operations have also increased due to the perceived negative impact they have on the environment. Public protests over our mining operations could cause operations to slow down, damage our reputation and goodwill or cause damage to our facilities. Public protest could also affect our ability to obtain necessary licenses to expand existing facilities or establish new operations. Our employees, members of the public or government authorities may bring claims against us arising out of these hazardous production processes. If it is determined by the appropriate authorities that provisions and measures for safety within our premises are inadequate, the licenses granted to us for operations at such premises may be revoked, thereby adversely affecting our business, financial condition and results of operations.

10. We are yet to obtain consent from Bank of Maharashtra, one of the lenders to our Company for the Issue.

Our Company has entered into several types of borrowing facilities of varying terms and tenures from lenders. Some of the financing arrangements entered into by us include conditions and covenants that require our Company to obtain lender's consents prior to carrying out certain activities and entering into certain transactions including certain actions and matters in relation to the Issue. Some of these covenants include, altering our capital structure; changing our current ownership / control, formulating a scheme of amalgamation, material change in management, undertaking guarantee obligations, declaration of dividend, and amending constitutional documents, for which we have to obtain consent from lenders. We have applied to all the relevant lenders for consent to undertake the Issue. While we have obtained lender consents from most of our lenders, as on date of this Draft Red Herring Prospectus, despite our repeated requests, we are yet to receive consent from Bank of Maharashtra. Our Company proposes to obtain such consent prior to filing the Red Herring Prospectus with the RoC. Undertaking the Issue without such consents constitutes a breach of covenant under the relevant financing documents, which entitle the respective lender to call up the entire outstanding amount and make it payable forthwith.

11. There have been certain instances of discrepancies in relation to statutory filings required to be made by us with the RoC under applicable laws as well as certain other non-compliances incurred by us under the Companies Act, 1956 and the Companies Act, 2013.

There have been certain discrepancies in relation to statutory filings required to be made by us with the RoC under applicable laws as well as certain other non-compliances incurred by us under the Companies Act, 1956 and the Companies Act, 2013. As of the date of this Draft Red Herring Prospectus, we have filed applications for condonation of delay with the Central Government, and compounding with National Company Law Tribunal (NCLT)/ Regional Director (RD) dated September 10, 2018, in relation to these non-compliances. There can be no assurance that the said Registrar of Companies, or any other statutory/regulatory authority, will not take an adverse view and impose penalties on our Company in this regard. These applications, pertain to, inter-alia: (i) non-filing of Ordinary / Special Resolution with the RoC within prescribed time in Form 23 (under Companies Act 1956) and Form MGT 14 (under Companies Act 2013), (ii) Non Appointment of Whole Time Company Secretary during the period from 31st March 2005 to 30th April 2009, and (iii) for violation of provisions of Section 292A of the Companies Act 1956 for constitution of Audit Committee.

12. Our Company had issued and allotted 4,950,000 Equity Shares of face value of ₹ 10/- each on March 03, 2004, as partly paid up shares. The call money with respect to this allotment of partly paid-up shares made by our Company, may not be compliant with the Companies Act, 1956.

Our Company had issued and allotted 4,950,000 Equity Shares of face value of ₹ 10/- each on March 03, 2004. These equity shares were issued as partly paid shares and in terms of Section 91 of the Companies Act, 1956, our Company was required to make calls on a uniform basis for the aforesaid allotment of equity shares. However, the calls made by our Company in the year 2004, 2005 and 2006, in connection with the said equity shares, were not uniform. While our Company received the full consideration for such shares over the aforesaid period, we cannot assure you that this lapse will not result in adverse regulatory action being taken against our Company. For further details, refer to "*Capital Structure*" on page 90.

13. We sell our products through a large network of channel partners, (distributors and dealers). Any deficiency in services, by any of our channel partners, could adversely affect us, our goodwill, operations, and profitability.

We sell our products through a large network of channel partners. We have entered into agreements with six distributors. Accordingly, we are legally liable for any fraud, deficiency in services, or other malpractices that any of our vendors may resort to. Any such deficiency in services could adversely affect our goodwill, operations, and profitability.

14. **All our manufacturing units are concentrated in the state of Chhattisgarh and our operations may be affected by various factors associated with Chhattisgarh.**

All our manufacturing units are concentrated in the state of Chhattisgarh. This concentration of our business in Chhattisgarh, subjects us to various risks, including but not limited to the following risks:

- regional slowdown in construction activities or reduction of infrastructure projects in and around Chhattisgarh;
- regional natural disasters;
- vulnerability to change of policies, laws and regulations or the political and economic environment of Chhattisgarh;
- constraints on our ability to diversify across states;
- perception by our potential clients, that we are a regional steel manufacturing company, which hampers us from competing against other large steel manufacturing companies at a national level.

If we are not able to mitigate this concentration risk, we may not be able to develop our business as we planned, and our business, financial condition and results of operations could be materially and adversely affected.

15. **A majority of our sales are generated from a limited number of distributors operating in the central and western regions of India. Any adverse developments in these regions could have an adverse impact on our business and financial conditions.**

Our revenues from the central and western regions of India, accounted for 90.42%, 86.88% and 88.63%, of our total revenue from operations on a restated standalone basis, for the Financial Year 2017- 2018, Financial Year 2016 -2017 and Financial Year 2015-2016, respectively. Such geographical concentration of our steel business in these regions heightens our exposure to adverse developments in these regions, which in turn could adversely affect our business prospects, financial conditions and results of operations. We may not be able to leverage our experience in central and western regions of India to expand our operations in other parts of India and overseas markets, should we decide to further expand our operations. Factors such as competition, culture, regulatory regimes, business practices and customs, industry needs, and transportation, in other markets where we may expand our operations, may differ from those in central and western regions of India, and our experience in central and western regions of India may not assist us in successfully competing in other markets. Further, a significant proportion of our Company's revenues are derived from a limited number of distributors. If we are unable to secure significant orders from such distributors in the future, on commercially favorable terms, or at all, our revenues and profitability may be adversely affected.

In addition, as we enter new markets and geographical areas, we are likely to compete not only with national players, but also local players who might have an established local presence, are more familiar with local regulations, business practices and industry needs, have stronger relationships with dealers and relevant government authorities, or are in a stronger financial position than us, all of which may give them a competitive advantage over us. Our inability to expand into areas outside central and western regions of India may adversely affect our business prospects, financial conditions and results of operations.

16. **Our business is dependent on our continuing relationships with our customers and suppliers. Our suppliers may, inter-alia, adversely vary the terms on which we procure raw materials, suspend or cancel the delivery of products, and/or, fail to deliver the required quality of raw materials, in a timely manner or at all. Such interruptions in our raw material supply chain could adversely impact our operations, goodwill and profitability**

Events of force majeure, such as disruptions of transportation services because of weather-related problems, strikes, lock-outs, inadequacies in the road infrastructure and port facilities, government actions or other events that are beyond the control of our suppliers, which prevent our our suppliers from adhering to the required delivery schedules, could in turn adversely affect our operations, goodwill and productivity.

Similarly, our customers may suspend or cancel delivery of our products during a period of force majeure, and any suspensions or cancellations that are not replaced by deliveries under new contracts, or sales to third parties on the spot market, would reduce cash flows and could adversely affect our financial condition and results of operations. There can be no assurance that such disruptions will not occur in the future.

17. Our business depends heavily on our reputation and the market perception of our brand. Any negative publicity, infringement or other harm to our brand, or any failure to maintain and enhance our brand recognition, may materially and adversely affect our goodwill, operations and profitability.

We believe the brand under which our businesses operate are among India's most valuable and trusted brands, as a result of which our brand and reputation are important assets which are integral to our success. For example, we believe our "Goel TMT" brand is among the most trusted in the industry for TMT Bars. Many factors, including any real or perceived problems relating to any of our products, as well as the materialization of any of the other risks discussed in several of the other risk factors in this section, may impact the reputation of our brand, which could in turn have a material adverse effect on our operational performance, earnings, cash flows and financial conditions.

18. Product liability claims could adversely affect our operations.

Our Company sell products to companies that operate in the infrastructure and construction sectors. If we were to sell steel that does not meet the required specifications of our customers, it could result in significant disruptions to the customer's operations. There could be, as a result of such quality failure, significant consequential damages resulting from the use of such products. We have a limited amount of product liability insurance coverage, and a major claim for damages related to products sold could leave us uninsured against a portion of, or all of, the claimed amount. All of the abovementioned factors could materially harm our reputation, operations and profitability.

19. As a part of our business expansion plan, we are currently in the process of commissioning a fully integrated steel plant in our Unit III at Tilda. Such expansion may be subject to the risks of cost and time overruns. Any inability to successfully complete our current or future expansion plans/ business strategies, in a timely and cost effective manner, could in turn have an adverse effect may have an adverse effect on our business, financial condition and results of operations.

On the completion of the proposed expansion at our Unit III, in Tilda, scheduled to be completed during Fiscal 2019, our Company's aggregate installed capacity is expected to increase from 360,000 TPA to 510,000 TPA, for sponge iron production; and from 235,200 MTPA to 264,000 MTPA, for Billets and Blooms. Our Company plans to replace the existing 8 x 4 Induction furnace with 15 MT x 4 Induction Furnace, at Unit I, with a billet caster, so as to enhance our steel melting and rolling capacity. Our Company also proposes to install machinery for facilitating the transfer of surplus power from Unit III to Unit I. We believe that implementation of our expansion plan will enable us to achieve significant savings in production costs. In this connection, we have obtained all major environmental and labour-related regulatory approvals, and have commenced civil work as well as the erection of equipment. We will however have to obtain additional third party consents and approvals, for completing and commissioning these expansion plans. In the past we have experienced cost and time overruns when implementing expansion plans. Any delays or cost overruns in connection with obtaining the said consents and approvals in a timely manner, could adversely impact our plans, operations, and profitability.

Our Company will also have to procure the necessary funding for our working capital needs and our future capital expenditures, (whether through debt or equity or a combination of both), in a favourable and timely manner. Further, our decision and ability to proceed with the implementation of our expansion plans may be contingent on a number of other factors that may be beyond our control, including applicable state laws and policies, the possibility of civil or political resistance to industrial development in the region, and operational difficulties that we may not be able to predict at this stage. Our inability to manage our funding requirements and the said contingencies in an effective and timely manner, could adversely affect our growth, operations, and profitability.

Our planned expansion will also increases the challenges we face in connection with human resources, including recruitment, training and retention of skilled and experienced technical and management personnel. We shall also be required to implement / improve our administrative infrastructure, controls and processes. If we are unable to recruit human resource with adequate skill and experience and/or fail to install appropriate systems and controls on a timely basis, or if there are weaknesses in such systems and controls that result in inconsistent internal standard operating procedures, we may not be able to meet our expected schedule of implementation, or may exceed budgeted expenditure.

In addition, our expansion plans may not yield the expected or desired revenues, profitability, efficiency or cost reduction outcomes, or result in any increase in the value of your investment in the Equity Shares.

20. We may not be able to obtain adequate funding, on favourable terms and in a timely manner, as required for carrying out any future plans for growth.

Disruptions in global credit and financial markets and the resulting governmental actions around the world could have a material adverse impact on our ability to meet funding needs. We require continuous access to large quantities of capital in order to carry out day-to-day operations. We have historically required, and in the future expect to require, outside financing to fund capital expenditure needed to support the growth of our business, as well as for refinance of our existing debt obligations.

In the event of adverse market conditions, or if actual expenditure exceeds planned expenditure, our external financing activities and internal sources of liquidity may not be sufficient to support our current and future operational plans, and we may be forced to, or may choose to, delay or terminate future plans for expansion.

Our ability to arrange external financing and the cost of such financing, as well as our ability to raise additional funds through the issuance of equity, equity-related or debt instruments in the future, is dependent on numerous factors. These factors include general economic and capital market conditions, interest rates, credit availability from banks or other lenders, investor confidence in us, our profitability, applicable tax and securities laws, the political and economic conditions in the geographic locations in which we operate, the amount of capital that other entities may seek to raise in the capital markets, and the liquidity of the capital markets in general. There can be no assurance that we will be able to obtain bank loans, or renew existing credit facilities in the future, on favourable terms or at all. If we are unable to arrange adequate external financing on favourable terms, our operations and profitability could be adversely and materially affected.

21. Sufficient insurance coverage may not be available in the market, for covering all of the risks associated with our operations, and accordingly, we may not have sufficient insurance coverage for all possible future economic losses.

Our operations are subject to inherent risks such as fire, strikes, loss-in-transit of our products, cash-in transit, accidents and natural disasters. In addition, many of these operating and other risks may cause personal injury, and damage to or destruction of our properties, which could in turn result in the suspension of operations, and the imposition of civil or criminal penalties. As part of our risk management, we maintain insurance policies that may provide some insurance cover for mechanical failures, power interruptions, natural calamities or other problems at our facilities. Notwithstanding the insurance coverage that we carry, the occurrence of any event that causes losses in excess of limits specified under the policy, or losses arising from events not covered by insurance policies, could have a material adverse effect on our business, financial condition and results of operations. While we believe that we maintain adequate insurance coverage amounts for our business and operations, our insurance policies do not cover all risks and are subject to exclusions and deductibles. If any or all of our facilities are damaged in whole or in part, our operations, totally or partially, may be interrupted for a temporary period. Further, we do not maintain key-man insurance for any of our key personnel and the loss of services of such key personnel would have an adverse effect on our business, financial condition and results of operations.

In addition, our insurance policies are subject to annual review, and we cannot assure you that we will be able to renew these policies on similar terms, favorable terms, or at all. If we were to incur a serious uninsured loss, or a loss that significantly exceeds the limits of our insurance policies, it could have a material adverse effect on our financial condition and results of operations.

22. **The steel industry is highly cyclical, and a decrease in steel prices may have a material adverse effect on our business, results of operations, prospects and financial condition. Further, the steel industry is affected by global and domestic economic conditions. Slower than expected or uneven growth of the global or Indian economy, or a renewed global recession, could have a material adverse effect on the steel industry and consequently on our operations and profitability.**

Steel prices are volatile, reflecting the highly cyclical nature of the global and domestic steel industry.

The prices at which we sell our products, and consequently our profitability, is dependent on a number of factors, such as the availability and cost of raw materials, fluctuations in domestic and international demand and supply of steel and steel products, worldwide production and capacity, fluctuation in the volume of steel imports, transportation costs, protective trade measures, and various social and political factors, in the economies in which the steel producers sell their products. Any adverse changes in one or more of these factors, could in turn adversely impact out operations and/or, profitability.

Our operations and profitability are also dependent upon the trends of particular industries, such as infrastructure, construction, packaging, appliances, automobiles, machinery, equipment and transportation industries, which are among the biggest consumers of steel products. When downturns occur in these sectors, we may experience decreased demand for our products, which may lead to a decrease in steel prices, which may, in turn, have a material adverse effect on our business, results of operations, financial condition and prospects.

Notably, global steel prices fell sharply in 2008, as the global credit crisis led to a collapse in the demand for steel products. While steel prices have increased in recent years, they have been subject to fluctuations. Low steel prices adversely affect the businesses and results of operations of steel producers generally, including ours, resulting in lower revenue and margins, and write downs of finished steel products and raw material inventories. In addition, the volatility, length and nature of business cycles affecting the steel industry have become increasingly unpredictable, and the recurrence of another major downturn in the industry may have a material adverse impact on our business, results of operations, financial condition and prospects.

Further, our business and results of operations have been and continue to be affected by international, national and regional, economic conditions. Following the global financial crisis in 2007 to 2009, the Eurozone crisis in 2009 to 2013, and the decline in commodity prices that began in 2014, there has been significant volatility in number of indicators, making it more difficult to forecast short and medium term growth. The rate of economic growth has a significant impact on the consumption of steel products by various industries, such as the automotive and the construction industries, and declines in steel consumption caused by poor or unfavourable economic conditions, in one or more of our major markets, would have a material adverse effect on the demand for our products, our operations, and our profitability.

23. **The operation of our iron ore mining facilities may face opposition from local communities and other parties. Any disruptions or delays to our iron ore mining schedules would adversely impact our profitability.**

The construction and operation of our facilities in India have previously faced opposition from local communities where these projects are located and from special interest groups. In particular, the public may oppose our steel or power plants due to the perceived negative impact they may have on the environment. There can be no assurance that we will not encounter such opposition for our future projects. The resettlement and rehabilitation program is developed on a project-by-project basis and is included in our budget for each project. However, the government of the state in which the project is located is ultimately responsible for disbursing compensation funded by us to those individuals that are displaced due to our projects. Significant opposition by local communities, NGOs and other parties to the operation of our projects could cause authorities to order suspension of some of our operations, attract negative publicity and adversely affect our results of operations and financial condition.

24. Our efforts to ensure high utilization in our Units may result in overcapacity and oversupply of our productswhich may adversely affect our profitability.

Our competitiveness and long-term profitability are, to a significant degree, dependent upon our ability to optimize capacity utilization and to maintain and enhance production efficiencies. Due to the high fixed costs related to steel production, steel producers generally attempt to maintain high capacity utilization in order to maintain their profitability. During periods of declining demand, this may result in a significant oversupply of steel, and a corresponding decline in steel prices. This may be further exacerbated by reduced levels of GDP growth and government policies in major economies, including China and the United States. In recent years, China has been affected by reduced growth in GDP, indexes of industrial production, real estate and other factors, all of which have resulted in lower growth in China's steel usage. Meanwhile in the United States, uncertainties exist over U.S. dollar appreciation and the potential for protective trade policies to be enacted, which could lead other countries to take protective countermeasures and further exacerbate overcapacity and oversupply challenges for the steel industry. Global steelmaking capacity already currently exceeds the global consumption of steel products. This excess capacity often results in manufacturers exporting significant amounts of steel and steel products at prices that are at or below their costs of production. In addition, oversupply may result in decreased steel prices as well as lower utilization rate. Continued low utilization rates would also affect our fixed costs, which cannot be fully reduced in line with production, leading to a higher per unit cost. A decrease in our utilization rate could have a material adverse effect on our business, financial condition and results of operations.

25. We face substantial competition, both from Indian and international steel producers, which may affect our prospects.

The Indian steel industry is highly competitive. As an integrated steel manufacturer in India, we compete to varying degrees with other Indian integrated steel manufacturers. The major integrated producers in India, account for most of the flat steel products that are produced in India, such as hot rolled coils, cold rolled coils and galvanized steel.

In addition to these major integrated producers, we also compete with certain non-integrated steel producers, which manufacture value-added steel products.

Competing domestic steel producers have increased their manufacturing capacities, and we expect domestic competition to further intensify with the ramping up of new facilities by these competitors. Some of our domestic competitors may possess an advantage over us due to various reasons, such as captive raw material sources, greater economies of scale, integrated manufacturing facilities, specialization in production of value-added or niche products and greater presence or dominance in certain markets. Our competitors may have lower leverage and stronger balance sheets. Larger competitors may also use their resources, which may be greater than ours, against us in a variety of ways, including by making additional acquisitions, and investing more aggressively in product development and capacity. The market is still highly fragmented, and if the trend towards consolidation continues, we could be placed in a disadvantageous competitive position relative to other steel producers, which would in turn adversely affect our operations and profitability. Maintaining or increasing our market share will depend on effective marketing initiatives, and our ability to anticipate and respond to various factors that affect the industry, including our ability to improve our manufacturing process and techniques, to introduce new products, to respond to pricing strategies of our competitors, and, to adapt to changes in technology and changes in customer preferences. Failure by us to compete effectively would have a material adverse effect on our business, financial condition and results of operations. We also expect increasing competition from international steel producers due to the increasing consolidation in the steel industry worldwide. A number of our international competitors may have greater financial and other resources.

We may also face competition from new companies that are emerging which may attempt to obtain a share in our existing markets.

The abovementioned factors, among others, have intensified the competition from global steel players and there can be no assurance that we will be able to compete successfully in the future against our existing or potential competitors, or that increased competition with respect to our activities will not have an adverse effect on our business, financial condition and results of operations.

26. **Our top 5 customers for Financial Year 2017- 2018, Financial Year 2016 -2017 and Financial Year 2015-2016 on a restated standalone basis, have constituted 14.51%, 11.67%and 12.52% respectively, to our revenue.**

Our top 5 customers for Financial Year 2017- 2018, Financial Year 2016 -2017 and Financial Year 2015-2016, on a restated standalone basis, have constituted 14.51%, 11.67% and 12.52% of total revenue, respectively. If we are unable to secure significant orders from such customers in the future, on commercially favorable terms, or at all, our revenues and profitability may be adversely affected.

27. **The production of steel is capital intensive, involves fixed costs, and is subject to long gestation periods, which can in turn result in a substantial price volatility for our finished products.**

The production of steel is capital intensive, with a high proportion of investment in fixed assets such as land, plant and machinery. Further, setting up of new capacities or expansion of existing capacities require long lead times. If total capacity in the industry exceeds demand, there is a tendency for prices to fall sharply. Conversely, if demand grows strongly, prices increase rapidly, as unutilized capacity cannot be utilised quickly. The result can be substantial price volatility of our finished products. While we have taken steps to reduce operating costs, we may be negatively affected by significant price volatility, (particularly in the event of excess production capacity in the global steel market), and we may incur operating losses as a result.

28. **If we are unable to invest in new technologies and equipment, our cost of processing may increase relative to our competitors, which may have an adverse impact on our business, results of operations and financial condition.**

We believe that going forward, our profitability and competitiveness will depend in large part on our ability to maintain a low cost of operations, including our ability to process and supply sufficient quantities of our products as per required specifications. While we believe that we have a strong focus on research and development, and have achieved significant technological advancements, if we are unable to respond or adapt to changing trends and standards in technologies and equipment, or otherwise adapt our technologies and equipment to changes in market conditions or requirements, in a timely manner and at a reasonable cost, we may not be able to compete effectively, and our business, financial condition and results of operations may be adversely affected

29. **The profitability of our power business is dependent on the sale of power at favourable terms. Our financial condition could be adversely affected if the sale of such power can not be continued on favourable terms or at all.**

A majority of our power sales from IAHEPL's power plant are made through a PPA between IAHPL and the Haryana Power Purchase Centre. The said PPA is subject to termination in certain circumstances, including events of default. For further details please see section titled "*Our Subsidiaries*" on page 192**.** The said PPA may be terminated upon the triggering of "events of default" stipulated in the PPA, or may otherwise be discontinued, and any such termination or other discontinuance, would adversely affect our business and financial condition. Moreover, there can be no assurance that we will be able to replace the Haryana Power Purchase Centre as a customer, in the event that the Haryana Power Purchase Centre ceases to purchase power from us on favourable terms or at all.

30. **The profitability of our power business is largely a function of how effectively we manage our costs and our ability to operate our plants at optimal levels.**

The profitability of our power business is largely a function of how effectively we are able to manage our costs during the terms of our contracts and our ability to operate our plants at optimal levels. If we are unable to manage our costs effectively or operate our plants at optimal levels, our business prospects, financial condition and results of operations may be materially and adversely affected. IAHEPL's long-term PPAs generally require IAHEPL to guarantee certain minimum performance standards, such as plant availability and generation capacity. If our facilities do not meet the required performance standards, our customers will not reimburse us for any increased costs arising as a result of our plants' failure to operate within the agreed norms, which in turn may affect our results of operations.

In addition to the performance requirements specified in IAHEPL's long-term PPAs and other agreements, national and state regulatory bodies and other statutory and government mandated authorities may, from time to time, impose minimum performance standards upon us. Failure to meet these requirements could expose us to the risk of penalties. Any of the foregoing could have an adverse effect on our business, financial condition and results of operation.

31. A reduction in import duties on steel products in India may lead to increased competition from foreign companies, reduce our market share and consequently our profits.

Except from Japan and Indonesia the basic import duty payable on plates is 10% and on TMT and structural steel is 12.5%. The import duty, along with lower freight costs and, in some countries, higher labour costs, have allowed domestic manufacturers to enjoy a significant price advantage over imported steel products in the domestic Indian market. However, any policy change by the Government, resulting in a reduction in import duties, may assert downward pressure on our margins and prices. Reductions in import duties and lower priced imports from countries that benefit from bilateral or multilateral trade agreements with India, may have an adverse effect on our business, financial condition and results of operations

32. Our success largely depends on our Promoters, senior management and key personnel, and our ability to attract and retain such senior management.

We are highly dependent on our Promoters, senior management and other key personnel. Their extensive experience in the steel, mining and power industries and in-depth knowledge of various aspects of our business operations, are critical to our future performance and continued success. Competition for senior management and key personnel in the steel, mining and power industries is intense. While we believe we have appropriate retention practices in place, we may not be able to retain our senior management personnel and key personnel, or attract and retain new senior management and key personnel in the future. The loss of any of these key personnel could adversely affect our business and results of operations.

33. We have in the last twelve months issued Equity Shares at a price which may be lower than the Issue Price.

In the 12 months prior to the date of filing of this Draft Red Herring Prospectus, we have issued Equity Shares at a price which could be lower than the Issue Price:

Sr. No.	Date of Allotment	Name of Shareholder	Number of Equity Shares	Face Value ₹	Issue Price ₹	Reasons for Allotment
1.	September 4, 2018	Allotment to the existing shareholders of our Company as of the record date, September 1, 2018.	39,213,465	10	N.A	Bonus issue of 3 (three) Equity Shares for every 1 (one) Equity Share held on the record date.

For further details, see "*Capital Structure*" on page 90.

34. Some of our Group Companies and Subsidiaries have incurred losses during recent Financial Years. The detail of our Group Companies and Subsidiaries, which have incurred losses in recent Financial Years, is as follows:

Name of Group Company	Financial Year (₹ in Millions)		
	2017- 2018	2016 - 2017	2015- 2016
I.A. Hydro Energy Private Limited (1)	(436.76)	(59.75)	-
Shri. Bajrang Energy Private Limited	1.3	(21.74)	Nil

Name of Group Company	Financial Year (₹ in Millions)		
	2017- 2018	2016 - 2017	2015- 2016
S B. Multimedia Private Limited	5.03	(7.75)	6.56
Swastik Mercantiles Limited	0.06	(0.56)	(0.12)
Shri Bajrang Ispat & Plywood Limited	0.08	(0.11)	(0.12)
Shri Bajrang Hydro Energy Private Limited	0.00*	(0.68)	0.00*
Shri Bajrang Steel & Power Limited	0.00*	(0.37)	Nil
Chhattisgarh Captive Coal Mining Limited	(0.14) (2)	(0.61)	(0.39)
IA Energy Private Limited	0.01	(0.22)	(0.01)

* *Negligible profits*

(1) *The company was a partner in "IA energy" w.e.f. June 18, 2010 which was later on converted into private limited company on March 23, 2017. The Company is having stake of 90.46% shareholding in newly formed company named "I.A Hydro Energy Private Limited*".

(2) *The financial results are as per the management certified accounts.*

There can be no assurance that these Group Companies and Subsidiaries will not incur losses in the future or that there will not be an adverse effect on our Company's reputation or business as a result of such losses.

35. Our profitability may be adversely affected if investments made by our Company do not perform as anticipated.

Our Company has invested in, and from time to time will invest in our Subsidiaries and joint venture/s. Our Company has invested approximately ₹ 30 million, in Chhattisgarh Captive Coal Limited, a joint venture company, whose coal allocation block has been cancelled vide order dated September 24, 2014, passed by the Honourable Supreme Court. Our Company will have to review and recognize the estimate the decline in the investment value in future. We cannot assure that these investments would yield the desired results. Our investment in such companies are subject to a number of significant risks that arise from the nature of their businesses.

If our Company is unable to benefit from the synergies or efficiencies expected from these investments, or provide for the decline in the value of such investments, our profitability may be adversely affected.

36. Our Restated Financial Statements may not be comparable

Our Restated Financial Statements included in this Draft Red Herring Prospectus for the Financial Years 2014-2015 and 2013-2014 have each been prepared in accordance with Indian GAAP and reporting guidelines prescribed by Indian regulatory authorities applicable as of the relevant applicable dates. Our Restated Financial Statements included in this Draft Red Herring Prospectus for the Financial Years 2017-2018, 2016-2017 and 2015-2016 have each been prepared in accordance with Ind AS and reporting guidelines prescribed by Indian regulatory authorities applicable as of the relevant applicable dates. As a result, our financial statements for the Financial Years 2014-2015 and 2013-2014 may not be comparable with our financial statements for the Financial Years 2017-2018, 2016-2017 and 2015-2016.

37. Our Company has registered negative cash flows from investing and financing activities, for the Financial Years ending on 2017-2018, 2016-2017 and 2015-2016.

The following table sets forth certain information relating to our cash flows on a consolidated basis for the periods indicated. We may in the future experience negative cash flows.

Particulars	Financial Year (₹ in Millions)		
	2017- 2018	2016 - 2017	2015- 2016
Net Cash from operating activities	2,112.90	5,297.53	218.60
Net Cash from investing activities	(398.91)	(6,514.68)	(443.56)

Net Cash from financing activities	(1,770.40)	(1,274.25)	(52.47)

We cannot assure you that we would be able to generate and/or maintain positive cash flows from various activities of our Company in the future. If we are unable to generate adequate cash flow from the activities of our Company, our financial condition and profitability could be adversely affected. For further details, see *"Management's Discussion and Analysis of Financial Condition and Results of Operations"* on page 431.

38. **Our Company is involved in certain legal and other proceedings. An adverse outcome in such proceedings, may have a material adverse effect on our business, results of operations and financial condition.**

There are outstanding legal proceedings involving our Company, Subsidiaries, Group Companies and some of our Promoters and Directors, which are pending at different levels of adjudication before various courts, tribunals and other authorities. Such proceedings could divert management time and attention and consume financial resources in their defense or prosecution. The amounts claimed in these proceedings have been disclosed to the extent ascertainable and quantifiable and include amounts claimed jointly and severally. Any unfavorable decision in connection with such proceedings, individually or in the aggregate, could adversely affect our reputation, business, financial condition and results of operations.

A summary of the outstanding legal proceedings against our Company, Subsidiaries, Group Comnanies, Directors and Promoter as disclosed in this Draft Red Herring Prospectus, have been set out below:

S. No	Nature of Case	Number of Pending Proceedings	Amount involved (₹ Million)
Legal proceedings initiated against our Company:			
1.	Criminal Proceedings	1	NIL
2.	Civil Proceedings	2	NIL
3.	Action taken by statutory and regulatory authorities	4	60
4.	Direct tax cases	9	320.36
5.	Indirect tax cases	10	137.79
6.	Legal notices and other threatened legal proceedings	5	187.70
Legal proceedings initiated by our Company:			
1.	Criminal Proceedings	2	9.31
2.	Civil Proceedings	NIL	NIL
3.	Proceedings against statutory and regulatory authorities	10	35.68
4.	Direct tax case	1	NIL
5.	Indirect tax cases	6	45.03

S. No.	Nature of Case	Number of Pending Proceedings	Amount involved (In ₹ Million)
Legal proceedings initiated against our Subsidiaries:			
1.	Civil Proceedings	2	2.5
2.	Criminal cases		NIL
3.	Action taken by statutory and regulatory authorities	NIL	NIL
4.	Direct tax cases	NIL	NIL
5.	Indirect tax cases	NIL	NIL
Legal proceedings initiated by our Subsidiaries:			
1.	Criminal Proceedings	1	NIL
2.	Civil Proceedings	2	101.31
3.	Arbitration Proceedings	1	5

S. No.	Nature of Case	Number of Pending Proceedings	Amount involved (In ₹ Million)
Legal proceedings initiated against our Group Companies:			
1.	Civil Proceedings	NIL	NIL

S. No.	Nature of Case	Number of Pending Proceedings	Amount involved (In ₹ Million)
2.	Criminal cases	NIL	NIL
3.	Action taken by statutory and regulatory authorities	NIL	NIL
4.	Direct tax cases	NIL	NIL
5.	Indirect tax cases	1	52.85
Legal proceedings initiated by our Group Companies:			
1.	Criminal Proceedings	NIL	NIL
2.	Civil Proceedings	3	12

S. No.	Nature of Case	Number of Pending Proceedings	Amount involved (In ₹ Million)
Legal proceedings initiated against Promoters:			
1.	Civil Proceedings	NIL	NIL
2.	Criminal cases	NIL	NIL
3.	Action taken by statutory and regulatory authorities	1	NIL
4.	Direct tax cases	NIL	NIL
5.	Indirect tax cases	NIL	NIL
6.	Legal notices and other threatened legal proceedings	3	NIL
Legal proceedings initiated by Promoters:			
1.	Criminal Proceedings	1	NIL
2.	Civil Proceedings	NIL	NIL
3.	Proceedings against any statutory/regulatory authorities	2	NIL

S. No.	Nature of Case	Number of Pending Proceedings	Amount involved (In ₹ Million)
Legal proceedings initiated against our Directors:			
1.	Civil Proceedings	NIL	NIL
2.	Criminal cases	NIL	NIL
3.	Action taken by statutory and regulatory authorities	1	NIL
4.	Direct tax cases	NIL	NIL
5.	Indirect tax cases	NIL	NIL
6.	Legal notices and other threatened legal proceedings	3	NIL
Legal proceedings initiated by our Directors:			
1.	Criminal Proceedings	1	NIL
2.	Civil Proceedings	NIL	NIL
3.	Proceedings against any statutory and regulatory authorities	5	NIL

39. Any inability to obtain, renew or maintain the statutory and regulatory permits, licenses and approvals required to operate our business could have a material adverse effect on our business.

We require various statutory and regulatory permits, licenses and approvals for our business activities, including environmental clearances and factory licenses. For instance, various permissions are required for setting up and commissioning manufacturing activities and various additional permits and approvals would be required for setting up additional manufacturing facilities on the parcels of the land available to our Company.

There can be no assurance that the relevant authorities will issue such permits or approvals in the time frame anticipated by us or, on favourable terms, or at all. Any inability on our part to obtain and maintain the requisite licenses, permits, approvals etc., in a timely manner or at all, or to renew or maintain existing permits or approvals, or to comply with the terms and conditions prescribed in such permits or approvals, may result in the interruption of our operations, (including suspension or termination of our mining leases), which in turn could adversely effect on our business, financial condition and results of operations. An inability to obtain, maintain or renew approvals or licenses required for our operations may adversely affect continuity of our operations or result into breach of our contractual obligations.

Furthermore, such government approvals and licenses are subject to numerous conditions, some of which are onerous and may require us to make substantial expenditure. For details of material approvals, see the section "*Government and Other Approvals*", beginning on page 480. If we fail to comply, or a regulator claims that we have not complied with these conditions, we may be subject to severe penalties or our operations may be ceased by the regulator which may adversely affect our cash flows, business, results of operations and financial condition, and our ability to bid for future projects.

40. Our inability to obtain and/or maintain sufficient cash flows, credit facilities and other sources of funding, in a timely manner, or at all, for meeting our requirements of working capital and/or for paying our debts, could adversely affect our operations, financial condition and profitability.

Our operations require a substantial amount of working capital. We are required to obtain and/or maintain adequate cash flows and funding facilities, from time to time. As at March 31, 2018, our Company had aggregate outstanding borrowings on a standalone basis in the form of working capital facilities for amounts aggregating ₹ 2,843.64 million. Further, typically our operations have net working capital cycles ranging between one to two months. Our inability to obtain and/or maintain sufficient cash flow, credit facilities and other sources of funding, in a timely manner, or at all, for meeting our requirements of working capital and/or for paying our debts, could adversely affect our operations, financial condition and profitability.

41. Our ability to pay dividends in the future will depend on our future earnings, financial condition, cash flows, working capital requirements, capital expenditure, and restrictive covenants in our financing arrangements.

Our business is inherently capital intensive, and the amount and frequency of our future dividend payments, if any, will depend on our future earnings, financial condition, cash flows, working capital requirements, capital expenditure and other factors. In the past, we have not made dividend payments to the Shareholders of our Company. We may retain all future earnings, if any, for use in the operations and expansion of the business. As a result, we may not declare dividends in the foreseeable future. Additionally, our ability to pay dividends is and may be subject to restrictive covenants contained in the financing related agreements we have entered into and will enter into in the future. There is no assurance that we will pay dividends in the future. For details of dividend paid by our Company in the past, see "*Dividend Policy*" on page 227

42. Our Promoters and Promoter Group will continue to retain control over our Company after completion of the Issue, which will allow them to influence the outcome of matters submitted for approval of our shareholders.

Our Promoters and Promoter Group currently own an aggregate of 86.16% of our Equity Shares. Following the completion of the Issue, our Promoters and Promoter Group will continue to hold majority of our post-Issue Equity Share capital. As a result, they will have the ability to influence matters requiring share-holders approval, including the ability to appoint Directors to our Board, and the right to approve significant actions at Board and at shareholders' meetings, including the issue of Equity Shares and dividend payments, business plans, mergers and acquisitions, any consolidation or joint venture arrangements, any amendment to our Memorandum of Association and Articles of Association, and/or any assignment or transfer of our interest in any of our licenses.

43. Our Company has issued the corporate guarantees for our Subsidiary Companies which if invoked would materially adversely affect our financial condition.

Our Company has issued the corporate guarantees for an amount of ₹ 3,311.00 million on standalone basis, in favour of certain lenders of our Subsidiary Companies. Most of these corporate guarantees given to lenders of the Subsidiary Companies which are in power generation business. The current cash flows of such Subsidiary Companies may not be sufficient to meet their debt obligations. The lenders may enforce the guarantees against our Company, if any of such Subsidiary Companies, breach its obligations under the relevant loan agreements. The lenders may also require alternate or additional guarantees, collaterals, accelerated payments of outstanding amounts or terminate the relevant loan facilities if they determine that our Company's guarantees are inadequate. We may not be successful in providing the required guarantees or at all and may need to repay outstanding amounts or seek additional sources of capital, which could affect our cash flows, financial condition and results of operation.

44. If industry-wide steel inventory levels are high, customers may draw from inventory rather than purchase new products, which would reduce our sales and earnings.

Above-normal industry inventory levels can cause a decrease in demand for our products and thereby adversely impact our earnings. High industry-wide inventory levels of steel reduce the demand for production of steel because customers can draw from inventory rather than purchase new products. This reduction in demand could result in a corresponding reduction in prices and sales, both of which could contribute to a decrease in earnings. Industry-wide inventory levels of steel products can fluctuate significantly from period to period.

45. We have certain contingent liabilities that have not been provided for in our financial statements, which if they materialize, may adversely affected our financial condition.

Our contingent liabilities as of March 31, 2018 aggregated to ₹ 4112.02 million on a restated consolidated basis. The contingent liabilities consist of corporate guarantees given on behalf of subsidiary company, letter of credit & guarantee issued by Bank, outstanding Bank guarantees and disputes tax liabilities not acknowledged. In the event that any of these contingent liabilities materialize, our results of operation and financial condition may be adversely affected. As on March 31, 2018, we had the following contingent liabilities on a consolidated basis that have not been provided for in our financial statements:

Particulars	Amount (₹ in million)
Claims against the Co./ disputed tax liabilities not acknowledged	469.16
Bank Guarantees outstanding	227.30
Letter of credit & guarantee issued by Bank	104.56
Jointly and severely corporate guarantee to the Bank on behalf of Subsidiary Company	3,311.00

We have created provisions for certain contingent liabilities in our financial statements. Any or all of these contingent liabilities may become actual liabilities. If any or all of these liabilities materialize, there may be an adverse effect on our business, financial condition and results of operations. For more information, see *"Restated Financial Statements"* on page 228.

46. We have a significant amount of indebtedness, which may adversely affect our cash flows, and/or results of operations.

Our outstanding gross indebtedness as at March 31, 2018 was ₹ 8,722.38 million on a restated consolidated basis. Any downturn in the steel industry, increases the possibility that we may be unable to generate cash sufficient to pay, when due, the principal of, interest on or other amounts due in respect of its indebtedness. In addition, as this debt matures, we may need to refinance or secure new debt which may not be available on favorable terms, or at all. Approximately 7.54% of this outstanding indebtedness is due within one year.

Our high indebtedness levels, and other financial obligations and contractual commitments, may have other significant consequences for our business and results of operations, including:

- increased vulnerability to adverse changes in economic conditions, government regulations, or the competitive environment;
- diversion of our cash flow, from operations to payments on our indebtedness, and other obligations and commitments, thereby reducing the availability of our cash flows to fund working capital, capital expenditure, acquisitions and other general corporate purposes;
- limiting additional borrowings for working capital, capital expenditure, acquisitions, debt refinancing service requirements, execution of its business strategy or other purposes; and
- impairing our ability to pay dividends in the future.

Our high indebtedness levels, and other financial obligations and contractual commitments, could lead to a downgrade of our credit rating by domestic rating agencies, thereby adversely impacting our ability to raise additional financing, as well as the interest rates and commercial terms on which such additional financing is availed of.

While, our Company intends to use a certain portion of the Net Proceeds towards pre-payment or repayment, in full or part, of certain loans availed of by our Company, we may incur additional borrowings in the future. Our inability to meet our debt servicing obligations and repay our outstanding indebtedness, depends primarily on the revenue generated by our business. We cannot assure you that we will generate sufficient revenues to service existing or proposed borrowings, or for funding other liquidity needs.

47. There can be no assurance that the government will not withdraw or curtail government policies which are beneficial to steel manufactures. Such statutory/regulatory changes could adversely affect our operations and profitability.

In February 2016, the Government of India announced a minimum import price on 173 steel products to prevent dumping of steel products. Subsequently, the minimum import price was discontinued and the Government of India imposed anti-dumping duties on steel products with effect from August, 2016 for a period of five years. Any regulatory policy with regards to import prices of steel products which we manufacture, and any anti-dumping legislature in connection with the same, could have a material impact on our operations and profitability. There can be no assurance that the government will not withdraw or curtail government policies in the future which are beneficial to steel manufactures. Such statutory/regulatory changes could adversely affect our operations and profitability.

48. BSE has in the past, suspended the trading of equity shares of Shri Bajrang Alloys Limited, our Group Company, on grounds of alleged non-compliance with Listing Agreement.

The equity shares of Shri Bajrang Alloys Limited were suspended from trading on the BSE with effect from January 14, 2003, for a period of three days on account of violation of clauses 16 of the Listing Agreement. Further, the equity shares of Shri Bajrang Alloys Limited were suspended from trading on the BSE with effect from April 20, 2003 for the non-compliance of clause 41 of the Listing Agreement. Subsequently, BSE vide its notice dated May 23, 2006, intimated that the suspension of the trading of securities of Shri Bajrang Alloys Limited be revoked with effect from May 26, 2006.

49. Environmental matters, including compliance with laws, regulations and remediation measures, could result in increased capital requirements and operating costs.

Our operations generate pollutants and waste, some of which are potentially dangerous. Our operations are subject to numerous laws, regulations, and contractual commitments, relating to the management of such pollutants and the environment. These laws, regulations and contractual commitments concern air emissions, wastewater discharges, solid and hazardous waste material handling and disposal, and the investigation and remediation of contamination, or other environmental restoration. The risk of substantial costs and liabilities related to compliance with these laws and regulations, is an inherent part of our business. The locations at which we manufacture our products, dispose of waste materials, and/or extract raw materials for our manufacturing activities, are all subject to environmental risks, and the associated costs and liabilities, including those related to the investigation and remediation of past or present contamination, or other environmental restoration.

Despite our efforts to monitor and comply with environmental laws and regulations, our goodwill, operations, and profitability, could from time to time be adversely affected, due to any inadvertent noncompliance in this regard. Any such noncompliance could lead to costly remedial action, as well as other liabilities, such as civil and/or criminal penalties being imposed, the suspension of permits, requirements to curtail or suspend operations, and lawsuits by third parties. There can be no assurance that substantial costs and liabilities will not be incurred by us in the future in this regard.

An increase in the requirements of environmental laws and regulations, increasingly strict enforcement thereof by governmental authorities, or claims for damages to property or injury to persons resulting from the environmental impacts of our present or past operations, could prevent or restrict some of our operations, require the expenditure of significant funds to bring us into compliance, involve the imposition of clean up requirements and reporting obligations, and give rise to civil and/or criminal liability. There can be no assurance that any such legislation, regulation, enforcement or private claim will not have a material adverse effect on our business, financial condition or results of operations. In the event that production at one of our facilities is partially or wholly disrupted due to this type of sanction, our business could suffer significantly and our results of operations and financial condition could be materially and adversely affected.

50. A failure to comply with financial and other restrictive covenants imposed on us under our financing agreements, could cause us to default on these agreements, which could adversely affect our profitability.

Some of our financing agreements and debt arrangements set limits on, or require us to obtain lender consent before, among other things, pledging assets as security, implementing any dividend payment, providing corporate guarantees, undertaking any expansion/modernization/diversification, incurring any capital expenditure, formulating a scheme of amalgamation or reconstruction, entering into any long term contractual obligations, raising additional sources of capital, and effecting changes in the management and control of our Company. In addition, certain financial covenants may limit our ability to borrow additional funds or to incur additional liens. If our liquidity needs, or growth plans, require such consents and such consents are not obtained in a timely and favorable manner, we may be forced to forego or alter our plans, which could materially and adversely affect our financial condition and results of operations. There can be no assurance that we will be able to obtain such consents in the future.

In the past, there has been an instance where a loan that was deployed for a particular purpose was partially utilized for other unsanctioned purposes. We can not assure you that the respective lender will not seek recourse, or that such recourse will not materially affect our operations. We also cannot assure you that there will not be other such technical no-compliances in the future.

We have sought a confirmation from each of our lenders, that we are in compliance with the relevant loan covenants, and that any past non-compliance is either addressed or waived. State Bank of India, while not raising any issue regarding any alleged non-compliance, have however not been in a position to provide the said compliance confirmation.

In the event, we breach financing agreements, the outstanding amounts due thereunder could become due and payable immediately, or result in increased costs. In the past, there have been breaches in adhering with some of the financial and technical covenants along with minor delays in repayments on few occasions, although our lenders have not issued notices for such breaches.

Where instances of breach arise, our lenders may invoke rights under the borrowing arrangements. In addition, future noncompliance with the financial covenants of our financing agreements may lead to increased costs for any future financings. This could adversely affect our ability to conduct our business and operations.

51. There has been delays in the past by our Company in the payment of interest and principal on our debt obligations. If in the future our Company fails to make interest and principal payments to our lenders in a timely manner or at all, we may be liable for pre-mature repayments of the relevant loans with interest or otherwise face action for default under the relevant borrowing agreements

There have been delays in the past in the payment of interest and principal due to financial constraints. The details of the delay in payment of principal and interest on a standalone basis are as follows:

Financial Year	Nature of Loan	Interest/ Principal Amount (₹ in million)	Delay (No. of Days)
2017 - 2018	Term Loan	Principal - 505.00	60
		Interest - 712.12	60

If in the future our Company fails to make interest payments or principal repayments to our lenders in a timely manner or at all, our Company's account with the lenders may be categorized as a "Non-Performing Asset". The said classification as a "Non-Performing Asset" could affect the credit rating of our Company.

We could face difficulties in obtaining additional funding required for our operations, including the ability to bid for projects and complete existing projects in a timely manner. Additionally, we may be liable for pre-mature repayments of the relevant loans with interest or otherwise face action for default under the relevant borrowing agreements.

52. Some of the members of the Promoter Group have pledged their Equity Shares as additional/collateral security under agreements with various lenders, in connection with various credit facilities obtained by our Company. In the event of any default under the relevant agreements, the lenders may enforce aforementioned pledges, which could result in the change in the capital structure of our Company and may also have an adverse impact of the market price of our Equity Shares.

As on date of this DRHP, 26,230,596 Equity Shares are held by the members of the Promoter group, out of which 3,671,125 Equity Shares representing 7.02% of the paid-up equity share capital of our Company, are pledged with the State Bank of India. In the event of any default under the relevant agreements with State Bank of India, the lenders may enforce aforementioned pledges, which could result in a change in the capital structure of our Company and may also have an adverse impact of the market price of our Equity Shares.

53. We have availed of certain unsecured loans which, subject to the terms and conditions of the relevant agreements, may be recalled at any time.

Our Company, has currently availed unsecured loans which may be recalled by the lenders at any time. In the event that any lender seeks a repayment of any such loan, the relevant borrower would need to find alternative sources of financing, which may not be available on commercially reasonable terms, or at all, and, may not have adequate working capital to undertake new projects or complete ongoing projects. As a result, any such demand may affect our business, cash flows, financial conditions and results of operations. For details in relation to the indebtedness of our Company, see "*Restated Financial Statements*" on page 228.

54. Our Company has in the past entered into related party transactions and may continue to do so in the future.

We have entered into transactions with several related parties, including our Promoters, our Subsidiaries, our Group Companies and others, in recent Fiscals. For instance, certain parcels of our freehold land admeasuring 13.94 hectares at Unit II are acquired from our Group Company, Shri Bajrang Ispat and Plywood Limited. Furthermore, it is likely that we will enter into related party transactions in the future. There can be no assurance that such transactions, individually or in the aggregate, will not have an adverse effect on our financial conditions and results of operations. The transactions we have entered into and any future transactions with our related parties, have involved or could potentially involve, conflicts of interest. For further details of such related party transactions, please see "*Related Party Transactions*" on page 226.

55. Conflicts of interest may arise out of common business objects shared by our Company and certain of our Group Companies. Any such conflict of interest which may occur between our business and the business of the members of our Promoter Group, could adversely affect our business, prospects, results of operations and financial condition.

Our Promoters have interests in other companies and entities, namely Shri Bajrang Alloys Limited, Shimmer Investments Private Limited., Swastik Mercantiles Limited., Shri Bajrang Ispat & Plywood Limited., Shri Bajrang Hydro Energy Private Limited., Shri Bajrang Steel & Power Limited., Chhattisgarh Captive Coal Mining Limited and IA Energy Private Limited whose main objects and objects ancillary thereto in their respective memorandum of association permit such entities to carry out activities similar to those of our Company and such entities may compete with us. Further, our Promoters may also have significate shareholding in some of these companies. As a result, conflict of interests may arise in allocating or addressing business opportunities and strategies amongst our Company and the aforementioned entities in circumstances where our interests differ from theirs. There can be no assurance that the interests of our Promoters will be aligned in all cases with the interests of our minority shareholders or the interests of our Company. There can be no assurance that the aforementioned entities will not compete with our existing business or any future business that we may undertake or that their interests will not conflict with ours.

We have not entered into any non-solicitation or non-compete agreement with any member of our Group Company. While such members of our Group Company are not currently carrying on any business in conflict with our Company, there is no assurance that such a conflict will not arise in the future, or that we will be able to suitably resolve any such conflict without an adverse effect on our business or operations. There can be no assurance that our Promoters or members of our Group Company will not provide comparable services, expand their presence, solicit our employees or acquire interests in competing ventures, in the locations or segments in which we operate.

A conflict of interest may occur between our business and the business of the members of our Promoter Group, which could have an adverse effect on our business, prospects, results of operations and financial condition.

56. Our Promoters and Directors have interests in our Company other than reimbursement of expenses incurred, normal remuneration and benefits. Although, transactions with our Promoters and/or Directors are typically undertaken at an arm's length basis, there may be potential conflicts of interests between our Company and such Directors in light of such transactions entered into with our Company.

Our Promoters are interested in our Company to the extent of their shareholding in our Company and dividend entitlement in relation thereto. Our Directors are also interested in our Company to the extent of remuneration paid to them for services rendered as Directors of our Company and reimbursement of expenses payable to them. Our Directors may also be interested to the extent of any transaction entered into by our Company with any other company or firm in which they are directors or partners.

Our Company has entered into an agreement dated April 1, 2014 with Mr. Narendra Goel, Promoter and Managing Director of our Company in connection with supply for one of key raw material i.e, dolomite. For further details on the same please refer to section titled "*Our Management*" on page 194.

Although, such transactions are typically undertaken at an arm's length basis, there may be potential conflicts of interests between our Company and such Directors in light of such transactions entered into with our Company, which conflict could adversely affect our operations and/or our results of operations.

57. A portion of the Net Proceeds is proposed to be utilized to repay/prepay some of the term loans availed of by our Company. We also propose to utilize a part of the Net Proceeds for general corporate purposes, subject to the discretion of our management.

We intend to use the Net Proceeds for the purposes as described under the section titled "*Objects of the Issue*" on page 111. The selection of borrowing proposed to be repaid from our Company's facilities is based on inter alia, the nature and timing of such loans, their tenure, and the conditions specified for their repayment/prepayment. Further, a certain portion of the total Net Proceeds have been allocated towards general corporate purposes. Accordingly, no tangible assets will be created from the portion of the Net Proceeds proposed to be utilised for the repayment/repayment of the loans availed by our Company from our lenders. Any variation in the utilization of the Net Proceeds as disclosed in this Draft Red Herring Prospectus shall be subject to certain compliance requirements, including prior approval of the shareholders of our Company.

We propose to utilize the Net Proceeds to repay or prepay a portion of the loans availed of by our Company. For further details of the proposed objects of the Issue, see "*Objects of the Issue*" on page 111. In accordance with Section 27 of the Companies Act, 2013, we cannot undertake any variation in the utilization of the Net Proceeds as disclosed in this Draft Red Herring Prospectus without obtaining the approval of shareholders of our Company through a special resolution. In the event of any such circumstances that require us to vary the disclosed utilization of the Net Proceeds, we may not be able to obtain the approval of the shareholders of our Company in a timely manner, or at all. Any delay or inability in obtaining such approval of the shareholders of our Company may adversely affect our operations.

Our Promoters or controlling shareholders would be required to provide an exit opportunity to the shareholders of our Company who do not agree with our proposal to modify the objects of the Issue, at a price and manner as prescribed by SEBI. The requirement on Promoters or controlling shareholders to provide an exit opportunity to such dissenting shareholders of our Company, may deter the Promoters or controlling shareholders from agreeing to the variation of the proposed utilization of the Net Proceeds, even if such variation is in the interest of our Company. We cannot assure you that the Promoters or the controlling shareholders of our Company will have adequate resources at their disposal at all times to enable them to provide an exit opportunity.

As detailed above, we may not be able to vary the objects of the Issue to use any unutilized proceeds of the Issue, if any, even if such variation is in the interest of our Company. This may restrict our Company's ability to respond to any change in our business or financial condition, by redeploying the unutilized portion of Net Proceeds, if any, and such inability could in turn adversely affect our operations and profitability.

58. In the year Financial Year 2015 -2016 the existing term loans of our Company have been structured pursuant to the scheme issued by Reserve Bank of India i.e. "Flexible Structuring of Long Term Loan". Any cash flow mismatch, or restructuring of loans, could adversely affect our profitability and/or operations.

The operations of our Company had come under strain due to various internal and external reasons such as stretched working capital cycles, increased cost of inputs, higher interest cost, slowdown in steel industry etc. which led to a strain on the resulting cash flows of our Company. Hence, our Company requested the Consortium Lenders for "Flexible Structuring of Long Term Loan" pursuant to the scheme issued by Reserve Bank of India. Accordingly, the term loans and the then maturity amounts were rescheduled as agreed with the Lenders. In terms of this flexible restructuring, the repayment tenor was extended for a period of 15 years without any material change in other terms and conditions of the original sanctions given to our Company. For further details, please see "*History and certain corporate matters*" on page 185.

We cannot assure you such instances of cash flow mismatch will not arise in the future which may impact our ability to meet our contractual liabilities, profitability and results of operations of our Company. Further, we cannot assure you that instances of statutory or regulatory restructuring will not arise in the future, or that such instances will not adversely impact the profitability and results of operations of our Company.

59. The reports of our statutory auditors, ("Auditor"), on our Standalone and Consolidated Financial Statements, listed certain qualifications and 'Emphasis of Matter' which may adversely impact our results of operations and financial condition.

Our Auditor and our previous auditors have in their respective Audit Reports on our Consolidated Financial Statements and Standalone Financial Statements listed the following qualifications for the Financial Year 2017-2018, Financial Year 2016-2017, Financial Year 2015-2016, Financial Year 2014-2015 and Financial Year 2013-2014.

Financial year 2017-2018

Emphasis of Matter which states that "*the Company has invested in equity shares amounting to ₹22740.00 lakhs in its subsidiary company (IA Hydro Energy Private Limited) during the year resulting into utilization of short term fund for long term purposes.*"

Financial year 2016-2017:

Qualified Opinion: which stated that "*the Company has recognised the uncertified units of REC/CER amounting to ₹. 0.32 crores in closing stock as per the Company's policy, which is not yet certified by the CDM Board due to which the profit and shareholder's fund of the Company has been enhanced by this amount for the year*."

Financial Year 2015-2016:

Qualified Opinion which stated that "*the Company has recognised the uncertified units of REC/CER amounting to ₹ 3.60 crores in closing stock as per the Company's policy, which is not yet certified by the CDM Board due to which the profit and shareholder's fund of the Company has been enhanced by ₹ 3.60 crores for the FY 2015-16*."

Emphasis of Matter which states that "*the Company has not made any provision against the expected diminution of its joint venture investment due to coal block cancellation.*"

Financial Year 2014-2015:

Qualified Opinion: which stated that "*the Company has recognised the uncertified units of REC/CER amounting to ₹ 3.53 crores in closing stock as per the Company's policy, which is not yet certified by the CDM Board due to which the profit and shareholder's fund of the Company has been enhanced by ₹ 3.53 crores for the FY 2014-15*."

Financial Year 2013-2014:

Qualified Opinion: which stated that "*the Company has recognised the uncertified units of REC/CER amounting to ₹. 2.25 crores in closing stock as per the Company's policy, which is not yet certified by the CDM Board due to which the profit and shareholder's fund of the Company has been enhanced by ₹. 2.25 crores for the FY 2013-14*."

For further details, on the Qualifications in the Audit Report and the emphasis of matters please refer to *"Management's discussion and analysis of our financial condition and results of operations"* on page 431.

60. Our Company has made an application to register the logo appearing on the cover page of this Draft Red Herring Prospectus.

Our Company has made an application for the logo ""appearing on the cover page of this Draft Red Herring Prospectus, which is an important asset of our business. We cannot assure you that we will secure trademark registration or other intellectual property protection for logo. Until we do so, we may not have recourse against other parties which attempt to use our name or logo, which could confuse potential customers or others and adversely impact our brand strength and results of operations. Moreover, others may secure trademarks or intellectual property protection for use of our name and logo, which could restrict or prevent us from using these for our own business. Any of the foregoing could adversely impact or reputation, business, financial condition and results of operations.

External Risks Factors:

Factors related to India:

61. Our business is substantially affected by prevailing economic and political conditions in India.

Our Company is incorporated in India and our assets and employees are located in India. As a result, we are highly dependent on prevailing economic conditions in India, and our results of operations are significantly affected by factors influencing the Indian economy. Factors that may adversely affect the Indian economy, and therefore our results of operations, are as follows:

- increases in interest rates or inflation;
- exchange rate fluctuations;
- scarcity of credit or other financing facilities in India;
- political instability, a change in government or a change in the economic and deregulation policies;
- domestic consumptions and savings;
- prevailing economic and income conditions among consumers and companies;
- volatility in, and actual or perceived trends in trading activity on, India's principal stock exchanges;
- changes in tax, trade, fiscal or monetary policies, including the manner in which GST is implemented;
- political instability, terrorism or military conflicts, in India or in countries in the region or globally;
- occurrence of natural or man-made disasters;
- infectious disease outbreaks or other serious public health concerns;
- prevailing regional or global economic conditions;
- other significant regulatory or economic developments in India, or affecting India, its financial services, of the sectors which are critical to our business, (steel, construction and infrastructure);

- increase in India's trade deficits or such trade deficits becoming unmanageable; and
- a material decline in India's foreign exchange reserves.

Any slowdown or perceived slowdown in the Indian economy, or in specific sectors of the Indian economy, could adversely impact our operations and profitability. Our performance and the growth of our business depends on the performance of the Indian economy, and the economies of the regional markets we currently serve. These economies could be adversely affected by various factors, such as political and regulatory changes including adverse changes in liberalization policies, social disturbances, religious or communal tensions, terrorist attacks and other acts of violence or war, natural calamities, interest rates, commodity and energy prices, and various other factors. Any slowdown in these economies could adversely affect the ability of our customers to afford our services, which in turn would adversely impact our business and financial performance and the price of the Equity Shares.

High rates of inflation in India could increase our costs without proportionately increasing our revenues, and as such decrease our operating margins. Any slowdown or perceived slowdown in the Indian economy, or in specific sectors thereof, could adversely impact our business, results of operations, financial condition, and the price of the Equity Shares.

62. Significant differences exist between Indian GAAP and other accounting principles, such as US GAAP, Ind AS and IFRS, which may be material to investors' assessments of our financial condition.

Our financial statements are extracted from our Consolidated Financial Statements as of and for the Financial Years, 2018, 2017, 2016 and Financial Years, 2015 and 2014 are prepared in accordance with Ind AS and Indian GAAP respectively. No attempt has been made to reconcile any of the information given in this Draft Red Herring Prospectus, to any other principles, or to base it on any other accounting standards. Ind AS and Indian GAAP, differ in certain significant respects from IFRS, U.S. GAAP, and could differ significantly from other accounting principles and auditing standards with which prospective investors may be familiar with in other countries. We do not provide a reconciliation of our financial statements to IFRS or U.S. GAAP, or a summary of principal differences between Indian GAAP, IFRS and U.S. GAAP as relevant to our business. As there are significant differences between Indian GAAP and IFRS and between Indian GAAP and U.S. GAAP, there may be substantial differences in the results of operation, cash flows and financial positions discussed in this Draft Red Herring Prospectus, if the relevant financial statements were prepared in accordance with IFRS or U.S. GAAP. Accordingly, the degree to which the financial information included in this Draft Red Herring Prospectus will provide meaningful information is dependent on your familiarity with Ind AS, Indian GAAP and the Companies Act, any reliance by persons not familiar with Ind AS, Indian GAAP or the financial disclosures presented in this Draft Red Herring Prospectus should accordingly be limited.

63. We have commissioned an industry report from ICRA Limited which has been used for industry related data in this Draft Red Herring Prospectus. Such data has not been independently verified by us.

We have commissioned ICRA Report to produce a report on the steel industry. ICRA Limited has provided us with a report titled "Industry Overview: Iron and Steel", dated August 30, 2018, which has been used for industry related data that has been disclosed in this Draft Red Herring Prospectus. While we have taken reasonable care in the reproduction of the information in the DRHP, the information has not been prepared or independently verified by us, any of the BRLMs or any of our or their respective affiliates or advisors and, therefore, we make no representation or warranty, express or implied, as to the accuracy or completeness of such facts and statistics. Such information may be inconsistent with the facts and statistics compiled by other studies within or outside India. We are also unable to assure you that that such data is complete or accurate. Moreover, this industry report includes projections that by their very nature are estimations. Therefore, discussions in this Draft Red Herring Prospectus relating to India, its economy, the industries in which we currently operate and their growth prospects, are subject to the caveat that the statistical and other data upon which such discussions are based, may be incomplete and are speculative. For further details, please refer to "*Industry Overview*" on page 125.

64. Any downgrade of India's sovereign debt rating by an international rating agency, could have a negative impact on our Company's results of operations and financial condition.

Any downgrade by international rating agencies of the credit rating for Indian domestic and international debt, may adversely impact our ability to raise additional financing and the interest rates and commercial terms on which such additional financing is availed of. This could have an adverse effect on our ability to obtain financing to fund growth on favourable terms or at all and, as a result, could have a material adverse effect on our operations and profitability.

65. The occurrence of natural or man-made disasters could adversely affect our results of operations, cash flows and financial condition. Hostilities, terrorist attacks, civil unrest and other acts of violence could adversely affect the financial markets and our business.

The occurrence of natural disasters, including cyclones, storms, floods, earthquakes, tsunamis, tornadoes, fires, explosions, pandemic disease and man-made disasters, including acts of terrorism and military actions, could adversely affect our results of operations, cash flows or financial condition. Terrorist attacks and other acts of violence or war may adversely affect the Indian securities markets. In addition, any deterioration in international relations, especially between India and its neighbouring countries, may result in investor concern regarding regional stability which could adversely affect the price of the Equity Shares. India has witnessed local civil disturbances in recent years and it is possible that future civil unrest as well as other adverse social, economic or political events in India could have an adverse effect on our business. Such incidents could also create a greater perception that investment in Indian companies involves a higher degree of risk, which could have an adverse effect on our business and the market price of the Equity Shares.

66. Investors may not be able to enforce a judgement of a foreign court against our Company.

Our Company is incorporated under the laws of India. Our Company's assets are primarily located in India, and all of our Board of Directors and Key Managerial Personnel are residents of India. As a result, it may not be possible for investors to effect service of process upon our Company or such persons, in jurisdictions outside India, or to enforce against them judgments obtained in courts outside India. Moreover, it is unlikely that a court in India would award damages on the same basis as a foreign court if an action were brought in India, or that an Indian court would enforce foreign judgments if it viewed the amount of damages as excessive or inconsistent with Indian public policy.

67. Investors can be subject to Indian taxes arising out of capital gains on the sale of the Equity Shares.

Recently, the Finance Act, 2018, levied taxes on long term capital gains exceeding ₹ 100,000 arising from sale of Equity Shares on or after April 1, 2018, while continuing to exempt the unrealized capital gains earned up to January 31, 2018 on such Equity Shares.

Under current Indian tax laws, capital gains arising from the sale of Equity Shares in an Indian company are generally taxable in India. However, any gain realized on the sale of listed equity shares on or before March 31, 2018, on a stock exchange, will not be subject to long term capital gains tax in India if: **(a)** such equity shares are held for more than 12 months, and, **(b)** Securities Transaction Tax, ("**STT**"), is paid on the sale transaction as stipulated by the Finance Act, 2017, at the time of acquisition of such equity shares which should be on or after October 1, 2004, (except in the case of such acquisitions of equity shares which are not subject to STT, as notified by the Central Government under notification no. 43/2017/F. No. 370142/09/2017 -TPL on June 5, 2017).

You may be subject to payment of long term capital gains tax in India, in addition to payment of STT, on the sale of any Equity Shares held for more than 12 months. STT will be levied on and collected by the domestic stock exchange on which the Equity Shares are sold.

Further, any gain realized on the sale of listed equity shares held for a period of 12 months or less will be subject to short term capital gains tax in India. Capital gains arising from the sale of the Equity Shares will be exempt from taxation in India in cases where the exemption from taxation in India is provided under a treaty between India, and the country of which the seller is resident. Generally, Indian tax treaties do not limit India's ability to impose tax on capital gains. As a result, residents of other countries may be liable for tax in India, as well as in their own jurisdiction, in connection with any gain upon the sale of the Equity

Shares.

68. We may be affected by competition law in India and any adverse application or interpretation of the Competition Act could in turn adversely affect our business.

The Competition Act 2002, ("**Competition Act**"), was enacted for the purpose of preventing practices that have, or are likely to have, an adverse effect on competition in India, and has mandated the Competition Commission of India, ("**CCI**"), to regulate such practices. Under the Competition Act, any arrangement, understanding or action, whether formal or informal, which causes or is likely to cause an appreciable adverse effect on competition, is void and attracts substantial penalties. Further, any agreement among competitors which, directly or indirectly, involves determination of purchase or sale prices, limits or controls production, or shares the market by way of geographical area or number of subscribers in the relevant market, is presumed to have an appreciable adverse effect in the relevant market and would accordingly be void. The Competition Act also prohibits abuse of a dominant position by any enterprise.

So as to govern the procedures relating to combinations, the Central Government on March 4, 2011, notified, (with effect from June 01, 2011), the Competition Commission of India (Procedure in regard to the transaction of business relating to combinations) Regulations, 2011, ("**Combination Regulations**"). The Combination Regulations, which provide the mechanism for implementation of the merger control regime in India, require acquisitions of shares, voting rights, assets or control or mergers or amalgamations that cross the prescribed asset and turnover based thresholds, to be mandatorily notified to, and pre-approved by, the CCI.

The Competition Act aims to, among other things, prohibit all agreements and transactions which may have an appreciable adverse effect in India. Consequently, all agreements entered into by us could be within the purview of the Competition Act.

Additionally, the CCI has extra-territorial powers and can investigate any agreements, abusive conduct or combination occurring outside India, if such agreement, conduct or combination has an appreciable adverse effect in India. The impact of the provisions of the Competition Act on the agreements entered into by us cannot be predicted with certainty at this stage. We do not have any outstanding notices in relation to non-compliance with the Competition Act or the agreements entered into by us.

Our goodwill, operations and profitability could directly or indirectly, be adversely affected, by the application or interpretation of any provisions of the Competition Act, and/or the Combination Regulations; any enforcement proceedings initiated by the CCI; any adverse publicity that may be generated due to scrutiny or prosecution by the CCI; and/or any prohibition or substantial penalties which may be levied on us pursuant to the Competition Act, and/or the Combination Regulations.

69. A third party could be prevented from acquiring control of us because of anti-takeover provisions under Indian law.

There are provisions in Indian law that may delay, deter, or prevent, a future takeover or change in control of our Company. Under the Takeover Regulations, an acquirer has been defined as any person who, directly or indirectly, acquires or agrees to acquire shares or voting rights or control over a company, whether individually or acting in concert with others. Although these provisions have been formulated to ensure that interests of investors/shareholders are protected, these provisions may also discourage a third party from attempting to take control of our Company. Consequently, even if a potential takeover of our Company would result in the purchase of the Equity Shares at a premium to their market price or would otherwise be beneficial to our Shareholders, such a takeover may not be attempted or consummated because of the mandatory restrictions and requirements of the Takeover Regulations.

70. Rights of shareholders under Indian laws may be more limited than under the laws of other jurisdictions.

Indian legal principles related to corporate procedures, directors' fiduciary duties and liabilities, and shareholders' rights, may differ from those that would apply to a company in another jurisdiction. Shareholders' rights under Indian law, including those related to class actions, may not be as extensive as shareholders' rights under the laws of other countries or jurisdictions. Investors may have more difficulty in asserting their rights as a shareholder in an Indian company, than as a shareholder of a corporation in another jurisdiction.

71. Foreign investors are subject to foreign investment restrictions under Indian law, which could limit our ability to attract foreign investors. The inability to attract foreign investors, could adversely impact our ability to attract investors that could be of strategic importance to our business operations and profitability.

Under the foreign exchange regulations currently in force in India, transfers of shares between non-residents and residents are freely permitted (subject to certain restrictions), if they comply with the pricing guidelines and reporting requirements specified by the RBI, and the sectional cap prescribed for foreign investment in the relevant company. If the transfer of shares is not in compliance with such pricing guidelines and reporting requirements, or if such transfer is subject to any statutory/regulatory exception, then, the prior approval of the RBI or the appropriate authorities is required for any such transfer.

Additionally, shareholders who seek to convert the Rupee proceeds from a sale of Equity Shares in India, into foreign currency and repatriate that foreign currency from India, will require a no objection/ tax clearance certificate from the income tax authority. We cannot assure investors that any required approval from the RBI or any other Government agency, can be obtained on any particular terms, in a timely manner, or at all.

Additionally, as an Indian company, we are subject to exchange controls that regulate borrowing in foreign currencies. Such regulatory restrictions limit our financing sources, and consequently limits our ability to obtain financing on competitive terms and our options for refinancing existing indebtedness. In addition, we cannot assure you that the required approvals will be granted without onerous conditions, or at all. Limitations on raising foreign debt may have an adverse effect on our business growth, financial condition and results of operations.

Risks Related to the Issue:

72. The Equity Shares have never been publicly traded, and, after the Issue, the Equity Shares may experience price and volume fluctuations, and an active trading market for the Equity Shares may not develop. Further, the price of the Equity Shares may be volatile, and you may be unable to resell the Equity Shares at or above the Issue Price, or at all.

Prior to the Issue, there has been no public market for the Equity Shares, and an active trading market on the Stock Exchanges may not develop or be sustained after the Issue. There can be no assurance that a market for the Equity Shares will develop, or if developed, that there would be liquidity for the Equity Shares. The Issue Price of the Equity Shares is proposed to be determined through a book-building process and may not be indicative of the market price of the Equity Shares, at the time of commencement of trading of the Equity Shares or at any time thereafter. The market price of the Equity Shares may be subject to significant fluctuations in response to, among other factors, variations in operating results of our Company, market conditions specific to the industry we operate in, developments relating to India, volatility in securities markets in jurisdictions other than India, variations in the growth rate of financial indicators, variations in revenue or earnings estimates by research publications, and changes in economic, legal and other regulatory factors.

73. The Issue Price of the Equity Shares may not be indicative of the market price of the Equity Shares after the Issue.

The Issue Price of the Equity Shares will be determined through a Book Building Process. This price will be based on numerous factors, as described under "*Basis for Issue Price*" on page 118, and this price may not be indicative of the market price for the Equity Shares after the Issue. The market price of the Equity Shares could be subject to significant fluctuations after the Issue, and may decline below the Issue Price. There can be no assurance that an investor will be able to resell any Equity Shares at or above the Issue Price.

74. Any future issuance of Equity Shares, or convertible securities, or other equity linked securities issued by us, may dilute your shareholding and any sale of Equity Shares by our Promoters or members of our Promoter Group may adversely affect the trading price of the Equity Shares.

Any future issuance of the Equity Shares, convertible securities or securities linked to the Equity Shares by us, including through exercise of employee stock options may dilute your shareholding in our Company, adversely affect the trading price of the Equity Shares and our ability to raise capital through an issue of our securities. In addition, any perception by investors that such issuances or sales might occur could also affect the trading price of the Equity Shares. We cannot assure you that we will not issue additional Equity Shares. The disposal of Equity Shares by our Promoters and Promoter Group, or the perception that such sales may occur may significantly affect the trading price of the Equity Shares. Except as disclosed in "*Capital Structure*" on page 90, we cannot assure you that our Promoters and Promoter Group will not dispose of, pledge or encumber their Equity Shares in the future.

75. QIBs and Non-Institutional Investors are not permitted to withdraw or lower their Bids (in terms of quantity of Equity Shares or the Bid Amount), at any stage after submitting a Bid.

Pursuant to the SEBI ICDR Regulations, QIBs and Non-Institutional Investors are not permitted to withdraw or lower their Bids, (in terms of quantity of Equity Shares or the Bid Amount), at any stage after submitting a Bid. Retail Individual Investors can revise their Bids during the Bid/Issue Period and withdraw their Bids until Bid/ Issue Closing Date. While our Company is required to complete allotments pursuant to the Issue within six Working Days from the Bid/Issue Closing Date, events affecting the Bidders' decision to invest in the Equity Shares, including material adverse changes in international or national monetary policy, etc., may arise between the date of submission of the Bid and Allotment. While our Company may complete the Allotment of the Equity Shares even if Bids are withdrawn as detailed above, any such withdrawal could cause the trading price of the Equity Shares to decline on listing.

76. There is no guarantee that our Equity Shares will be listed on the Stock Exchanges in a timely manner or at all.

In accordance with Indian law and practice, permission for listing and trading of our Equity Shares will not be granted until after certain actions have been completed in relation to this Issue, including the Allotment of Equity Shares pursuant to this Issue. In accordance with current regulations of SEBI, our Equity Shares are required to be listed on the Stock Exchanges within six Working Days from the Bid and Issue Closing Date, subject to any change in the prescribed timeline in this regard. We cannot however assure you, that the trading in our Equity Shares will commence in a timely manner or at all. Any failure or delay in obtaining final listing and trading approvals may restrict your ability to dispose of your Equity Shares.

77. Holders of Equity Shares may be restricted in their ability to exercise pre-emptive rights under Indian law and thereby suffer future dilution of their ownership position.

Under the Companies Act, a company incorporated in India must offer its equity shareholders pre-emptive rights to subscribe and pay for a proportionate number of equity shares to maintain their existing ownership percentages prior to issuance of any new equity shares, unless the pre-emptive rights have been waived by the adoption of a special resolution by shareholders of such company. However, if the law of the jurisdiction that you are in does not permit the exercise of such pre-emptive rights, without our filing an offering document or registration statement with the applicable authority in such jurisdiction, then, you will be unable to exercise such pre-emptive rights, unless we make such a filing. To the extent that you are unable to exercise pre-emptive rights granted in respect of the Equity Shares, your proportional interests in our Company may be reduced.

Prominent Notes:

A. Investors may contact the BRLMs who have submitted the due diligence certificate to SEBI, or the Registrar to the Issue, for any complaints, information or clarifications pertaining to the Issue.

B. The net worth of our Company as of March 31, 2018 was ₹ 5,163.32 million and as of March 31, 2017 was ₹ 4,399.59 million on the basis of the Restated Standalone Financial Statements. Further, the net worth of our Company as of March 31, 2018 was ₹ 6,739.17 million and as of March 31, 2017 was ₹ 4,437.10 million on the basis of the Restated Consolidated Financial Statements.

C. The average cost of acquisition of Equity Shares by our Promoters is as follows:

Name of Promoter	Number of Equity Shares held by our Promoters	Average cost of Acquisition (in ₹ per Equity Share)
Suresh Goel	648,000	4.41
Rajendra Goel	640,000	3.95
Narendra Goel	428,000	2.50
Anand Goel	628,400	2.56
Atlanta Securities Private Limited	8,158,000	3.67
Banka Finance& Services Private Limited	8,313,524	16.73

D. For information regarding the business or other interests of our Group Companies in our Company please refer to *"Our Promoters"* and *"Our Group Companies - Nature and Extent of Interest of Group Companies"* beginning on page 211 and 219 respectively.

E. For details of transactions between our Company, Subsidiaries and our Group Companies during the last financial year, including the nature and cumulative value of the transaction, see "*Related Party Transactions*" on page 226.

F. Our Company was incorporated on July 25, 2002 at Gwalior as a public limited company under the Companies Act, 1956 pursuant to a certificate of incorporation dated July 25, 2002, issued by the Registrar of Companies, Madhya Pradesh & Chhattisgarh. Our Company has also received a certificate for commencement of business dated February 5, 2004, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh. Pursuant to the Scheme, a certificate of registration of order of High Court on Scheme dated December 7, 2011 was issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh.

G. There has been no financing arrangement whereby our Promoters, our Company, our Promoter Group, the Directors or their relatives, have financed the purchase by any other person of securities of our Company, other than in normal course of the business of the financing entity, during the period of six months immediately preceding the filing of this Draft Red Herring Prospectus.

SECTION III: INTRODUCTION

SUMMARY OF INDUSTRY

The information contained in this section is derived from ICRA Report commissioned by our Company. Neither we nor any other person connected with this Issue has verified this information. Industry sources and publications generally state that the information contained therein has been obtained from sources generally believed to be reliable, but that their accuracy, completeness and underlying assumptions are not guaranteed, and their reliability cannot be assured. Industry publications are also prepared based on information as at specific dates and may no longer be current or reflect current trends. Accordingly, investment decisions should not be based on such information. The ICRA Report has been prepared at the request of our Company and includes the following disclaimer:

"All information contained herein has been obtained by ICRA from sources believed by it to be accurate and reliable. Although reasonable care has been taken to ensure that the information herein is true, such information is provided 'as is' without any warranty of any kind, and ICRA in particular, makes no representation or warranty, express or implied, as to the accuracy, timeliness or completeness of any such information. Also, ICRA or any of its group companies, while publishing or otherwise disseminating other reports may have presented data, analyses and/or opinions that may be inconsistent with the data, analyses and/or opinions presented in this publication. All information contained herein must be construed solely as statements of opinion, and ICRA shall not be liable for any losses incurred by users from any use of this publication or its contents. Also, ICRA provides credit rating and other permissible services to the company which are provided at arms-length basis."

Overview of the Global Steel Industry

A. Overview

The global steel industry has strong linkages with the performance of the various economies and is largely influenced by a demand-supply situation, manufacturing and industrial activity and infrastructure development across geographies. Steel being a commodity is an inherently cyclical industry and follows a typical 'boom-bust' commodity cycle. Transportation costs also play a major role in the global steel industry due to high material intensity of the steel production process, where almost four metric tonnes (MT) of material movement is necessary for the production of one MT of steel. Additionally, tariffs imposed by various countries on imports/exports of steel can have a material impact on global steel trade volumes and hence remain important drivers of the seaborne steel market.

As per the World Steel Association data, global crude steel production in CY2017 stood at 1691.2 million tonne (mt), indicating a YoY growth of 5.3%. Except CIS countries, which reported a flat growth, all major regions including Asia, European Union, North and South America, Africa and the Middle East reported a production growth of 4% and above during CY2017.

B. Top Steel-producing Countries

The following table gives the crude steel production volumes in top 10 steel producing countries in the world as per the World Steel Association data.

Exhibit 15: Top 10 steel producing countries in the world (mt)

Sr. no	Country name	CY2015	CY2016	CY2017
1	China	803.8	786.9	831.7
2	Japan	105.2	104.8	104.7
3	India	89.6	95.5	101.4
4	United States	78.9	78.5	81.6
5	Russia	71.1	70.5	71.3
6	South Korea	69.7	68.6	71.1
7	Germany	42.7	42.1	43.6
8	Turkey	31.5	33.2	37.5
9	Brazil	33.2	31.3	34.4
10	Italy	22.0	23.4	24.0

Source: World Steel Association, ICRA research

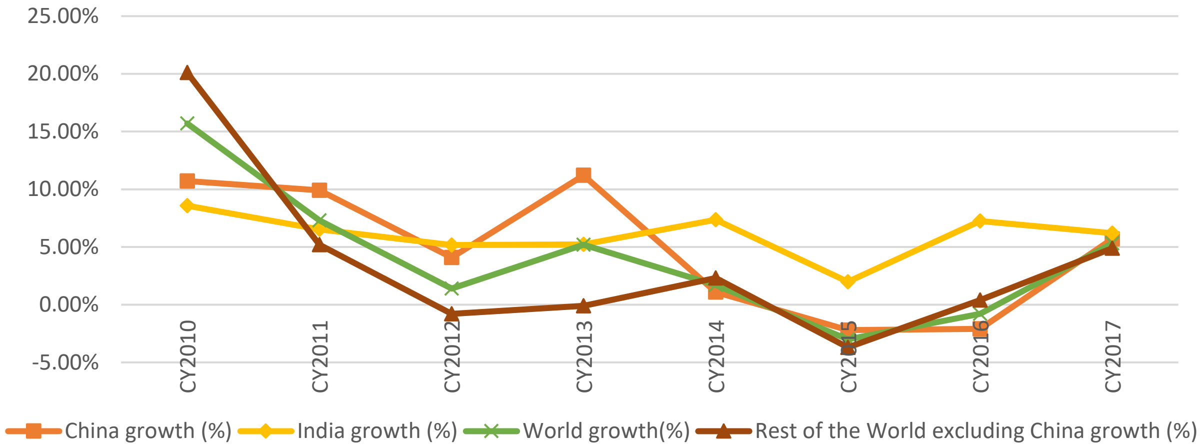
China remains the largest steel producer in the world with a share of about 49.2% in the global steel production in CY2017, followed by Japan and India, which contributed about 6.2% and 6% to the global steel production respectively during the same period.

C. Trends in Production and consumption

China and India have led the global steel production growth in the last few years. China's crude steel production has increased at a CAGR of 3.8% between the period CY2010 to CY2017 while the CAGR for India's steel production stood at 5.7%. As against this, world steel production grew at a CAGR of 2.2% during CY2010-CY2017 and production in the rest of the world excluding China grew by a meagre 0.8% during the same period. China's dominance in global steel trade can be gauged from the fact that its share in the incremental global steel production in the last seven years stood at 80%. India's share in the incremental global steel production during CY2010-CY2017 stood at 13% hinting that production in other geographies excluding China and India grew at a very slow pace during the last few years.

In CY2015 and CY2016, world steel production de-grew by 3% and 0.8% respectively because of subdued demand conditions globally. However, India's production growth remained positive even during these two years on the back of its improving domestic demand and increased competitiveness in the overseas markets due to anti-dumping duties levied on Chinese steel products in 2016 in various geographies including the US and the EU.

Exhibit 16: Global Crude Steel Production Annual Growth Trend



Source: World Steel Association, ICRA research

In case of global steel consumption growth, China's share in incremental global steel consumption during CY2010-CY2017 stood at 54% while India's share stood at 8% during the same period. As depicted in the table below, China accounted for about 46% of the global steel consumption in CY2017, while the share of most of the countries remains in the lower single digits, highlighting China's ascendency in the world steel trade.

In CY2014 and CY2015, China's finished steel consumption growth remained in negative territory, which largely affected global steel demand growth during those years. However, with gradual recovery in China's key consuming sectors, including property and infrastructure sectors, its demand growth improved in CY2016 to 1.2% and rose further to 8.3% in CY2017, which catapulted world steel consumption growth to 4.7% in CY2017 from -3.0% reported in CY2015.

Exhibit 17: Global Finished Steel Consumption Trends (in mt)

Country	CY2010	CY2011	CY2012	CY2013	CY2014	CY2015	CY2016	CY2017
China	587.6	641.2	660.1	741.4	710.4	672.3	680.3	736.8
United States	80.0	89.2	96.2	95.7	107.0	96.1	91.9	97.7
India	64.9	69.8	72.4	73.7	75.9	80.2	83.6	87.2
Japan	63.6	64.1	64.0	65.2	67.7	63.0	62.2	64.4
South Korea	52.4	56.4	54.1	51.8	55.5	55.8	57.1	56.4
Germany	36.2	40.7	37.5	38.0	39.6	39.3	40.5	41.8
Russia	36.7	41.5	42.8	43.3	43.1	39.8	38.6	40.6

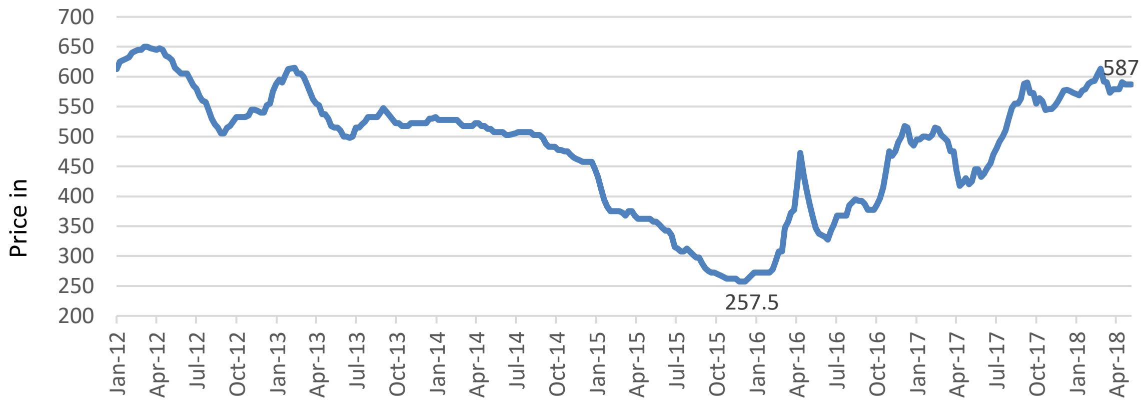
Country	CY2010	CY2011	CY2012	CY2013	CY2014	CY2015	CY2016	CY2017
Turkey	23.6	26.9	28.5	31.3	30.8	34.4	34.1	36.1
Mexico	17.8	19.8	20.9	20.6	22.5	24.2	25.4	26.4
Italy	25.7	26.6	21.5	21.9	21.9	24.5	24.1	24.5
World	**1310.7**	**1415.2**	**1442.5**	**1542.7**	**1546.7**	**1501.7**	**1517.1**	**1587.4**
World growth (%)	**14.0%**	**8.0%**	**1.9%**	**6.9%**	**0.7%**	**-3.0%**	**1.0%**	**4.7%**

Source: World Steel Association, ICRA research

D. Pricing Trends

Given China's domination in the global steel trade, any deviation in the demand-supply balance in China can have a material impact on global steel prices. As a result, Chinese steel prices act as a benchmark for global steel prices and China's export price of hot-rolled coils (HRC) is typically considered as a reference price for international steel prices. On the back of a healthy consumption growth in CY2013, China's export HRC prices remained largely range-bound between US$500/MT to US$ 600/MT during that period. Despite a demand de-growth in China, prices remained in the range of US$ 450/MT to US$ 530/MT for a large part of CY2014 on account of relatively better demand prospects in the overseas markets to which China exported large volumes (51% growth in Chinese steel exports was reported in CY2014).

Exhibit 18: China Export HRC Price (FOB) Trends



Source: Metalbulletin, ICRA research

However, due to persistent weakness in domestic demand conditions and slack demand in the overseas markets, Chinese HRC prices witnessed a steep fall in CY2015 from about US$ 460/MT in January 2015 to a multi-year low of US$ 258/MT in December 2015. In January 2016, the Chinese Government's announcement to cut its steel capacity by about 150 mt by 2020 and its fiscal stimulus to prop up property and infrastructure demand provided a respite to Chinese HRC prices, which witnessed an uptrend to reach US$ 500/MT level in December 2016. The Chinese Government's further announcement to shut down low grade induction furnaces in H1CY2017, intensified capacity cuts and the improving demand conditions helped the prices reach a level of US$580/MT in December 2017. After rising above US$ 600/MT level in March 2018 for a brief period, Chinese HRC prices remained stable in the last couple of months and stood at US$ 587/MT in May 2018.

While the prices are expected to remain steady in the near term on the back of resilient demand from real estate and infrastructure sectors, rising Chinese steel production levels and China's tighter credit policies, which would affect property sales, pose a risk of oversupply in the coming months.

E. Impact of US Import Tariffs on Global Steel Industry

On March 8, 2018, the USA Government announced the imposition of a 25% tariff on import of steel products, effective from March 23, 2018. This duty would be effective on all countries including Canada and Mexico (which together comprises about a quarter of the total US imports), and would affect the global steel trade of about 35 mt. While these volumes are not significant in relation to the extent of global steel trade, any diversion of the same to other countries could lead to a temporary disruption in those markets.

Exhibit 19: US Steel Import Trends

Exporting Country	Imports in million tonnes (mt)		
	CY2015	CY2016	CY2017
Canada	5.2	5.1	5.7
Mexico	2.5	2.7	3.2
Germany	1.4	1.1	1.4
Turkey	2.6	2.2	2.0
Russia	1.9	1.9	2.9
China	2.2	0.8	0.7
South Korea	4.4	3.5	3.4
Japan	2.4	1.9	1.7
Brazil	4.8	4.0	4.7
India	0.8	0.3	0.7
Share of Top 10 Exporters	**80%**	**78%**	**76%**
India's share in US imports	**2%**	**1%**	**2%**
Total US imports	**35.1**	**30.0**	**34.5**

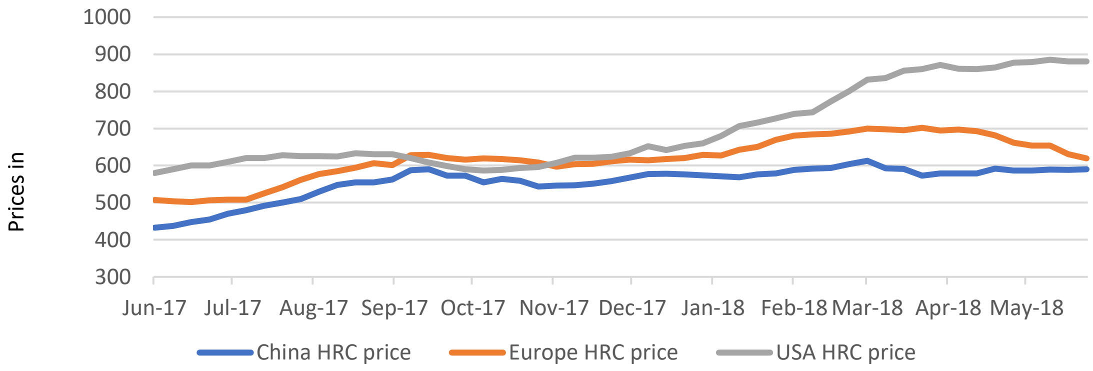
Source: US Department of Commerce, ICRA research

Impact of this import tariff may not be significant in the medium term due to three important reasons. Global steel demand (ex-USA) is expected to increase by 29 mt[1] in CY2018, and a part of the affected 35 mt seaborne volumes could be absorbed in other geographies, especially in the emerging and developing economies. Moreover, Chinese steel exports have been steadily declining in the last two years, reaching 75 mt in CY2017 from the peak level of 112 mt in CY2015. In the current year too, exports have continued to shrink, declining by 21% in the first four months of CY2018. This trend is expected to continue throughout CY2018 on the back of a resilient Chinese domestic demand and proposed steel capacity cuts. Therefore, other steel-exporting countries are likely to fill up this supply vacuum left by China by diverting affected volumes away from the USA. Further, in CY2017, domestic steel mills in the USA operated at a capacity utilisation of 74%, and even if capacity utilisation rates improve significantly in CY2018, it would still require around 10 mt of steel imports from non-exempt countries. Therefore US bound seaborne steel volumes that could potentially be vying for other markets are likely to be lower than 35 mt, moderating its impact on other geographies. However, the possibility of reciprocal tariffs by other countries cannot be ruled out, in which case the global steel trade may get affected to an extent in the near term.

It may be noted that two key steel exporting countries to India, namely South Korea and Japan, together exported around 5 mt steel to the USA in CY2017. Given that these two countries have free trade agreements (FTA) with India, ICRA believes that during the process of global readjustment of trade pattern, an increase in steel imports to India from South Korea and Japan would remain a likely possibility in the near term.

ICRA also notes that the steel prices in the USA have increased sharply since the announcement of import tariffs in March 2018 and are trading at a premium of above 40% over steel prices in China and Europe, which indicates that the exporters may still be able to sell in the USA despite higher duties without sacrificing margins.

Exhibit 20: HRC Price Trends in Various Geographies



Source: Metalbulletin, ICRA research

[1] as per the World Steel Association short-range forecast made in April 2018

Overview of the Indian Infrastructure Sector

A. Overview

Infrastructure is the backbone of development of any country, be it transport infrastructure like roads, railways, ports etc, or energy, or communication infrastructure. Each of the infrastructures have a key role in the overall economic growth of the country.

B. Investment in Infrastructure in India

India had seen sizeable investment in infrastructure development across sectors. The total investment in the infrastructure sector during the Twelfth Five Year Plan period (2012-2017) is estimated at Rs. 37 lakh crore. Major investments have taken place in electricity, roads & bridges, telecom, railways, irrigation, etc. However, the investment in Infrastructure is only about 6% of India's GDP.

Given the under-investment in the past, there is a need to accelerate investments to meet the requirements of the sector. As per the Economic Survey 2017-18, around US$4.5 trillion infrastructure investments would be needed till 2040 to improve the economic growth and community wellbeing. The Central Government has increased the capital outlay towards key infrastructure sectors like roads and railways significantly over the last few years, which is likely to help improve the pace of infrastructure investment in the country. However, private sector participation has remained weak in the past with an estimated 34% contribution to the total infrastructure investment during the Twelfth Plan. The Indian Government has taken various policy and regulatory steps to revive private sector participation, including innovative models like the Hybrid Annuity Mode (HAM), Infrastructure Investment Trusts (InvIT), the National Infrastructure Investment Fund (NIIF), etc.

A brief investment potential on some key infrastructure segments is summarised below:

<u>Roads:</u> The Government has initiated a large highway upgradation programme under the *Bharatmala Pariyojana* scheme. The first phase of this programme is estimated to cost Rs. 5.35 lakh crore and is to be undertaken over the next four to five years. Apart from the Bharatmala programme, various state governments also have sizeable highway development plans, estimated at over Rs. 3 lakh crore of infrastructure investment over the next three to four years.

<u>Railways:</u> Under the National Rail Plan 2030, the Indian Railways envisages investments of Rs. 35 lakh-crore, thereby entailing an average annual outlay of Rs. 2.5 lakh crore. In the medium term, the Railways' annual capex is estimated at over Rs. 1.5 lakh crore, of which about half is of relevance to the construction sector. The Indian Railways has increased its capital outlay with a major part of it towards laying of new railway tracks, doubling of lines, electrification of railway lines, etc. This apart, a sizeable investment is being planned towards railway station redevelopment over the long term.

<u>Metro Rail Development:</u> Currently, the metro rail network is operational/partly operational in nine cities. In addition to the extension of the Metro Rail network in these cities, new Metro Rail networks are proposed to be developed in another 15-20 cities with a population of over 1 million. The Metro Rail projects are likely to require an investment of over Rs. 2 lakh crore over the next five years.

SUMMARY OF OUR BUSINESS

Some of the information in the following discussion, including information with respect to our plans and strategies, contains forward looking statements that involve risks and uncertainties. You should read the section "Forward-Looking Statements" beginning on page 20 for a discussion of the risks and uncertainties related to those statements and also the section "Risk Factors" beginning on page 22 for a discussion of certain factors that may affect our business, financial condition or results of operations. Our actual results may differ materially from those expressed in or implied by these forward-looking statements. Our Financial Year ends on March 31 of each year, and references to a particular Financial Year are to the twelve-month period ended March 31 of that year. You should carefully consider all the information in this Draft Red Herring Prospectus, including this section, "Risk Factors", "Industry Overview", "Restated Financial Statements" and "Management's Discussion and Analysis of Financial Condition and Results of Operations" beginning on pages 22, 125, 228 *and* 431, *respectively, before making an investment in the Equity Shares.*

Unless otherwise indicated, industry and market data used in this section has been derived from industry publications and other publicly available information, including, in particular, the ICRA Report. Unless otherwise indicated, all financial, operational, industry and other related information derived from the CRISIL Report and included herein with respect to any particular year refers to such information for the relevant financial year.

Overview

Shri Bajrang Power and Ispat Limited, the flagship company of Goel group of companies, is an integrated manufacturer of long steel products in India. Our current product portfolio comprises of TMT bars, wire rod, HB wires, sponge iron, pellets, steel billets, ferro alloys, and fly ash bricks. The Goel group is involved in, inter-alia, the manufacturing of steel, generation and sale of hydro-power, generation of captive power, and operating a regional television channel.

Our Company is led by an experienced management team, consisting of professionals with experience across various sectors. Each of our individual Promoters, namely Suresh Goel, Rajendra Goel, Narendra Goel, and Anand Goel have more than three decades of hands on experience in the steel industry. Our Company believes that our management team's collective experience and capabilities enable us to understand and anticipate market trends, manage our business operations and growth, leverage customer relationships and respond to changes in customer preferences.

Our TMT Bars and HB wires, are sold under the brands "Goel TMT" and "Goel TMT WireX" respectively which, our Company believes, are well recognized brands in their respective categories. Revenues from sale of TMT Bars and HB Wires has been the pre-dominant revenue stream for our Company and contributes 58.57% of our standalone revenues for Financial Year 2017 - 2018.

Our Company caters primarily to the infrastructure and construction industry in India especially across the central and western regions of India which is serviced through 6 distributors with a network of 385 dealers.

Our Company is an integrated steel manufacturer, with three strategically located manufacturing facilities in Raipur, which is the capital of the state of Chhattisgarh – a state rich in various minerals, including coal and iron ore which are the primary and critical raw materials that our Company requires for manufacturing its products. (*source: http://chhattisgarhmines.gov.in/sites/default/files/MiningBooklet_2017_web.pdf*). Availability of these raw materials in close proximity to our manufacturing facilities, helps our Company in minimising our operating costs and achieve operational efficiencies.

Our customer base during the Financial Year 2017 - 2018 was spread across 24 states, with primary market presence being in the central and western regions of India. During Financial Year 2017 - 2018, our revenue share from state of Chhattisgarh, Madhya Pradesh and Maharashtra constituted 61.90%, 16.52% and 9.63% respectively of our standalone restated revenues.

Our Company endeavors to be innovative in its sector and has relied on process re-design and re-engineering to reduce the time and cost involved in manufacturing of its products. In an effort to enhance our backward integration, increase raw material security, and enhance profits, our Company has applied for, and have been allotted exclusive mining rights, in connection with an iron ore mine located in the Uttar Bastar Kanker district at Chhattisgarh. Our Company also have exclusive mining rights in connection with an open-cast manganese ore mine located in Vizianagaram district, in Andhra Pradesh with an area of 3.95 Ha.

Details of our manufacturing facilities are as follows:

	Name and location of facility	Facility Commissioned in	Installed Capacity (as on July 31, 2018) (in MTPA)							(No.'s)
			Pellets	Iron Ore Beneficiation plant	Sponge Iron	Billets and Blooms	Rerolled Steel Products	HB Wire	Silico Manganese	Fly Ash Bricks
1.	**Unit I:** Borjhara, Raipur	2005	NA	NA	210,000	129,600	120,000	NA	14,400	20,000,000
2.	**Unit II:** Gondawara. Raipur	2002*	NA	NA	NA	105,600	225,000	30,000	NA	6,000,000
3.	**Unit III:** Tilda, Raipur	2013	1,200,000	1,320,000	150,000	NA	NA	NA	NA	10,000,000
	Total:		1,200,000	1,320,000	360,000	235,200	345,000	30,000	14,400	36,000,000

Source: Certificate from Er. Shreyansh Agrawal (Chartered Engineer) dated August 1, 2018 with license number AM086382/6.
**Unit II has been upgraded in the Financial Year 2007-2008.*

Our captive power generating facilities:

The details of our captive power installed capacity, are as follows:

	Name and location of facility	Captive power installed capacity (MW)	Generated from
1.	**Unit I:** Borjhara, Raipur	18	waste heat recovery
		8	bio-mass
2.	**Unit II:** Gondawara, Raipur	16	thermal coal
3.	**Unit III:** Tilda, Raipur	16	waste heat recovery
	Total installed capacity in our Company:	**58**	

Source: Certificate from Er. Shreyansh Agrawal (Chartered Engineer) dated August 1, 2018 with license number AM086382/6.

Some of our key financial parameter as per Restated Consolidated Financial Statements are set forth below:

(₹ in million)

Particulars	**Financial Year 2017 - 2018**	**Financial Year 2016 - 2017**	**Financial Year 2015 - 2016**	**CAGR**
Revenue from operations	18,512.00	15,618.40	14,106.44	9.48%
Gross Margin*	4,946.49	3,539.73	2,717.96	22.09%
Gross Margin* as % of Revenue	26.72%	22.66%	19.27%	-
EBIDTA	2,832.57	2,161.76	1,570.81	21.72%
EBIDTA Margin as % of Revenue from operations	15.30%	13.84%	11.14%	-
PAT	368.88	282.19	(194.66)	Not meaningful
PAT Margin as % of Revenue from operations	1.99%	1.81%	(1.38)%	-
Net Debt**	11,590.82	11,827.27	9,103.61	8.38%
Net Worth***	6,739.17	4,437.10	4,144.35	17.59%

[*] *Gross Margin has been defined as Revenues from operations minus cost of materials consumed minus purchase of traded goods minus change in inventory of finished goods, work in progress, traded goods and stores and spares*
[**] *Net Debt has been defined as Long Term Debt plus Short Term Debt plus Current Maturities of Long Term Debt minus Cash and Cash equivalents.*
[***] *net worth means the aggregate of the paid up share capital, share premium account, and reserves and surplus (excluding revaluation reserve) as reduced by the aggregate of miscellaneous expenditure (to the extent not adjusted or written off) and the debit balance of the profit and loss account;*

Our Strengths:

- ***Our Company is an integrated manufacturer of long steel products in India, with a diversified product portfolio and well recognized brands 'Goel TMT' and 'Goel TMT WireX'.***

  Our Company is an integrated manufacturer of long steel products in India with a diversified products portfolio which are focused on the infrastructure and construction industry in India. Our backward integration into iron ore mining and captive power generation capabilities helps our Company in minimizing operating costs and maximizing operational efficiencies and profitability. Further, our focus on value added long products viz. TMT Bars, wire rods and HB Wires vis-à-vis sale of pellets or billets helps us capture larger proportion of value chain.

  Our products in categories of TMT bars, and HB Wires are sold under the brand of "Goel TMT" and "Goel TMT WireX" respectively. Our Company believes that 'Goel TMT', is one of the established brands for TMT bars in the Central India region and both the brands are well recognized in the end user market in central India and parts of western India. Sale of "Goel TMT" and "Goel TMT WireX" branded products constituted 58.57 % of our standalone restated revenues. Additionally, our Company manufactures ferroalloys both for internal consumption as well as for sale in the market. Ferroalloys are sold by our Company to the aluminum industry and the steel manufacturing industry. The sale of these ferroalloys is one of the revenue contributors for our Company. Our ferroalloy sales for the Financial Year 2017 - 2018, Financial Year 2016 - 2017 and Financial Year 2015 - 2016 was ₹ 550.46 million, ₹ 678.70 million and ₹ 345.58 million respectively.

- ***Efficient operations with focus on product quality and cost optimization***

  All of our products are manufactured at our manufacturing facilities located in Raipur, Chhattisgarh. At the aforesaid facilities our Company has set up steel melting shops, rolling mills, captive electricity generation units, palletization plant and iron ore beneficiation plant. our Company has obtained, and maintain, a number of prestigious quality management system certificates in line with industry standards, including ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 for Unit I and Unit II. This helps in our Company achieving efficiencies of over 100% for certain processes.

  Our Company endeavors to be innovative in its sector and has relied on process re-design and re-engineering to reduce the time and cost involved in our manufacturing operations. One such initiative has been the adoption of direct rolling process in Unit I and Unit II for manufacturing of rerolled products. Direct rolling process is a technical evolution of hot charging, where continuous cast billet is directly pushed to the rolling mill, without the need of an intermediate process of re-heating. This process eliminates the need for re-heating the ingots/ billets and results in savings in fuel as well as emission of greenhouse gases.
  (<u>*source*</u>*: http://www.in.undp.org/content/dam/india/docs/EnE/0-34-321_BOOK_WEB.PDF)*

  Our other initiatives and infrastructure including captive iron ore mine, captive power generation capacity, captive source of water, private railway siding, iron ore beneficiation plant which helps beneficiate low grade fines with an average grade of Fe 55% to usable ore with an average grade of Fe 62%., coal linkage with South Eastern Coalfields Limited, manufacturing of ferroalloys for internal consumption and use of Producer Gas (Producer gas is fuel gas that is manufactured from material such as coal) at our Unit III helps us to manage our operations in cost efficient manner.

  For our Unit II, our Company received recognition from the Ministry of Steel, GoI, and the United Nations Development Programme Global Environmental Finance Unit, ("UNDP-GEF") in 2014 for: (1)

"Removal of Barriers to Energy Efficiency Improvement in Steel Re-rolling Mill Sector in India"; and, (2) being a "Model Unit For Energy Efficiency Interventions".

- ***Established relationships with channel partners supported by large distribution network:***

  Our Company has established strong customer relations during our sixteen years of operations. our Company manages the channel and retail business through distributors who in turn manage a network of dealers throughout the central and western regions of India. As of July 31, 2018, our Company had a network of 385 dealers and 6 distributors. For details of the geographies in which our Company sells the products, please see "*Our Business - Sales and distribution*" on page 175. Our Company manages our channel partners and retail sales through a sales and marketing team of 63 employees as at July 31, 2018, who aid the distribution process and are primarily engaged in distributor/dealer relationship management, appointment of dealers and distributors, procuring orders, product promotions and collections.

- ***Strategically located manufacturing facilities***

  Steelmaking is a highly raw material and logistics intensive business, with one tonne of steel requiring the movement of four tonne of raw materials. For a secondary steel producer, raw materials account for around 70% of the cost of steelmaking. Iron ore and coal are the two most critical steelmaking ingredients, and proximity to iron ore and/or coal mines give considerable competitive advantage to a steel player due to lower logistics costs for raw material procurement. Given this cost dynamics, our manufacturing facilities are situated in Raipur surrounding the mining belts of states having large reserves of iron ore and/or coal enjoying a competitive advantage over access to cheaper raw material. Our manufacturing facilities are located in Chhattisgarh, a state rich in various minerals, including coal and iron ore which are the primary and critical raw materials that our Company requires for manufacturing its products. Chattisgarh has coal reserves equivalent to approximately 18.15% of India's coal reserves and Iron Ore (Haemetite) reserves of approximately 19.59% of India's reserves for the mineral and was the leading producer of coal and second largest producer of iron ore in the country. Coal and iron ore are voluminous commodities and proximity of sources of such minerals helps our Company in minimising our operating costs and achieve operational efficiencies. (*source: http://chhattisgarhmines.gov.in/sites/default/files/MiningBooklet_2017_web.pdf)*

  Further, due to the voluminous nature of our products, transportation cost is a critical aspect. Our core markets of central and western India are expected to witness significant construction activity driven by various schemes including 'Bharatmala' project, 'Pradhan Mantri Urja Ganga' programme, 'Pradhan Mantri Awas Yojana', 'Sagarmala' programme and 'Atal Mission of Rejuvenation & Urban Transformation' (AMRUT).

- ***Strong track record of robust financial performance***

  Our Company believes that our integrated production facilities, high capacity utilization, productivity and low operating costs due to refined technological processes are the inherent strength of our Company, which protects our Company against the cyclical trends of the steel sector. Our Company has maintained healthy leverage and credit rating despite the various challenges in the sector.

  For Financial Year 2015 - 2016 to Financial Year 2017 - 2018, we achieved a CAGR of 9.48 % in revenue from operations, and CAGR of 21.72 % in EBITDA as per the Restated Consolidated Financial Statements. The debt to equity ratio of our Company as of Financial Year 2017 - 2018 was 1.44 as per the Restated Standalone Financial Statements. According to Brickwork ratings, our Company was rated BWR A-/A2+ with outlook stable on May 10, 2017. Our Company has made an application to Brickwork Ratings for renewal of our credit rating.

- ***Strong management team backed by experienced Promoters***

  Our Company believes that it benefits from the vision, leadership, skills, experience and relationships of several members of our senior management including our Promoters Suresh Goel, (Executive Director and Chairman), Narendra Goel (Managing Director), Rajendra Goel (Executive Director), and, Anand Goel, Executive Director, each of whom has more than three decades of experience in manufacturing of iron and steel and related products. Our Company's senior management team comprises of members with extensive experience, in-depth knowledge and professional qualifications in the steel industry and regulatory environment.

Our management team's collective experience, industry knowledge and project execution skill enable us to understand and anticipate market trends, manage our business operations and growth, leverage customer relationships and respond to changes in customer preferences. Our Company believes that the skill and experience of our management, drawn from several years of experience in setting up and managing our existing operations, and executing large scale projects, will help us in expanding our operations and implementing our organic growth strategy. Our Company will continue to leverage on the experience of our management team and their understanding of the industry, to take advantage of current and future market opportunities.

Our Strategies:

- ***Improve asset utilization and enhance our production capacities***

Our products are largely used in construction industry and given the Government's thrust on infrastructure creation, and gradual recovery of construction sector, our Company anticipates industry wide volumes to grow at approximately 4.0% during Fiscal 2019 and Fiscal 2020, and around 7.5% between Fiscal 2021 and Fiscal 2023. Our Company believes that it is well positioned to out-pace the industry growth and increase our market share in respective segment. For details of our aggregate installed capacity, production volumes, and the capacity utilization of each of the products manufactured by our Company, for the last three years, please see "*Our Business – Capacity & Capacity Utilization*" on page 172.

In addition to our existing facilities at Units I, II and III, our Company plans to increase our production capacities through:

i Setting up of an additional sponge iron plant, of 150,000 TPA, at the Unit III Tilda facility. This would significantly enhance our sponge iron output and doubling it from 150,000 TPA to 300,000 TPA.

ii Setting up a replacement facility at Unit III, comprising of: (a) steam turbines capable of generating 30 MW per day, (b) waste heat recovery boilers with an aggregate capacity of 62 TPH; and, (c) machinery for facilitating the transfer of surplus power from Unit III to Unit I, (namely an external combustor, 132 Kva power transmission lines, and, a sub-station with 20/25 Mva generator transformer).

iii Replacement of existing 8 x 4 Induction furnace with 15 MT x 4 Induction Furnace, at Unit I, with a billet caster, so as to enhance our steel melting and rolling capacity.

The facilities above are expected to be fully commissioned during Financial Year 2020. On completion of the above expansion plans, our Company's aggregate installed capacity is expected to increase from 360,000 TPA to 510,000 TPA, for sponge iron production; and from 235,200 MTPA to 264,000 MTPA, for Billets and Blooms.

Our manufacturing facility at Unit III at Tilda has an unutilized land area of 105.615 hectares has the necessary infrastructure facilities and also the environment clearances for setting up of our future projects. Thus, our Company has the advantage of setting up new projects with minimum costs and reduced timelines.

Our future plans for expansion also includes manufacturing of new products including, seamless tubes, alloy steel products and ductile iron pipes.

- ***Continued focus on cost optimization***

Our Company believes that despite the standardized nature of processes in our industry, our Company has been able to create an effective cost advantage through relentless focus on cost optimization by investments in infrastructure, re-engineering initiatives and operational excellence. Our Company intends to set-up additional facilities like blast furnace, coke oven plant and sinter plant, which will lead to further economies of scale for our Company. In addition, our Company intends to continuously re-evaluate our processes and ecosystem to reduce costs.

- ***Expand our network and further strengthen our key brands***

Our Company currently sells our products through a network of approximately 385 dealers largely focused around central and western India. Our Company intends to expand our geographical presence for instance, in Financial Year 2017 - 2018, our Company entered the western regions of Orissa. Our Company will continue to evaluate such other geographically contiguous areas which are viable from cost of transportation perspective.

Our Company will continue to improve our penetration in our existing markets by enhancing our retail distribution network, further strengthening the internal sales and marketing teams and improved visibility of our key brands. Our Company believes that our key brands 'Goel TMT' and 'Goel TMT WireX' enjoy wide recognition in their target markets and will invest in further strengthening them through increased but targeted media spends and better engagement with customers, professional customers and intermediaries.

Our Company also believes that it will be able to capitalize on our reputation for quality, consistent performance and consumer satisfaction in our existing markets and product verticals to target new consumers.

- ***Focus on sustainable and profitable growth***

Our Company continuously seeks to improve our financial profile and maintain a strong focus on sustainable growth. Our Company intends to maintain our attention to cost optimization and maintain profitable operations across commodity cycles. Further, our Company is committed to achieving the optimization of financial cost supported by credit rating improvement and proactive debt management. Our Company has been able to complete the incremental capital expenditure required across all Units over the last two primarily through internal accruals, and did not significantly increase our debt for the said capital expenditure. In keeping with the expected volume ramp up and the low capital intensity of our capital expenditures, our Company believes that it is well positioned to achieve improved leverage and return ratios. Our Company also believes that repayment/pre-payment of loan will help to reduce our outstanding indebtedness and enable utilization of our accruals for further investment in our business growth and expansion. In addition, we believe that the strength of our balance sheet and leverage capacity of our Company will improve our ability to raise further resources in the future to fund our potential business development opportunities and plans to grow and expand our business. For further details, please see "*Objects of the Issue*" on page 111.

SUMMARY OF FINANCIAL INFORMATION

The following tables set forth the summary financial information derived from the Restated Financial Statements as at and for the Fiscals 2018, 2017, 2016, 2015 and 2014.

The Restated Financial Statements are set forth in "Restated Financial Statements" beginning on page 228. The summary financial information presented below should be read in conjunction with the "Restated Financial Statements" and with respect to the Restated Consolidated Financial Statements, "Management's Discussion and Analysis of Financial Condition and Results of Operations" beginning on pages 228 and 431, respectively.

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Restated Consolidated Ind AS Summary Statement of Assets and Liabilities

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
I. ASSETS			
(1) Non-current Assets			
(a) Property, Plant & Equipment	14629.76	14902.65	8999.83
(b) Capital work-in-progress	359.22	441.51	390.11
(c) Investment Property	189.83	193.01	196.19
(d) Intangible Assets	142.21	147.21	152.21
(e) Goodwill (Consolidated)	2123.91	98.91	98.91
(f) Financial Assets			
(i) Investments	21.65	22.39	22.37
(ii) Others	58.38	59.17	49.58
(g) Deferred Tax Assets (Net)	54.57	54.96	83.89
(h) Other Non-current assets	205.02	72.49	62.42
Total Non-Current Assets	**17,784.56**	**15,992.30**	**10,055.51**
(2) Current Assets			
(a) Inventories	2,430.73	2,119.57	2,433.84
(b) Financial Assets			
(i) Trade Receivables	737.86	526.01	479.56
(ii) Cash and cash equivalents	18.91	75.33	18.23
(iii) Bank Balance other than Cash	145.07	180.23	158.35
(iv) Loans	-	-	1,886.73
(v) Other Financial Assets	28.13	39.38	66.76
(c) Current Tax Assets (Net)	0.45	68.26	100.21
(d) Other current assets	888.38	1,025.72	1,077.54
Total Current Assets	**4,249.54**	**4034.49**	**6221.21**
Total	**22,034.10**	**20,026.80**	**16,276.72**
II. EQUITY AND LIABILITIES			
(1) Equity			
(a) Equity Share Capital	130.71	130.71	130.71
(b) Other Equity	7,421.64	5,119.56	4,826.71
Equity Attributable to owners of the Company	**7,552.35**	**5,250.27**	**4,975.43**
Non-Controlling Interests	70.95	19.74	20.46
Total Equity	**7,623.31**	**5,270.01**	**4,977.89**
(2) Non-Current Liabilities			
(a) Financial Liabilities			
(i) Borrowings	8,064.63	7,858.05	5214.38
(b) Provisions	57.85	44.57	32.72
(c) Deferred Tax Liabilities (Net)	-	-	-
(d) Other Long-Term Liabilities	60.80	60.80	60.80
Total Non-Current Liabilities	**8,183.28**	**7,963.42**	**5,307.90**

(3) Current Liabilities			
(a) Short-Term Borrowings			
(i) Borrowings	2,887.36	3,393.64	3,545.77
(ii) Trade Payable	2,009.98	1,915.57	1,568.85
(ii) Other Financial Liab.	943.36	1,114.30	645.98
(b) Other Current Liabilities	232.11	338.04	205.88
(c) Short-Term Provisions	34.61	31.81	24.45
(d) Current Tax Liabilities (net)	120.09	-	-
Total Current Liabilities	**6,227.51**	**6,793.36**	**5,990.93**
Total	**22,034.10**	**20,026.80**	**16,276.72**

Restated Consolidated Summary Statement of Profit and Loss Account

(₹ 'in Million)

Particulars		For The Year Ended 31.03.2018	For The Year Ended 31.03.2017	For The Year Ended 31.03.2016 (Proforma)
I.	Revenue from Operations	18,512.00	15,618.40	14,106.44
II.	Other Income	132.28	45.24	47.24
III.	**Total Revenue (I+II)**	**18,644.28**	**15,663.64**	**14,153.68**
IV.	**Expenses**			
	Cost of Materials Consumed	12,745.79	9,455.66	9,570.27
	Purchase of Stock in Trade	201.75	35.92	153.15
	(Increase) / Decrease in Stock in Trade	(485.18)	508.09	(239.16)
	Excise Duty on Sales	523.22	1,681.64	1,519.89
	Employees benefit Expenses	573.92	448.71	417.36
	Financial Costs	1,470.70	1,222.29	979.91
	Depreciation	708.19	564.81	547.24
	Other Expenses	2,252.21	1,371.86	1,154.69
	Total	**17,990.60**	**15,288.97**	**14,103.36**
V.	**Profit Before Exceptional and**			
	Items & Tax (III-IV)	**653.68**	**374.67**	**50.32**
VI.	Exceptional items	-	-	6.67
XVII	**Profit Before Tax (VII-VIII)**	**653.68**	**374.67**	**43.65**
XIVIII.	**Tax expenses:**			
	Net current Tax	294.68	113.05	8.66
	Deferred Tax	0.36	28.88	229.26
IXII	**Profit/ (Loss) for the period**	**358.65**	**232.73**	**(194.28)**
	Add: Share in Profit of Joint Venture	(0.03)	(0.12)	(0.42)
	Less: Minority Share in Profit	(12.61)	(5.73)	-
	Less: Loss of Firm transferred to Partners Capital Account	-	(45.16)	-
		371.23	**283.51**	**(194.70)**
XIII.	**Other Comprehensive Income:**			
	a) Re-measurements of the defined benefit plans	**(2.41)**	**(1.40)**	-
	b) Equity instruments through other comprehensive income	0.10	0.13	0.06
	c) Income tax relating to items that will not be			
	reclassified to profit or loss	(0.03)	(0.05)	(0.02)
	Less: Minority Share in Other Comprehensive Income	(0.00)	-	-
		(2.35)	**(1.31)**	**0.04**
XIV.	**Total Comprehensive Income for the year**	**368.88**	**282.19**	**(194.66)**
XVXII.	**Basic / Diluted Earnings per Equity Share**	**28.22**	**21.59**	**(14.89)**

Restated Consolidated Ind AS Summary Statement of Cash Flows

(₹ 'in Million)

	As At	As At	As At
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
A CASH FLOW FROM OPERATING ACTIVITIES			
Net Profit before Tax	653.68	374.67	43.65
ADJUSTMENTS FOR:			
Depreciation	708.19	564.81	547.24
Interest & Financial Expenses	1470.70	1222.29	979.91
Interest Received	(63.97)	(37.93)	(32.09)
Provision for Bad & Doubtful Debt	1.94	0.38	4.84
Share in Loss of Partnership Firm	-	45.16	-
Share in Profit of Joint Venture	(0.03)	(0.12)	(0.42)
Bad Debts Written off	(1.39)	-	-
Equity instruments through other comprehensive income	0.10	0.13	0.06
Re-measurements of the defined benefit plans	(2.41)	(1.40)	-
Income Disclosed Under IDS (Net of Tax)	-	11.00	-
Dividend Income	(0.00)	(0.00)	(0.00)
Impact of Restatement of Financial Statement	(27.98)	(0.45)	(0.44)
Profit/(Loss) on Sale of Fixed Asset	22.22	0.31	7.10
OPERATING PROFIT BEFORE WORKING CAPITAL CHANGES	**2761.06**	**2178.85**	**1549.86**
ADJUSTMENTS FOR CHANGE IN CURRENT ASSETS& LIABILITIES:			
(Increase)/Decrease in Inventories	(311.17)	314.27	(323.94)
(Increase)/Decrease in Trade Receivables	(212.41)	(46.83)	347.77
(Increase)/Decrease in Other Current Assets	216.40	1997.87	(1083.63)
Increase/(Decrease) in Current Liabilities & Provisions	(59.57)	954.56	(273.62)
Increase/(Decrease) in Non Current Provisions	13.28	11.85	10.82
CASH GENERATED FROM OPERATIONS	**2407.58**	**5410.58**	**227.26**
Direct Taxes Paid/Deducted at Source	294.68	113.05	8.66
NET CASH FROM OPERATING ACTIVITIES	**2112.90**	**5297.53**	**218.60**
B CASH FLOW FROM INVESTING ACTIVITIES			
Deletion/(Addition) to PPE (Including Goodwill)	(435.18)	(6537.07)	(605.28)
Increase/(Decrease) in Long-Term Loans & Advances	(131.75)	(19.66)	58.65
Sale of Fixed Asset	68.14	26.02	79.76
Dividend Income	0.00	0.00	0.00
Interest Received	63.97	37.93	32.09
(Increase) / Decrease in Bank Balance other than Cash & Cash Equivalent	35.16	(21.88)	(26.55)
(Increase) / Decrease in Investments	0.74	(0.02)	17.78
NET CASH USED IN INVESTING ACTIVITIES	**(398.91)**	**(6514.68)**	**(443.56)**
C CASH FLOW FROM FINANCING ACTIVITIES			
(Increase) / Decrease in Long-Term Borrowings	206.58	2643.67	527.82
Proceeds from issue of Share Capital (incl. Application Money			
& Premium	-	5.00	-
Increase/(Decrease) in Short-Term Borrowings	(506.28)	(152.13)	399.62
Interest & Financial Expenses	(1,470.70)	(1,222.29)	(979.91)
NET CASH USED IN FINANCING ACTIVITIES	**(1,770.40)**	**(1,274.25)**	**(52.47)**
NET INCREASE / (DECREASE) IN CASH &			
CASH EQUIVALENTS (A+B+C)	**(56.41)**	**57.10**	**(277.44)**
Cash and Cash Equivalents at the beginning of the year	**75.33**	**18.23**	**295.66**

Cash and Cash Equivalents at the end of the year	**18.91**	**75.33**	**18.23**
Components of cash and cash equivalents as at			
Cash in hand	3.77	5.95	9.01
With bank: On Current Account	15.14	69.38	9.21
Cash and cash Equivalents at the end of the year	**18.91**	**75.33**	**18.23**

Restated Consolidated IGAAP Summary Statement of Assets and Liabilities

(₹ In Million)

Particulars	As at 31.03.2015	As at 31.03.2014
I. EQUITY AND LIABILITIES		
(1) Shareholders' Fund		
(a) Share Capital	130.71	129.93
(b) Reserve & Surplus	4208.74	4124.65
(2) Share application money pending allotment	-	25.00
(3) Minority Interest	20.46	20.46
(4) Non-Current Liabilities		
(a) Long-Term Borrowings	4,686.56	4,212.14
(b) Deferred Tax Liabilities (Net)	(16.90)	(9.60)
(c) Long-Term Provisions	82.71	63.12
(5) Current Liabilities		
(a) Short-Term Borrowings	3,146.15	3,100.43
(b) Trade Payables	1,257.68	1,299.19
(c) Other Current Liabilities	1,420.41	1,303.00
(d) Short-Term provisions	40.70	35.31
Total	**14,977.21**	**14,303.62**
II. ASSETS		
(1) Non-current Assets		
(a) Fixed Assets		
(i) Tangible Assets	8,451.01	7,849.90
(ii) Intangible Assets (Goodwill)	100.29	100.29
(iii) Capital work-in-progress	518.33	1037.66
(b) Non-current investments	9.24	9.24
(c) Long-term loans and advances	169.56	214.39
(d) Other Non-Current Assets	1.14	1.14
(2) Current Assets		
(a) Inventories	2,109.90	2,070.38
(b) Trade Receivables	832.17	528.27
(c) Cash and cash equivalents	428.47	231.99
(d) Short-Term loans and advances	1,986.28	1,908.50
(e) Other current assets	370.82	351.86
Total	**14,977.21**	**14,303.62**

Restated Consolidated IGAAP Summary Statement of Profit and Loss

(₹ In Million)

		For the Year Ended	For the Year Ended
Particulars		**31.03.2015**	**31.03.2014**
I.	Revenue from Operations	18,778.45	11,640.17
II.	Other Income	55.23	32.64
III.	**Total Revenue (I+II)**	**18,833.68**	**11,672.81**
IV.	**Expenses**		
	Cost of Materials Consumed	11,290.16	8,535.44
	Purchase of Stock in Trade	4,329.40	477.73
	(Increase) / Decrease in Stock in Trade	(194.87)	313.47
	Employees benefit Expenses	371.28	274.22
	Financial Costs	1,087.93	866.74
	Depreciation	622.35	668.27
	Other Manufacturing Expenses	1,024.99	583.11
	Other Administrative Expenses	107.61	71.29
	Other Selling & Distribution Expenses	116.31	78.19
	Total	**18,755.15**	**11,868.46**
V.	**Profit Before Exceptional and Extraordinary**		
	Items and Tax (III-IV)	**78.53**	**(195.65)**
VI.	Exceptional items	10.88	-
VII.	**Profit Before Extraordinary Items and Tax (V-VI)**	**67.65**	**(195.65)**
VIII.	Extraordinary Items	-	-
IX.	**Profit Before Tax (VII- VIII)**	**67.65**	**(195.65)**
X.	**Tax expenses:**		
	Net current Tax	16.31	(192.44)
	Deferred Tax	(7.30)	(167.40)
XI	**Profit (Loss) for the period from**		
	Continuing operations (IX-X)	**58.63**	**164.20**
XII	**Profit/(loss) from discontinuing operations**	-	-
XIII	**Tax expense of discontinuing operations**	-	-
XIV	**Profit/(loss) from Discontinuing operations (after tax) (XII-XIII)**	-	-
XV	**Profit (Loss) for the period (XI + XIV)**	**58.63**	**164.20**
XVI	**Basic / Diluted Earnings per Equity Share(in Rs.)**	**4.49**	**12.71**

Restated Consolidated IGAAP Summary Statement of Cash Flows

(₹ In Million)

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
A CASH FLOW FROM OPERATING ACTIVITIES		
Net Profit before Tax	67.65	(195.65)
ADJUSTMENTS FOR:		
Depreciation	622.35	668.27
Financial Costs	1,087.93	866.74
Interest Income	(55.68)	(29.43)
Dividend Income	(0.00)	(0.00)
Impact of Restatement of Financial Statement	1.39	0.99
Net Gain on Sale of Fixed Asset	17.66	0.95
OPERATING PROFIT BEFORE WORKING CAPITAL CHANGES	**1,741.29**	**1,311.86**
ADJUSTMENTS FOR CHANGE IN CURRENT ASSETS& LIABILITIES:		
(Increase)/Decrease in Inventories	(39.52)	(277.27)
(Increase)/Decrease in Trade Receivables	(303.91)	(124.09)
(Increase)/Decrease in Other Current Assets	28.04	(188.94)
Increase/(Decrease) in Current Liabilities & Provisions	100.87	1,047.92
CASH GENERATED FROM OPERATIONS	**1,526.78**	**1,769.48**
Direct Taxes Paid/Deducted at Source	16.31	-
NET CASH FROM OPERATING ACTIVITIES	**1,510.46**	**1,769.48**
B CASH FLOW FROM INVESTING ACTIVITIES		
Deletion/(Addition) to Tangible Assets	(747.91)	(1418.45)
Increase/(Decrease) in Long-Term Loans & Advances	44.72	208.38
Sale of Tangible Asset	25.97	23.43
Dividend Income	0.00	0.00
Interest Income	55.68	29.43
(Purchase)/Sale of Non-current Investments	-	(2.46)
NET CASH USED IN INVESTING ACTIVITIES	**(621.54)**	**(1,159.67)**
C CASH FLOW FROM FINANCING ACTIVITIES		
Proceeds from Long-Term Borrowings (Net)	474.42	(377.49)
Proceeds from issued of Share Capital		
(incl. Application money and premium)	-	3.14
Increase/(Decrease) in Short-Term Borrowings	(78.94)	782.47
Financial Costs	(1,087.93)	(866.74)
NET CASH USED IN FINANCING ACTIVITIES	**(692.44)**	**(458.62)**
NET INCREASE / (DECREASE) IN CASH &		
CASH EQUIVALENTS (A+B+C)	**196.48**	**151.19**
Cash and Cash Equivalents at the beginning of the year	**231.99**	**80.80**
Cash and Cash Equivalents at the end of the year	**428.47**	**231.99**
Components of cash and cash equivalents as at		
Cash in hand	22.44	25.70
With bank	406.03	206.29
	428.47	**231.99**

Restated Standalone Ind AS Summary Statement of Assets and Liabilities

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
I. ASSETS			
(1) Non-current Assets			
(a) Property, Plant & Equipment	8,622.48	8,904.03	8,985.86
(b) Capital work-in-progress	167.85	91.18	235.54
(c) Investment Property	189.83	193.01	196.19
(d) Intangible Assets	142.21	147.21	152.21
(e) Financial Assets			
(i) Investments	2,407.98	208.70	134.15
(ii) Others	47.45	48.25	43.92
(f) Deferred Tax Assets (Net)	-	35.89	83.89
(g) Other Non-current assets	162.94	34.49	50.15
Total Non-Current Assets	**11,740.74**	**9,662.77**	**9,881.92**
(2) Current Assets			
(a) Inventories	2,418.74	2,099.08	2,433.84
(b) Financial Assets			
(i) Trade Receivables	710.97	517.26	479.56
(ii) Cash and cash equivalents	15.82	13.06	17.56
(iii) Bank Balance other than	144.97	175.14	158.35
Cash & Cash Equivalent			
(iv) Loans	269.32	2,477.93	1,455.09
(v) Other Financial Assets	24.34	38.65	66.61
(c) Current Tax Assets (Net)	-	68.03	100.21
(d) Other current assets	871.67	1,012.19	1,077.53
Total Current Assets	**4,455.82**	**6,401.33**	**5,788.75**
Total	**16,196.57**	**16,064.10**	**15,670.67**
II. EQUITY AND LIABILITIES			
(1) Equity			
(a) Equity Share Capital	130.71	130.71	130.71
(b) Other Equity	5,845.68	5,081.95	4,758.50
Total Equity	**5,976.39**	**5,212.66**	**4,889.21**
(2) Non-Current Liabilities			
(a) Financial Liabilities			
(i) Borrowings	4,136.05	4,369.05	4,749.95
(b) Provisions	55.57	44.57	32.72
(c) Deferred Tax Liabilities (Net)	158.52	-	-
(d) Other Long-Term Liabilitie	60.80	60.80	60.80
Total Non-Current Liabilities	**4,410.95**	**4,474.42**	**4,843.47**

(3) Current Liabilities			
(a) Financial Liabilities			
(i) Borrowings	2,843.64	3,393.64	3,494.91
(ii) Trade Payable	2,009.98	1,915.60	1,568.85
(ii) Other Financial Liabilities	608.60	752.42	643.91
(c) Other Current Liabilities	196.29	286.01	205.88
(d) Provisions	30.76	29.35	24.45
(e) Current Tax Liabilities (net)	119.95	-	-
Total Current Liabilities	**5,809.23**	**6,377.02**	**5,938.00**
Total	**16,196.57**	**16,064.10**	**15,670.67**

Restated Standalone Ind AS Summary Statement of Profit and Loss

(₹ in Million)

		For the Year Ended	For the Year Ended	For the Year Ended
Particulars		**31.03.2018**	**31.03.2017**	**31.03.2016**
				(Proforma)
I.	Revenue from Operations	18,299.32	15,604.80	14,106.44
II.	Other Income	142.67	46.89	47.24
III.	**Total Revenue (I+II)**	**18,441.99**	**15,651.69**	**14,153.68**
IV.	**Expenses**			
	Cost of Materials Consumed	12,745.79	9,455.66	9,570.27
	Purchase of Stock in Trade	201.75	34.66	153.15
	(Increase) / Decrease in Stock in Trade	(485.18)	508.09	(239.16)
	Excise Duty on Sales	523.22	1,681.64	1,519.89
	Employees benefit Expenses	536.97	445.37	417.36
	Financial Costs	1,044.01	1,170.83	979.91
	Depreciation	538.65	539.31	547.24
	Other Expenses	2,049.18	1,343.90	1,154.69
	Total	**17,154.38**	**15,179.47**	**14,103.36**
V.	**Profit Before Exceptional and Tax (III-IV)**	**1,287.60**	**472.22**	**50.32**
VI.	Exceptional items	-	-	6.67
VII.	**Profit Before Tax (VII- VIII)**	**1,287.60**	**472.22**	**43.65**
VIII.	**Tax expenses:**			
	Net current Tax	294.35	113.05	8.66
	Deferred Tax	194.38	47.95	229.26
IX.	**Profit (Loss) for the period (VII-VIII)**	**798.87**	**311.22**	**(194.28)**
X.	**Other Comprehensive Income:**			
	(i) Items that will not be reclassified to profit or loss			
	a) Re-measurements of the defined benefit plans	**(2.56)**	**(1.40)**	**-**
	b) Equity instruments through other comprehensive income	0.10	0.13	0.06
	c) Income tax relating to items that will not be			
	reclassified to profit or loss	(0.03)	(0.05)	(0.02)
		(2.49)	**(1.31)**	**0.04**
	(ii) Items that will be reclassified to profit or loss	-	-	-
XI.	**Total Comprehensive Income for the year**	**796.38**	**309.90**	**(194.24)**
XII.	**Basic / Diluted Earnings per Equity Share**	**60.93**	**23.71**	**(14.86)**

Restated Standalone Ind AS Summary Statement of Cash Flows

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
A CASH FLOW FROM OPERATING ACTIVITIES			
Net Profit before Tax	1,287.60	472.22	43.65
ADJUSTMENTS FOR:			
Depreciation	538.65	539.31	547.24
Financial Costs	1,044.01	1,170.83	979.91
Interest Income	(79.05)	(42.94)	(32.09)
Provision for Bad & Doubtful Debt	1.94	0.38	4.84
Bad Debts Written Off	(1.39)	-	-
Equity instruments through Other comprehensive income	0.10	0.13	0.06
Re-measurements of the defined benefit plans	(2.56)	(1.40)	-
Other Adjustment due to Restatement	(32.65)	2.55	(0.44)
Income Disclosed Under IDS (Net of Tax)	-	11.00	-
Dividend Income	(0.00)	(0.00)	(0.00)
Profit/(Loss) on Sale of Investment	-	-	8.06
Profit/(Loss) on Sale of Fixed Asset	9.50	0.31	7.10
OPERATING PROFIT BEFORE WORKING CAPITAL CHANGES	**2,766.15**	**2,152.40**	**1,558.34**
ADJUSTMENTS FOR CHANGE IN CURRENT ASSETS& LIABILITIES:			
(Increase)/Decrease in Inventories	(319.65)	334.75	(323.94)
(Increase)/Decrease in Trade Receivables	(194.26)	(38.08)	347.77
(Increase)/Decrease in Other Current Assets	2,472.29	(897.35)	(632.35)
Increase/(Decrease) in Current Liabilities & Provisions	(58.62)	540.29	(275.72)
Increase/(Decrease) in Non Current Provisions	11.00	11.85	11.29
CASH GENERATED FROM OPERATIONS	**4,676.91**	**2,103.86**	**685.38**
Direct Taxes Paid/Deducted at Source	294.35	113.05	8.66
NET CASH FROM OPERATING ACTIVITIES	**4,382.56**	**1,990.81**	**676.72**
B CASH FLOW FROM INVESTING ACTIVITIES			
Deletion/(Addition) to Tangible Assets	(391.65)	(331.28)	(580.17)
Increase/(Decrease) in Long-Term Loans & Advances	(127.65)	11.33	69.67
Sale of Tangible Asset	56.57	26.02	79.76
Dividend Income	0.00	0.00	0.00
Interest Income	79.05	42.94	32.09
(Increase) / Decrease in Bank Balance other than Cash & Cash Equivalent	30.16	(16.79)	(26.55)
(Purchase)/Sale of Non-current Investments	(2,199.29)	(74.54)	9.29
NET CASH USED IN INVESTING ACTIVITIES	**(2,552.79)**	**(342.31)**	**(415.92)**
C CASH FLOW FROM FINANCING ACTIVITIES			
Proceeds from Long-Term Borrowings (Net)	(233.00)	(380.90)	93.44
Increase/(Decrease) in Short-Term Borrowings	(550.00)	(101.27)	348.76
Financial Costs	(1,044.01)	(1,170.83)	(979.91)
NET CASH USED IN FINANCING ACTIVITIES	**(1,827.00)**	**(1,653.00)**	**(537.72)**
NET INCREASE / (DECREASE) IN CASH &			
CASH EQUIVALENTS (A+B+C)	**2.77**	**(4.51)**	**(276.91)**
Cash and Cash Equivalents at the beginning of the year	**13.06**	**17.56**	**294.47**
Cash and Cash Equivalents at the end of the year	**15.82**	**13.06**	**17.56**

Components of cash and cash equivalents as at			
Cash in hand	3.29	4.05	8.80
With bank: On Current Account	12.53	9.01	8.76
	15.82	**13.06**	**17.56**

Restated Standalone IGAAP Summary Statement of Assets and Liabilities

(₹ 'in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
I. EQUITY AND LIABILITIES		
(1) Shareholders' Fund		
(a) Share Capital	130.71	129.93
(b) Reserve & Surplus	4,140.11	4,045.68
(2) Share application money pending allotment	-	25.00
(3) Non-Current Liabilities		
(a) Long-Term Borrowings	4,656.50	4,212.14
(b) Deferred Tax Liabilities (Net)	(16.90)	(9.60)
(c) Long-Term Provisions	82.71	63.12
(4) Current Liabilities		
(a) Short-Term Borrowings	3,146.15	3,100.43
(b) Trade Payables	1,257.68	1,295.42
(c) Other Current Liabilities	1,419.96	1,302.42
(d) Short-Term provisions	40.70	35.27
Total	**14,857.61**	**14,199.80**
II. ASSETS		
(1) Non-current Assets		
(a) Fixed Assets		
(i) Tangible Assets	8,435.72	7,832.62
(ii) Intangible Assets	-	-
(iii) Capital work-in-progress	374.95	905.42
(b) Non-current investments	151.51	151.51
(c) Long-term loans and advances	163.74	208.56
(2) Current Assets		
(a) Inventories	2,109.90	2,070.38
(b) Trade Receivables	832.17	528.27
(c) Cash and cash equivalents	426.27	218.02
(d) Short-Term loans and advances	1,992.76	1,933.69
(e) Other current assets	370.60	351.34
Total	**14,857.61**	**14,199.80**

Restated Standalone IGAAP Summary Statement of Profit and Loss

(₹ 'in Million)

		For The Year Ended 31.03.2015	For The Year Ended 31.03.2014
Particulars			
I.	Revenue from Operations	18,778.45	11,640.17
II.	Other Income	54.04	32.64
III.	**Total Revenue (I+II)**	**18,832.49**	**11,672.81**
IV.	**Expenses**		
	Cost of Materials Consumed	11,290.16	8,535.44
	Purchase of Stock in Trade	4,329.39	477.73
	(Increase) / Decrease in Stock in Trade	(194.87)	313.47
	Employees benefit Expenses	371.16	274.22
	Financial Costs	1,087.80	866.74
	Depreciation	622.28	668.27
	Other Manufacturing Expenses	1,024.99	583.11
	Other Administrative Expenses	107.44	71.29
	Other Selling & Distribution Expenses	116.31	78.19
	Total	**18,754.66**	**11,868.46**
V.	**Profit Before Exceptional and Extraordinary**		
	Items and Tax (III-IV)	**77.**83	(195.65)
VI.	Exceptional items	-	-
VII.	**Profit Before Extraordinary Items and Tax (V-VI)**	**77.**83	(195.65)
VIII.	Extraordinary Items	-	-
IX.	**Profit Before Tax (VII- VIII)**	**77.**83	(195.65)
X.	**Tax expenses:**		
	Net current Tax	16.31	(192.44)
	Deferred Tax	(7.30)	(167.40)
XI	**Profit (Loss) for the period from continuing operations**	**68.81**	**164.20**
XII	**Profit/(loss) from discontinuing operations**	**-**	**-**
XIII	**Tax expense of discontinuing operations**	**-**	**-**
XIV	**Profit/(loss) from Discontinuing operations (after tax) (XII-XIII)**	**-**	**-**
XV	**Profit (Loss) for the period (XI + XIV)**	**68.81**	**164.20**
XVI	**Basic / Diluted Earnings per Equity Share 32**	**5.27**	**12.71**

Restated Standalone IGAAP Summary Statement of Cash Flows

(₹ 'in Million)

Particulars		As at 31.03.2015	As at 31.03.2014
A	**CASH FLOW FROM OPERATING ACTIVITIES**		
	Net Profit before Tax	77.83	(195.65)
	ADJUSTMENTS FOR:		
	Depreciation	622.28	668.27
	Financial Costs	1,087.80	866.74
	Interest Income	(54.49)	(29.43)
	Dividend Income	-	-
	Other Adjustment due to Restatement	1.39	0.99
	Loss on Sale of Fixed Asset	17.61	0.68
OPERATING PROFIT BEFORE WORKING CAPITAL CHANGES		**1,752.41**	**1,311.59**
	ADJUSTMENTS FOR CHANGE IN CURRENT ASSETS & LIABILITIES:		
	(Increase)/Decrease in Inventories	(39.52)	(277.27)
	(Increase)/Decrease in Trade Receivables	(303.91)	(124.09)
	(Increase)/Decrease in Other Current Assets	(78.33)	(313.46)
	Increase/(Decrease) in Current Liabilities & Provisions	104.81	1,045.77
	CASH GENERATED FROM OPERATIONS	**1,435.46**	**1,642.56**
	Direct Taxes Paid/Deducted at Source	16.31	-
	NET CASH FROM OPERATING ACTIVITIES	**1,419.15**	**1,642.56**
B	**CASH FLOW FROM INVESTING ACTIVITIES**		
	Deletion/(Addition) to Tangible Assets	(738.43)	(1,395.20)
	Increase/(Decrease) in Long-Term Loans & Advances	44.82	7.32
	Sale of Tangible Asset	25.91	22.47
	Dividend Income	-	-
	Interest Income	54.49	29.43
	(Purchase)/Sale of Non-current Investments	-	(2.39)
	NET CASH USED IN INVESTING ACTIVITIES	**(613.19)**	**(1,338.37)**
C	**CASH FLOW FROM FINANCING ACTIVITIES**		
	Proceeds from Long-Term Borrowings (Net)	444.37	(176.55)
	Proceeds from issued of Share Capital	-	0.38
	Increase / (Decrease) in Short-Term Borrowings	45.73	889.94
	Financial Costs	(1,087.80)	(866.74)
	NET CASH USED IN FINANCING ACTIVITIES	**(597.70)**	**(152.98)**
	NET INCREASE / (DECREASE) IN CASH &		
	CASH EQUIVALENTS (A+B+C)	**208.25**	**151.22**
	Cash and Cash Equivalents at the beginning of the year	**218.02**	**66.81**
	Cash and Cash Equivalents at the end of the year	**426.27**	**218.02**
	Components of cash and cash equivalents as at		
	Cash in hand	21.77	25.31
	With bank: On Current Account	272.70	72.50
	: Margin Money with Bank	131.80	120.21
		426.27	**218.02**

THE ISSUE

The following table summarizes the details of the Issue:

Issue [(1)]	Up to [●] Equity Shares (of face value of ₹ 10 each), aggregating up to ₹ 5,000 million.
The Issue comprises:	
A) QIB Portion[(2)(3)]	Not more than [●] Equity Shares (of face value of ₹ 10 each)
of which:	
(i) Anchor Investor Portion	Not more than [●] Equity Shares (of face value of ₹ 10 each)
of which:	
(a) Mutual Funds	[●] Equity Shares (of face value of ₹ 10 each)
(b) Other QIBs	[●] Equity Shares (of face value of ₹ 10 each)
(ii) Balance available for allocation to QIBs other than Anchor Investors (assuming Anchor Investor Portion is fully subscribed)	[●] Equity Shares (of face value of ₹ 10 each)
of which:	
(a) Available for allocation to Mutual Funds only (5% of the QIB Portion excluding Anchor Investor Portion)	[●] Equity Shares (of face value of ₹ 10 each)
(b) Balance for all QIBs including Mutual Funds	[●] Equity Shares (of face value of ₹ 10 each)
B) Non-Institutional Portion[(3)]	Not less than [●] Equity Shares (of face value of ₹ 10 each)
C) Retail Portion[(3)]	Not less than [●] Equity Shares (of face value of ₹ 10 each)
Pre and post Issue Equity Shares	
Equity Shares outstanding prior to the Issue	52,284,620 Equity Shares (of face value of ₹ 10 each)
Equity Shares outstanding after the Issue	[●] Equity Shares (of face value of ₹ 10 each)
Utilisation of Net Proceeds	See "*Objects of the Issue*" on page 111. For information about the use of the proceeds from the Issue.

(1) The Issue has been authorized by a resolution passed by our Board at its meeting held on September 2, 2018 and by a special resolution passed by our Shareholders at their meeting held on September 3, 2018.

(2) Our Company may, in consultation with the BRLMs, allocate up to 60% of the QIB Portion to Anchor Investors on a discretionary basis. The QIB portion will accordingly be reduced for the Equity Shares allocated to Anchor Investors. One-third of the Anchor Investor Portion shall be reserved for domestic Mutual Funds, subject to valid Bids being received from domestic Mutual Funds at or above the Anchor Investor Allocation Price. In the event of under-subscription in the Anchor Investor Portion, the remaining Equity Shares shall be added to the QIB Portion 5 % of the QIB Portion (excluding Anchor Investor Portion) shall be available for allocation on a proportionate basis to Mutual Funds only, and the remainder of the QIB Portion (excluding Anchor Investor Portion) shall be available for allocation on a proportionate basis to all QIB Bidders (other than Anchor Investors), including Mutual Funds, subject to valid Bids being received at or above the Issue Price. In the event the aggregate demand from Mutual Funds is less than as specified above, the balance Equity Shares available for Allotment in the Mutual Fund Portion will be added to the QIB Portion (excluding Anchor Investor Portion) and allocated proportionately to the QIB Bidders (other than Anchor Investors) in proportion to their Bids. For details, see "Issue Procedure" on page 542.

(3) Subject to valid Bids being received at or above the Issue Price, under-subscription, if any, in any category except the QIB Portion, would be allowed to be met with spill over from any other category or combination of categories at the discretion of our Company in consultation with the BRLMs and the Designated Stock Exchange, subject to applicable laws. For further details, including in relation to grounds for rejection of Bids, see "Terms of the Issue", "Issue Structure" and "Issue Procedure" on page 435, 540 and 542, respectively.

Allocation to all categories, except the Anchor Investor Portion and the Retail Portion, if any, shall be made on a proportionate basis, subject to valid Bids received at or above the Issue Price. The allocation to each Retail Individual Bidder shall not be less than the minimum Bid Lot, subject to availability of Equity Shares in Retail Portion, and the remaining available Equity Shares, if any, shall be Allocated on a proportionate basis. For further details, see "*Issue Procedure – Part B – Allotment Procedure and Basis of Allotment*" on page 575.

For details of the terms of the Issue, see "*Terms of the Issue*" on page 535.

GENERAL INFORMATION

Our Company was incorporated on July 25, 2002 at Gwalior as a public limited company under the Companies Act, 1956 pursuant to a certificate of incorporation issued by the Registrar of Companies, Madhya Pradesh & Chhattisgarh. Our Company received the certificate for commencement of business dated February 5, 2004, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh. For further details of our Company, see "*History and Certain Corporate Matters*" on page 185.

Registered Office of our Company
Village Borjhara, Guma Road,
Urla Growth Center,
Raipur-493 221, Chattisgarh
Tel: 0771-4288019/4288029/4288039;
Fax: 0771-4288123
E-mail: cs@goelgroup.co.in
Website: www.sbpil.co.in
Corporate Identification No.: U27106CT2002PLC015184

Address of the RoC

Our Company is registered with the RoC situated at the following address:

Registrar of Companies**,**
1st Floor, Ashok Pingley Bhavan,
Municipal Corporation, Nehru Chowk,
Bilaspur, Chhattisgarh – 495001
Phone: (07752)-250092(D), 250094
Fax: (07752) - 250093

Board of Directors

The Board of Directors as on the date of this Draft Red Herring Prospectus comprises the following:

Name	Designation	DIN	Address
Suresh Goel	Executive Director and Chairman	00115834	Near Dhebar Gali, Hari Chhaya, Shankar Nagar, Raipur- 492007, Chhattisgarh
Rajendra Goel	Executive Director	01263958	Gurudwara Road, Hari Kripa Ravi Nagar, Pandri Raipur, Chhattisgarh-492004
Narendra Goel	Managing Director	00115883	Near Dhebar Gali, Hari Chhaya, Shankar Nagar, Raipur- 492007, Chhattisgarh
Anand Goel	Executive Director	00796135	Behind Ganesh Temple, Hari Prateek, C-10, Anupam Nagar, Raipur – 492007, Chhattisgarh
Shravan Kumar Goyal	Whole - time Director	01829618	Flat No. 4 C, Block C, Mallika Merlin Jaishree Vihar, New Mandi Road Raipur 492001 Chhattisgarh.
Hemendra Nath	Independent Director	02020546	J- 205, Shivalik Nagar, B.H.E.L. Haridwar, Uttarakhand – 249403
Ravinder Singh Rajput	Independent Director	08145449	38, Housing Colony, Phase – 2, Bilaspur (209), Himachal Pradesh – 174001.
Hema Thakur	Independent Director	01363454	D-103, Akar Pinnacle, M and M chs, Dattapada road, Near Dattapada Muncipal School, Borivali (East), Mumbai – 400066, Maharashtra.
Rakesh Bhargava	Independent Director	06485964	Block – E/1, Flat No. 3C, Sail City New Pundag, Ranchi – 834007
Anshul Dave	Independent Director	05123750	45/176, Edward Road, Sadar Bazar, Raipur - 492001, Chhattisgarh

For further details of our Directors, see "*Our Management*" on page 194.

Company Secretary and Compliance Officer

Parul Verma is the Company Secretary & and Compliance Officer of our Company. Her contact details are as follows:

Parul Verma
Village Borjhara, Guma Road,
Urla Growth Center,
Raipur-493 221,
Chattisgarh
Tel: 0771-4288019
Fax: 0771-4288123
E-mail: cs@goelgroup.co.in

Chief Financial Officer

Sandeep Goel is the Chief Financial Officer of our Company. His contact details are as follows:

Sandeep Goel
Village Borjhara, Guma Road,
Urla Growth Center,
Raipur-493 221,
Chattisgarh
Tel: 0771-4288110
Fax: 0771-4288150
Email: sandeep@goeltmt.com

Investor grievances

Investors can contact the Company Secretary and Compliance Officer, the BRLMs or the Registrar to the Issue in case of any pre-Issue or post-Issue related problems, such as non-receipt of letters of Allotment, non credit of Allotted Equity Shares in the respective beneficiary account, non receipt of refund orders and non receipt of funds by electronic mode.

All Issue related grievances may be addressed to the Registrar to the Issue with a copy to the relevant Designated Intermediary to whom the Bid cum Application Form was submitted. The Bidder should give full details such as name of the sole or first Bidder, Bid cum Application Form number, Bidder DP ID, Client ID, PAN, date of submission of the Bid cum Application Form, address of the Bidder, number of the Equity Shares applied for and the name and address of the Designated Intermediary, and in the case of Anchor Investors the name and address of the BRLMs, where the Bid cum Application Form was submitted by the Bidder.

Further, the Bidders shall also enclose a copy of the Acknowledgement Slip duly received from the Designated Intermediaries in addition to the documents/information mentioned hereinabove.

Book Running Lead Managers

IDBI Capital Markets & Securities Limited,
3rd Floor, Mafatlal Centre,
Nariman Point, Mumbai – 400 021.
Telephone: +91 22 4322 1212
Facsimile: +91 22 2285 0785
E-mail: ipo.sbpil@idbicapital.com
Investor grievance e-mail: redressal@idbicapital.com
Website: www.idbicapital.com
Contact Person: Sumit Singh / Priyankar Shetty
SEBI Registration No.: INM000010866

Equirus Capital Private Limited
12th Floor, C Wing, Marathon Futurex,
N M Joshi Marg, Lower Parel, Mumbai - 400 013
Telephone: +91-(0) 22-43320600

Facsimile: +91-(0) 22-43320601
E-mail: project.sbpil@equirus.com
Investor grievance e-mail: investorsgrievance@equirus.com
Website: www.equirus.com
Contact Person: Pavan Naik / Gaurav Phadke
SEBI Registration No.: INM000011286

SBI Capital Markets Limited,
202, Maker Tower 'E', Cuffe Parade,
Mumbai – 400 005, Maharashtra, India.
Telephone: + 91 (22) 2217 8300
Facsimile: + 91 (22) 2218 8332
E-mail: sbpil.ipo@sbicaps.com
Investor grievance e-mail: investor.relations@sbicaps.com
Website: www.sbicaps.com
Contact Person: Janardhan Wagle/ T Mounika
SEBI Registration No.: INM000003531

Legal Advisors to the Issue

J. Sagar Associates
Vakils House,
18 Sprott Road, Ballard
Estate, Mumbai 400 001
Maharashtra
Tel: +91 22 4341 8600
Fax: +91 22 4341 8617

Registrar to the Issue
Link Intime India Private Limited
C-101, 1st Floor, 247 Park, Lal Bhadur Shastri Marg,
Vikhroli (West), Mumbai 400 083
Telephone: +91 022 49186200
Facsimile +91 022 49186195
Email: sbpil.ipo@linkintime.co.in
Investor grievance e-mail: sbpil.ipo@linkintime.co.in
Website: www.linkintime.co.in
Contact Person: Ms. Shanti Gopalkrishnan
SEBI Regn. Number: INR000004058

Statutory Auditors to our Company

S S S D & Co Chartered Accountants,
Shreemata Nilay, A-11(7)
Sector 3, Udaya Society Tatibandh,
Raipur - 492009
Tel: 0771-4001194
E-mail: sssdandco@gmail.com
Firm Registration No.: 020203C
Peer review No: 010757

Syndicate Members
[●]

Banker(s) to the Issue and/or Escrow Collection Bank(s)
[●]

Public Issue Account Bank(s)
[●]

Refund Bank(s)
[●]

Bankers to our Company

Bank of Baroda
Emerging Corporate Branch,
2nd Floor, LIC Investment Building,
Pandri, Raipur – 492 001
Tel: 9752410758
E-mail: whlrai@bankofbaroda.com
Website: www.bankofbaroda.com
Contact person: Ashutosh Bajpai

Bank of India
Raipur main branch, Samvet Sikhar Building,
Opposite Ekatama parisar,
Rajbandha Maidan,
Tel: 0771-2222015/16/17
E-mail: raipur.raipur@bankofindia.co.in
Website: www.bankofindia.com
Contact person: Shri A.K. Mishra

Bank of Maharashtra*
1st Floor, Shree Complex,
Pool Chowk,
Raipur
Tel: 0771-4265618
E-mail: bom439@mahabank.co.in
Website: www.bankofmaharashtra.com
**Source*: *Sanction letter received by our Company from Bank of Maharashtra dated April 16, 2018*.

For further details, please see "*Risk Factors – We are yet to obtain consent from Bank of Maharashtra, one of the lenders to our Company for the Issue*" on page 27.

Karnataka Bank
Devendra Nagar, Raipur
Tel: 9893107993
E-mail: raipur@ktkbank.com
Website: www.karnatakabank.com
Contact person: Shri K K Mahesh

State Bank of India
Commercial branch,
2nd Floor, Pujari Complex,
Pachpedi Naka,
Raipur (C.G) - 492001
Tel: 9406918339
Fax: 0771 - 4040487
E-mail: sbi.08536@sbi.co.in
Website: www.sbi.co.in
Contact person: Mr. Ghanshyam Dewangan

Self-Certified Syndicate Banks

The list of banks that have been notified by SEBI to act as the SCSBs for the ASBA process is provided on the website of SEBI at http://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognised=yes. For a list of branches of the SCSBs named by the respective SCSBs to receive the ASBA Forms from the Designated Intermediaries, refer to the above-mentioned link.

Syndicate SCSB Branches

In relation to Bids (other than Bids by Anchor Investors) submitted to a member of the Syndicate, the list of branches of the SCSBs at the Specified Locations named by the respective SCSBs to receive deposits of Bid cum Application Forms from the members of the Syndicate is available on the website of the SEBI (http://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognised=yes) and updated from time to time. For more information on such branches collecting Bid cum Application Forms from the Syndicate at Specified Locations, see the website of the SEBI (http://www.sebi.gov.in/sebiweb/home/list/5/33/0/0/Recognised-Intermediaries).

Registered Brokers

The list of the Registered Brokers, including details such as postal address, telephone number and e-mail address, is provided on the websites of the BSE and the NSE at http://www.bseindia.com/Markets/PublicIssues/brokercentres_new.aspx?expandable=3 and http://www.nseindia.com/products/content/equities/ipos/ipo_mem_terminal.htm, respectively, as updated from time to time.

Registrar and Share Transfer Agents

The list of the RTAs eligible to accept ASBA Forms at the Designated RTA Locations, including details such as address, telephone number and e-mail address, is provided on the websites of the BSE and the NSE at http://www.bseindia.com/Static/Markets/PublicIssues/RtaDp.aspx?expandable=6 and http://www.nseindia.com/products/content/equities/ipos/asba_procedures.htm, respectively, as updated from time to time.

Collecting Depository Participants

The list of the CDPs eligible to accept ASBA Forms at the Designated CDP Locations, including details such as name and contact details, is provided on the websites of the BSE and the NSE at http://www.bseindia.com/Static/Markets/PublicIssues/RtaDp.aspx?expandable=6 and http://www.nseindia.com/products/content/equities/ipos/asba_procedures.htm, respectively, as updated from time to time.

Experts

Except as stated below, our Company has not obtained any expert opinions:

Our Company has received written consent from the Statutory Auditors namely, S S S D & Co Chartered Accountants, to include their names as required under Section 26(1)(a)(v) of the Companies Act, 2013 in this Draft Red Herring Prospectus and as "expert" as defined under section 2(38) of the Companies Act, 2013 in respect of their examination reports on the Restated Standalone Financial Statements and Restated Consolidated Financial Statements, both dated September 2, 2018, and the statement of tax benefits dated September 12, 2018 included in this Draft Red Herring Prospectus and such consent has not been withdrawn as on the date of this Draft Red Herring Prospectus.

Monitoring Agency

In terms of Regulation 16(2) of the SEBI ICDR Regaluations, our Company shall appoint a monitoring agency prior to the filing of the Red Herring Prospectus with the RoC. The requisite details shall be included in the Red Herring Prospectus.

Appraising Agency

None of the objects for which the Net Proceeds will be utilized have been appraised by any agency.

Credit Rating

As this is an issue of equity shares, no credit rating is required for the Issue.

IPO Grading

No credit rating agency registered with SEBI has been appointed for grading the Issue.

Trustees

As the Issue is an initial public offering of equity shares, the appointment of trustees is not required.

Inter-se allocation of responsibilities:

Sr. No.	Activity	Responsibility	Coordinator
1	Capital structuring with the relative components and formalities such as composition of debt and equity, type of instruments, size of issue, allocation between primary and secondary, etc.	IDBI Capital, Equirus & SBICAP	IDBI Capital
2	Due diligence of our Company including its operations/management/business /legal etc., drafting and design of DRHP, RHP and Prospectus, abridged prospectus and application form. Ensure compliance and completion of prescribed formalities with the Stock Exchanges, SEBI and RoC including finalisation of RHP, Prospectus and RoC filing, follow up and coordination till final approval from all regulatory authorities	IDBI Capital, Equirus & SBICAP	IDBI Capital
3	Drafting and approval of all statutory advertisements	IDBI Capital, Equirus & SBICAP	IDBI Capital
4	Drafting and approval of all publicity material other than statutory advertisements, including corporate advertisements, brochures, etc.	IDBI Capital, Equirus & SBICAP	SBICAP
5	Appointment of Registrar to the Issue, Printers, Banker(s) to the Issue, Advertising agency, Monitoring Agency, etc (including coordinating all agreements to be entered with such parties)	IDBI Capital, Equirus & SBICAP	Equirus
6	Preparation of road show presentation and frequently asked questions (FAQs) for the road show team	IDBI Capital, Equirus & SBICAP	Equirus
7	International institutional marketing of the Issue, which will cover, inter alia: • Institutional marketing strategy • Finalizing the list and division of international investors for one-to-one meetings • Finalizing international road show and investor meeting schedules	IDBI Capital, Equirus & SBICAP	Equirus
8	Domestic institutional marketing of the Issue, which will cover, inter alia: • Finalizing the list and division of domestic investors for one-to-one meetings • Finalizing domestic road show and investor meeting schedules	IDBI Capital, Equirus & SBICAP	IDBI Capital
10	Conduct retail and non-institutional marketing of the Issue, which will cover, inter-alia: • Finalising media, marketing, public relations strategy and publicity budget • Finalising collection centres • Finalising centres for holding conferences for brokers etc.	IDBI Capital, Equirus & SBICAP	SBICAP

Sr. No.	Activity	Responsibility	Coordinator
	• Follow-up on distribution of publicity and Issue material including form, RHP/Prospectus and deciding on the quantum of the Issue material		
11	Coordination with Stock Exchanges for book building software, bidding terminals, mock trading and deposit of 1% security deposit	IDBI Capital, Equirus & SBICAP	SBICAP
12	Managing the book and finalization of pricing in consultation with the Company	IDBI Capital, Equirus & SBICAP	Equirus
13	Post-Issue activities – managing Anchor book related activities and submission of letters to regulators post completion of anchor allocation, management of escrow accounts, finalisation of the basis of allotment based on technical rejections, essential follow-up steps including follow-up with bankers to the issue and Self Certified Syndicate Banks and coordination with various agencies connected with the post-Issue activity such as registrar to the Issue, bankers to the Issue, Self Certified Syndicate Banks etc. listing of instruments, demat credit and refunds/ unblocking of funds, announcement of allocation and dispatch of refunds to Bidders, etc., redressal of investor grievances, coordination with SEBI and Stock Exchanges for refund of 1% security deposit and media compliance report	IDBI Capital, Equirus & SBICAP	Equirus

Book Building Process

The book building, in the context of the Issue, refers to the process of collection of Bids from investors on the basis of the Red Herring Prospectus within the Price Band. The Price Band and Minimum Bid Lot will be decided by our Company in consultation with the BRLMs, and will be advertised in [●] editions of [●] (a widely circulated english national daily newspaper), [●] editions of [●] (a widely circulated hindi national daily newspaper) and [●] edition of [●] (a widely circulated [●] daily newspaper, [●] being the regional language of Chhattisgarh, where our Registered Office is located), each with wide circulation, at least five Working Days prior to the Bid/Issue Opening Date and shall be made available to the Stock Exchanges for the purposes of uploading on their respective websites. The Issue Price shall be determined by our Company in consultation with the BRLMs after the Bid/Issue Closing Date.

All Bidders, except Anchor Investors, shall mandatorily participate in the Issue through the ASBA process.

In accordance with the SEBI ICDR Regulations, QIBs Bidding in the QIB Portion and Non-Institutional Bidders Bidding in the Non-Institutional Category are not allowed to withdraw or lower the size of their Bids (in terms of the quantity of the Equity Shares or the Bid Amount) at any stage. Retail Individual Bidders can revise their Bids during the Bid/Issue Period and withdraw their Bids until the Bid/Issue Closing Date. Further, Anchor Investors cannot withdraw their Bids after the Anchor Investor Bid/Issue Period. Allocation to the Anchor Investors will be on a discretionary basis.

For further details, see "*Issue Structure*" and "*Issue Procedure*" beginning on pages 540 and 542, respectively.

Illustration of Book Building and Price Discovery Process

For an illustration of the Book Building Process and the price discovery process, see "*Issue Procedure – Part B – Basis of Allocation - Illustration of Book Building and Price Discovery Process*" on page 574.

Underwriting Agreement

After the determination of the Issue Price, but prior to the filing of the Prospectus with the RoC, our Company will enter into an Underwriting Agreement with the Underwriters for the Equity Shares proposed to be offered through the Issue. The underwriting shall be to the extent of the Bids uploaded, subject to Regulation 13 of the SEBI ICDR Regulations. The Underwriting Agreement is dated [●]. Pursuant to the terms of the Underwriting Agreement, the obligations of each of the Underwriters will be several and will be subject to certain conditions specified therein.

The Underwriters have indicated their intention to underwrite the following number of Equity Shares:

(This portion has been intentionally left blank and will be filled in before filing of the Prospectus with the RoC.)

Name, Address and Contact Details of the Underwriters	Indicative Number of Equity Shares to be Underwritten	Amount Underwritten (₹ in million)
[●]	[●]	[●]
[●]	[●]	[●]
[●]	[●]	[●]

The above-mentioned is indicative underwriting and will be finalised after pricing and actual allocation and subject to the provisions of the SEBI ICDR Regulations.

In the opinion of our Board (based on representations made to our Company by the Underwriters), the resources of the Underwriters are sufficient to enable them to discharge their respective underwriting obligations in full. The Underwriters are registered with SEBI under Section 12(1) of the SEBI Act or registered as brokers with the Stock Exchange(s). Our Board/ IPO Committee, at its meeting held on [●], has accepted and entered into the Underwriting Agreement mentioned above on behalf of our Company.

Allocation among the Underwriters may not necessarily be in proportion to their underwriting commitment.

Notwithstanding the above table, the Underwriters shall be severally responsible for ensuring payment with respect to the Equity Shares allocated to investors procured by them. In the event of any default in payment, the respective Underwriter, in addition to other obligations defined in the Underwriting Agreement, will also be required to procure subscribers for or subscribe to the Equity Shares to the extent of the defaulted amount in accordance with the Underwriting Agreement. The underwriting agreement mentioned above shall not apply to subscription by the Bidders in the Issue, except for Bids procured by the Syndicate.

CAPITAL STRUCTURE

The share capital of our Company as on the date of this Draft Red Herring Prospectus is set forth below:

(In ₹ except share data)

		Aggregate value at face value	Aggregate value at Issue Price*
A	**AUTHORIZED SHARE CAPITAL**		
	100,000,000 Equity Shares of face value ₹ 10/- each	1,000,000,000	
B	**ISSUED, SUBSCRIBED AND PAID-UP CAPITAL BEFORE THE ISSUE**		
	52,284,620 Equity Shares of face value ₹ 10/- each	522,846,200	
C	**PRESENT ISSUE IN TERMS OF THIS DRAFT RED HERRING PROSPECTUS** (1)		
	Issue of up to [●] Equity Shares of face value of ₹ 10/- each aggregating up to ₹ 5,000 million.	[●]	[●]
D	**ISSUED, SUBSCRIBED AND PAID-UP CAPITAL AFTER THE ISSUE**		
	[●] Equity Shares of face value of ₹ 10/- each	[●]	[●]
E	**SECURITIES PREMIUM ACCOUNT**		
	Before the Issue(2)		1,455,827,450
	After the Issue *		[●]

* *To be updated upon finalization of the Issue Price.*

1. *The Issue has been authorized by a resolution passed by our Board at its meeting held on September 2, 2018 and by a special resolution passed by our Shareholders at their meeting held on September 3, 2018.*

2. *The share premium account consists of the premium received by our Company from the Equity Shares.*

Changes in authorised share capital since incorporation of our Company:

Date of shareholders resolutions	Details of alteration
February 03, 2004	The authorised share capital of our Company was increased from ₹ 2,500,000/- divided into 250,000 Equity Shares of ₹ 10/- each to ₹ 90,000,000/- divided into 9,000,000 Equity Shares of ₹ 10/- each.
September 18, 2004	The authorised share capital of our Company was increased from ₹ 90,000,000/- divided into 9,000,000 Equity Shares of ₹ 10/- each to ₹ 100,000,000/- divided into 10,000,000 Equity Shares of ₹ 10/- each.
January 31, 2006	The authorised share capital of our Company was increased from ₹100,000,000/- divided into 10,000,000 Equity Shares of ₹ 10/- each to ₹ 110,000,000/- divided into 11,000,000 Equity Shares of ₹ 10/- each.
May 19, 2007	The authorised share capital of our Company was increased from ₹ 110,000,000/- divided into 11,000,000 Equity Shares of ₹ 10/- each to ₹ 130,000,000/- divided into 13,000,000 Equity Shares of ₹ 10/- each.
September 01, 2007	The authorised share capital of our Company was increased from ₹130,000,000/- divided into 13,000,000 Equity Shares of ₹ 10/- each to ₹ 240,000,000/- divided into 24,000,000 Equity Shares of ₹ 10/- each.
January 16, 2008	The authorised share capital of our Company was increased from ₹240,000,000/- divided into 24,000,000 Equity Shares of ₹ 10/- each to ₹ 450,000,000/- divided into 45,000,000 Equity Shares of ₹ 10/- each.

Date of shareholders resolutions	Details of alteration
November 14, 2011	The authorised share capital of our Company was increased from ₹ 450,000,000/- divided into 45,000,000 Equity Shares of ₹ 10/- each to ₹ 600,000,000/- divided into 60,000,000 Equity Shares of ₹ 10/- each, pursuant to scheme of amalgamation of Shri Bajarang Metallics and Power Limited and our Company approved by the High Court of Chhattisgarh, by an order dated November 14, 2011. For further details, please see "*History and Certain Corporate Matters*" on page 185.
September 3, 2018	The authorized share capital of our Company was increased from ₹600,000,000/- divided into 60,000,000 Equity Shares of ₹ 10 each to ₹ 1,000,000,000/- divided into 100,000,000 Equity Shares of ₹ 10 each.

Notes to the Capital Structure

1. **Equity Share capital history of our Company**

The history of the equity share capital of our Company is set forth in the table below:

Allotment Date	No. of Equity Shares Allotted	Face Value (₹)	Issue Price (₹)	Nature of Consideration	Nature of transaction	Cumulative Number of Equity Shares	Cumulative paid up equity share capital (₹)
July 25, 2002	50,000	10	10	Cash	Subscription to MoA [1]	50,000	500,000
March 03, 2004	4,950,000	10	10	Cash	Preferential Allotment of Equity shares [2]	5,000,000	50,000,000
March 31, 2004	131,000	10	100	Cash	Preferential Allotment of Equity shares [3]	5,131,000	51,310,000
May 31, 2004	300,000	10	100	Cash	Preferential Allotment of Equity shares [4]	5,431,000	54,310,000
August 31, 2004	418,000	10	100	Cash	Preferential Allotment of Equity shares [5]	5,849,000	58,490,000
November 30, 2004	936,000	10	100	Cash	Preferential Allotment of Equity shares [6]	6,785,000	67,850,000
March 31, 2005	960,500	10	100	Cash	Preferential Allotment of Equity shares [7]	7,745,500	77,455,000
May 31, 2005	623,000	10	100	Cash	Preferential Allotment of Equity shares [8]	8,368,500	83,685,000
September 30, 2005	1,080,000	10	100	Cash	Preferential Allotment of Equity shares [9]	9,448,500	94,485,000
January 06, 2006	391,500	10	100	Cash	Preferential Allotment of Equity shares [10]	9,840,000	98,400,000
January 30, 2006	133,000	10	100	Cash	Preferential Allotment of Equity shares [11]	9,973,000	99,730,000
March 14, 2006	391,500	10	100	Cash	Preferential Allotment of Equity shares [12]	10,364,500	103,645,000

Allotment Date	No. of Equity Shares Allotted	Face Value (₹)	Issue Price (₹)	Nature of Consideration	Nature of transaction	Cumulative Number of Equity Shares	Cumulative paid up equity share capital (₹)
July 10, 2009	253,600	10	500	Cash	Preferential Allotment of Equity shares[13]	10,618,100	106,181,000
March 29, 2010	85,600	10	500	Cash	Preferential Allotment of Equity shares[14]	10,703,700	107,037,000
March 02, 2012	402,120	10	500	Cash	Preferential Allotment of Equity shares[15]	11,105,820	111,058,200
March 27, 2012	49,400	10	500	Cash	Preferential Allotment of Equity shares [16]	11,155,220	111,552,200
March 31, 2012	134,000	10	500	Cash	Preferential Allotment of Equity shares[17]	11,289,220	112,892,200
October 09, 2012	373,313	10	300	Cash	Preferential Allotment of Equity shares [18]	11,662,533	116,625,330
October 31, 2012	456,747	10	300	Cash	Preferential Allotment Equity shares[19]	12,119,280	121,192,800
December 21, 2012	227,450	10	300	Cash	Preferential Allotment of Equity shares [20]	12,346,730	123,467,300
March 30, 2013	567,000	10	300	Cash	Preferential Allotment of Equity Shares [21]	12,913,730	129,137,300
March 05, 2014	62,300	10	320	Cash	Preferential Allotment of Equity Shares[22]	12,976,030	129,760,300
March 12, 2014	17,000	10	320	Cash	Preferential Allotment of Equity Shares[23]	12,993,030	129,930,300
May 12, 2014	78,125	10	320	Cash	Preferential Allotment of Equity Shares[24]	13,071,155	130,711,550
September 4, 2018	39,213,465	10	-	-	Bonus Issue [25]	52,284,620	522,846,200

[1] Initial subscription of 50,000 partly paid up Equity Shares issued to the following allotees:

8,000 equity shares issued to Suresh Goel and 7,000 equity shares each issued to Rajendra Goel, Narendra Goel, Anand Goel, Dinesh Goel, Sandeep Goel and Bajrang Goel.

[2] Further allotment of 4,950,000 partly paid up Equity Shares issued to the following allottees:

250,000 equity shares each issued to Pranav Goel, Shimmer Goel, Avneesh Goel, Aayush Goel, Archit Goel and Ashutosh Goel. 175,000 equity shares each issued to Pawan Goel and Bajrang Goel. 150,000 equity shares each issued to Rashmi Goel, Suman Goel, Kiran Goel, Aruna Goel, Neeta Goel, Sarla Goel, Ginni Devi Goel, Sandeep Goel, Dinesh Goel, Anand Goel, Rajendra Goel, Suresh Goel, Hariram Goel, Sandeep Goel &Sons(HUF), Dinesh Goel &Sons(HUF), Anand Goel&Sons(HUF), Narendra Goel &Sons (HUF), Rajendra Goel &Sons (HUF), Suresh Goel & Sons (HUF) and Jainarayan Hariram &Sons (HUF). 100,000 equity shares issued to Narendra Goel. The calls were made by our Company in the year 2004, 2005 and 2006. For further details, please see "Risk Factors – Our Company had issued and allotted 4,950,000 Equity Shares of face value of ₹ 10/- each on March

03, 2004, as partly paid up shares. The call money with respect to this allotment of partly paid-up shares made by our Company, may not be compliant with the Companies Act, 1956 on page 27.

[3] Further allotment of 131,000 Equity Shares issued to the following allottees:

80,000 equity shares issued to S M Securities Limited and 51,000 equity shares issued to Dreamland Plantation Private Limited.

[4] Further allotment of 300,000 Equity Shares issued to the following allottees:

30,000 equity shares issued to S M Securities Limited, 200,000 equity shares issued in favour Dreamland Plantation Private Limited and 70,000 equity shares issued to Aman Alluminum Private Limited.

[5] Further allotment of 418,000 Equity Shares issued to the following allottees:

50,000 equity shares issued to Alexcy Tracon Private Limited., 60,000 equity shares each issued to Nandan Mercantiles Private Limited.and Omni Associates Private Limited., 55,000 equity shares each issued to Raashman Finvest Private Limited and Sonal Tie- Up Private Limited., 75,000 equity shares issued to Shreevar Overseas Limited and 63,000 equity shares issued to Hiland Finance & Trading Private Limited.

[6] Further allotment of 936,000 Equity Shares issued to the following allottees:

10,000 equity shares each issued to Amit Fin-Trade Limited, Ramdev Marketing Private Limited and Sonal International Limited, 20,000 equity shares each issued to Alexy Tracon Private Limited, Narottamka Mercantile Private Limited and Raashman Finvest Private Limited, 5,000 equity shares each issued to Amrut Jyot Enterprises Private Limited, Bhavna Investments Private Limited, Darshani Marketing Private Limited, Data Innovation (India) Private Limited. ,Dhanavidhya Financial & Investments Consultancy Ser. Private Limited. ,Hardik Marketing Private Limited., Kamali Finstock Limited ,M.A.Anandia Leasing & Finance Limited ,Midas Flexipacks Private Limited, Palan Real Estate Developers Private Limited ,Rudra Securities & Capital Limited ,Sakira Finance Limited and Shanti Treadelink Private Limited., 40,000 equity shares each issued to Bakliwal Finvest Private Limited. ,Iris Commercial Private Limited and SCM Holdings Private Limited, 15,000 equity shares issued to Dhanavidhya Multisales Private Limited., 83,000 equity shares issued to Dreamland Plantation Private Limited ,110,500 equity shares issued to Gujarat Jhaveri Spinners Limited, 55,000 equity shares issued to NKP Holdings Private Limited, 50,000 equity shares issued to NKP Fincom Private Limited and Bagamber Dealers Private Limited, 108,000 equity shares issued to Ranakpur Securities Limited, 35,000 equity shares each issued to Sonal Cosmetics (Export)Limited and Trident Lamipack Private Limited ,60,000 equity shares issued to Sukhvarsha Distributers P Limited , 52,000 equity shares issued to Vax Housing Finance Corpon Limited and 7,500 shares issued to Venkatesh Industrial Wires Private Limited.

[7] Further allotment of 960,500 Equity Shares issued to the following allottees:

19,500 equity shares issued to Sheth Rasayan Limited , 20,000 equity shares each issued to Skil-Link Tele systems Private Limited and Napraaj Commercial Private Limited, 5,000 equity shares issued to Sonal International Limited, 25,000 equity shares each issued to Authentic Finlease Private Limited and NJ Investment Private Limited., 10,000 equity shares each issued to Bagambar Dealers Private Limited., Bhavna Investments Private Limited and Prabhavi Investment Private Limited., 60,000 equity shares issued to Bela Properties Private Limited, 35,000 equity shares issued to Dabriwal Investments & Financires Private Limited, 45,000 equity shares issued to Glamor Sales Private Limited, 120,000 equity shares each issued to Nexus Software Limited and Genus Commu-Trade Limited., 28,000 equity shares issued to Scope Sales Private Limited, 34,000 equity shares issued to Super Tech Leathers Private Limited, 100,000 equity shares issued to Supreme Telecom & Network (I)Limited, 30,000 equity shares issued to Trident Laxmi Pack Private Limited, and 50,000 equity shares issued to Yuthaka Commercial Co. , 20,500 equity shares each were issued to Ashray Finman Services Private Limited and Meghal Fin Cap Private Limited., 75,000 equity shares issued to Avin Star Multi Link & Information,40,000 equity shares issued to Dynachem Pharmaceuticals (Export) Limited. , 15,000 equity shares each issued to Fraternity Petro Chem Private Limited. and Gujrat Jhaveri Spinners Limited., 8,000 equity shares issued to Shetal Securities Finance Limited.

[8] Further allotment of 623,000 Equity Shares issued to the following allottees

20,000 equity shares each issued to Agareswar Dev Viniyog Private Limited. , Magic Tech Securities Private

Limited and Prabhavi Investments Private Limited, 47,000 equity shares issued to AHV Investment Private Limited, 38,000 equity shares issued to Authentic Finlease Private Limited, 41,000 equity shares issued to Allied Global Finance Limited, 78,000 equity shares issued to Blue Print Securities Limited, 68,000 equity shares issued to Elvis Security Private Limited, 10,000 equity shares each issued to Telent Infoway Limited , Buniyad Chemicals Limited and Nexus Software Limited , 30,000 equity shares each issued to Konark Commercial & Industries Limited , Dhanvidhya Impex Private Limited., Milinium Imports Private Limited. and Shree Krishna Infrastructure Limited, 25,000 equity shares each issued to Vishesh Plastic Private Limited, Avin Star Multi - Link & Information Private Limited and Shree Krishna Holiday Homes & Farms Limited, 22,000 equity shares each issued to Bhavna Investments Private Limited. and Sun Gold Capital Limited, 15,000 equity shares issued to Dhanvidhya Multisales Private Limited, 6,000 equity shares issued to Dynachem Pharmaceuticals (Exports)Limited and 1,000 equity shares issued to Medha Properties Limited.

[9] Further allotment of 1,080,000 Equity Shares issued to the following allottees:

31,000 equity shares to be allotted to Aasiyana Technocast & Scrap Private Limited., 300,000 equity shares allotted to Aman Aluminum Private Limited., 35,000 equity shares allotted to Askan Chemicals (Guj) Private Limited, 13,000 equity shares allotted to Avin Star Multi Link & Information System Private Limited, 20,000 equity shares each allotted to Bhavna Investments Private Limited ,Millennium Imports Private Limited and Prabhavi Investments Private Limited, 40,000 equity shares allotted to Buniyad Chemicals Limited, 105,000 equity shares allotted to G.S.R.Finvest Private Limited, 183,000 equity shares allotted to Hiland Finance & Trading Private Limited, 55,000 equity shares allotted to Rays & Arrows Finance & Investments Private Limited, 10,000 equity shares allotted to Talent Infoway Limited, 214,000 equity shares allotted to Upkar Merchants Private Limited and 34,000 equity shares allotted to Valiant Pharmachem Limited.

[10] Further allotment of 391,500 Equity Shares issued to the following allottees:

159,000 equity shares allotted to Rays & Arrows Finance & Investments Private Limited and 232,500 equity shares allotted to Upkar Merchants Private Limited.

[11] Further allotment of 133,000 Equity Shares issued to the following allottees:

10,000 equity shares allotted to Dreamland Plantations Private Limited. and 123,000 equity shares allotted to Upkar Merchants Private Limited.

[12] Further allotment of 391,500 Equity Shares issued to the following allottees:

356,500 equity shares allotted to Aman Aluminum Private Limited and 35,000 equity shares allotted to Hiland Finance & Trading Private Limited.

[13] Further allotment of 253,600 Equity Shares issued to the following allottees:

180,000 equity shares allotted to S.B Multimedia Private Limited., 13,600 equity shares allotted to Rajendra Goel, 20,000 equity shares allotted to Narendra Goel and 40,000 shares allotted to Suresh Goel.

[14] Further allotment of 85,600 Equity Shares issued to the following allottees:

85,600 equity shares allotted to Sukanya Merchandise Private Limited.

[15] Further allotment of 402,120 Equity Shares issued to the following allottees:

6,170 equity shares allotted to Banka Finance & Securities Private Limited, 44,000 equity shares allotted to Sukanya Merchandise Private Limited, 215,950 equity shares allotted to Bonus Dealcom Private Limited and 136,000 equity shares allotted to Priority Construction Private Limited.

[16] Further allotment of 49,400 Equity Shares issued to the following allottees:

49,400 equity shares allotted to Priority Constructions Private Limited.

[17] Further allotment of 134,000 Equity Shares issued to the following allottees:

80,000 equity shares allotted to SB Multimedia Private Limited and 54,000 equity shares allotted to Shri Bajrang Ispat & Plywood Limited.

[18] Further allotment of 373,313 Equity Shares issued to the following allottees:

355,178 equity shares allotted to Priority Constructions Private Limited, 4,667 equity shares allotted to Shri Bajrang Ispat & Plywood Limited, 3,301 equity shares allotted to Banka Finance & Securities Private Limited and 10,167 shares allotted to Sukanya Merchandise Private Limited

[19] Further allotment of 456,747 Equity Shares issued to the following allottees:

411,010 equity shares allotted to Banka Finance & Securities Private Limited and 45,737 equity shares allotted to Sukanya Merchandise Private Limited

[20] Further allotment of 227,450 Equity Shares issued to the following allottees:

33,000 equity shares each allotted to Shimmer Investments Private Limited. and Atlanta Securities Private Limited., 3,200 equity shares allotted to Rashmi Goel, 5,300 equity shares allotted to Neeta Goel, 8,500 equity shares allotted to Aruna Goel, 8,900 equity shares allotted to Kiran Goel, 9,200 equity shares allotted to Sarla Goel, 350 equity shares allotted to Suman Goel, 13,000 equity shares allotted to Pawan Goel, 9,000 equity shares allotted to Bajrang Goel, 5,000 equity shares allotted to Ashutosh Goel, 4,000 equity shares allotted to Aayush Goel and 20,000 equity shares each allotted to Jai narayan Hariram Goel & Sons, Suresh Goel &Sons, Rajendra Goel & sons and Narendra Goel &Sons and 15,000 equity shares allotted to Anand Goel &Sons.

[21] Further allotment of 567,000 Equity Shares issued to the following allottees:

567,000 equity shares allotted to Popular Mercantiles Private Limited.

[22] Further allotment of 62,300 Equity Shares issued to the following allottees:

16,000 equity shares allotted to Ginni Devi Goel, 16,700 shares allotted to Sarla Goel, 9,000 equity shares allotted to Ashutosh Goel, 8,600 equity shares allotted to Neeta Goel, 2,500 equity shares each allotted to Suman Goel and Archit Goel, 4,500 equity shares allotted to Esha Goel, 1,500 equity shares allotted to Anjali Goel and 1,000 equity shares allotted to Pawan Goel.

[23] Further allotment of 17,000 Equity Shares issued to the following allottees:

17,000 equity shares allotted to Ankita Goel.

[24] Further allotment of 78,125 Equity Shares issued to the following allottees:

66,250 equity shares allotted to Shri Bajrang Alloys Limited and 11,875 equity shares allotted to Anjali Goel.

[25] Bonus issue of 39,213,465 Equity Shares issued to forty three shareholders in the ratio of 3 (three) Equity Shares for every 1 (one) Equity Shares held:

For details of the bonus issue please see "Capital Structure - Details of Equity Shares issued for consideration other than cash or out of revaluation reserves" on page 96 and allottees list as per point 4 below.

2. **Issue of Equity Shares at price lower than the Issue Price in the last year**

   Other than the bonus issue made by our Company on September 4, 2018, our Company has not issued any Equity Shares at a price that may be lower than the Issue Price during the last one year. For details in relation to the bonus issuance, see "*Capital Structure – Details of Equity Shares issued for consideration other than cash or out of revaluation reserves*" on page 96.

3. **Issue of Equity Shares in the last two years**

   For details of issue of Equity Shares by our Company in the two immediately preceding years, see "*Capital Structure – Equity Share Capital History of our Company*" on page 91.

4. **Details of Equity Shares issued for consideration other than cash or out of revaluation reserves**

Except as disclosed below, our Company has not issued Equity Shares for consideration other than cash or through the bonus issue as on the date of this Draft Red Herring Prospectus. Our Company has not issued any Equity Shares out of revaluation reserves of our Company.

S.No	Date of allotment	Name of the allottee	No. of Equity Shares allotted under the bonus issue	Issue price (₹)	Reason	Benefit accrued to our Company
1.	September 4, 2018	Suresh Goel	486,000	-	Bonus issue of 39,213,465 Equity Shares of ₹ 10/- each in the ratio three new Equity Shares for every one existing paid up Equity Share, was authorised by the shareholders of our Company through a resolution dated September 3, 2018 and allotment was made by the Board through a resolution dated September 4, 2018.	-
2.		Rajendra Goel	480,000	-		
3.		Narendra Goel	321,000	-		
4.		Anand Goel	471,300	-		
5.		Dinesh Goel	471,000	-		
6.		Sandeep Goel	1,243,800	-		
7.		Bajrang Goel	575,700	-		
8.		Kiran Goel	477,600	-		
9.		Aruna Goel	475,500	-		
10.		Neeta Goel	492,600	-		
11.		Sarla Goel	528,900	-		
12.		Sandeep Goel & Sons (HUF) Karta-Shri Sandeep Goel	450,300	-		
13.		Anand Goel & Sons (HUF) Karta - Shri Anand Goel	495,300	-		
14.		Narendra Goel & Sons Karta - Shri Narendra Goel	510,300	-		
15.		Rajendra Goel & Sons (HUF) Karta - Shri Rajendra Goel	510,300	-		
16.		Jainarayan Hariram Goel & Sons (HUF) Karta - Suresh Goel	510,000	-		
17.		Shri Bajrang Alloys Limited	1,890,750	-		
18.		Aayush Goel	762,300	-		
19.		Archit Goel,	757,800	-		
20.		Ashutosh Goel	794,100	-		
21.		Avneesh Goel,	750,000	-		
22.		Dinesh Goel & Sons (HUF) Karta - Shri Dinesh Goel	450,300	-		
23.		Pawan Goel	569,100	-		

S.No	Date of allotment	Name of the allottee	No. of Equity Shares allotted under the bonus issue	Issue price (₹)	Reason	Benefit accrued to our Company
24.		Pranav Goel,	750,000	-		
25.		Rashmi Goel	459,600	-		
26.		Shimmer Goel,	750,300	-		
27.		Suman Goel	460,350	-		
28.		Suresh Goel & Sons (HUF) Karta - Suresh Goel	510,300	-		
29.		Banka Finance & Securities Private Limited	6,235,143	-		
30.		Atlanta Securities Private Limited	6,118,500	-		
31.		S.B. Multimedia Private Limited	780,000	-		
32.		Shimmer Investments Private Limited	159,000	-		
33.		Swastik Mercantiles Limited	135,000	-		
34.		Sukanya Merchandise Private Limited	2,172,762	-		
35.		Bonus Dealcom Private Limited.	2,151,900	-		
36.		Priority Constructions Private Limited.	1,621,734	-		
37.		Shri Bajarang Ispat And Plywood Limited	176,001	-		
38.		Popular Mercantile Private Limited	1,701,000	-		
39.		Esha Goel,	15,300	-		
40.		Anjali Goel,	490,125	-		
41.		Ankita Goel,	51,900			
42.		Pawan Goel & Sons (HUF) Karta - Shri Pawan Goel	300	-		
43.		Bajrang Goel & Sons (HUF) Karta - Shri Bajrang Goel	300	-		

5. **Allotment pursuant to a scheme approved under Sections 391-394 of the Companies Act, 1956/ Sections 230-232 of the Companies Act, 2013**

Date of High Court Order approving the Scheme	Names of parties	Details of the Scheme
November 14, 2011	Scheme of amalgamation between Shri Bajrang Metallics & Power Limited with Shri Bajrang Power and Ipsat Limited	For details of the scheme, see "*History and Certain Corporate Matters*" on page 185

Our Company has not issued any Equity Shares pursuant to the above Scheme or any other scheme approved under Sections 391-394 of the Companies Act, 1956/ Sections 230-232 of the Companies Act, 2013.

6. **Bonus shares allotted out of revaluation reserves**

Our Company has not issued any bonus shares, out of revaluation reserves, at any time since incorporation.

7. **Particulars of Equity Shares issued under employee stock option scheme of our Company**

Our Company has not issued any Equity Shares pursuant to any employee stock option scheme of our Company.

8. **History of the Equity Shares capital held by our Promoters**

As on the date of this Draft Red Herring Prospectus, our Promoters hold 18,815,924 Equity Shares, equivalent to 35.99 % of the issued, subscribed and paid-up Equity Share capital of our Company.

- *Build-up of the Promoters' shareholding in our Company*

The build-up of the Equity Shares held by our Promoters since incorporation of our Company is set forth in the table below

Name of Promoter	Date of allotment /transfer	Nature of transaction	No. of Equity Shares	Nature of consideration	Face value per Equity Share (₹)	Issue / acquisition / transfer price per Equity Share (₹)	Percentage of the pre-Issue capital (%)	Percentage of the post-Issue capital (%) *
Atlanta Securities Private Limited	November 18, 2008	Transfer from Authentic Finelease Private Limited	25,000	Cash	10	100	0.05	[•]
	January 09, 2008	Transfer (1)	327,000	Cash	10	10	0.63	[•]
	March 30, 2008	Transfer (2)	75,000	Cash	10	10	0.15	[•]
	July 31, 2008	Transfer (3)	1,579,500	Cash	10	10	3.01	[•]
	December 21, 2012	Preferential Allotment of Equity Shares	33,000	Cash	10	300	0.06	[•]
	September 4, 2018	Bonus issue	6,118,500	_	10	_	11.70	[•]
Total			**8,158,000**				**15.60**	
Banka Finance & Securities Private Limited	December 14, 2007	Transfer (4)	1,008,000	Cash	10	10	1.93	[•]
	April 05, 2010	Transfer (5)	317,100	Cash	10	3	0.54	[•]
	April 05, 2010	Transfer (6)	332,800	Cash	10	2	0.56	[•]
	March 02, 2012	Preferential Allotment of Equity Shares	6,170	Cash	10	500	0.01	[•]
	October 09, 2012	Preferential Allotment of Equity Shares	3,301	Cash	10	300	Negligible	[•]

Name of Promoter	Date of allotment /transfer	Nature of transaction	No. of Equity Shares	Nature of consideration	Face value per Equity Share (₹)	Issue / acquisition / transfer price per Equity Share (₹)	Percentage of the pre-Issue capital (%)	Percentage of the post-Issue capital (%) *
	October 31, 2012	Preferential Allotment of Equity Shares	411,010	Cash	10	300	0.79	[•]
	September 4, 2018	Bonus issue	6,235,143	_	10	_	11.93	[•]
Total			**8,313,524**				**15.90**	
Suresh Goel	July 25, 2002	Initial Subscription to MOA	8,000	Cash	10	10	0.01	[•]
	March 3, 2004	Preferential Allotment of Equity Shares	150,000	Cash	10	10	0.29	[•]
	July 10, 2009	Preferential Allotment of Equity Shares	40,000	Cash	10	500	0.08	[•]
	July 24, 2009	Transfer to Swastik Mercantiles Limited	(40,000)	Cash	10	500	0.08	[•]
	September 29, 2014	Transfer from Shri Bajrang Alloys Limited	4,000	Cash	10	320	0.01	[•]
	September 4, 2018	Bonus issue	486,000	_	10	_	0.93	[•]
Total			**648,000**				**1.24**	
Rajendra Goel	July 25, 2002	Initial subscription to MoA	7,000	Cash	10	10	0.01	[•]
	March 03, 2004	Preferential Allotment of Equity Shares	150,000	Cash	10	10	0.29	[•]
	July 10, 2009	Preferential Allotment of Equity Shares	13,600	Cash	10	500	0.03	[•]
	July 24, 2009	Transfer to Swastik Mercantiles Limited	(13600)	Cash	10	500	0.03	[•]
	September 29, 2014	Transfer from Shri Bajrang Alloys Limited	3,000	Cash	10	320	0.01	[•]
	September 4, 2018	Bonus issue	480,000	_	10	_	0.92	[•]
Total			**640,000**				**1.22**	
Narendra Goel	July 25, 2002	Initial subscription to MoA	7,000	Cash	10	10	0.01	[•]
	March 03, 2004	Preferential Allotment of Equity Shares	100,000	Cash	10	10	0.19	[•]
	July 10, 2009	Preferential Allotment of Equity Shares	20,000	Cash	10	500	0.04	[•]

Name of Promoter	Date of allotment /transfer	Nature of transaction	No. of Equity Shares	Nature of consideration	Face value per Equity Share (₹)	Issue / acquisition / transfer price per Equity Share (₹)	Percentage of the pre-Issue capital (%)	Percentage of the post-Issue capital (%) *
	July 24, 2009	Transfer to Shimmer Investment Private Limited	(20,000)	Cash	10	500	0.04	[•]
	September 4, 2018	Bonus Issue	321,000	Cash	10	-	0.61	[•]
Total			**428,000**				**0.82**	
Anand Goel	July 25, 2002	Initial subscription to MoA	7,000	Cash	10	10	0.01	[•]
	March 03, 2004	Preferential Allotment of Equity Shares	150,000	Cash	10	10	0.29	[•]
	May 05, 2017	Transfer from Sardar Ajit Singh	100	Cash	10	400	Negligible	[•]
	September 4, 2018	Bonus Issue	471,300	-	10	-	0.90	[•]
Total			**628,400**				**1.20**	

** Assuming full subscription of the Issue.*

(1) *Atlanta Securities Private Limited has acquired Equity Shares at a price of ₹ 10 each from the following: 25,000 Equity Shares from Vishesh Plastics Private Limited, 68,000 Equity Shares from Elvis Security Private Limited, 78,000 Equity Shares from Blue Print Securities Private Limited, 47,000 Equity Shares from Ahv Investments Private Limited, 38,000 Equity Shares, from Authentic Finelease Private Limited, 30,000 Equity Shares, from Konark Commercial and Industries Limited, 41,000 Equity Shares from Allied Global Finance Limited.*

(2) *Atlanta Securities Private Limited has acquired Equity Shares at a price of ₹ 10 each from the following: 35,000 Equity Shares from Gurukul Dealers Private Limited, 40,000 Equity Shares from Akhilesh Suppliers Private Limited.*

(3) *Atlanta Securities Private Limited has acquired Equity Shares at a price of ₹ 10 each from the following: 10,000 Equity Shares from Amit Fintrade Limited, 5,000 Equity Shares from Amrutjyot Enterprises Private Limited, 57,000 Equity Shares from Bhavana Investment Private Limited, 5,000 Equity Shares from Darshani Marking Private Limited, 5,000 Equity Shares from Data Innovation India Private Limited, 5,000 Equity Shares from Dhanvidhya Fin & Inv. Consultancy Services Private Limited, 30,000 Equity Shares from Dhanvidhya Multi Sales Private Limited, 125,500 Equity Shares from Gujarath Jhaveri Spinners Limited, 5,000 Equity Shares from Kamali Finstock Limited, 5,000 Equity Shares from Hardik Marketing Private Limited, 5,000 Equity Shares from M.A. Anandia Leasing and Finance Limited, 5,000 Equity Shares from Midas Flexipacks Private Limited, 5,000 Equity Shares from Palan Realestate Developers Private Limited, 10,000 Equity Shares from Ramdev Marketing Private Limited, 108,000 Equity Shares from Ranakpur Securities, 5,000 Equity Shares from Rudra Securities and Capital Limited, 5,000 Equity Shares from Sakira Finance Limited, 5,000 Equity Shares at Rs 10, from Shanti Trade Link Private Limited, 35,000 Equity Shares from Sonal (Cosmetics) Exports Limited, 15,000 Equity Shares from Sonal International Limited, 52,000 Equity Shares from Vax Housing Finance Corporation Limited, 7,500 Equity Shares from Venkatesh Industrial Wires Private Limited, 34,000 Equity Shares from Super Tech Leathers Private Limited, 20,500 Equity Shares from Ashray Finman Services Private Limited, 113,000 Equity Shares from Avin Star Multi Link & Information Private Limited, 20,500 Equity Shares from Meghal Fin-Cap Private Limited, 46,000 Equity Shares from Dynachem Pharmaceuticals (Export) Limited, 15,000 Equity Shares from Fraternity Petrochem Private Limited, 120,000 Equity Shares from Genus Commu- Trade Limited, 25,000 Equity Shares from Nj Investments Private Limited, 50,000 Equity Shares from Prabhavi Investments Private Limited, 8,000 Equity Shares from Sheetal Securities Finance Limited, 19,500 Equity Shares from Sheth Rasayan Limited, 20,000 Equity Shares from Skil Link Tele Systems Private Limited, 100,000 Equity Shares from Supreme Telecom*

& Network (I) Limited, 130,000 Equity Shares from Nexus Software Limited, 20,000 Equity Shares from Talent Infoway Limited, 50,000 Equity Shares from Buniyad Chemicals Limited, 30,000 Equity Shares at Rs 10, from Dhanvidhya Impex Private Limited, 20,000 Equity Shares from Magic-Tech Securities Private Limited, 1,000 Equity Shares from Medha Projects Limited, 50,000 Equity Shares from Millenium Imports Private Limited, 25,000 Equity Shares from Shree Krishna Holiday Homes and Farms Limited, 30,000 Equity Shares from Shree Krishna Infrastructures Limited, 22,000 Equity Shares from Sungold Capital Limited, 35,000 Equity Shares at from Askan Chemicals (Gujarat) Private Limited, 34,000 Equity Shares at from Valiant Pharmachem Limited, 31,000 Equity Shares from Aasiyana Technocast & Scrap Private Limited.

(4) Banka Finance & Securities Private Limited has acquired Equity Shares at a price of ₹ 10 each from the following: 313,000 Equity Shares from Green Valley Sale S Private Limited, 350,000 from Kohinoor Commodities Private Limited, 345,000 Equity Shares from Valentineo Tradecom Private Limited.

(5)Banka Finance & Securities Private Limited has acquired Equity Shares at a price of ₹ 3 each from the following: 49,650 Equity Shares from A.Ramesh, 47,600 Equity Shares from T.Rajshekhar, 49,800 Equity Shares from P.Jagannath, 50,500 Equity Shares from Suresh R. Sahoo, 45,000 Equity Shares from Sardar Paramjeet Singh, 40,550 Equity Shares from K.K.Singh, 34,000 Equity Shares from Surendra Singh Rao.

(6)Banka Finance & Securities Private Limited has acquired Equity Shares at a price of ₹ 2 each from the following: 31,500 Equity Shares from Uday Singh Rathore, 48,900 Equity Shares from C.Karr, 50,000 Equity Shares from Muni K Reddy, 50,900 Equity Shares from A.P.Marathe, 45,000 Equity Shares from Girdhari Lal, 45,000 Equity Shares from Pyarelal Sharma, 16,500 Equity Shares from Bhagwati Prasad, 45,000 Equity Shares from Abhimanyu Singh.

- *Details of pledged shares of our Company as held by our Promoters:*

None of the Equity Shares held by our Promoters are pledged as on the date of this Draft Red Herring Prospectus.

- *The details of the Shareholding of our Promoters and the other members of the Promoter Group as on the date of filing of this Draft Red Herring Prospectus are set forth below:*

		Pre- Issue		**Post – Issue***	
S. No.	**Shareholder**	**No. of Equity Shares**	**Percentage (%)**	**No. of Equity Shares**	**Percentage (%)**
Promoters					
1.	Suresh Goel	648,000	1.24	648,000	[●]
2.	Rajendra Goel	640,000	1.22	640,000	[●]
3.	Narendra Goel	428,000	0.82	428,000	[●]
4.	Anand Goel	628,400	1.20	628,400	[●]
5.	Atlanta Securities Private Limited	8,158,000	15.60	8,158,000	[●]
6.	Banka Finance & Securities Private Limited	8,313,524	15.90	8,313,524	[●]
Total (A)		**18,815,924**	**35.99**	**18,815,924**	
Promoter Group					
1.	Sarla Goel	705,200	1.35	705,200	[●]
2.	Dinesh Goel	628,000	1.20	628,000	[●]
3.	Sandeep Goel	1,658,400	3.17	1,658,400	[●]
4.	Bajrang Goel	767,600	1.47	767,600	[●]
5.	Kiran Goel	636,800	1.22	636,800	[●]

		Pre- Issue		Post – Issue*	
S. No.	**Shareholder**	**No. of Equity Shares**	**Percentage (%)**	**No. of Equity Shares**	**Percentage (%)**
6.	Aruna Goel	634,000	1.21	634,000	[●]
7.	Neeta Goel	656,800	1.26	656,800	[●]
8.	Pawan Goel	758,800	1.45	758,800	[●]
9.	Archit Goel	1,010,400	1.93	1,010,400	[●]
10.	Aayush Goel	1,016,400	1.94	1,016,400	[●]
11.	Ashutosh Goel	1,058,800	2.03	1,058,800	[●]
12.	Shri Bajrang Alloys Limited	2,521,000	4.82	2,521,000	[●]
13.	Shimmer Investment Private Limited	212,000	0.41	212,000	[●]
14.	Swastik Mercantiles Limited	180,000	0.34	180,000	[●]
15.	S.B. Multimedia Private Limited	1,040,000	1.99	1,040,000	[●]
16.	Shri Bajrang Ispat and Plywood Limited	234,668	0.45	234,668	[●]
17.	Sandeep Goel & Sons (HUF)	600,400	1.15	600,400	[●]
18.	Anand Goel & Sons (HUF)	660,400	1.26	660,400	[●]
19.	Narendra Goel & Sons	680,400	1.30	680,400	[●]
20.	Rajendra Goel & Sons (HUF)	680,400	1.30	680,400	[●]
21.	Jainarayan Hariram Goel & Sons (HUF)	680,000	1.30	680,000	[●]
22.	Dinesh Goel & Sons (HUF)	600,400	1.15	600,400	[●]
23.	Suresh Goel & Sons (HUF)	680,400	1.30	680,400	[●]
24.	Bajrang Goel & Sons (HUF)	400	Negligible	400	Negligible
25.	Pawan Goel & Sons (HUF)	400	Negligible	400	Negligible
26.	Sukanya Mercandise Private Limited	2,897,016	5.54	2,897,016	[●]
27.	Bonus Dealcom Private Limited	2,869,200	5.49	2,869,200	[●]
28.	Priority Constructions Private Limited	2,162,312	4.14	2,162,312	[●]
Total (B)		**26,230,596**	**50.17**	**26,230,596**	**[●]**
Total (A + B)		**45,046,520**	**86.16**	**45,046,520**	**[●]**

- *Shareholding of directors of ASPL and BFSPL, our Corporate Promoters*

None of the directors of ASPL hold any Equity Shares as on the date of this Draft Red Herring Prospectus.

Sandeep Goel and Pawan Goel, directors of BFSPL, hold 1,658,400 and 758,800 Equity Shares respectively, as on the date of this Draft Red Herring Prospectus.

- *Details of Promoters' contribution and lock-in:*

(i) Pursuant to Regulations 32 and 36 of the SEBI ICDR Regulations, an aggregate of 20% of the fully diluted post-Issue Equity Share capital of our Company held by our Promoters shall be locked in for a period of three years from the date of Allotment ("**Promoters' Contribution**"), and the Promoters' shareholding in excess of 20% of the fully diluted post-Issue Equity Share capital shall be locked in for a period of one year from the date of Allotment.

(ii) Details of the Equity Shares to be locked-in for three years as Promoters' Contribution are set forth in the table below:*

Name of the Promoter	Date of allotment of the Equity Shares	Nature of transaction	No. of Equity Shares	Face Value (₹)	Issue/ acquisition price per Equity Share (₹) and nature of consideration	No. of Equity Shares locked-in	Percentage of the post-Issue paid-up Equity Share capital (%)
Atlanta Securities Private Limited	November 18, 2008	Transfer from Authentic Finelease Private Limited	25,000	10	100	[●]	[●]
	January 9, 2008	Transfer (1)	327,000	10	10	[●]	[●]
	March 30, 2008	Transfer (2)	75,000	10	10	[●]	[●]
	July 31, 2008	Transfer (3)	1,579,500	10	10	[●]	[●]
	December 21, 2012	Preferential Allotment of Equity Shares	33,000	10	300	[●]	[●]
	September 4, 2018	Bonus Issue	6,118,500	10	-	[●]	[●]
Total			**8,158,000**			[●]	[●]
Banka Finance and Securities Private Limited	December 14, 2007	Transfer (4)	1,008,000	10	10	[●]	[●]
	April 05, 2010	Transfer (5)	317,100	10	3	[●]	[●]
	April 05, 2010	Transfer (6)	332,800	10	2	[●]	[●]
	March 02, 2012	Preferential Allotment of Equity Shares	6,170	10	500	[●]	[●]
	October 09, 2012	Preferential Allotment of Equity Shares	3,301	10	300	[●]	[●]
	October 31, 2012	Preferential Allotment of Equity Shares	411,010	10	300	[●]	[●]
	September 4, 2018	Bonus issue	6,235,143	10	-	[●]	[●]
Total			**8,313,524**			[●]	[●]

* *Note: Above table will be finalized after finalisation of the Issue Price and Post Issue Capital.*

(1) *Atlanta Securities Private Limited has acquired Equity Shares at a price of ₹ 10 each from the following: 25,000 Equity Shares from Vishesh Plastics Private Limited, 68,000 Equity Shares from Elvis Security Private Limited, 78,000 Equity Shares from Blue Print Securities Private Limited, 47,000 Equity Shares from Ahv Investments Private Limited, 38,000 Equity Shares, from Authentic Finelease Private Limited, 30,000 Equity Shares, from Konark Commercial and Industries Limited, 41,000 Equity Shares from Allied Global Finance Limited.*

[2] *Atlanta Securities Private Limited has acquired Equity Shares at a price of ₹ 10 each from the following: 35,000 Equity Shares from Gurukul Dealers Private Limited, 40,000 Equity Shares from Akhilesh Suppliers Private Limited.*

[3] *Atlanta Securities Private Limited has acquired Equity Shares at a price of ₹ 10 each from the following: 10,000 Equity Shares from Amit Fintrade Limited, 5,000 Equity Shares from Amrutjyot Enterprises Private Limited, 57,000 Equity Shares from Bhavana Investment Private Limited, 5,000 Equity Shares from Darshani Marking Private Limited, 5,000 Equity Shares from Data Innovation India Private Limited, 5,000 Equity Shares from Dhanvidhya Fin & Inv. Consultancy Services Private Limited, 30,000 Equity Shares from Dhanvidhya Multi Sales Private Limited, 125,500 Equity Shares from Gujarath Jhaveri Spinners Limited, 5,000 Equity Shares from Kamali Finstock Limited, 5,000 Equity Shares from Hardik Marketing Private Limited, 5,000 Equity Shares from M.A. Anandia Leasing and Finance Limited, 5,000 Equity Shares from Midas Flexipacks Private Limited, 5,000 Equity Shares from Palan Realestate Developers Private Limited, 10,000 Equity Shares from Ramdev Marketing Private Limited, 108,000 Equity Shares from Ranakpur Securities, 5,000 Equity Shares from Rudra Securities and Capital Limited, 5,000 Equity Shares from Sakira Finance Limited, 5,000 Equity Shares at Rs 10, from Shanti Trade Link Private Limited, 35,000 Equity Shares from Sonal (Cosmetics) Exports Limited, 15,000 Equity Shares from Sonal International Limited, 52,000 Equity Shares from Vax Housing Finance Corporation Limited, 7,500 Equity Shares from Venkatesh Industrial Wires Private Limited, 34,000 Equity Shares from Super Tech Leathers Private Limited, 20,500 Equity Shares from Ashray Finman Services Private Limited, 113,000 Equity Shares from Avin Star Multi Link & Information Private Limited, 20,500 Equity Shares from Meghal Fin-Cap Private Limited, 46,000 Equity Shares from Dynachem Pharmaceuticals (Export) Limited, 15,000 Equity Shares from Fraternity Petrochem Private Limited, 120,000 Equity Shares from Genus Commu- Trade Limited, 25,000 Equity Shares from Nj Investments Private Limited, 50,000 Equity Shares from Prabhavi Investments Private Limited, 8,000 Equity Shares from Sheetal Securities Finance Limited, 19,500 Equity Shares from Sheth Rasayan Limited, 20,000 Equity Shares from Skil Link Tele Systems Private Limited, 100,000 Equity Shares from Supreme Telecom & Network (I) Limited, 130,000 Equity Shares from Nexus Software Limited, 20,000 Equity Shares from Talent Infoway Limited, 50,000 Equity Shares from Buniyad Chemicals Limited, 30,000 Equity Shares at Rs 10, from Dhanvidhya Impex Private Limited, 20,000 Equity Shares from Magic-Tech Securities Private Limited, 1,000 Equity Shares from Medha Projects Limited, 50,000 Equity Shares from Millenium Imports Private Limited, 25,000 Equity Shares from Shree Krishna Holiday Homes and Farms Limited, 30,000 Equity Shares from Shree Krishna Infrastructures Limited, 22,000 Equity Shares from Sungold Capital Limited, 35,000 Equity Shares at from Askan Chemicals (Gujarat) Private Limited, 34,000 Equity Shares at from Valiant Pharmachem Limited, 31,000 Equity Shares from Aasiyana Technocast & Scrap Private Limited.*

[4] *Banka Finance & Securities Private Limited has acquired Equity Shares at a price of ₹ 10 each from the following: 313,000 Equity Shares from Green Valley Sale S Private Limited, 350,000 from Kohinoor Commodities Private Limited, 345,000 Equity Shares from Valentineo Tradecom Private Limited.*

[5]*Banka Finance & Securities Private Limited has acquired Equity Shares at a price of ₹ 3 each from the following: 49,650 Equity Shares from A.Ramesh, 47,600 Equity Shares from T.Rajshekhar, 49,800 Equity Shares from P.Jagannath, 50,500 Equity Shares from Suresh R. Sahoo, 45,000 Equity Shares from Sardar Paramjeet Singh, 40,550 Equity Shares from K.K.Singh, 34,000 Equity Shares from Surendra Singh Rao.*

[6]*Banka Finance & Securities Private Limited has acquired Equity Shares at a price of ₹ 2 each from the following: 31,500 Equity Shares from Uday Singh Rathore, 48,900 Equity Shares from C.Karr, 50,000 Equity Shares from Muni K Reddy, 50,900 Equity Shares from A.P.Marathe, 45,000 Equity Shares from Girdhari Lal, 45,000 Equity Shares from Pyarelal Sharma, 16,500 Equity Shares from Bhagwati Prasad, 45,000 Equity Shares from Abhimanyu Singh.*

(iii) The Promoters' Contribution has been brought in to the extent of not less than the specified minimum lot and from the persons defined as 'promoter' under the SEBI ICDR Regulations. Our Company undertakes that the Equity Shares that are being locked-in are not and will not be ineligible for computation of promoters' contribution in terms of Regulation 33 of the SEBI ICDR Regulations. In this connection, we confirm the following:

(a) The Promoters' Contribution does not include Equity Shares acquired in the three years immediately preceding the date of filing of this Draft Red Herring Prospectus: (a) for consideration other than cash, and revaluation of assets or capitalisation of intangible assets; or (b) bonus shares out of revaluation reserves or unrealised profits of our Company or bonus shares issued against Equity Shares, which are otherwise ineligible for computation of promoters' contribution;

(b) The Promoters' Contribution does not include any Equity Shares acquired during the one year immediately preceding the date of filing of this Draft Red Herring Prospectus at a price lower than the price at which the Equity Shares are being offered to the public in the Issue;

(c) Our Company has not been formed by the conversion of a partnership firm into a company; and

(d) The Promoter's Contribution does not include any Equity Shares which are subject to any pledge.

- *Other lock-in requirements:*

(i) Pursuant to Regulation 39(a) and Regulation 39(b) of the SEBI ICDR Regulations, the Equity Shares held by our Promoters, which are locked-in, for a period of three years from the date of Allotment or for a period of one year from the date of Allotment may till such time that they are locked-in, be pledged only with scheduled commercial banks or public financial institutions as collateral security for loans granted by such banks or public financial institutions, provided that such loans have been granted by such bank or institution for the purpose of financing one or more of the objects of the Issue and pledge of the Equity Shares is a term of sanction of such loans.

(ii) The Equity Shares held by the Promoters, which are locked-in may be transferred to and among the other Promoters and the members of the Promoter Group or to any new promoter or persons in control of our Company, subject to continuation of the lock-in in the hands of the transferees for the remaining period and compliance with the Takeover Regulations, as applicable.

(iii) The Equity Shares held by persons other than our Promoter will be locked-in for a period of one year from the date of Allotment in the Issue and may be transferred to any other person holding the Equity Shares which are locked-in, subject to continuation of the lock-in in the hands of transferees for the remaining period and compliance with the Takeover Regulations, as applicable.

(iv) Any Equity Shares Allotted to Anchor Investors under the Anchor Investor Portion shall be locked- in for a period of 30 days from the date of Allotment.

9. **Shareholding Pattern of our Company**

The table below presents the shareholding pattern of our Company as on the date of this Draft Red Herring Prospectus:

Category (I)	Category of shareholder (II)	Nos. of shareholders (III)	No. of fully paid up equity shares held (IV)	No. of Partly paid-up equity shares held (V)	No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) =(IV)+(V)+ (VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialised form (XIV)
								No. of Voting: Class eg: X	Class eg: Y	Total	Total as a % of (A+B+C)			No. (a)	As a % of total Shares held	No. (a)	As a % of total Shares held (b)	
(A)	**Promoter & Promoter Group**	34	45,046,520			45,046,520	86.16									3,671,125	8.15	6,772,930
(B)	**Public**	9	7,238,100	-	-	7,238,100	13.84	-	-	-	-	-	-	-	-	730,375	10.09	752,775
(C)	**Non Promoter-Non Public**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
(C1)	**Shares underlying DRs**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
(C2)	**Shares held by Employee Trusts**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Total	**43**	**52,284,620**	**Nil**	**Nil**	**52,284,620**	**100.00**									**4,401,500**	**18.24**	**7,525,705**

10. **Details of Equity Shareholding of the top 10 shareholders of our Company**

(a) The top 10 shareholders and the number of Equity Shares held by each of them, as on the date of filing of this Draft Red Herring Prospectus are set forth in the table below:

S. No.	Name of the shareholder	No. of Equity Shares	Percentage of the pre- Issue equity share capital (%)
1.	Banka Finance & Securities Private Limited	8,313,524	15.90
2.	Atlanta Securities Private Limited	8,158,000	15.60
3.	Sukanya Merchandise Private Limited	2,897,016	5.54
4.	Bonus Dealcom Private Limited	2,869,200	5.49
5.	Shri Bajrang Alloys Limited	2,521,000	4.82
6.	Popular Mercantile Private Limited	2,268,000	4.34
7.	Priority Constructions Private Limited	2,162,312	4.14
8.	Sandeep Goel	1,658,400	3.17
9.	Ashutosh Goel	1,058,800	2.03
10.	S.B. Multimedia Private Limited	1,040,000	1.99
Total		**32,946,252**	**63.02**

(b) The top 10 shareholders and the number of Equity Shares held by each of them, as on 10 days prior to the date of filing of this Draft Red Herring Prospectus are set forth in the table below:

S. No.	Name of the shareholder	No. of Equity Shares	Percentage of the pre- Issue equity share capital (%)
1.	Banka Finance & Securities Private Limited	2,078,381	15.90
2.	Atlanta Securities Private Limited	2,039,500	15.60
3.	Sukanya Merchandise Private Limited	724,254	5.54
4.	Bonus Dealcom Private Limited	717,300	5.49
5.	Shri Bajrang Alloys Limited	630,250	4.82
6.	Popular Mercantile Private Limited	567,000	4.34
7.	Priority Constructions Private Limited	540,578	4.14
8.	Shri Sandeep Goel	414,600	3.17
9.	Shri Ashutosh Goel	264,700	2.03
10.	S.B. Multimedia Private Limited	260,000	1.99
Total		**8,236,563**	**63.02**

(c) The 10 shareholders and the number of Equity Shares held by each of them, as on two years prior to the date of filing of this Draft Red Herring Prospectus are as follows:

S. No.	Name of the shareholder	No. of Equity Shares	Percentage of the pre- Issue equity share capital (%)
1.	Banka Finance & Securities Private Limited	2,078,381	15.90
2.	Atlanta Securities Private Limited	2,039,500	15.60
3.	Sukanya Merchandise Private Limited	724,254	5.54
4.	Bonus Dealcom Private Limited	717,300	5.49
5.	Shri Bajrang Alloys Limited	630,250	4.82
6.	Popular Mercantile Private Limited	567,000	4.34
7.	Priority Constructions Private Limited	540,578	4.14
8.	Ashutosh Goel	264,600	2.02
9.	S.B. Multimedia Private Limited	260,000	1.99
10.	Aayush Goel	254,000	1.94
Total		**8,075,863**	**61.78**

11. **Details of Equity Shares held by our Directors and Key Management Personnel of our Company**

Other than as disclosed below, our Directors and Key Management Personnel do not hold any Equity Shares as on the date of this Draft Red Herring Prospectus:

S. No.	Name	Designation	No. of Equity Shares	Percentage of the pre-Issue Equity Share capital (%)	Percentage of the post-Issue Equity Share capital (%)
1.	Suresh Goel	Executive Director and Chairman	648,000	1.24	[●]
2.	Rajendra Goel	Executive Director	640,000	1.22	[●]
3.	Narendra Goel	Managing Director	428,000	0.82	[●]
4.	Anand Goel	Executive Director	628,400	1.20	[●]
4.	Sandeep Goel	CFO	1,658,400	3.17	[●]
Total			**4,002,800**	**7.65**	[●]

12. Our Company has not made any public issue or rights issue of any kind or class of securities since its incorporation.

13. Our Company presently does not intend or propose to alter the capital structure for a period of six months from the Bid/Issue Opening Date, by way of split or consolidation of the denomination of Equity Shares or further issue of Equity Shares (including issue of securities convertible into or exchangeable, directly or indirectly for Equity Shares) whether on a preferential basis or issue of bonus or rights or further public issue of specified securities or qualified institutions placement or otherwise. However, if our Company enters into acquisitions, joint ventures or other arrangements, our Company may, subject to necessary approvals, consider raising additional capital to fund such activity or use Equity Shares as currency for acquisitions or participation in such joint ventures.

14. None of the members of our Promoter Group, our Promoters, our Directors or directors of our Corporate Promoters and their immediate relatives have purchased or sold any securities of our Company or its

Subsidiaries during the period of six months immediately preceding the date of this Draft Red Herring Prospectus.

15. As on the date of this Draft Red Herring Prospectus, the BRLMs and their respective associates (as defined under the Companies Act) do not hold any Equity Shares of our Company. The BRLMs and their respective affiliates may engage in transactions with and perform services for our Company in the ordinary course of business or may in the future engage in commercial banking and investment banking transactions with our Company and/or our Subsidiaries, for which they may in the future receive compensation.

16. As on the date of the filing of this Draft Red Herring Prospectus, the total number of our Shareholders is forty three.

17. Neither our Company, our Promoters nor the Directors have entered into any buy-back, safety net and/or standby arrangements for purchase of Equity Shares or other securities from any person. Further, the BRLMs have not entered into any buy-back, safety net and/or standby arrangements for purchase of Equity Shares or other securities from any person.

18. Our Company has no outstanding warrants, options or rights to convert debentures, loans or other instruments convertible into Equity Shares as on the date of this Draft Red Herring Prospectus.

19. A Bidder cannot make a Bid for more than the number of Equity Shares offered in the Issue, subject to the maximum limit of investment prescribed under relevant laws applicable to each category of investor.

20. Any oversubscription to the extent of 10% of the Issue can be retained for the purposes of rounding off to the nearest integer.

21. None of our Promoters and members of our Promoter Group will participate in the Issue.

22. There have been no financing arrangements whereby our Promoters, members of the Promoter Group, our Directors and their relatives have financed the purchase by any other person of securities of our Company, other than in the normal course of business of the financing entity during a period of six months immediately preceding the date of filing of this Draft Red Herring Prospectus.

23. The Issue is being made in terms of Rule 19(2)(b) of SCRR. The Issue is being made through the Book Building Process in accordance with Regulation 26(1) of the SEBI ICDR Regulations, wherein not more than 50% of the Issue shall be available for allocation on a proportionate basis to QIBs. Our Company may, in consultation with the BRLMs allocate up to 60% of the QIB Portion to Anchor Investors on a discretionary basis, out of which one-third shall be reserved for domestic Mutual Funds only, subject to valid Bids being received from domestic Mutual Funds at or above the Anchor Investor Issue Price, in accordance with the SEBI ICDR Regulations. In the event of under-subscription or non-allocation in the Anchor Investor Portion, the balance of Equity Shares shall be added to the QIB Portion. 5% of the QIB Portion (excluding the Anchor Investor Portion) shall be available for allocation on a proportionate basis to Mutual Funds only, and the remainder of the QIB Portion shall be available for allocation on a proportionate basis to all QIB Bidders (other than Anchor Investors), including Mutual Funds, subject to valid Bids being received at or above the Issue Price. Further, not less than 15% of the Issue shall be available for allocation on a proportionate basis to Non-Institutional Bidders and not less than 35% of the Issue shall be available for allocation to Retail Individual Bidders in accordance with the SEBI ICDR Regulations, subject to valid Bids being received at or above the Issue Price such that subject to availability of Equity Shares, each Retail Individual Bidder shall be allotted not less than the Minimum Bid Lot, and the remaining Equity Shares, if available, shall be allotted to all Retail Individual Bidders on a proportionate basis.

24. Subject to valid bids being received at or above the Issue Price, under-subscription, if any, in any category, except in the QIB Portion, would be allowed to be met with spill-over from any other category or a combination of categories at the discretion of our Company in consultation with the BRLMs and the Designated Stock Exchange. Such inter-se spill over, if any, would be effected in accordance with applicable laws.

25. There shall be only one denomination of the Equity Shares, unless otherwise permitted by law.

26. Our Company shall comply with such disclosure and accounting norms as may be specified by the SEBI from time to time.

27. Our Company shall ensure that transactions in the Equity Shares by our Promoter and the other members of our Promoter Group between the date of registering the Red Herring Prospectus with RoC and the date of closure of the Issue shall be intimated to the Stock Exchanges within 24 hours of such transaction.

28. No person connected with the Issue, including, but not limited to, the BRLMs, the members of the Syndicate, our Company, the Directors, the Promoters, members of the Promoter Group, and Group Companies, shall offer any incentive, whether direct or indirect, in any manner, whether in cash or kind or services or otherwise to any Bidder for making a Bid. Further, no payment, direct or indirect benefit in the nature of discount, commission and allowance or otherwise shall be offered or paid either by our Company or our Promoters or our Promoter Group to any person in connection with making an application for or receiving any Equity Shares pursuant to this Issue.

29. Except for the Issue, there will be no further issue of capital whether by way of issue of bonus shares, preferential allotment, rights issue, conversion of convertible instruments or in any other manner during the period commencing from submission of this Draft Red Herring Prospectus with SEBI until the Equity Shares to be issued pursuant to the Issue have been listed on the Stock Exchanges.

30. All Equity Shares issued pursuant to this Issue shall be fully paid up at the time of Allotment, failing which no Allotment shall be made.

OBJECTS OF THE ISSUE

Our Company proposes to utilize the Net Proceeds from the Issue towards funding the following objects:

1. Repayment/pre-payment, in full or part, of certain borrowings availed by our Company;

2. General corporate purposes

   (collectively, referred to herein as the "**Objects**").

The main objects and objects incidental and ancillary to the main objects set out in the Memorandum of Association enable us to undertake the activities proposed to be funded from the Net Proceeds, as well as the activities towards which the loans proposed to be repaid from the Net Proceeds were utilized. Further, we confirm that the activities carried out by our Company until date are in accordance with the objects set out in the Memorandum of Association.

Net Proceeds

The details of the proceeds from the Issue are summarized in the following table:

Particulars	Amount (₹ in million)
Gross proceeds of the Issue	Upto 5,000.00
(Less) Issue expenses (1)	**[●]**
Net Proceeds	**[●]**

(1) *To be finalised upon determination of the Issue Price and updated in the Prospectus prior to filing with the RoC.*

Means of Finance

The entire requirement of funds towards the Objects will be met from the Net Proceeds. Accordingly, as required under the Regulation 4(2)(g) of the SEBI ICDR Regulations, we confirm that there is no requirement for us to make firm arrangement so finance through verifiable means towards atleast 75% of the stated means of finance, excluding the amount to be raised from the Net Proceeds.

Requirement of Funds and Utilization of Net Proceeds

The Net Proceeds are proposed to be used in accordance with the details provided in the following table:

Particulars	Estimated Amount (₹ in million)
Repayment/pre-payment, in full or part, of certain borrowings availed by our Company	Upto 3,750.00
General corporate purposes (1)	[●]
Total	**[●]**

(1) *To be finalized upon determination of the Issue Price and updated in the Prospectus prior to filing with the RoC.*

The fund requirements mentioned above are based on our internal management estimates, contracts and quotations received from vendors and third-party agencies, which are subject to change in the future, and have not been appraised by any bank, financial institution or any other external agency.

Schedule of Implementation and Deployment of Net Proceeds

Our Company proposes to deploy the Net Proceeds for the aforesaid purposes in accordance with the estimated schedule of implementation and deployment of funds set forth in the table below:

(₹ in million)

Sr. No	Particulars	Amount proposed to be funded from Net Proceeds	Estimated Utilisation of Net Proceeds in Financial Year 2018 - 2019
1.	Repayment/pre-payment, in full or part, of certain borrowings availed by our Company	3,750.00	3,750.00
2.	General corporate purposes (1)	[•]	[•]

(1) *To be finalized upon determination of the Issue Price and updated in the Prospectus prior to filing with the RoC.*

As indicated above, our Company proposes to deploy the entire Net Proceeds towards the Objects as described herein during Financial Year 2018 - 2019. In the event of the estimated utilization of the Net Proceeds in a scheduled Financial Year is not undertaken in its entirety, the remaining Net Proceeds shall be utilized in subsequent Financial Years, as may be decided by our Company, in accordance with applicable laws. Further, if the Net Proceeds are not completely utilized for the Objects during the respective periods stated above due to factors such as (i) economic and business conditions; (ii) increased competition; (iii) delay in procuring and operationalizing assets; (iv) timely completion of the Issue; (v) market conditions outside the control of our Company; and (vi)any other commercial considerations, the remaining Net Proceeds shall be utilized (in part or full)in subsequent periods as may be determined by our Company in accordance with applicable laws.

The deployment of funds indicated above is based on management estimates, current circumstances of our business and prevailing market conditions. The deployment of funds described herein has not been appraised by any bank or financial institution. Our Company may have to revise our funding requirements and deployment from time to time on account of various factors, such as financial and market conditions, competition, business and strategy and interest/exchange rate fluctuations and other external factors, which may not be within the control of our management. For further details of factors that may affect these estimates, see "*Risk Factors*" on page 22. This may entail rescheduling the proposed utilization of the Net Proceeds and changing the allocation of funds from its planned allocation at the discretion of our management, subject to compliance with applicable law.

Subject to applicable laws, in the event of any increase in the actual utilization of funds earmarked for the purposes set forth above, such additional funds for a particular activity will be met by way of means available to us, including from internal accruals and any additional equity and/or debt arrangements. Further, if the actual utilization towards any of the stated Objects is lower than the proposed deployment, the balance remaining may be utilized towards future growth opportunities, and/or towards funding any of the other existing Objects (if required), and/or general corporate purposes, subject to applicable laws.

Details of the Objects

The details in relation to Objects are set forth herein below.

1. Repayment/pre-payment of certain borrowings, in full or part, availed by our Company

Our Company has entered into certain financing arrangements with various banks and financial institutions. For details of these financing arrangements including the terms and conditions, please refer to *"Financial Indebtedness"* on page 461.

Our Company proposes to utilize an estimated amount of ₹ 3,750.00 million from the Net Proceeds towards full or partial repayment or pre-payment of certain borrowings availed by our Company. Our Company may repay or refinance some loans set out in the table below, prior to Allotment. In such a scenario, our Company may utilize the Net Proceeds of the Issue for part or full repayment of any such additional loan or loans obtained to refinance any existing loans of our Company.

Further, our Company may choose to repay, or pre-pay borrowings availed by us, other than those identified in the table below, which may include additional borrowings that our Company may avail after the filing of this Draft Red Herring Prospectus. Our Company undertakes to identify the borrowings that our Company may repay or pre-pay, in part or in full, prior to filing of the Red Herring Prospectus and update disclosures in this regard in the Red Herring Prospectus.

Further, the amounts outstanding under the borrowings identified for repayment (in full or in part) may vary on account of interim repayments and drawdowns. In the event that outstanding amounts were to vary prior to the filing of the Red Herring Prospectus with the RoC, we may revise our utilization of the Net Proceeds towards repayment of amounts under the identified borrowings, subject to compliance with the SEBI ICDR Regulations, Companies Act and other applicable laws.

Our Company believes that such repayment/pre-payment will help to reduce our outstanding indebtedness and enable utilization of our accruals for further investment in our business growth and expansion. In addition, we believe that the strength of our balance sheet and leverage capacity of our Company will improve our ability to raise further resources in the future to fund our potential business development opportunities and plans to grow and expand our business.

The following table provides details of the borrowings availed by our Company, which are currently proposed to be fully or partially repaid or pre-paid from the Net Proceeds:

Sr. No	Name of the Lender	Nature of Borrowing and date of the Sanction Letter/Document	Purpose (1)	Amount Sanctioned (1) (₹ million)	Amount Outstanding as at July 31, 2018 (₹ million)	Rate of Interest(per annum)	Repayment Date / Schedule	Pre-payment penalty
1.	State Bank of India	Term Loan - Sanction letter dated June 20, 2012	Project Implementation	900.00	652.00	@ 3.40% above one year MCLR, present effective rate being 11.55% p.a.	Repayable in 177 monthly Installments Last EMI on March'2030	Not applicable
		Term Loan - Sanction letter dated February 18, 2014	Project Implementation	500.00	429.32	@ 3.40% above one year MCLR, present effective rate being 11.55% p.a.	Repayable in 177 monthly Installments Last EMI on March'2030	Not applicable
		Term Loan - Sanction letter dated January 27, 2015	Project Implementation	487.70	402.48	@ 2.80% above one year MCLR, present effective rate being 10.95% p.a.	Repayable in 177 monthly Installments Last EMI on March'2030	Not applicable
2.	Bank of Baroda	Term Loan - Sanction letter dated June 01, 2012	Project Implementation	1000.00	703.44	@ 12.15% p.a.fixed till FY 2018-19 & @ 12.50% p.a. fixed from FY 2019-20	Repayable in 177 monthly Installments Last EMI on March'2030	Not applicable
		Term Loan - Sanction letter dated September 18, 2013	Project Implementation	750.00	527.61	@ 12.15% p.a.fixed till FY 2018-19 & @ 12.50% p.a. fixed from FY 2019-20	Repayable in 177 monthly Installments Last EMI on March'2030	Not applicable
		Term Loan - Sanction letter dated November 7, 2014	Project Implementation	500.00	430.00	@ 12.15% p.a.fixed till FY 2018-19 & @ 12.50%	Repayable in 177 monthly Installments Last EMI on	Not applicable

Sr. No	Name of the Lender	Nature of Borrowing and date of the Sanction Letter/Document	Purpose (1)	Amount Sanctioned (1) (₹ million)	Amount Outstanding as at July 31, 2018 (₹ million)	Rate of Interest(per annum)	Repayment Date / Schedule	Pre-payment penalty
						p.a. fixed from FY 2019-20	March'2030	
3.	Bank of India	Term Loan - Sanction letter dated June 14, 2012	Project Implementation	800.00	542.18	MCLR 8.30% + BSS 0.30%+CRP 2.35% = 10.95%	Repayable in 174 monthly Installments Last EMI on March'2030	Not applicable
4.	Karnataka Bank	Term Loan - Sanction letter dated June 07, 2012	Project Implementation	400.00	281.84	Base Rate + 2% = 12.50%	Repayable in 177 monthly Installments Last EMI on March'2030	Not applicable
		Term Loan - Sanction letter dated June 27, 2013	Project Implementation	140.00	96.31	Base Rate + 2.75% = 13.25%	Repayable in 177 monthly Installments Last EMI on March'2030	Not applicable
Total					**4,065.18**			

(1) The amount outstanding as of July 31, 2018 has been certified by S S S D & Co Chartered Accountants (Firm Registration Number 020203C) vide its certificate dated September 12, 2018. Further, S S S D & Co Chartered Accountants, have confirmed that these borrowings have been utilized for the purposes for which they were availed, as provided in the relevant borrowing documents. S S S D & Co Chartered Accountants, have further confirmed that none of the borrowings that are intended to be repaid out of the net proceeds of the Issue have been utilized for any payments to or repayment/refinancing of any loans availed from the Promoter Group or Group Companies.

Some of our financing agreements provide for the levy of prepayment penalties. Given the nature of these borrowings and the terms of prepayment, the aggregate outstanding loan amounts may vary from time to time. In the event that there are any prepayment penalties required to be paid under the terms of the relevant financing agreements, such prepayment penalties shall be paid by our Company out of our internal accruals.

Our Company may choose not to prepay the loans from the Net Proceeds to the extent specified above, in the event of a shortfall of the Net Proceeds.

2. General corporate purposes

Our Company proposes to deploy the balance Net Proceeds aggregating ₹[●] million towards general corporate purposes, subject to such utilization not exceeding 25% of the Net Proceeds, in compliance with the SEBI ICDR Regulations, including but not limited to capital expenditure, marketing expenses, geographical expansion, reduction of debt or meeting fund requirements which our Company may face in the ordinary course of business, meeting expenses incurred in the ordinary course of business and any other purpose as may be approved by the Board or a duly appointed committee from time to time, subject to compliance with the necessary provisions of the Companies Act. Our Company's management, in accordance with the policies of the Board, will have flexibility in utilizing any surplus amounts.

Issue Expenses

The total expenses of the Issue are estimated to be approximately ₹ [●] million. Also, see "*Terms of the Issue – Issue Expenses*" on page 532. The break-up for the Issue expenses is as follows:

Activity	Estimated expenses (1) (₹ in million)	As a % of the total estimated Issue expenses (1)	As a % of the total Issue size (1)
BRLM's fees (including underwriting commission	[●]	[●]	[●]
Brokerage and selling commission and bidding charges for Members of the Syndicate, Registered Brokers, RTAs and CDPs(3)	[●]	[●]	[●]
Selling Commission and/processing fee for SCSBs(2)	[●]	[●]	[●]
Fees payable to the Registrar to the Issue	[●]	[●]	[●]
Other advisors to the Issue	[●]	[●]	[●]
Others	[●]	[●]	[●]
- BSE and NSE Processing fees, SEBI filing fees, book building software fees	[●]	[●]	[●]
- Advertising and marketing expenses, Printing and stationery	[●]	[●]	[●]
- Miscellaneous (Listing fees, Auditor fees, Demat charges, Depository charges others)	[●]	[●]	[●]
Total estimated Issue expenses	[●]	[●]	[●]

(1) *Amounts will be finalised on determination of Issue Price and other details.*

(2) *Selling commission payable to the SCSBs on the portion for Retail Individual Investors and Non-Institutional Investors which are directly procured by the SCSBs, would be as follows:*

*Portion for Retail Individual Investors**	[●] *% of the Amount Allotted (plus applicable taxes)*
*Portion for Non-Institutional Investors**	[●] *% of the Amount Allotted (plus applicable taxes)*

* *Amount Allotted is the product of the number of Equity Shares Allotted and the Issue Price.*
Selling Commission payable to the SCSBs will be determined on the basis of the bidding terminal id as captured in the Bid Book of BSE or NSE

No processing fees shall be payable by our Company to the SCSBs on the applications directly procured by them.

Processing fees payable to the SCSBs on the portion for Retail Individual Bidders and Non-Institutional Bidders which are procured by the members of the Syndicate/sub-Syndicate/Registered Broker/RTAs/ CDPs and submitted to SCSB for blocking, would be as follows:

*Portion for Retail Individual Bidders**	₹[●] *per valid application (plus applicable taxes)*
*Portion for Non-Institutional Bidders**	₹[●] *per valid application (plus applicable taxes)*

(3) *Selling commission on the portion for Retail Individual Bidders, Non-Institutional Bidders which are procured by members of the Syndicate (including their sub-Syndicate Members), Registered Brokers, RTAs and CDPs would be as follows:*

Portion for Retail Individual Bidders	[●] *% of the Amount Allotted* (plus applicable taxes)*
Portion for Non-Institutional Bidders	[●] *%of the Amount Allotted* (plus applicable taxes)*

* *Amount Allotted is the product of the number of Equity Shares Allotted and the Issue Price.*
The Selling Commission payable to the Syndicate / Sub-Syndicate Members will be determined on the basis of the application form number / series, provided that the application is also bid by the respective Syndicate / Sub-Syndicate Member. For clarification, if a Syndicate ASBA application on the application form number / series of a Syndicate / Sub-Syndicate Member, is bid by an SCSB, the Selling Commission will be payable to the SCSB and not the Syndicate / Sub-Syndicate Member.
Bidding Charges payable to members of the Syndicate (including their sub-Syndicate Members), RTAs and CDPs on the portion for Retail Individual Bidders and Non-Institutional Bidders which are procured by them and submitted to SCSB for blocking, would be as follows: ₹ [●] *plus GST, per valid application bid by the Syndicate (including their sub-Syndicate Members), RTAs and CDPs.*
The selling commission and Bidding Charges payable to Registered Brokers the RTAs and CDPs will be determined on the basis of the bidding terminal id as captured in the Bid Book of BSE or NSE.

The selling commission or charges, as the case may be, payable to SCSBs, members of the Syndicate (including their sub- Syndicate Members), Registered Brokers, RTAs and CDPs will be subject to finalization of the Basis of Allotment.

The Issue expenses shall be payable in accordance with the arrangements or agreements entered into by the Company with the respective designated intermediary.

Working Capital Requirement

The Net Proceeds of this Issue will not be used to meet our working capital requirements as we expect sufficient internal accruals and already have bank limits for working capital to meet our existing working capital requirements.

Our Company, in accordance with the policies established by our Board from time to time, will have flexibility to deploy the Net Proceeds. The Net Proceeds of the Issue pending utilization for the purposes stated in this section shall be deposited only in scheduled commercial banks included in the Second Schedule of the Reserve Bank of India Act, 1934. In accordance with Section 27 of the Companies Act, 2013, our Company confirms that it shall not use the Net Proceeds for any buying, trading, or otherwise dealing in the shares of any other listed company or for any investment in the equity markets or providing inter-corporate deposits to any related parties.

Bridge Financing Facilities

Our Company has not raised any bridge loans from any bank or financial institution as on the date of this Draft Red Herring Prospectus, which are proposed to be repaid from the Net Proceeds.

Monitoring of Utilization of Funds

Our Company shall appoint a monitoring agency in relation to the Issue as required under the SEBI ICDR Regulations prior to filing of the Red Herring Prospectus with the RoC. Our Board will monitor the utilization of the Net Proceeds through its Audit Committee. Our Company will disclose the utilization of Net Proceeds under separate head in our balance sheet along with relevant details for all sum amounts that have not been utilized. Our Company will indicate investments, if any, of unutilized Net Proceeds in the balance sheet of our Company for the relevant Financial Years subsequent to receipt of listing and trading approvals from the Stock Exchanges.

Pursuant to the SEBI Listing Regulations, our Company shall disclose to the Audit Committee of our Board, the uses and applications of the Net Proceeds, on a quarterly basis. Our Company shall on an annual basis, prepare a statement of funds utilized for purposes other than those stated in this Draft Red Herring Prospectus and place it before the Audit Committee of our Board, as required under applicable law. Such disclosure shall be made only until such time that all the Net Proceeds have been utilized in full. The statement shall be certified by the statutory auditors of our Company.

Furthermore, in accordance with the Regulation 32(1) of the SEBI Listing Regulations, our Company shall furnish to the Stock Exchanges on a quarterly basis, a statement indicating (i) deviations, if any, in the actual utilization of the proceeds of the Issue from the Issue as stated above; and (ii) details of category wise variations in the actual utilization of the proceeds of the Issue from the Objects as stated above. This information will also be published in newspapers simultaneously with the interim or annual financial results, and explanation for such variation (if any) will be included in our Directors' report, after placing the same before the Audit Committee of our Board.

Variation in Objects

In accordance with Section 13(8) and Section 27 of the Companies Act, 2013 and applicable rules and SEBI ICDR Regulations, our Company shall not vary the Objects without our Company being authorized to do so by our shareholders by way of a special resolution through postal ballot. In addition, the notice issued to our shareholders in relation to the passing of such special resolution (the "Postal Ballot Notice") shall specify the prescribed details as required under the Companies Act and applicable rules. The Postal Ballot Notice shall simultaneously be published in the newspapers, one in English and one in the vernacular language of the jurisdiction where our Registered Office is situated. Our Promoters or controlling shareholders will be required to provide an exit opportunity to such shareholders who do not agree to the proposal to vary the Objects, at such price, and in such manner, as prescribed in Chapter VI-A of the SEBI ICDR Regulations.

Other Confirmations

No part of the proceeds from the Issue will be paid by us to our Promoters and members of our Promoter Group, Group Companies, Directors, or Key Management Personnel. Our Company has not entered into and is not planning to enter into any arrangement/agreements with our Promoters, members of our Promoter Group, Group Companies, Directors and Key Management Personnel in relation to the utilization of the Net Proceeds.

BASIS FOR ISSUE PRICE

The Issue Price will be determined by our Company in consultation with the BRLMs on the basis of assessment of market demand for the Equity Shares offered through the Book Building Process and on the basis of quantitative and qualitative factors as described below. The face value of the Equity Shares is ₹ 10 each and the Issue Price is [●] times the face value at the lower end of the Price Band and [●] times the face value at the higher end of the Price Band.

Investors should see "*Risk Factors*", "*Our Business*", and *"Restated Financial Statements"* beginning on pages 22,162 and 228, respectively, to have an informed view before making an investment decision.

Qualitative Factors

Some of the qualitative factors which form the basis for computing the Issue Price are:

- Integrated manufacturer of long steel products in India;
- Diversified product portfolio and well recognized brands 'Goel TMT' and 'Goel TMT WireX';
- Efficient operations with focus on product quality and cost optimization;
- Established relationships with channel partners supported by large distribution network;
- Strong presence in central and western region
- Strategically located manufacturing facilities
- Strong track record of robust financial performance.
- Strong management team backed by experienced Promoters.

For further details, see *"Risk Factors", "Our Business"*, and *"Restated Financial Statements"* beginning on pages 22, 162 and 228, respectively.

Quantitative Factors

Certain information presented below relating to our Company is based on the Restated Standalone Financial Statements and Restated Consolidated Financial Statements. For details, see *"Restated Financial Statements"* beginning on page 228.

Some of the quantitative factors which may form the basis for computing the Issue Price are as follows:

1. **Basic and Diluted Earnings per Share ("EPS"), as adjusted for changes in capital:**

As per Restated Standalone Financial Statements:

Standalone basis			
Financial Year ended	Face Value Per Share (₹ 10 Per Share)		
	Basic EPS in Rupees	Diluted EPS in Rupees	Weight
March 31, 2018	60.93	60.93	3
March 31, 2017	23.71	23.71	2
March 31, 2016	(14.87)	(14.87)	1
Weighted average	**35.89**	**35.89**	

As per Restated Consolidated Financial Statements:

Consolidated basis			
Financial Year ended	Face Value Per Share (₹10 Per Share)		
	Basic EPS in Rupees	Diluted EPS in Rupees	Weight
March 31, 2018	28.22	28.22	3
March 31, 2017	21.59	21.59	2
March 31, 2016	(14.89)	(14.89)	1
Weighted average	**18.82**	**18.82**	

Notes:

(i) *The earning per share has been computed on the basis of the restated profits of the respective years/ period drawn after considering the impact of material adjustments of prior period items pertaining to the earlier years.*

(ii) *The denominator considered for the purpose of calculating earnings per share is the weighted average number of equity shares outstanding as of date.*

(iii) *Basic Earnings per share = Net profit/(loss) after tax, as restated attributable to equity shareholders/Weighted average number of shares outstanding during the period or Financial Year.*

(iv) *Diluted Earnings per share = Net profit/(loss) after tax, as restated attributable to equity shareholders/Weighted average number of diluted Equity Shares outstanding during the period or Financial Year.*

(v) *Earnings per share (EPS) calculation is in accordance with Indian Accounting standard (Ind AS 33 - Earnings per share) prescribed by The Companies (Indian Accounting Standards) Rules 2015.*

2. Price/Earning ("P/E") ratio in relation to Price Band of ₹ [●] to ₹ [●] per Equity Share:

Particulars	**P/E at the lower end of Price band (no. of times)**	**P/E at the higher end of Price band (no. of times)**
Based on basic EPS for the year ended March 31, 2018 on a standalone basis	[●]	[●]
Based on basic EPS for the year ended March 31, 2018 on a consolidated basis	[●]	[●]
Based on diluted EPS for the year ended March 31, 2018 on a standalone basis	[●]	[●]
Based on diluted EPS for the year ended March 31, 2018 on a consolidated basis	[●]	[●]

3. Industry P/ E ratio

Particulars P/ E	**P/E**
Highest	32.09
Lowest	6.03
Industry Composite	13.42

Note:

1. *The Industry high and low has been considered based on the Consolidated and standalone (in case of peers where there is no consolidation) financials from the Industry Peer Group (as disclosed below under "Comparison of Accounting Ratios with Listed Industry Peers")*
2. *The Industry composite has been calculated as the arithmetic average of consolidated and standalone (in case of peers where there is no consolidation) P/E of the Industry are computed based on closing market price as on August 31, 2018 at BSE, For further details, please see "Comparison of Accounting Ratios with Listed Industry Peers" provided below.*

4. **Return on Net Worth ("RoNW")**

As per Restated Standalone Financial Statements of our Company:

Standalone Basis:		
Financial Year ended	RONW %	Weight
March 31, 2018	15.42	3
March 31, 2017	7.04	2
March 31, 2016	(4.77)	1
Weighted average	**9.27**	

As per Restated Consolidated Financial Statements of our Company:

Consolidated Basis:		
Financial Year ended	RONW %	Weight
March 31,2018	5.47	3
March 31,2017	6.36	2
March 31,2016	(4.70)	1
Weighted average	**4.07**	

Note: The return on net worth has been computed on the basis of the restated profits of the respective years/ period drawn after considering the impact of material adjustments of prior period items pertaining to earlier years. The Net Worth has been computed on a closing net worth excluding share application money, as per the Restated Statement of Assets and Liabilities.

5. **Minimum Return on Increased Net Worth after the Issue needed to maintain Pre-Issue EPS for the year ended March 31, 2018:**

Particulars	At Floor Price	At Cap Price
To maintain pre-Issue basic EPS (after adjusting bonus shares)		
On standalone basis	[●]%	[●]%
On consolidated basis	[●]%	[●]%
To maintain pre-Issue diluted EPS (after adjusting bonus shares)		
On standalone basis	[●]%	[●]%
On consolidated basis	[●]%	[●]%

6. **Net Asset Value per Equity Share of face value of ₹ 10 each**

(i) Net asset value per Equity Share as on March 31, 2018 on a restated standalone basis is ₹ 395.02.

(ii) Net asset value per Equity Share as on March 31, 2018 on a restated consolidated basis is ₹ 515.58.

(iii) After the Issue on a standalone basis:

(a) At the Floor Price: ₹ [●]

(b) At the Cap Price: ₹ [●]

(iv) After the Issue on an consolidated basis:

(a) At the Floor Price: ₹ [●]

(b) At the Cap Price: ₹ [●]

(v) Issue Price: ₹ [●]

Notes:
i) Net asset value (₹) = Net worth / number of equity shares as at the end of year.

7. Comparison of Accounting Ratios with Listed Industry Peers

Name of Company	Standalone / Consolidated	Revenues from Operations (in ₹ million)	Face value (₹ per share)	EPS (₹) Basic	EPS (₹) Diluted	P/E (x)	RoNW (%)	NAV (₹ per share)
Shri Bajrang Ispat & Power Limited	Standalone	18,299.32	10.00	60.93	60.93	[●]	15.42%	395.02
	Consolidated	18,512	10.00	28.22	28.22	[●]	5.47%	515.58
Peer Group								
JSW Steel Limited	Standalone	662,340.00	1.00	19.24	19.14	20.61	16.57	115.45
	Consolidated	715,030.00	1.00	25.85	25.71	15.34	21.83	115.83
Jindal Steel & Power Limited	Standalone	179,082.00	1.00	(3.95)	(3.95)	NM	NM	234.53
	Consolidated	281,161.70	1.00	(15.38)	(15.38)	NM	NM	312.96
Prakash Industries Limited	Standalone	30,066.70	10.00	25.58	23.05	6.03	14.12	174.40
	Consolidated	30,066.70	10.00	25.58	23.05	6.03	14.12	174.40
Godawari Power & Ispat Limited	Standalone	21,846.14	10.00	51.64	51.64	10.21	20.98	246.15
	Consolidated	25,888.36	10.00	58.92	58.92	8.95	23.25	262.04
Sarda Energy & Mineral Limited	Standalone	15,150.94	10.00	52.27	52.27	8.10	13.73	379.68
	Consolidated	22,165.89	10.00	56.01	56.01	7.56	13.05	437.31
Kamadhenu Limited	Standalone*	11,873.25	10.00	6.70	6.69	32.09	10.91	61.37
Tata Sponge Iron Limited	Standalone	8,166.45	10.00	91.47	91.47	10.56	14.28	640.54
	Consolidated	8,166.45	10.00	91.48	91.48	10.56	14.28	640.60

Source: Respective peer group company's regulatory filings with BSE

NM: Denoted as Not Meaning in table above as a) EPS is negative, resulting in a negative P/E ratio or b) Net loss after tax for Fiscal March 31, 2018 is leading to a negative RONW.

**The peer group company has only one set of financials i.e. standalone financial statements.*

Notes:

1. *Basic EPS refers to the Basic EPS sourced from the publicly available financial results of the respective company for the year ended March 31,2018.*
2. *P/E Ratio has been computed based on the closing market price of equity shares on the BSE on August 31, 2018, divided by the Basic EPS provided under Note 1 above.*
3. *RoNW is computed as net profit after tax divided by net worth at the end of the financial year March 31, 2018. Net worth means aggregate value of paid up share capital of the company and other equity.*
4. *NAV is computed as net worth at the end of the financial year March 31, 2018 divided by the closing outstanding number of equity shares as of March 31, 2018.*

The Issue Price of ₹ [●] has been determined by our Company in consultation with BRLMs, on the basis of assessment of market demand from investors for Equity Shares through the Book Building Process and, is justified in view of the above qualitative and quantitative parameters.

Investors should read the above mentioned information along with "*Risk Factors*", "*Our Business*", *"Restated Financial Statements"* and "*Management's Discussion and Analysis of Financial Condition and Results of Operations*" beginning on pages 22, 162, 228 and 431 respectively, to have a more informed view. The trading price of Equity Shares could decline due to factors mentioned in "*Risk Factors*" beginning on page 22 and you may lose all or part of your investments.

The Issue Price will be determined by our Company in consultation with the BRLMs on the basis of assessment of market demand for the Equity Shares offered through the Book Building Process and on the basis of quantitative and qualitative factors as described below. The face value of the Equity Shares is ₹ 10 each and the Issue Price is [●] times the face value at the lower end of the Price Band and [●] times the face value at the higher end of the Price Band.

Investors should see "*Risk Factors*", "*Our Business*", and *"Restated Financial Statements"* beginning on pages 22,162 and 228, respectively, to have an informed view before making an investment decision.

STATEMENT OF TAX BENEFITS

Date: September 12, 2018

To: The Board of Directors,
Shri Bajrang Power & Ispat Ltd
Village Borjhara, Urla-Guma Road,
Urla Growth Centre Raipur 493221 (C.G

Dear Sirs,

Re: Proposed initial public offering of equity shares by Shri Bajrang Power & Ispat Limited, ("**Company**"), ("**IPO**").
Sub: Statement of Possible Special Tax Benefits Available to the Company and its Shareholders

We S S S D & Co Chartered Accountants, the statutory auditor of the Company hereby report that the enclosed statement is in connection with **(i)** the special possible tax benefits available to the Company under the Income-tax Act, 1961, (and indirect tax laws), presently in force in India, and, **(ii)** to the shareholders of the Company under the Income tax Act, 1961, presently in force in India. **(Annexure A)**

Several of these benefits are dependent on the Company or its shareholders fulfilling the conditions prescribed under the relevant statutory provisions. Hence, the ability of the Company or its shareholders to derive the tax benefits is dependent upon fulfilling such conditions, which based on business imperatives the Company faces in the future, the Company may or may not choose to fulfill.

The benefits discussed in the enclosed statement are not exhaustive. This statement is only intended to provide general information to the investors and is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of the tax consequences and changing tax laws, each investor is advised to consult his or her own tax consultant with respect to the specific tax implications arising out of their participation in the initial public offering of equity shares of the Company. We do not express any opinion or provide any assurance as to whether:

i. the Company or its shareholders will continue to obtain these benefits in the future; or
ii. the conditions prescribed for availing of the benefits have been/would be met with.

The contents of the **enclosed statement** are based on information, explanations and representations obtained from the Company and on the basis of our understanding of the business activities and operations of the Company.

For S S S D & Co
Chartered Accountants
Registration No.: 020203C

(Vidhan Chandra Srivastava)
Partner
Membership No.: 073712

Annexure A

Statement of Possible Special Tax Benefits Available to the Company and its Shareholders
Special Tax Benefits

A. Special Tax Benefits available to the Company:

The following special tax benefits are available to the Company after fulfilling conditions as per respective provision of the Income tax law.

1. Under Section 35(2AB) of the Income tax Act , a weighted deduction of 150% in respect of expenditure incurred on scientific research (excluding cost of land or building) in an approved in house research & development facility is allowable to Companies engaged in the business of bio –technology or in the business of manufacturing articles or things , not being items mentioned in the Eleventh Schedule , subject to certain terms and conditions .The Company has approved research and development facilities and has been claiming deduction under this section . Further Company is claiming deduction u/s 35(1)(iv) read with section 35 (2).
2. Company is claiming Investment Allowance u/s 32AC.
3. Company is eligible to claim benefit u/s 80 –IA for Generation /transmission /distribution of power.

B. Special Tax Benefits available to the shareholders of the Company :

No Special tax Benefits available to the shareholders of the Company.

SECTION IV: ABOUT OUR COMPANY

INDUSTRY OVERVIEW

The information contained in this section is derived from ICRA Report commissioned by our Company. Neither we nor any other person connected with this Issue has verified this information. Industry sources and publications generally state that the information contained therein has been obtained from sources generally believed to be reliable, but that their accuracy, completeness and underlying assumptions are not guaranteed, and their reliability cannot be assured. Industry publications are also prepared based on information as at specific dates and may no longer be current or reflect current trends. Accordingly, investment decisions should not be based on such information. The ICRA Report has been prepared at the request of our Company and includes the following disclaimer:

"All information contained herein has been obtained by ICRA from sources believed by it to be accurate and reliable. Although reasonable care has been taken to ensure that the information herein is true, such information is provided 'as is' without any warranty of any kind, and ICRA in particular, makes no representation or warranty, express or implied, as to the accuracy, timeliness or completeness of any such information. Also, ICRA or any of its group companies, while publishing or otherwise disseminating other reports may have presented data, analyses and/or opinions that may be inconsistent with the data, analyses and/or opinions presented in this publication. All information contained herein must be construed solely as statements of opinion, and ICRA shall not be liable for any losses incurred by users from any use of this publication or its contents. Also, ICRA provides credit rating and other permissible services to the company which are provided at arms-length basis."

Overview

India Macro

Global GDP growth rates

India remains one of the drivers of world growth, in an improving global economic environment. According to the data released by the International Monetary Fund (IMF) in April 2018, the world economy grew by 3.2% and 3.8%, respectively, in 2016 and 2017 (refer Exhibit 1). Notwithstanding a mild slowdown in the pace of growth, the Indian economy expanded by a sharper 7.1% and 6.7%, respectively, in 2016 and 2017. This makes it one of the fastest growing large economies in the world, along with China (+6.7% and +6.9%). The pace of growth of the Indian economy in 2016 and 2017 has been significantly healthier than the performance of South Africa (+0.6% and +1.3%), Brazil (-3.5% and +1.0%) and Russia (-0.2% and +1.5%). The advanced economies recorded an uptick in growth from 1.7% in 2016 to 2.3% in 2017, led by acceleration in growth in the US, the Euro Area and Japan. For instance, economic growth improved between 2016 and 2017 in the US (from +1.5% to +2.3%), the Euro Area (from +1.8% to +2.3%), and Japan (from +0.9% to +1.7%). The economy of the UK was an exception to this trend, with growth easing from 1.9% in 2016 to 1.8% in 2017.

Exhibit 1: Global GDP growth and forecasts (as per IMF)

Country/ Group	Real GDP Growth (%)						
	Actual					Forecasted	
	2013	2014	2015	2016	2017	2018E	2019E
China	7.8%	7.3%	6.9%	6.7%	6.9%	6.6%	6.4%
Brazil	3.0%	0.5%	-3.6%	-3.5%	1.0%	2.3%	2.5%
Russia	1.8%	0.7%	-2.5%	-0.2%	1.5%	1.7%	1.5%
South Africa	2.5%	1.8%	1.3%	0.6%	1.3%	1.5%	1.7%
India	**6.4%**	**7.4%**	**8.2%**	**7.1%**	**6.7%**	**7.4%**	**7.8%**
Japan	2.0%	0.4%	1.4%	0.9%	1.7%	1.2%	0.9%
Euro Area	-0.2%	1.3%	2.1%	1.8%	2.3%	2.4%	2.0%
United Kingdom	2.1%	3.1%	2.3%	1.9%	1.8%	1.6%	1.5%
United States	1.7%	2.6%	2.9%	1.5%	2.3%	2.9%	2.7%
Advance Economies	1.3%	2.1%	2.3%	1.7%	2.3%	2.5%	2.2%
World	3.5%	3.6%	3.5%	3.2%	3.8%	3.9%	3.9%

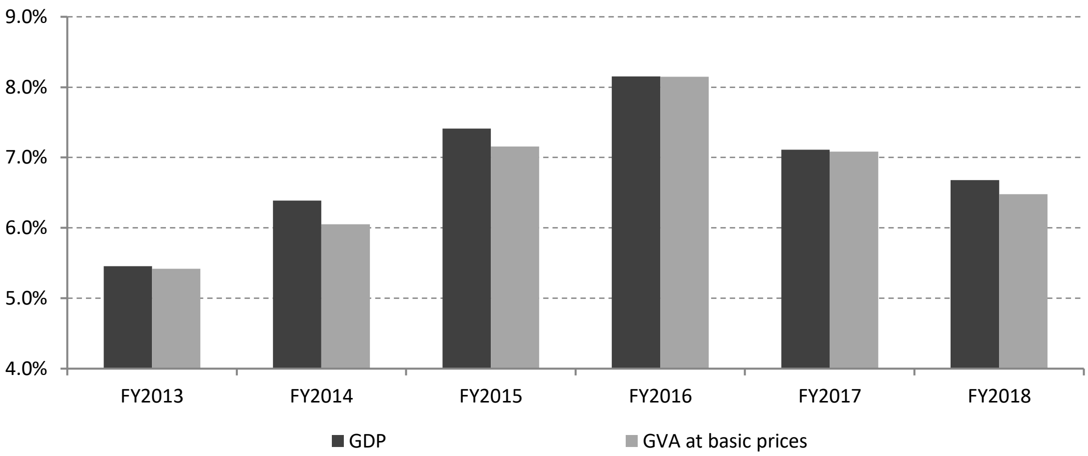
Source: IMF World Economic Outlook (April 2018), ICRA Research

Looking ahead, the IMF expects global economic growth to pick up pace to 3.9% each in 2018 and 2019. India's growth rate is expected to improve to 7.4% in 2018 and further to 7.8% in 2019, led by strong private consumption, and fading temporary effects of the note ban and transition to the Goods and Services Tax (GST). The IMF also stated that India's growth is expected to rise gradually over the medium-term, with the continued implementation of structural reforms that boost productivity and incentivise private sector investment. In contrast, the IMF expects the rate of expansion of economic activity in China to decline to 6.6% in 2018 and further to 6.4% in 2019, on account of the ongoing rebalancing away from investment towards private consumption and from industry to services.

Indian GDP growth since FY2013

Growth of Indian GDP and gross value added (GVA) at basic prices displayed an uptrend from FY2013 to FY2016. GDP and GVA growth rose from the subdued prints of 5.5% and 5.4%, respectively, in FY2013, to the robust 8.2% and 8.1%, respectively, in FY2016. However, the GDP and GVA growth witnessed a slowdown to 7.1% each in FY2017 (refer Exhibit 2). Moreover, this trend continued in FY2018, with GDP and GVA growth slowing to a four-year low 6.7% and 6.5%, respectively during the year, partly driven by the disruption in economic activity after the transition to GST. The decline in GDP growth in FY2018 was broad-based, with Private Final Consumption Expenditure (PFCE), Government Final Consumption Expenditure (GFCE) and Gross Fixed Capital Formation (GFCF) recording a slowdown (to +6.6%, +10.9%, and +7.6%, respectively, from +7.3%, +12.2% and +10.1%, respectively), partly offset by a contrasting trend in exports, inventories and valuables (to +5.6%, +4.5% and +58.8%, respectively from +5.0%, -61.2% and -13.9%, respectively). The dip in the GVA growth in FY2018, relative to FY2017, was led by a moderation in the growth of agriculture (to +3.4% from +6.3%) and industry (to +5.5% from +6.8%), offset by a revival in the expansion of services (to +7.9% from +7.5%).

Exhibit 2: YoY Growth in GDP and GVA at basic prices (Constant 2011-12 Prices)



Source: Central Statistics Organisation (CSO); ICRA research

GDP growth in Q4 FY2018

Quarterly data reveal that a broad-based recovery has already set in, as the temporary effects of the GST and note ban have eased, and some benefits have emerged related to the near-normal monsoon and the staggered pay revision.

Growth of India's GDP (at constant 2011-12 prices) improved to 7.7% in Q4 FY2018 in year-on-year (YoY) terms from 6.1% in Q4 FY2017 (refer Exhibit 3). Moreover, the growth in GVA at basic prices increased to 7.6% in Q4 FY2018 from 6.0% in Q4 FY2017 (refer Exhibit 4). In addition, the pace of growth of both the GDP and the GVA charted a sequential recovery in Q4 FY2018 relative to the prints of 7.0% and 6.6%, respectively, in Q3 FY2018.

Exhibit 3: Growth of GDP and its Components (in %, Constant 2011-12 Prices, YoY)

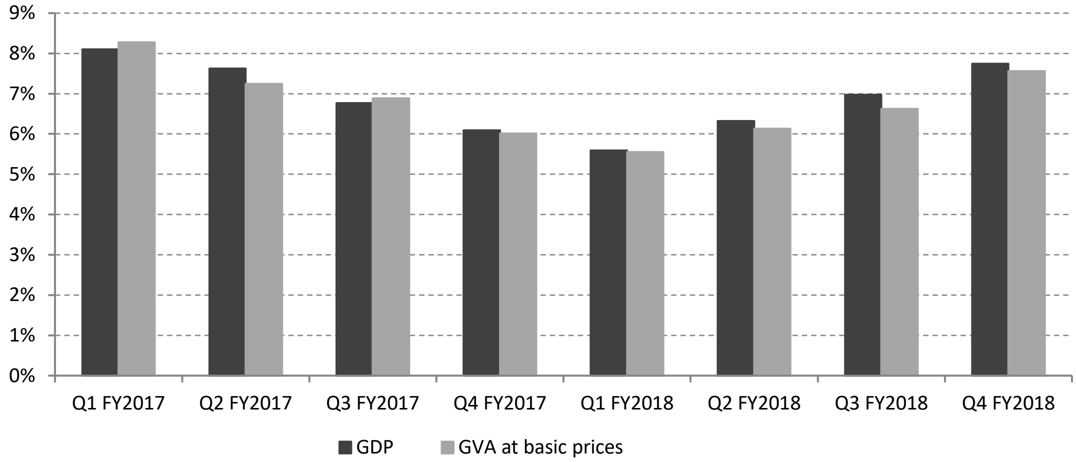
	Q4FY2017	Q1FY2018	Q2FY2018	Q3FY2018	Q4FY2018
Private Final Consumption Expenditure	4.2%	6.9%	6.8%	5.9%	6.7%
Government Final Consumption Exp.	22.5%	17.6%	3.8%	6.8%	16.8%
Exports	7.0%	5.9%	6.8%	6.2%	3.6%
less Imports	6.6%	18.5%	10.0%	10.5%	10.9%

	Q4FY2017	Q1FY2018	Q2FY2018	Q3FY2018	Q4FY2018
Gross Fixed Capital Formation	6.0%	0.8%	6.1%	9.1%	14.4%
GDP	**6.1%**	**5.6%**	**6.3%**	**7.0%**	**7.7%**
	Q4FY2017	**Q1FY2018**	**Q2FY2018**	**Q3FY2018**	**Q4FY2018**
Agriculture, Forestry and Fishing	7.1%	3.0%	2.6%	3.1%	4.5%
Industry	5.0%	0.1%	6.1%	7.1%	8.8%
Services	6.3%	9.5%	6.8%	7.7%	7.7%
GVA at Basic Prices	**6.0%**	**5.6%**	**6.1%**	**6.6%**	**7.6%**
GVA ex-Agriculture	**5.8%**	**6.0%**	**6.6%**	**7.5%**	**8.1%**

Source: CSO; ICRA research

The substantial improvement in GDP growth to 7.7% in Q4 FY2018 from 6.1% in Q4 FY2017 was led by a pickup in growth of GFCF and PFCE, which more than offset the slowdown in growth of GFCE and exports. GFCF growth improved sharply to 14.4% in Q4 FY2018 from 6.0% in Q4 FY2017; this was in line with the pickup in growth of capital goods output (+9.0% in Q4 FY2018, +2.6% in Q4 FY2017), while somewhat at odds with other trends related to investment activity, including Government capital spending, project announcement and completion. Moreover, inventories recorded a YoY growth of 7.8% in Q4 FY2018, in contrast to the contraction of 61.8% in Q4 FY2017. In addition, the PFCE growth improved to 6.7% in Q4 FY2018 from 4.2% in Q4 FY2017. In contrast, the GFCE growth slowed to 16.8% in Q4 FY2018 from 22.5% in Q4 FY2017, partly on account of unfavourable base effect. Moreover, a pickup in import growth (to +10.9% from +6.6%), coupled with a moderation in export growth (to +3.6% from +7.0%), resulted in net imports exerting a larger drag upon GDP expansion in Q4 FY2018 relative to Q4 FY2017.

Exhibit 4: YoY Growth in GDP and GVA at Basic Prices (Constant 2011-12 Prices)



Source: CSO; ICRA research

Growth Outlook for the Indian Economy

Recently, the India Meteorological Department (IMD) released its second stage forecast, which has predicted that the volume of rainfall in the upcoming southwest monsoon season (June-September) would be 97% of the long period average (LPA), with an error range of +/-4%. The actual outturn of the upcoming southwest monsoon will be vital for replenishing reservoir and ground water levels, and supporting timely sowing and eventual yields. Moreover, the FY2019 Union Budget has laid significant emphasis on agriculture and the Government of India's (GoI's) endeavour to double the farmer's income by FY2022. As of now, the agricultural GVA is expected to grow by 3-3.5% in FY2019, if the temporal and spatial distribution of the monsoon is normal, which should lend support to rural consumption demand.

Additionally, the benefits of the pay revision for state government employees are likely to continue in FY2019. Out of the nine states that had not revised pay scales by FY2018, three states have already announced that they would undertake pay revision in FY2019. This, in conjunction with improving sentiment, is expected to continue to boost the urban consumption demand. Such trends would bolster capacity utilisation in various sectors, and a broad-based capacity addition by the private sector may emerge in H2 FY2019. Completion of the resolution process of cases admitted to the National Company Law Tribunal (NCLT) would improve utilisation of existing capacity and promote consolidation in some sectors. However, interest costs are likely to rise in the current fiscal, which would weigh upon the strength of the investment recovery.

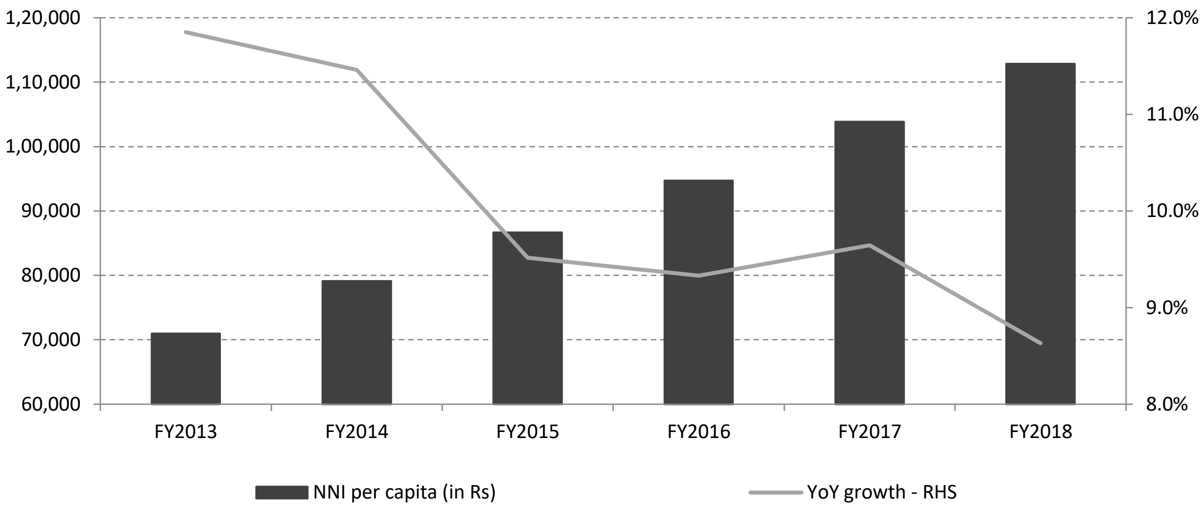
The benefits of the GST are likely to become more broad-based in FY2019, with a shift from informal businesses to formal/organised players. An improvement in compliance post the introduction of the e-way bill, is likely to boost Government revenues. A rise in government spending at the Central and State level is expected to boost economic activity and infrastructure creation, which may augment the demand for steel as well as electricity. The adequate recapitalisation of public sector banks would be critical to support lending growth and investment revival in the economy.

The depreciation of the INR would support export growth although the risk of trade wars persists. Moreover, higher crude oil prices are likely to weigh upon the purchasing power of consumers and earnings across various sectors. On balance, GDP and GVA growth are expected to improve to 7.1% and 7.0%, respectively, in FY2019, from 6.7% and 6.5%, respectively, in FY2018.

Trends in per capita income and consumption

Growth of India's net national income (NNI) per capita at current prices increased at an annual average rate of 10.1% to Rs. 112,834.7 in FY2018 from Rs. 70,982.6 in FY2013 (refer Exhibit 8). The pace of growth has recorded some moderation over these years, from the double-digit levels recorded in FY2013 and FY2014, while remaining healthy at 8.6% in FY2018.

Exhibit 8: YoY Growth in NNI per capita (Current Prices)

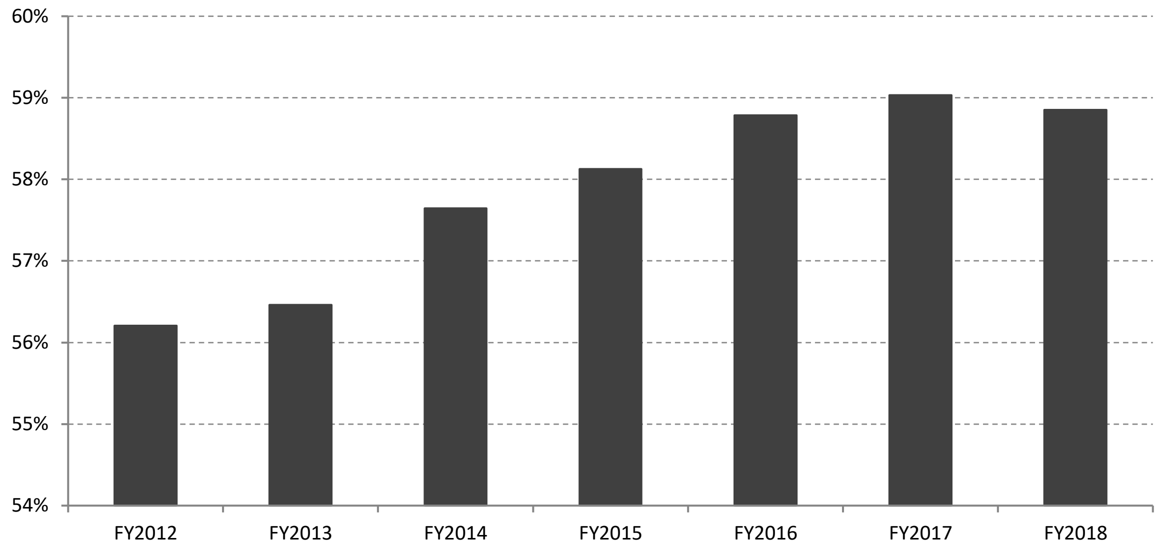


Source: CSO; ICRA research

Consumption remains the key driver of growth of the Indian economy. The share of private final consumption expenditure (PFCE) in the nominal GDP of India rose to 59.0% in FY2017 and 58.9% in FY2018, from 56.2% in FY2012 (refer Exhibit 9).

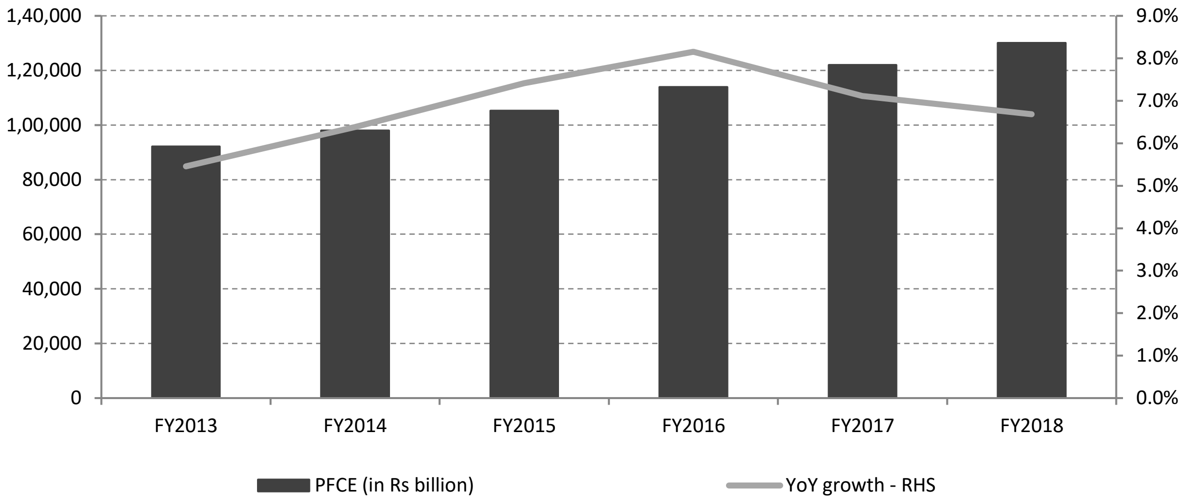
Growth of India's PFCE at constant prices increased at an annual average rate of 6.9% between FY2013 and FY2018. After increasing steadily between FY2013 and FY2016, PFCE growth slowed somewhat to 7.1% in FY2017 and further to 6.7% in FY2018 (refer Exhibit 10).

Exhibit 9: Share of PFCE in GDP (Current Prices)



Source: CSO; ICRA research

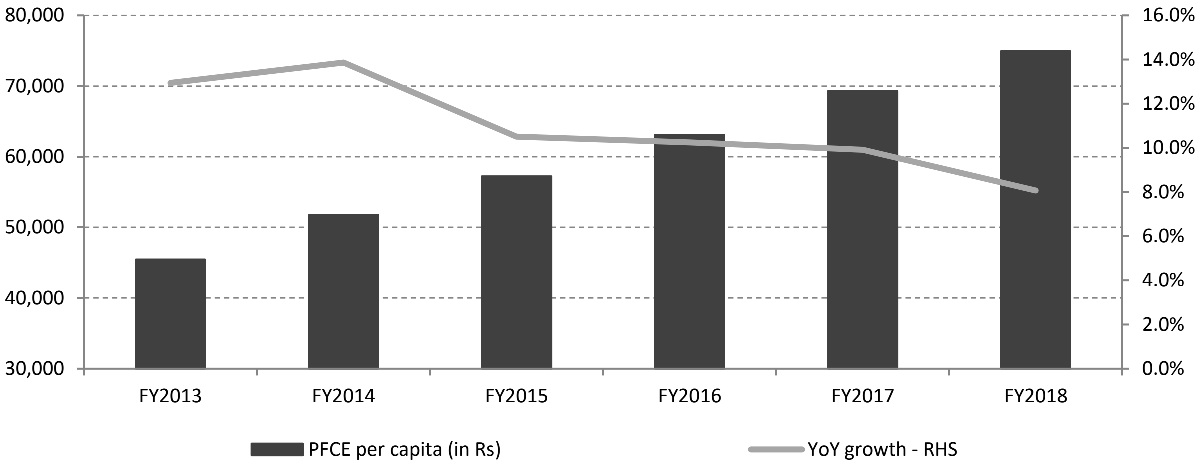
Exhibit 10: Growth of PFCE (Constant Prices)



Source: CSO; ICRA research

Growth of India's PFCE per capita at current prices increased at an annual average rate of 10.9% to Rs. 74,914 in FY2018 from Rs. 45,461 in FY2013 (refer Exhibit 11). After recording double-digit growth in FY2013 to FY2016, the pace of growth eased somewhat to 9.9% in FY2017 and further to 8.1% in FY2018, on an enlarged base.

Exhibit 11: YoY Growth in PFCE per capita (Current Prices)

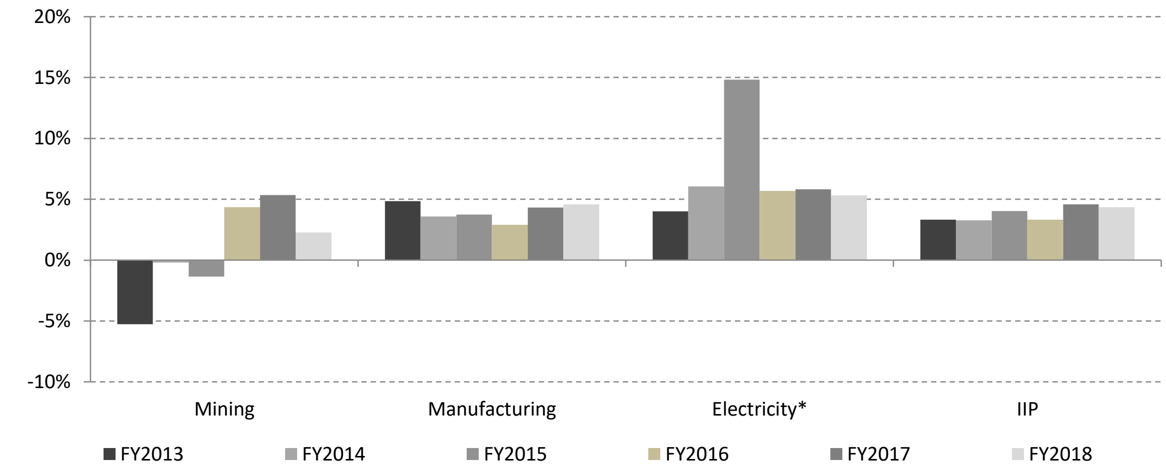


Source: CSO; ICRA research

Trends in Index of Industrial Production

Growth of India's Index of Industrial Production (IIP) displayed a mixed trend from FY2013 till FY2018 (refer Exhibit 12). IIP growth remained steady in FY2013 and FY2014 at 3.3%, before rising somewhat to 4.0% in FY2015, led by sharp growth in electricity generation (which increased as a result of inclusion of renewables in the calculation of electricity generation from FY2015 onwards). After dipping to 3.3% in FY2016, the IIP growth witnessed a rise to 4.6% in FY2017, led by an improvement in the performance of all the sectors, namely, mining, manufacturing and electricity, in spite of the impact of demonetisation towards the end of the year. For instance, manufacturing output growth increased to 4.3% in FY2017 from 2.9% in FY2016, whereas mining output growth rose to 5.3% from 4.3%. Moreover, the pace of expansion of electricity generation inched up to 5.8% from 5.7%, exceeding the other sectors in both years.

Exhibit 12: Trends in IIP



**From FY2015, the CSO started including renewables in the calculation of electricity generation*
Source: CSO; ICRA research

In FY2018, industrial growth eased to 4.3% from 4.6% in FY2017, led by a slowdown in the growth of mining and electricity generation (to +2.3% and +5.3%, respectively, in FY2018, from +5.3% and +5.8%, respectively, in FY2017). Encouragingly, manufacturing growth volumes improved to 4.6% in FY2018 from 4.3% in FY2017.

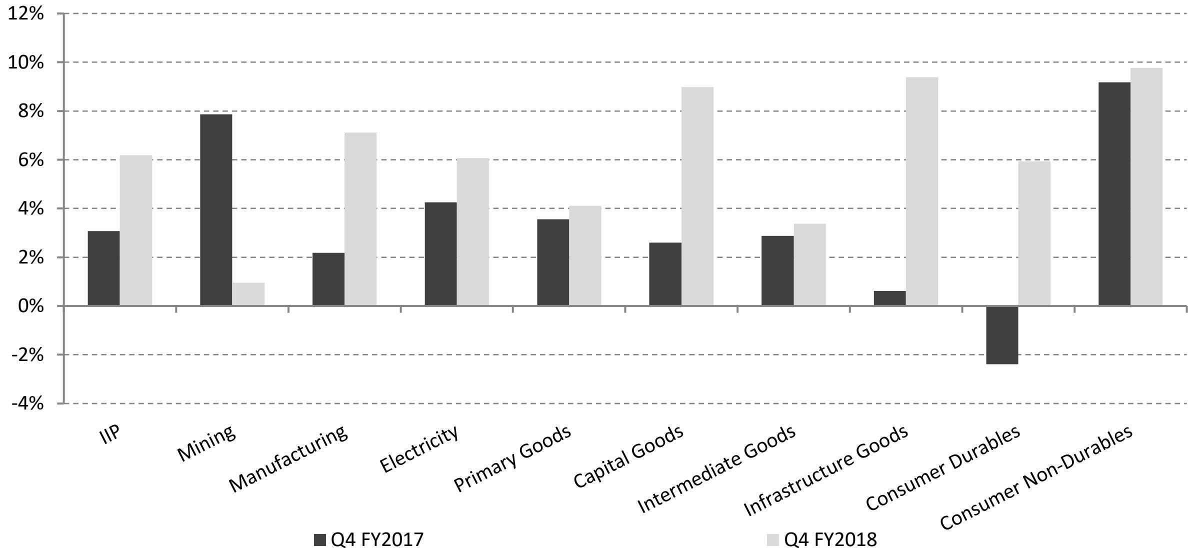
In the recent months, the IIP data indicates that industrial growth rose to 6.2% in Q4 FY2018 from 3.1% in Q4 FY2017 (refer Exhibit 13). This improvement in growth in Q4 FY2018 relative to Q4 FY2017, was led by all the use-based categories, with substantial improvements recorded by infrastructure/construction goods (to +9.4% from +0.6%), consumer durables (to +5.9% from -2.4%) and capital goods (to +9.0% from +2.6%), and a more modest pickup in consumer non-durables (to +9.8% from +9.2%), primary goods (to +4.1% from +3.6%) and intermediate goods (to +3.4% from +2.9%).

Moreover, manufacturing growth rose sharply to 7.1% in Q4 FY2018 from 2.2% in Q4 FY2017, benefitting from the low base related to the adjustment of production schedules after demonetization, as well as a healthy underlying growth momentum.

In addition, the growth of electricity generation improved to 6.1% in Q4 FY2018 from 4.3% in Q4 FY2017, according to the IIP. Data released by the CEA indicates a pickup in the pace of expansion of nuclear generation (to +9.5% from +0.4%) and thermal electricity generation (to +5.3% from +3.0%) in Q4 FY2018 relative to Q4 FY2017. However, hydroelectricity generation contracted by 8.6% in Q4 FY2018, in contrast to the expansion of 9.7% in Q4 FY2017.

The IIP data indicates a sharp slowdown in the growth of mining output to a subdued 1.0% in Q4 FY2018 from 7.9% in Q4 FY2017, led by components such as natural gas (to -0.3% from +6.2%), crude oil (to -2.4 from -0.4%) and coal (to +4.8% from +7.0%).

Exhibit 13: Trends in IIP and its use-based classification in Q4 FY2017 and Q4 FY2018



Source: CSO; ICRA research

Overview of the Global Steel Industry

C. Overview

The global steel industry has strong linkages with the performance of the various economies and is largely influenced by a demand-supply situation, manufacturing and industrial activity and infrastructure development across geographies. Steel being a commodity is an inherently cyclical industry and follows a typical ‘boom-bust’ commodity cycle. Transportation costs also play a major role in the global steel industry due to high material intensity of the steel production process, where almost four metric tonnes (MT) of material movement is necessary for the production of one MT of steel. Additionally, tariffs imposed by various countries on imports/exports of steel can have a material impact on global steel trade volumes and hence remain important drivers of the seaborne steel market.

As per the World Steel Association data, global crude steel production in CY2017 stood at 1691.2 million tonne (mt), indicating a YoY growth of 5.3%. Except CIS countries, which reported a flat growth, all major regions including Asia, European Union, North and South America, Africa and the Middle East reported a production growth of 4% and above during CY2017.

D. Top Steel-producing Countries

The following table gives the crude steel production volumes in top 10 steel producing countries in the world as per the World Steel Association data.

Exhibit 15: Top 10 steel producing countries in the world (mt)

Sr. no	Country name	CY2015	CY2016	CY2017
1	China	803.8	786.9	831.7
2	Japan	105.2	104.8	104.7
3	India	89.6	95.5	101.4
4	United States	78.9	78.5	81.6
5	Russia	71.1	70.5	71.3
6	South Korea	69.7	68.6	71.1
7	Germany	42.7	42.1	43.6
8	Turkey	31.5	33.2	37.5
9	Brazil	33.2	31.3	34.4
10	Italy	22.0	23.4	24.0

Source: World Steel Association, ICRA research

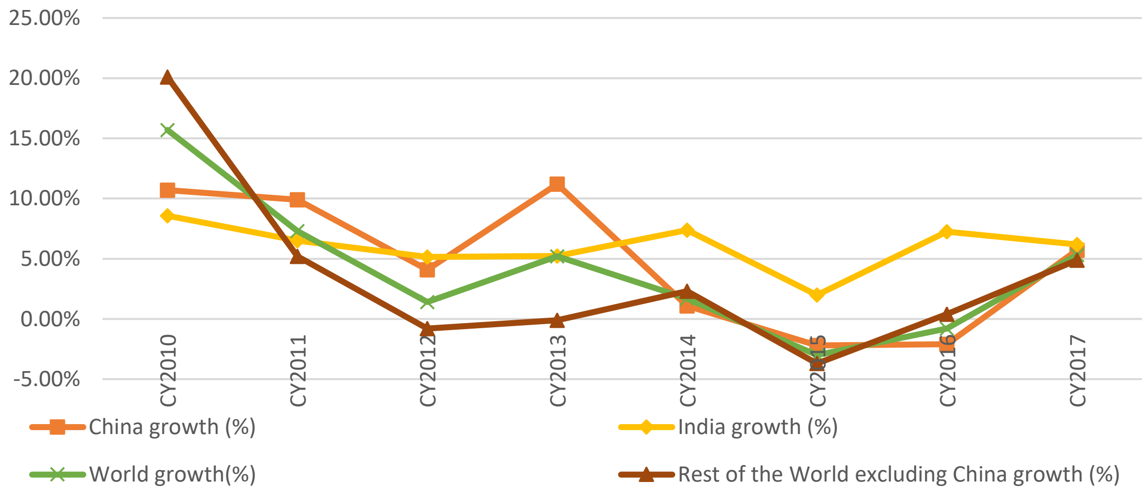
China remains the largest steel producer in the world with a share of about 49.2% in the global steel production in CY2017, followed by Japan and India, which contributed about 6.2% and 6% to the global steel production respectively during the same period.

E. Trends in Production and consumption

China and India have led the global steel production growth in the last few years. China's crude steel production has increased at a CAGR of 3.8% between the period CY2010 to CY2017 while the CAGR for India's steel production stood at 5.7%. As against this, world steel production grew at a CAGR of 2.2% during CY2010-CY2017 and production in the rest of the world excluding China grew by a meagre 0.8% during the same period. China's dominance in global steel trade can be gauged from the fact that its share in the incremental global steel production in the last seven years stood at 80%. India's share in the incremental global steel production during CY2010-CY2017 stood at 13% hinting that production in other geographies excluding China and India grew at a very slow pace during the last few years.

In CY2015 and CY2016, world steel production de-grew by 3% and 0.8% respectively because of subdued demand conditions globally. However, India's production growth remained positive even during these two years on the back of its improving domestic demand and increased competitiveness in the overseas markets due to anti-dumping duties levied on Chinese steel products in 2016 in various geographies including the US and the EU.

Exhibit 16: Global Crude Steel Production Annual Growth Trend



Source: World Steel Association, ICRA research

In case of global steel consumption growth, China's share in incremental global steel consumption during CY2010-CY2017 stood at 54% while India's share stood at 8% during the same period. As depicted in the table below, China accounted for about 46% of the global steel consumption in CY2017, while the share of most of the countries remains in the lower single digits, highlighting China's ascendency in the world steel trade.

In CY2014 and CY2015, China's finished steel consumption growth remained in negative territory, which largely affected global steel demand growth during those years. However, with gradual recovery in China's key consuming sectors, including property and infrastructure sectors, its demand growth improved in CY2016 to 1.2% and rose further to 8.3% in CY2017, which catapulted world steel consumption growth to 4.7% in CY2017 from -3.0% reported in CY2015.

Exhibit 17: Global Finished Steel Consumption Trends (in mt)

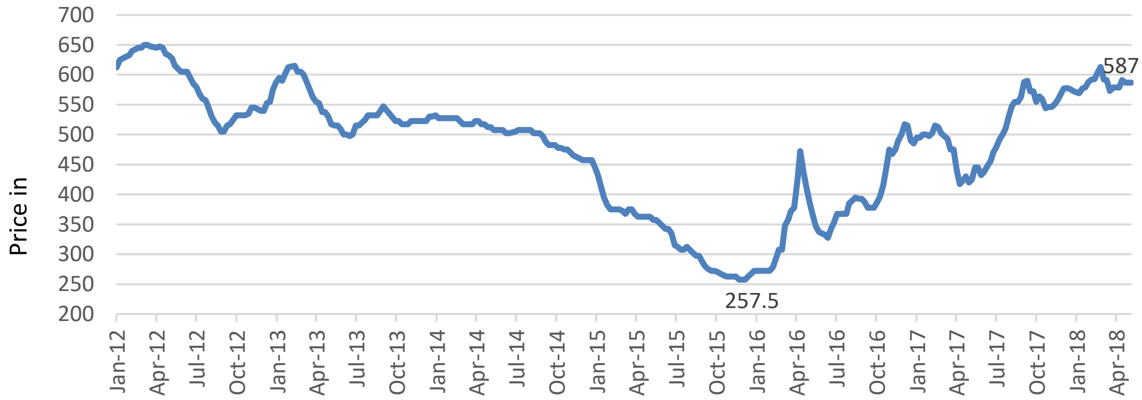
Country	CY2010	CY2011	CY2012	CY2013	CY2014	CY2015	CY2016	CY2017
China	587.6	641.2	660.1	741.4	710.4	672.3	680.3	736.8
United States	80.0	89.2	96.2	95.7	107.0	96.1	91.9	97.7
India	64.9	69.8	72.4	73.7	75.9	80.2	83.6	87.2
Japan	63.6	64.1	64.0	65.2	67.7	63.0	62.2	64.4
South Korea	52.4	56.4	54.1	51.8	55.5	55.8	57.1	56.4
Germany	36.2	40.7	37.5	38.0	39.6	39.3	40.5	41.8
Russia	36.7	41.5	42.8	43.3	43.1	39.8	38.6	40.6
Turkey	23.6	26.9	28.5	31.3	30.8	34.4	34.1	36.1
Mexico	17.8	19.8	20.9	20.6	22.5	24.2	25.4	26.4
Italy	25.7	26.6	21.5	21.9	21.9	24.5	24.1	24.5
World	**1310.7**	**1415.2**	**1442.5**	**1542.7**	**1546.7**	**1501.7**	**1517.1**	**1587.4**
World growth (%)	**14.0%**	**8.0%**	**1.9%**	**6.9%**	**0.7%**	**-3.0%**	**1.0%**	**4.7%**

Source: World Steel Association, ICRA research

F. Pricing Trends

Given China's domination in the global steel trade, any deviation in the demand-supply balance in China can have a material impact on global steel prices. As a result, Chinese steel prices act as a benchmark for global steel prices and China's export price of hot-rolled coils (HRC) is typically considered as a reference price for international steel prices. On the back of a healthy consumption growth in CY2013, China's export HRC prices remained largely range-bound between US$500/MT to US$ 600/MT during that period. Despite a demand de-growth in China, prices remained in the range of US$ 450/MT to US$ 530/MT for a large part of CY2014 on account of relatively better demand prospects in the overseas markets to which China exported large volumes (51% growth in Chinese steel exports was reported in CY2014).

Exhibit 18: China Export HRC Price (FOB) Trends



Source: Metalbulletin, ICRA research

However, due to persistent weakness in domestic demand conditions and slack demand in the overseas markets, Chinese HRC prices witnessed a steep fall in CY2015 from about US$ 460/MT in January 2015 to a multi-year low of US$ 258/MT in December 2015. In January 2016, the Chinese Government's announcement to cut its steel capacity by about 150 mt by 2020 and its fiscal stimulus to prop up property and infrastructure demand provided a respite to Chinese HRC prices, which witnessed an uptrend to reach US$ 500/MT level in December 2016. The Chinese Government's further announcement to shut down low grade induction furnaces in H1CY2017, intensified capacity cuts and the improving demand conditions helped the prices reach a level of US$580/MT in December 2017. After rising above US$ 600/MT level in March 2018 for a brief period, Chinese HRC prices remained stable in the last couple of months and stood at US$ 587/MT in May 2018.

While the prices are expected to remain steady in the near term on the back of resilient demand from real estate and infrastructure sectors, rising Chinese steel production levels and China's tighter credit policies, which would affect property sales, pose a risk of oversupply in the coming months.

G. Impact of US Import Tariffs on Global Steel Industry

On March 8, 2018, the USA Government announced the imposition of a 25% tariff on import of steel products, effective from March 23, 2018. This duty would be effective on all countries including Canada and Mexico (which together comprises about a quarter of the total US imports), and would affect the global steel trade of about 35 mt. While these volumes are not significant in relation to the extent of global steel trade, any diversion of the same to other countries could lead to a temporary disruption in those markets.

Exhibit 19: US Steel Import Trends

Exporting Country	Imports in million tonnes (mt)		
	CY2015	CY2016	CY2017
Canada	5.2	5.1	5.7
Mexico	2.5	2.7	3.2
Germany	1.4	1.1	1.4
Turkey	2.6	2.2	2.0
Russia	1.9	1.9	2.9
China	2.2	0.8	0.7
South Korea	4.4	3.5	3.4
Japan	2.4	1.9	1.7
Brazil	4.8	4.0	4.7
India	0.8	0.3	0.7
Share of Top 10 Exporters	**80%**	**78%**	**76%**
India's share in US imports	**2%**	**1%**	**2%**
Total US imports	**35.1**	**30.0**	**34.5**

Source: US Department of Commerce, ICRA research

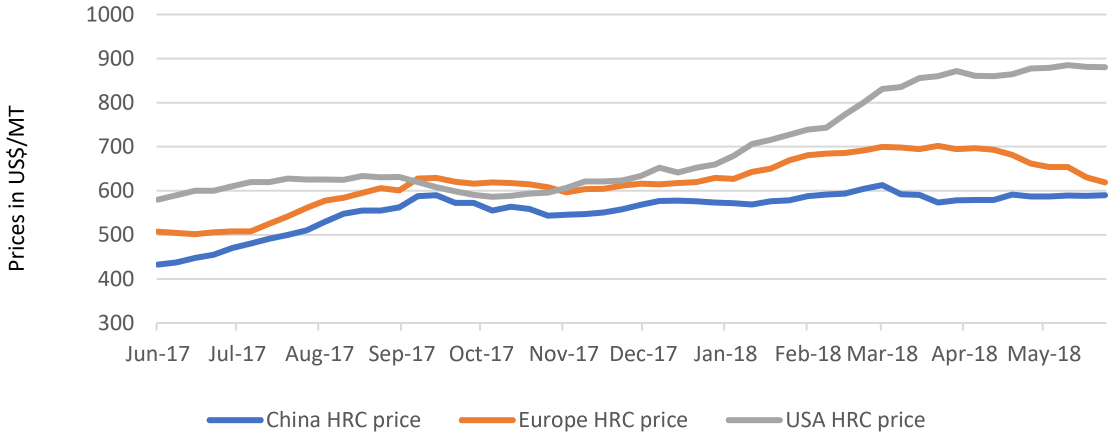
Impact of this import tariff may not be significant in the medium term due to three important reasons. Global steel demand (ex-USA) is expected to increase by 29 mt[2] in CY2018, and a part of the affected 35 mt seaborne volumes could be absorbed in other geographies, especially in the emerging and developing economies. Moreover, Chinese steel exports have been steadily declining in the last two years, reaching 75 mt in CY2017 from the peak level of 112 mt in CY2015. In the current year too, exports have continued to shrink, declining by 21% in the first four months of CY2018. This trend is expected to continue throughout CY2018 on the back of a resilient Chinese domestic demand and proposed steel capacity cuts. Therefore, other steel-exporting countries are likely to fill up this supply vacuum left by China by diverting affected volumes away from the USA. Further, in CY2017, domestic steel mills in the USA operated at a capacity utilisation of 74%, and even if capacity utilisation rates improve significantly in CY2018, it would still require around 10 mt of steel imports from non-exempt countries. Therefore US bound seaborne steel volumes that could potentially be vying for other markets are likely to be lower than 35 mt, moderating its impact on other geographies. However, the possibility of reciprocal tariffs by other countries cannot be ruled out, in which case the global steel trade may get affected to an extent in the near term.

It may be noted that two key steel exporting countries to India, namely South Korea and Japan, together exported around 5 mt steel to the USA in CY2017. Given that these two countries have free trade agreements (FTA) with India, ICRA believes that during the process of global readjustment of trade pattern, an increase in steel imports to India from South Korea and Japan would remain a likely possibility in the near term.

ICRA also notes that the steel prices in the USA have increased sharply since the announcement of import tariffs in March 2018 and are trading at a premium of above 40% over steel prices in China and Europe, which indicates that the exporters may still be able to sell in the USA despite higher duties without sacrificing margins.

[2] as per the World Steel Association short-range forecast made in April 2018

Exhibit 20: HRC Price Trends in Various Geographies



Source: Metalbulletin, ICRA research

Overview of the Indian Infrastructure Sector

H. Overview

Infrastructure is the backbone of development of any country, be it transport infrastructure like roads, railways, ports etc, or energy, or communication infrastructure. Each of the infrastructures have a key role in the overall economic growth of the country.

I. Investment in Infrastructure in India

India had seen sizeable investment in infrastructure development across sectors. The total investment in the infrastructure sector during the Twelfth Five Year Plan period (2012-2017) is estimated at Rs. 37 lakh crore. Major investments have taken place in electricity, roads & bridges, telecom, railways, irrigation, etc. However, the investment in Infrastructure is only about 6% of India's GDP.

Given the under-investment in the past, there is a need to accelerate investments to meet the requirements of the sector. As per the Economic Survey 2017-18, around US$4.5 trillion infrastructure investments would be needed till 2040 to improve the economic growth and community wellbeing. The Central Government has increased the capital outlay towards key infrastructure sectors like roads and railways significantly over the last few years, which is likely to help improve the pace of infrastructure investment in the country. However, private sector participation has remained weak in the past with an estimated 34% contribution to the total infrastructure investment during the Twelfth Plan. The Indian Government has taken various policy and regulatory steps to revive private sector participation, including innovative models like the Hybrid Annuity Mode (HAM), Infrastructure Investment Trusts (InvIT), the National Infrastructure Investment Fund (NIIF), etc.

A brief investment potential on some key infrastructure segments is summarised below:

Roads: The Government has initiated a large highway upgradation programme under the *Bharatmala Pariyojana* scheme. The first phase of this programme is estimated to cost Rs. 5.35 lakh crore and is to be undertaken over the next four to five years. Apart from the Bharatmala programme, various state governments also have sizeable highway development plans, estimated at over Rs. 3 lakh crore of infrastructure investment over the next three to four years.

Railways: Under the National Rail Plan 2030, the Indian Railways envisages investments of Rs. 35 lakh-crore, thereby entailing an average annual outlay of Rs. 2.5 lakh crore. In the medium term, the Railways' annual capex is estimated at over Rs. 1.5 lakh crore, of which about half is of relevance to the construction sector. The Indian Railways has increased its capital outlay with a major part of it towards laying of new railway tracks, doubling of lines, electrification of railway lines, etc. This apart, a sizeable investment is being planned towards railway station redevelopment over the long term.

Metro Rail Development: Currently, the metro rail network is operational/partly operational in nine cities. In addition to the extension of the Metro Rail network in these cities, new Metro Rail networks are proposed to be developed in another 15-20 cities with a population of over 1 million. The Metro Rail projects are likely to require an investment of over Rs. 2 lakh crore over the next five years.

Evolution of Indian Steel Sector

A. Overview and India Position in World in terms of Production & Consumption

The Indian steel industry ranks third in the world with a crude steel production of 101.4 million tonne (mt) registered in CY2017 (source: World Steel Association, WSA), with a share of 6% in the global steel production. As a consuming market, India presents a high growth potential with a low annual per capita finished steel consumption of 63 kg in CY2016, as compared with 207 kg globally (source: WSA). India is also the third largest steel-consuming country in the world with a consumption of 87.2 mt recorded in CY2017 (share of 5.5% in world steel consumption).

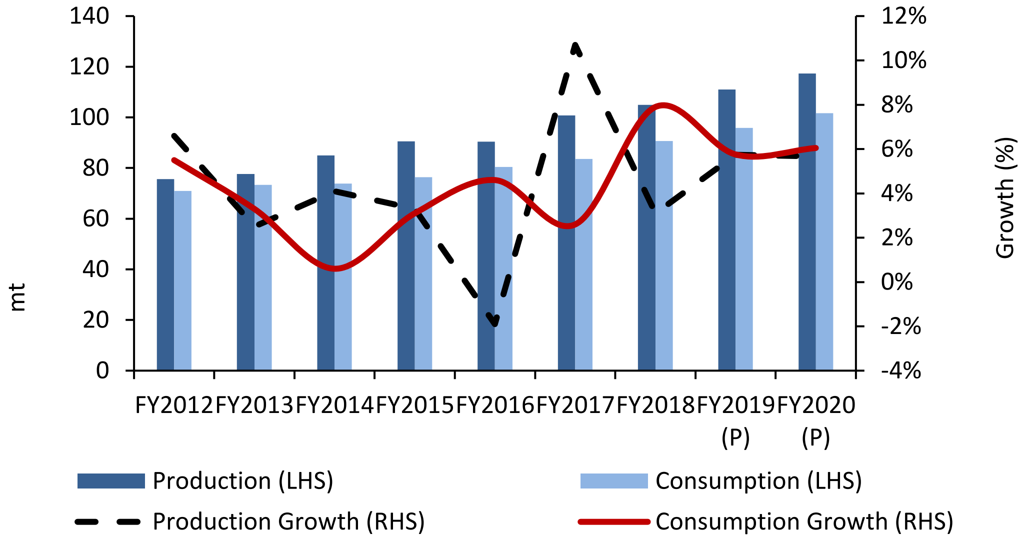
The structure of the Indian steel industry comprises the main producers, other large producers and small and medium producers, with an estimated installed capacity of about 131 mt per annum as on March 31, 2018. Main and other large steel producers typically use the blast furnace (BF) or the basic oxygen furnace (BOF) route to produce steel and mainly include a handful of players such as Steel Authority of India Ltd, Tata Steel Ltd, Rashtriya Ispat Nigam Limited, JSW Steel Ltd and Essar Steel Ltd. Small and medium steel producers mainly make steel by melting scrap, sponge iron and pig iron in the electric arc furnace (EAF) or induction furnace (IF) and are a part of a highly fragmented industry characterised by intense competition. Small scale steel producers also include re-rollers, which rely on secondary steel players and roll out semis into finished steel products and stand-alone sponge iron and pig iron units which are not forward integrated.

Despite their presence in long steel products, the product mix of most of the large steel producers in India is skewed in favour of flat steel products, which include plates, hot rolled (HR) coils, cold-rolled (CR) coils and galvanised products, and find application mainly in the manufacture of automobiles, consumer durables, pipes and tubes, pressure vessels etc. Small and medium steel producers mainly produce long steel products, comprising bars, rounds and structurals, which are primarily used in construction, infrastructure and heavy engineering sectors.

B. Historical Trend in Production & Consumption of Steel & Outlook

FY2012 to reach a low of 0.6% in FY2014 on the back of subdued demand from the key end user industries. Construction, capital goods and automobile sectors together contribute to about three fourth of the domestic steel consumption and remain the key demand drivers for the domestic steel industry. While the demand growth improved in FY2015 to 3.1% aided by a healthy growth in automobile sales and increased further to 4.6% in FY2016 on the back of a pickup in construction activities, overall growth remained tepid in FY2017 at 2.6% due to a slowdown in construction and capital goods sectors. Domestic consumption growth improved sharply to 7.9% IN FY2018 supported by buoyancy in the auto sector and a recovery in construction and capital goods sectors during the year. ICRA believes that domestic steel consumption growth is likely to remain healthy in the next couple of years at 5.8% and 6% respectively on the back of the Government’s infrastructure push towards railways, affordable housing, roads, transmission lines and solar power generation.

Exhibit 21: Steel Consumption/Production Trends



Source: JPC, ICRA research

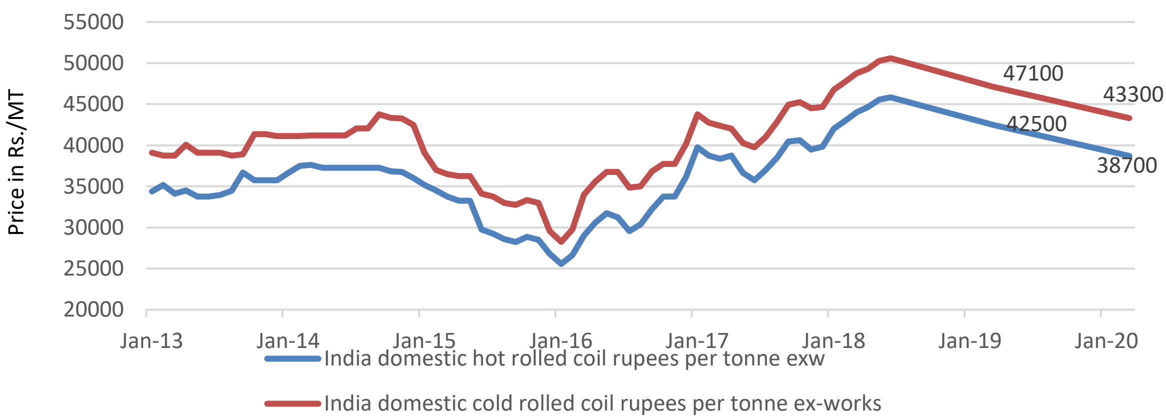
Domestic steel consumption growth, which touched almost double-digit levels till FY2011, witnessed a slowdown since Domestic steel production growth, which stood at 6.6% in FY2012 dropped to 2.5% in FY2013 because of a spurt in steel imports during that year before recovering to 4.1% in FY2014, when steel exports gained prominence in the absence of domestic demand. However, due a surge in steel imports during the year FY2015 and FY2016, India's steel production growth turned negative in FY2016. Indian government's various trade protection measures led to a decline in steel imports in FY2017, and aided by remunerative international prices, domestic steel production growth touched a high of 10.7% during that year. Although the growth eased to 3.1% in FY2018 due to a high base effect, ICRA expects the domestic steel production to grow at a healthy rate of 5.7% in FY2019 and FY2020, which would be driven largely by expectations of strong domestic demand and favourable steel prices internationally.

C. Pricing Trends and Outlook

Flat product prices

Domestic steel prices are usually import parity-based and generally follow international price trends. Domestic HRC prices have been taken as a benchmark for steel prices. Despite a low domestic demand, HRC prices witnessed a modest uptrend in FY2014 as the international steel prices remained firm during that period and the prices remained relatively steady in the first half of FY2015, supported by better domestic demand conditions. However, the prices reduced to Rs. 33,250/MT in March 2015 from Rs. 37,250/MT in October 2014 on account of a surge in cheaper imports from China, Japan and South Korea. Onslaught of cheaper imports continued in FY2016 at a faster pace and the domestic HRC prices reached a bottom of Rs. 25,250/MT in January 2016.

Exhibit 22: Trend in Domestic HRC and CRC Prices (Ex-works)



Source: Metalbulletin, ICRA research

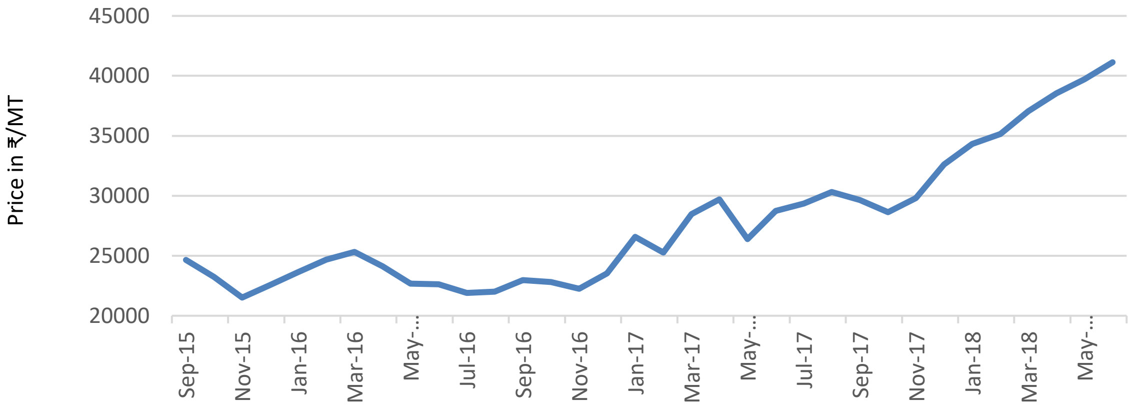
However, post the imposition of the minimum import price (MIP) mechanism in February 2016 by the Indian Government to protect the domestic steelmakers, HRC prices started recovering and touched a level of Rs. 30,000/MT in April 2016. While the prices remained steady at that level till August 2016, they were supported by the levy of provisional anti-dumping duties on certain hot-rolled and cold-rolled products in August 2016 and rose till February 2017, when it reached a level of Rs. 40,000/MT. Due to softer demand conditions in subsequent months, prices remained at about Rs. 36000/MT level till June 2017. Nevertheless, on the back of a recovery in domestic demand, HRC prices kept increasing and touched a high of Rs. 45500/MT in May 2018.

Supported by a recovery in domestic demand and buoyant international prices, domestic HRC prices are expected to stay at about Rs. 42,500/MT in FY2019, representing a rise of 7.3% over FY2018. However, given ICRA's expectation of a decline in raw material prices in the medium term, a correction in HRC prices by ~9% in FY2020 over FY2019 is expected. Given the high degree of correlation between HRC and CRC prices, similar trend is likely to be observed in the case of CRC prices in the near to medium term.

Long product prices

After remaining subdued for a large part of FY2016 and FY2017 due to tepid demand from construction sector, domestic rebar prices have witnessed a sharp rally in the last few months with the prices rising by almost 30% to Rs. 37,000/MT in March 2018 from Rs. 28500/MT level in October 2017. ICRA feels that the revival in demand from construction sector is one of the key reasons behind the buoyancy in long product prices in addition to other factors such as increase in input costs. While sustainability of the rally in long product prices remains to be seen, ICRA believes that the demand outlook for longs remains favourable in the medium term on the back of a sharp increase in budgetary allocation in Budget 2018-19 towards sectors such as affordable housing, railways, power transmission and roads.

Exhibit 23: Trend in Domestic Rebar Prices (Ex-works)

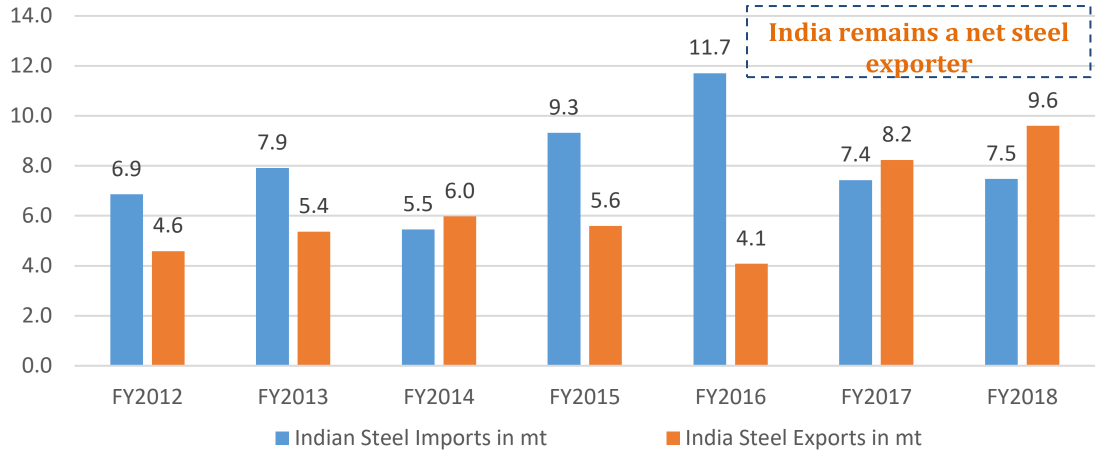


Source: Metalbulletin, ICRA research

D. Import and Export

India remained a net importer of steel in FY2012 and FY2013 as the domestic steel prices remained less competitive against the landed price of imports. However, due to relatively elevated prices in the international market and subdued demand in the domestic market, steel imports in FY2014 remained lower than the overall steel exports and India became a net exporter of steel during that year. The situation reversed in the subsequent year as cheaper imports into India kept rising. Surge in steel imports continued in FY2016 despite the Indian Government's steps in the first half of that year like hiking the import duty successively by 5% on flat products to 12.5% from 7.5% and imposition of a safeguard duty of 20% on certain flat products. This was on account of a sharp correction in international steel prices and led to a significant growth of 71% in India's steel imports. To further protect the domestic steel industry, the Indian Government imposed MIP in February 2016 and again imposed a provisional anti-dumping duty (ADD) in August 2016 on certain HR and CR roducts, which provided a respite to domestic steelmakers and India became a net exporter of steel again after a span of two years.

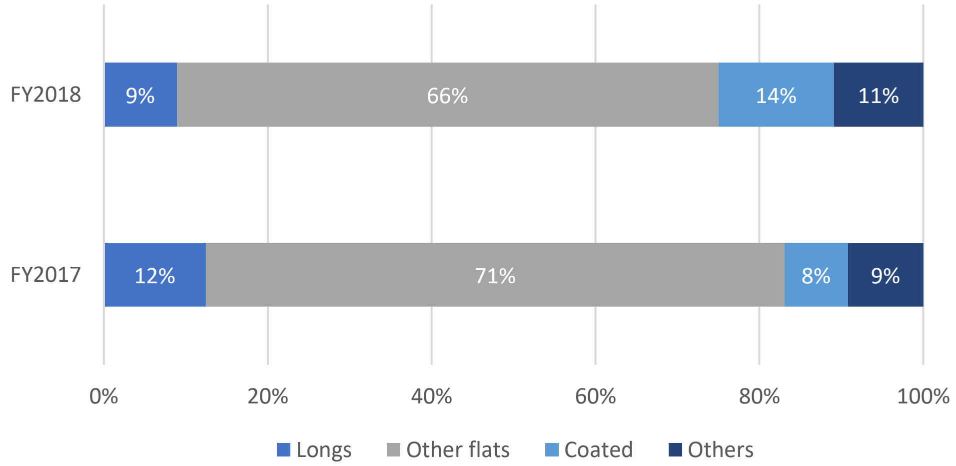
Exhibit 24: India's Steel Import/Export Trends



Source: JPC, ICRA research

India's status as a net exporter of steel continued in FY2018 whereby its exports grew by 16.7% in FY2018 to 9.6 mt and imports grew at a slower pace of 3.5% to 7.5 mt. Share of flat products in the total imports remained unchanged at about 80% in FY2018 but the share of coated products increased to 14% from 8% in FY2017.

Exhibit 25: Share of Key Steel Products in Total Steel Imports



Source: Ministry of Commerce, ICRA research

Combined share of South Korea and Japan in India's steel imports increased to 54% in FY2018 from 38% in FY2017 due to nil import duty on steel imported from these two free trade agreement (FTA) countries as against 12.5% duty on steel imported from China. Italy, Vietnam, Belgium, the UAE and Nepal formed 50% of India's steel exports in FY2018.

Going forward, definitive ADD imposed on colour coated coils in October 2017, which is valid till January 2022, along with ADD on HR and CR products till August 2021, would result in a further reduction in overall steel imports. Steel exports, however, may not increase much in the near-to-medium term as the significant improvement in domestic demand would absorb a part of the volumes destined for the overseas markets.

E. Investment in steel sector

Steel is a capital-intensive business with an investment of about US$ 1 billion required to set up a greenfield integrated steel plant of 1 mtpa capacity. Pace of capacity addition gathered steam during the period FY2011-FY2017 where the capacity grew by 60% and the overall addition stood at about 48 mt.

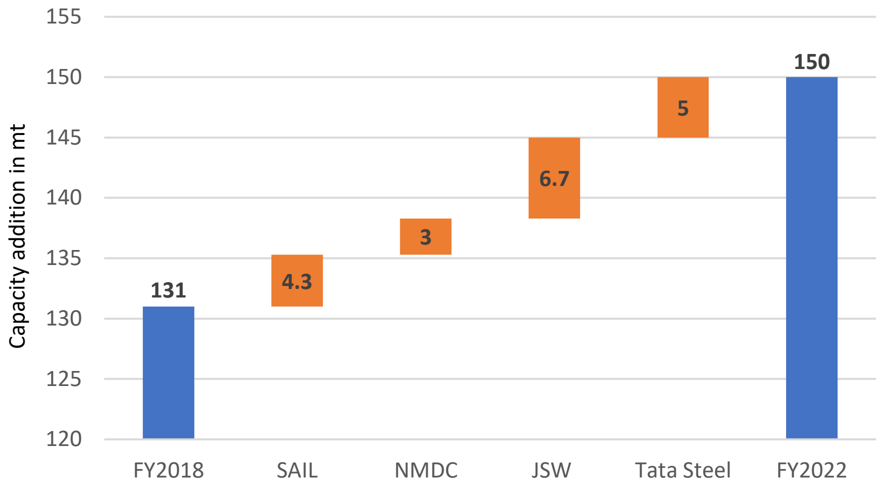
Exhibit 26: Capacity addition trends

Particulars	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018
Installed capacity in mt	80.4	90.9	97.0	102.2	109.9	122.0	128.3	131.0

Source: Ministry of Steel, ICRA research

Going forward, fresh incremental capacity addition is expected to be at around 19 mt in the next four years, which can be largely absorbed by the incremental domestic demand. JSW and Tata Steel would be the key beneficiaries of the incremental capacities. Total capex to be incurred by SAIL, NMDC, JSW and Tata Steel for capacity addition of 19 mt is around ₹ 94000 crore (source: company presentations).

Exhibit 27: Likely capacity addition trends in next four years



Source: Company presentations, ICRA research

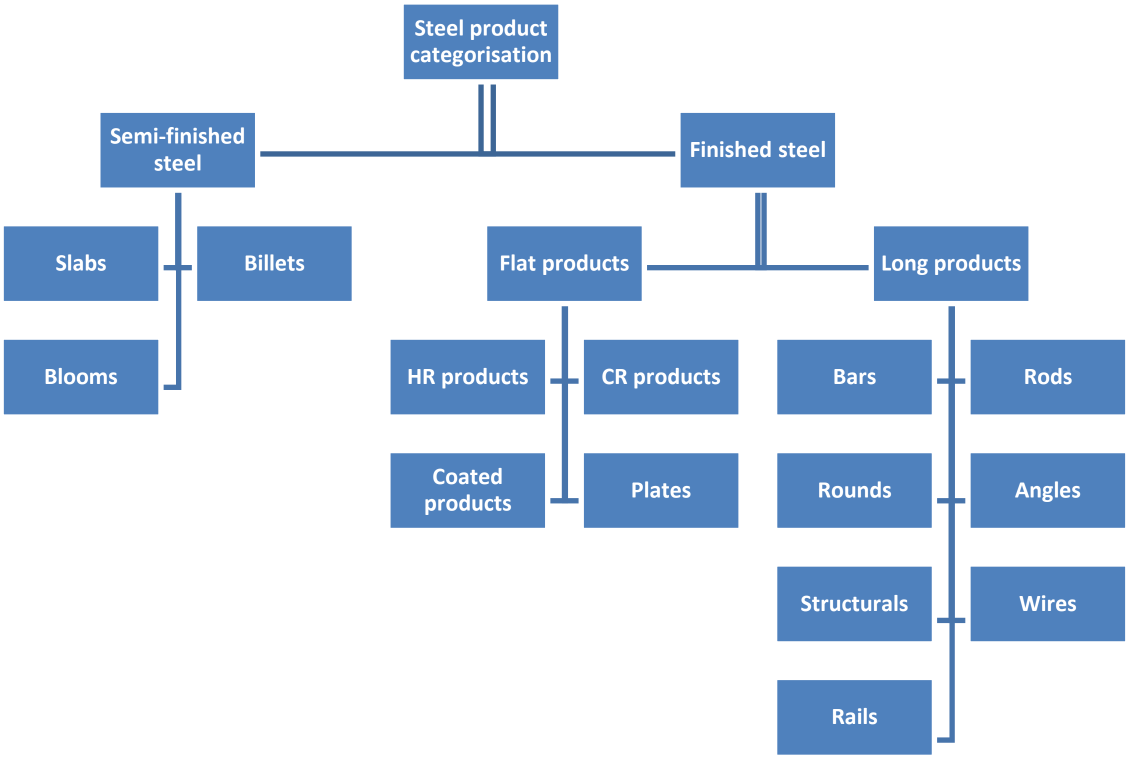
Structure of Steel Sector

A. Forms of Steel and End Use

Steel is an iron-based alloy that contains up to 2% carbon. In practice, it usually contains manganese and residual amounts of phosphorus, silicon, and sulphur and has a carbon content of between 0.05-1.25%. Crude (raw) steel is the first solid state after melting and is suitable for further processing or sale. It includes ingots, steel castings, and strand or pressure cast steel. Steels that derive their properties mainly from carbon with no specified minimum alloy content (other than manganese) are classified as carbon steels.

Following chart depicts the various products across the steel value-chain.

Exhibit 28: Forms of Steel



Source: ICRA research

Steel products are generally categorised as:

1. **<u>Semi-finished steel</u>** - Semi-finished steel products are essentially intermediate products that are cast from liquid steel for further rolling into finished products. This category includes slabs, billets and blooms. In the Indian context, these products are generally sold by the integrated steel plants and sometimes the secondary steel producers for further rolling into finished products.

   <u>End use</u> - Slabs are generally used to make finished flat steel products such as plates, hot rolled (HR) coils, cold-rolled (CR) flat products, and galvanised products. Blooms and billets are generally used to make long products, including HR bars and light shapes, reinforcing bars (rebars), rails, rods, wires, nails, seamless tubes, etc.

2. **<u>Finished steel -</u>** Finished steel products that are made from slabs are termed flat steel products and those that are made from blooms or billets are termed long steel products. They are also distinguished on the basis of shape or section. Flat steel products are rectangular in shape with their width far exceeding the thickness and are usually in coil, sheet or plate form whereas long steel products are in the form of rounds, squares, rectangles, angles, wires, etc.

Flat steel products

- **HR** products is the major category within the flat steel products from which other flat steel products are made. These include HR sheets, HR plates, CR coils/sheets and galvanised sheets. HR steel has lower unit cost of all forms of steel and has good formability, machinability, and weldability in certain grades.

  <u>End use</u> - HR products are used in general structural functional areas where surface finish and light weight are not crucial. Such steel is used in structural parts of automobiles (body frames and wheels) and appliances, ships, transmission towers and light poles, self-propelled machinery such as cranes and bulldozers, railway wagons, tanks, pipes, oilwell rigs, etc.

- **CR** products such as coils, sheets, strips; incorporate, in various degrees and combinations, attractive appearance, ductility, ease of fabrication, predetermined strength after fabrication, uniformity, as well as compatibility with other materials and various coatings and processes. Cold-rolling can also impart various surface finishes and textures. CR steel is among other things used in steel applications that demand higher surface quality or finish.

  End use - It is used for applications as panels in electrical equipment and appliances, or for body parts in automobiles, where surface finish or strength-to-weight ratio is important. CR also serves as a material for utensils, cutting tools, and cutlery.

- **Coated Sheets**: Coated sheet signifies CR steel that has been coated with zinc, aluminium or a combination thereof to render it corrosion-resistant and to improve its paintability. Hot dipped galvanised, electro-galvanised and aluminised products are the different types of coated sheet. These are the highest value-added sheet products because they require the greatest degree of processing and have the strictest quality requirements.

  End use - Coated sheet is used for many applications, such as automobile exteriors, major household appliances, roofing and siding, heating and air conditioning equipment, air ducts and switch boxes, as well as in certain packaging applications, such as food containers.

- **Plates:** Plates are produced by hot-rolling slabs or ingots. They can be made in plate mills or in a hot strip mill from coils.

  End use - The principal end uses for plates include various structural products such as bridge construction, storage vessels, tanks, shipbuilding, offshore drilling platforms, railway wagons, line pipe, industrial machinery and equipment.

- **Tinplate:** Tinplate is a light gauge CR, low-carbon steel usually coated with a micro-thin layer of tin. Tinplate offers particular advantages for packaging, such as strength, workability, corrosion resistance, weldability and ease in decoration.

  End use - Food and general line steel containers are made from tinplate.

Long steel products

Long Steel Products or long products or longs comprise bars, rounds, angles and structurals and are primarily used in construction, infrastructure and heavy engineering.

- **Bars:** Bars are rolled from billets and are either categorised as merchant bars or reinforcing bars (rebars). Merchant bars include rounds, flats, rectangles, and squares.

  End use - Bars are used by fabricators to manufacture a wide variety of products such as furniture, stair railings, and farm equipment. Rebar is used to strengthen concrete in highways, bridges and buildings.

- **Wire Rods**: Wire rods are small diameter rods and are usually sold in coiled form.

  End use – They are used in the automotive, construction, welding and engineering applications.

- **Wire Products:** Wire products include a broad range of products produced by cold reducing wire rod through a series of dies to improve surface finish, dimensional accuracy and physical properties.

  End use - Wire products are used in a variety of applications such as springs, concrete wire, electrical conductors and structural cables.

- **Special Bar Quality (SBQ) Steel:** SBQ steel is the highest quality steel long product, and is typically used in safety-critical applications by manufacturers of engineered products. SBQ steel is the only bar product that typically requires customer qualification and is generally sold under contract to customers.

End use - End-markets are principally the automotive, heavy truck and agricultural sectors, and products made with SBQ steel include axles, crankshafts, transmission gears, bearings and seamless tubes.

- **Structural Sections:** Structural sections or shapes is the general term for rolled shapes and include wide-flange beams, bearing piles, channels, angles and tees.

  End use - They are used mainly in the construction industry and in many other structural applications.

- **Rails:** Rails are hot rolled from a reheated bloom.

  End use - They are used mainly for railway rails but they also have many industrial applications, for example, rails for construction cranes.

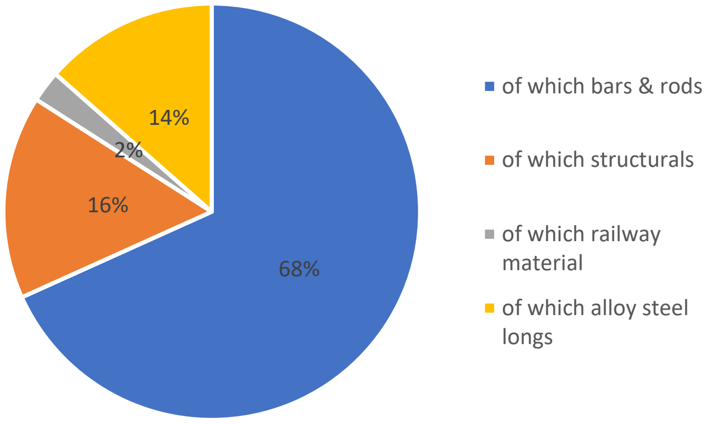
Exhibit 29: Trend in domestic steel demand for the last five years

Product-wise Domestic Steel Demand (in mt)	FY2014	FY2015	FY2016	FY2017	FY2018
Bars & Rods	29.4	31.1	33.0	33.7	34.4
Structurals	6.9	7.3	7.3	7.8	8.0
Rly. Materials	0.9	0.9	0.9	1.1	1.2
Alloy Longs	5.1	5.7	6.4	6.1	6.8
Total - Longs	**42.3**	**44.9**	**47.6**	**48.6**	**50.4**
Total Longs as % of Total Finished Steel Demand	**57%**	**58%**	**58%**	**58%**	**56%**
Plates	4.2	4.8	4.9	5.2	5.1
H.R.Coils	12.6	12.6	12.7	13.7	16.4
H.R.Sheets	1.0	1.1	1.4	1.1	2.4
C.R.Sheets \ Coils	4.7	3.9	3.9	4.4	3.3
GP \ GC Sheets	5.4	5.6	6.2	6.7	7.6
Elec. Sheets	0.5	0.5	0.4	0.9	0.8
Tinplate	0.5	0.5	0.4	0.5	0.6
Pipes	2.0	2.0	2.1	1.9	1.9
Tin Free Steel	0.1	0.1	0.1	0.0	0.1
Alloy Flats	1.0	1.1	1.7	1.0	2.1
Total - Flats	**31.8**	**32.1**	**33.9**	**35.4**	**40.2**
Total Flats as % of Total Finished Steel Demand	**43%**	**42%**	**42%**	**42%**	**44%**

Source: JPC, ICRA research

Domestic demand for long products has historically remained higher than the demand for flat products. In the last five years (FY2014 – FY2018), long products accounted for a majority share of 56%-58% of India's overall steel demand. Within the domestic long product consumption basket in FY2018, bars & rods accounted for the largest share of 68%, followed by structurals (16%) and alloy steel longs (14%). Share of railway materials stood at a nominal 2%. Rebars/TMT bars are the leading contributor within the bars & rods product category, followed by other value-added products like wire rods and special bars.

Exhibit 30: Product-wise share of long product demand in India in FY2018

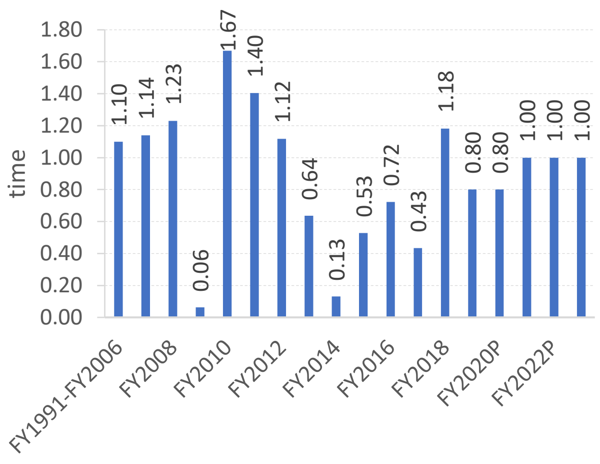


Source: JPC, ICRA research

B. Domestic Steel Demand Annual Growth Outlook

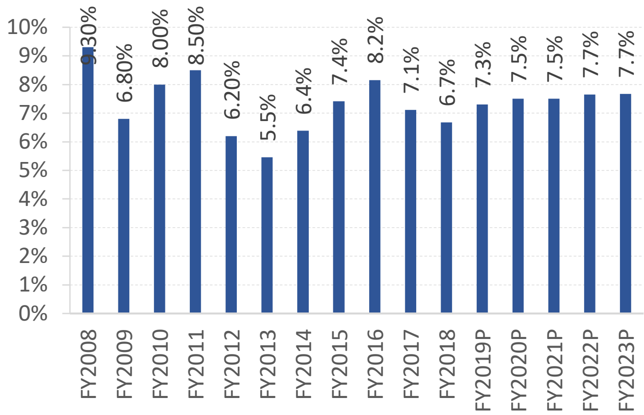
Steel demand exhibits strong linkages with the level of economic activity in a country. Therefore, the GDP elasticity of steel demand has been used as a parameter to estimate the growth in domestic steel demand going forward. Over time, the GDP elasticity of steel demand has remained above one. For example, during the periods FY1991-FY2006 and FY2005-2011, the GDP elasticity of steel demand has remained at 1.1 time and 1.14 time respectively. An aberration to this trend was visible during the XIIth plan period (FY2013 – FY2017), when the demand elasticity consistently remained at less than 1 time. However, aided by the recovery in domestic steel demand growth from 3.1% in FY2017 to 7.9% in FY2018, the GDP elasticity of steel demand increased to 1.18 time, going above the previous levels.

Exhibit 31: Elasticity of steel demand growth to GDP growth



Source: JPC, World Bank, IMF, ICRA research

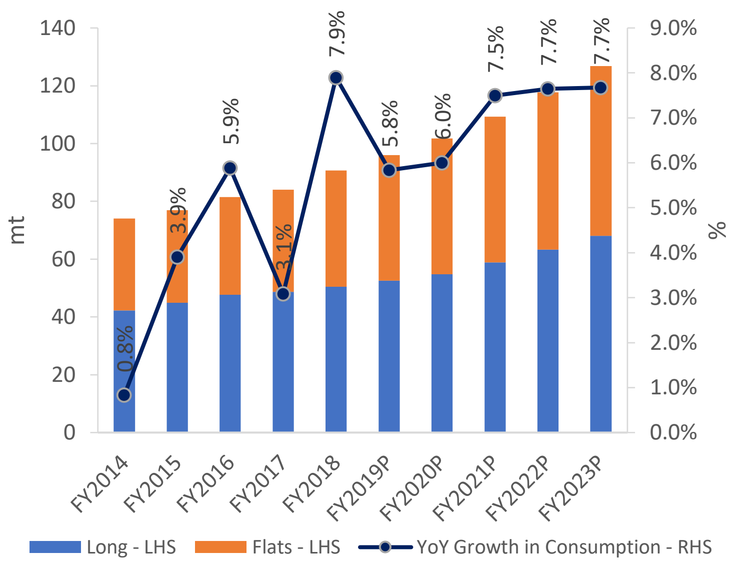
Exhibit 32: Projected GDP growth rate (at constant prices) for India



Source: World Bank, IMF, ICRA research

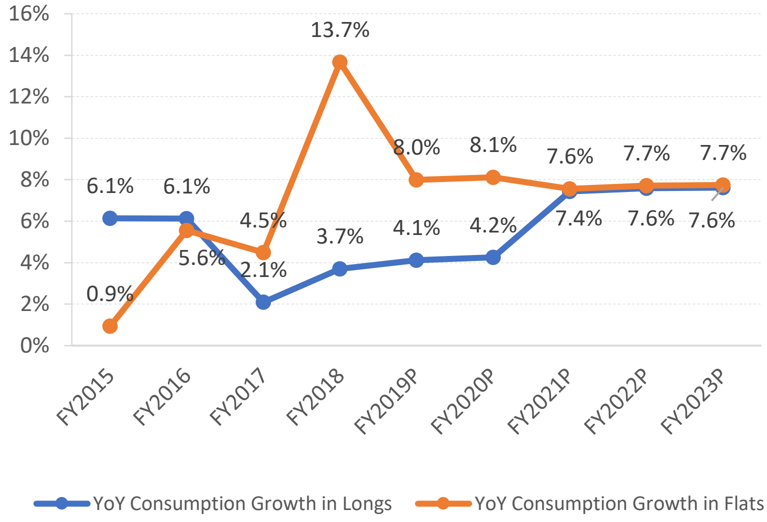
As per the World Bank and IMF forecasts, the Indian GDP growth rate is expected to remain healthy, ranging from 7.3% to 7.7% between FY2019 and FY2023. On the other hand, the NSP 2017 has estimated a GDP elasticity of steel demand of 0.8 time during FY2019 - FY2020 and 1.0 time during FY2021 – FY2023. Accordingly, the domestic steel demand is estimated to grow by a healthy rate of around 6% annually during FY2019 – FY2020 and by around 7.5% annually during FY2021 – FY2023.

Exhibit 33: Domestic steel consumption trends



Source: JPC, ICRA research

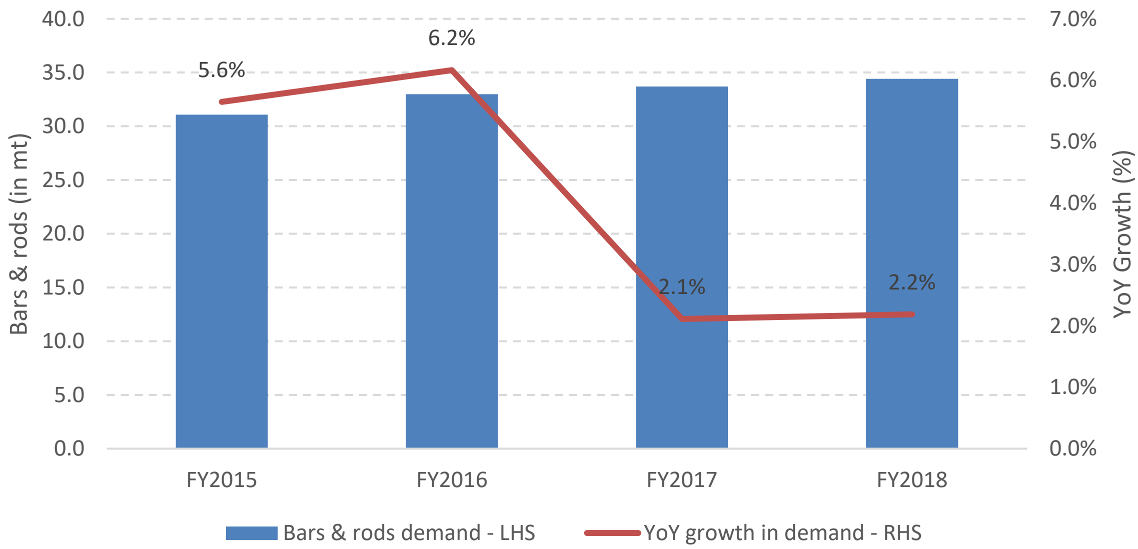
Exhibit 34: Growth in long and flat steel consumption



Source: JPC, ICRA research

During FY2017 and FY2018, annual growth rates in long steel demand trailed growth rates in flat steel demand. However, on studying the trends over a longer time horizon (FY2007 – FY2018), the CAGR for long and flat steel demand remains almost at the same level. Given the Government's thrust on infrastructure creation, and the gradual recovery of the construction sector, the gap between long and flat steel demand growths is expected to gradually reduce from 10.0% in FY2018 to 3.9% in FY2019 and FY2020, and further reduce to just 0.1% in FY2021 – FY2023, aided by a recovery in long steel demand from 3.7% in FY2018 to around 4.0% during FY2019 and FY2020, and around 7.5% between FY2021 and FY2023.

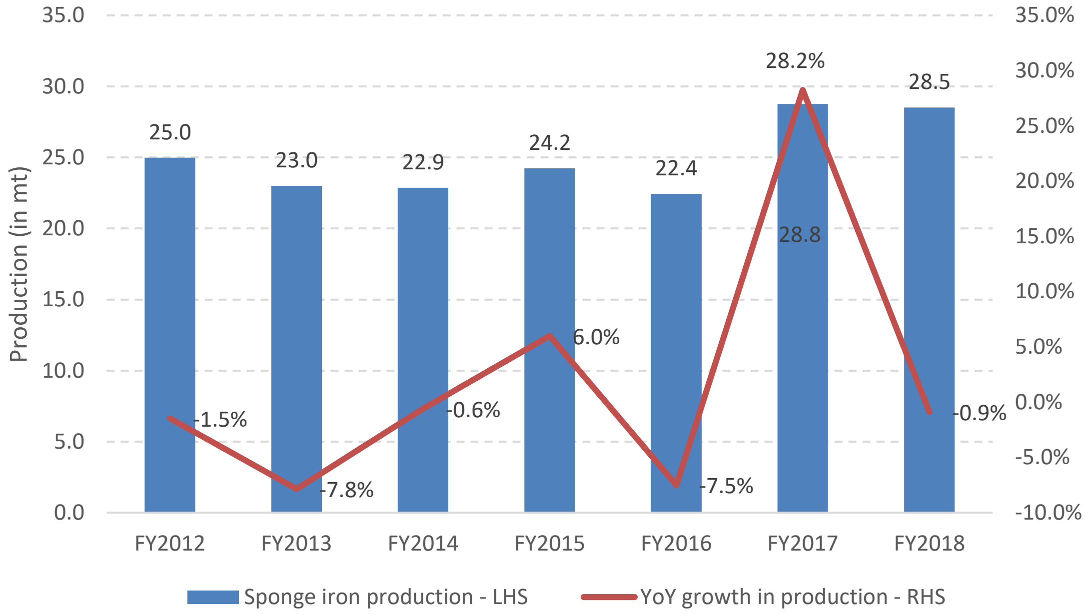
Exhibit 35: Trend in domestic demand growth for bars & rods



Source: JPC, ICRA research

Within the domestic long steel product consumption basket, bars & rods account for around 70%. The market for bars & rods remain a highly fragmented one, characterised by the presence of large number of secondary steel producers having a strong regional presence. Between FY2007 and FY2016, the domestic demand for bars & rods had grown at a healthy CAGR of 6.5%. However, the growth momentum for this key long product slowed down during FY2017 and FY2018 (2.1% and 2.2% YoY growth rates registered in FY2017 and FY2018 respectively as against 5.6% in FY2015), dragged by the twin adverse impacts on the housing market coming from demonetisation and implementation of Real Estate (Regulation and Development) Act, 2016 (RERA). However, supported by the pick-up in construction activity due to the Government's infrastructure push, as well as a gradual recovery in the real-estate market from the FY2017 lows, demand growth for bars and rods is expected to increase going forward, helping pull-up overall long steel demand growth between FY2019 and FY2023.

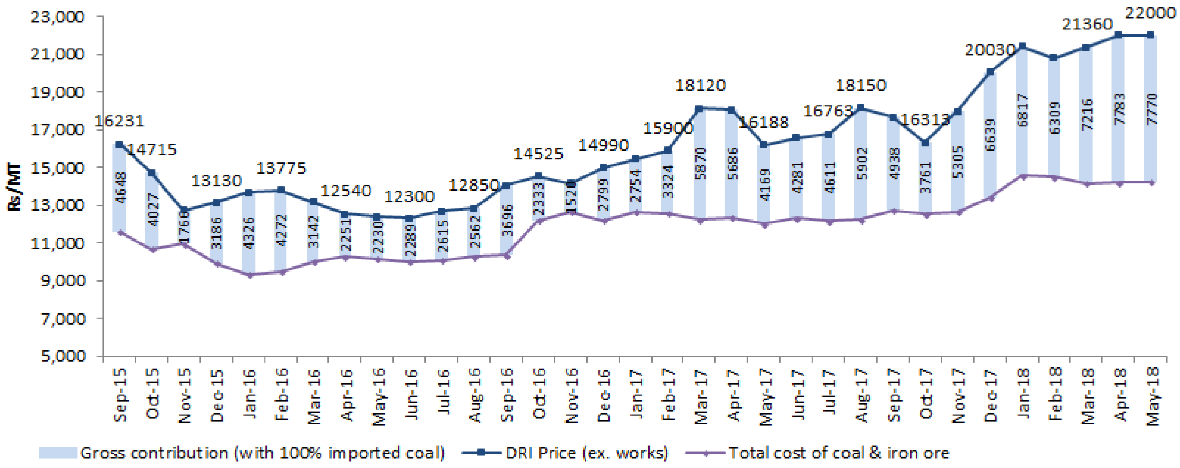
Exhibit 36: Trend in domestic sponge iron production



Source: JPC, Ministry of Steel, ICRA research; Note: FY2017 production figures restated by JPC in FY2018

Most secondary steel manufacturers produce steel through the induction furnace or electric arc furnace. These two methods of steelmaking cumulatively accounted for around 57% of the domestic crude steel production in 9M FY2018. Sponge iron remains a key raw material for producing steel through the electric route, and its production growth trends have remained uneven in the past. However, aided by the recovery in long steel prices in the last nine months, sponge iron realisations have increased from ₹ 16,313/MT in October 2017 to ₹. 22,000/MT in May 2018, helping register a steady improvement in gross contribution levels of domestic sponge iron manufacturers since Q3 FY2018. Going forward, demand for sponge iron would depend not only on a revival in the financial health of secondary steel producers, but also on its cost competitiveness with respect to steel scrap, a sponge iron substitute used in steelmaking.

Exhibit 37: Trend in gross contribution of a domestic sponge iron producer using imported coal

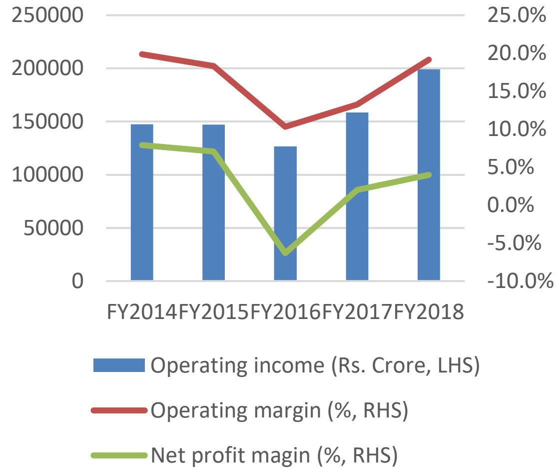


Source: Metalbulletin, ICRA research

C. Trends in Industry Financial Performance

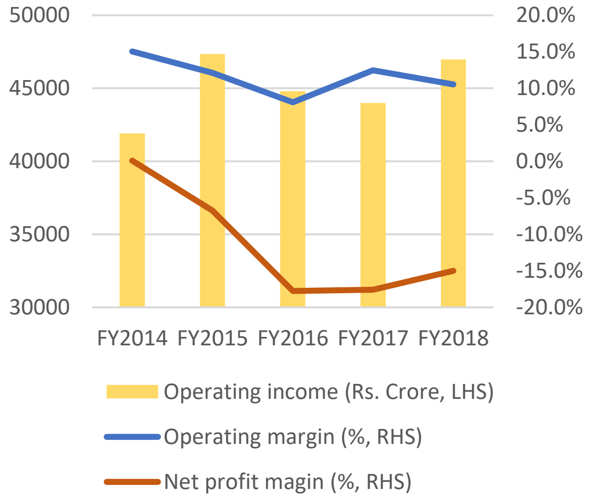
ICRA has aggregated the financial performance of a sample of 22 large and mid-sized steel players, accounting for about 60% of the current domestic capacity and analysed the financial performance by comparing two sample sets. First sample set comprises four large steel players (Tata Steel, JSW Steel, SAIL, Jindla Steel & Power) comprising about 45% of the total domestic capacity while the second sample set comprises 18 mid-sized steel companies contributing about 15% to the total domestic steel capacity.

Exhibit 38: Profitability trends for 4 large players



Source: Company financials, ICRA research

Exhibit 39: Profitability trends for 18 mid-sized players



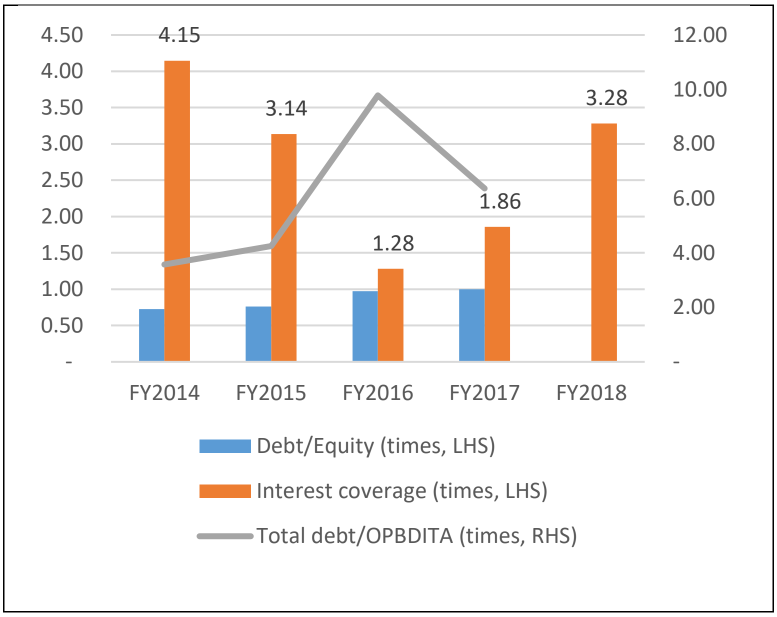
Source: Company financials, ICRA research

Financial performance of four large steel players remained steady in FY2014 and FY2015 but deteriorated sharply in FY2016 on account of global meltdown in steel prices and onslaught of cheaper steel imports, which affected the entire domestic steel industry. However, the performance improved in FY2017 on the back of various trade protection measures taken by the Government and recovery in steel prices both internationally and domestically. In FY2018, the performance improved further due to better domestic demand conditions and operating margins almost touched the FY2014 level, but the net margins remained lower than historic levels on account of increased debt levels of these steel companies.

While the performance of 18 mid-sized steel players has also followed the similar trend in the last five years, the extent of deterioration in performance has been much higher and the sample set continued to report net losses in the FY2018 despite reporting better operating profitability than FY2016 levels. Key reason behind the same is significantly leveraged balance sheets of most of these mid-sized companies.

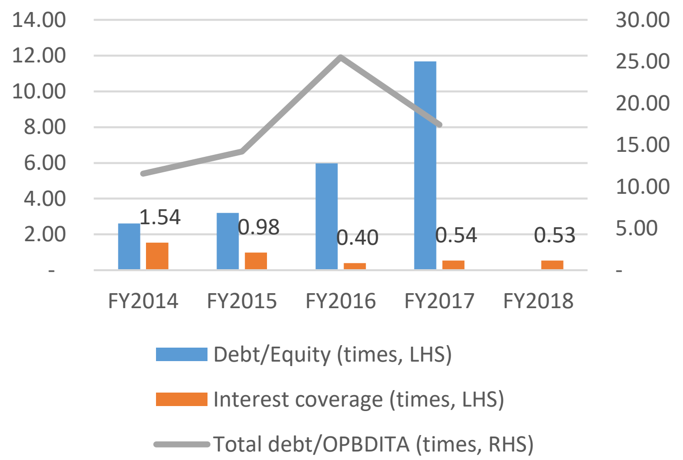
While comparing the trends in capitalization and coverage ratios of four large Vs 18 mid-sized companies, the pressure is more acute in the case of the latter where the aggregate interest coverage is less than unity in the last four years indicating severe pressures in their debt-servicing ability.

Exhibit 40: Trends in coverage ratios for 4 large players



Source: Company financials, ICRA research

Exhibit 41: Trends in coverage ratios for 18 mid-sized players



Source: Company financials, ICRA research

Given the elevated debt levels of these mid-sized companies, ICRA believes that the coverage metrics for this sample set are unlikely to improve significantly in the near-to-medium term.

Key Government Regulation and Policy

A. National Steel Policy 2017 (NSP)

On May 3, 2017, the Union Cabinet cleared the National Steel Policy (NSP) 2017, which aims to increase the crude steel capacity to 300 mt by FY2031 from the current capacity of 128 mt, and finished steel consumption per capita to around 160 kg by FY2031 from 63 kg at present. As per the NSP, at the current rate of GDP growth, the steel demand will grow to reach a level of about 206 mt by FY2031. Currently around 40% of the steel consumption comes from the construction and infrastructure sectors, which is expected to increase to 59% by FY2031. The policy also intends to meet the entire demand of value added steel from domestic sources and increase the availability of washed coking coal to reduce import dependence to 65% by FY2031 from 85% at present. Although the NSP has a challenging target of reaching a crude steel production of 255 mt by FY2031, implying a compounded annual growth rate (CAGR) of 6.4%, the CAGR growth of finished steel production during FY2001-FY2018 stood at 7.8%. Therefore, it seems that the target growth rate is achievable, provided challenges in creating the transportation network, plant commissioning and financing such large capacity increase is successfully managed.

Exhibit 43: Projected Demand Drivers As Per NSP 2017

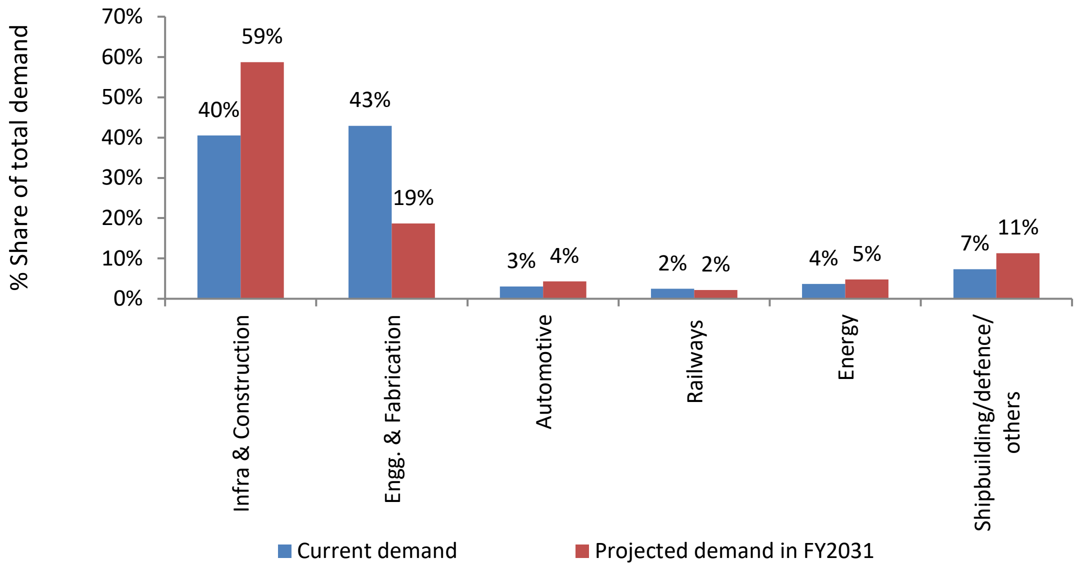
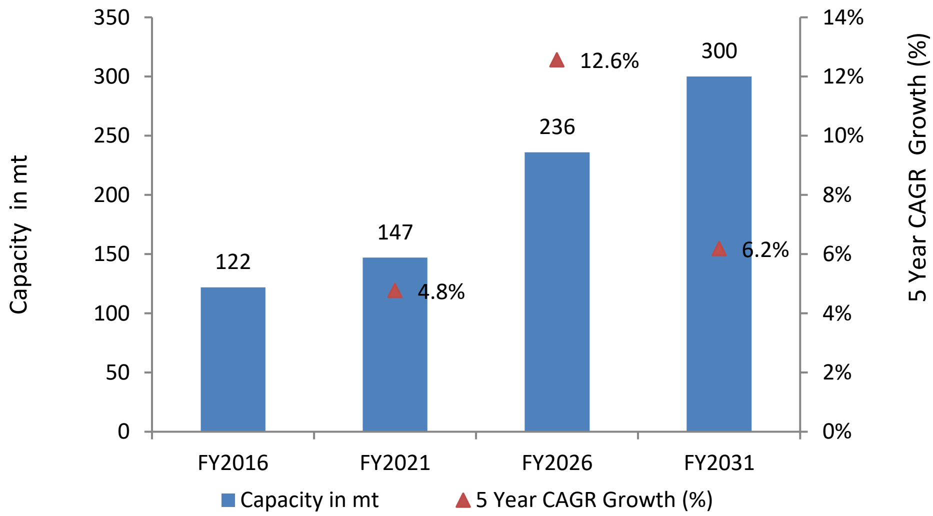


Exhibit 44: Phasing of Capacity Expansion As Per NSP 2017



Source: JPC, NSP document, ICRA research

B. Policy intervention to encourage greater use of steel

The principle of 'Life Cycle Cost' has been included in the Rule 136 (1) (iii) of the 'General Financial Rules (GFR), 2017' which emphasizes on the concept of total ownership cost during the entire tenure of a project's life while evaluating proposals rather than solely focusing on the upfront capital cost in isolation. This would encourage greater usage of steel in Government projects like bridges where the upfront cost could be higher than the alternatives, but the life cycle cost would be lower.

C. 'Make in India' Push

The Government launched the 'Make in India' programme on September 25, 2014 to create an ecosystem that would support best-in-class manufacturing from India. Action plans for key sectors like automobile, construction, defence, electrical machinery, oil & gas, ports and shipping, railways, power, and roads were identified for specific actions pertaining to policy and fiscal initiatives, improving the ease of doing business, facilitating infrastructure creation, fostering R&D, and supporting skill development.

To encourage domestic manufacturing as part of the Make in India initiative, the Government issued the 'Public Procurement (Preference to Make in India), Order 2017' on June 15, 2017 to give preference to local procurement in Government tenders through enabling clauses like minimum 50% local content, and a margin of purchase preference of 20%. Earlier, on May 08, 2017, to encourage the procurement of steel from domestic producers, The Ministry of Steel notified a policy for giving preference to domestically manufactured iron & steel products on Government procurements having a minimum value addition of 15%. Further, to promote the export of iron and steel products, duty exemption schemes have been provided to manufacturers for import of duty-free raw materials for production of steel made for export.

D. Impact of GST

The GST has been rolled out from July 01, 2017, replacing multiple Central and State taxes and levies. The implementation of the GST is expected to lead to better tax compliance for the industry. The Government has kept the total indirect tax rate for steel products largely unchanged at 18.0% under the GST against an effective rate of 18.1% in the pre-GST regime. For the key steelmaking ingredients, the tax rate for iron ore has been kept unchanged at 5.0%, but the same for coal has been reduced substantially from 11.3% to 5.0%, which is expected to lower working capital requirement for steel companies. Moreover, the GST rollout is expected to lead to efficient transmission of input tax credits, especially for items like Central Sales Tax (CST) on input raw materials, and entry tax where credit was not available in the earlier regime.

Exhibit 45: Duty structure on steel products and key raw materials

	Steel	Iron Ore	Domestic Coal
Excise Duty	12.5%	-	6.0%
VAT	5.0%	5.0%	5.0%
Effective Duty (pre-GST)	18.1%	5.0%	11.3%
GST Rate	18.0%	5.0%	5.0%

Source: ICRA research

GST is not only gradually reducing the friction in the intra and inter-state movement of goods, but also bringing in an architectural change in the logistics sector through more cost-efficient planning of logistics assets like warehouses. This is expected to improve the operating efficiency for fleet operators, whose gains can partly trickle down to the steel industry where logistics typically account for around 15% of the cost of steelmaking.

Key Growth Drivers for the Steel Industry

A. Strong Demand and Policy Support

Given the low per capita finished steel use of 65 kg in CY2017, as compared with the global average of 215 kg, steel demand potential remains strong in India. The National Steel Policy 2017 also estimates the demand to reach a level of 206 mt by FY2031 from the current levels of 91 mt, assuming that demand grows at the current rate of GDP growth.

While strong demand is likely to support domestic steel production, external factors such as cheaper imports of steel tend to disturb the demand-supply balance. During the period FY2015 and FY2016, which witnessed a surge in steel imports, the Indian Government took various trade remedial measures to protect the domestic steel producers, which were instrumental in turning India's status as a net steel exporter in the subsequent years (FY2017 and FY2018) from net importer status during those two years. The following table indicates some of the key duty hikes and impositions undertaken by the Government since June 2015.

Exhibit 47: Trade protection measures taken by the Government of India

Date of levy/imposition	Type of levy/imposition	Product under trade protection	Quantum of duty
June 2015	Import duty hike	Flat and long steel products	Flat products – 10% from 7.5% Long products – 7.5% from 5%
August 2015	Import duty hike	Flat and long steel products	Flat products – 12.5% from 10% Long products – 10% from 7.5%
September 2015	Provisional safeguard duty (SGD) imposition	HR flat products	20% for 200 days
February 2016	Minimum Import Price (MIP) for six months	173 Flat and long products	HR coils – US$ 445/MT CR coils – US$ 560/MT Ingots and billets – US$ 362/MT
March 2016	Definitive SGD	HR flat products	20% till Sep 13, 2016 18% from Sep 14, 2016 to 13th Mar 2017 15% from 14th March 2017 to 13th Sep 2017 10% from 14th Sep 2017 to 13th Mar 2018
August 2016	MIP extension till October 2016 and again till December 2016	66 flat and long products	Ingots and billets – US$ 362/MT Flat alloy steel products -US$ 643/MT Coated flat products - US$ 643/MT to US$752/MT
August 2016	Provisional anti-dumping duty (ADD)	HR and CR flat products	HR coils- US$ 474/MT HR sheets/plates – US$ 557/MT CR coils – US$ 594/MT
December 2016	MIP extension for two months	19 flat products	Flat alloy steel products -US$ 643/MT Coated flat products - US$ 643/MT to US$752/MT
January 2017	Provisional ADD	Colour coated flat products	Colour coated flat products - US$ 849/MT
May 2017	Definitive ADD **till August 2021**	HR and CR flat products	HR coils- US$ 489/MT HR sheets/plates – US$ 561/MT CR coils – US$ 576/MT
October 2017	Definitive ADD **till January 2022**	Colour coated flat products	Colour coated flat products - US$ 822/MT

Source: Government notifications, ICRA research

Apart from steel products, in order to ensure good quality raw material availability for domestic players and value addition in India, the export duty on iron ore with Fe content higher than 58% has been kept at 30% by the Government.

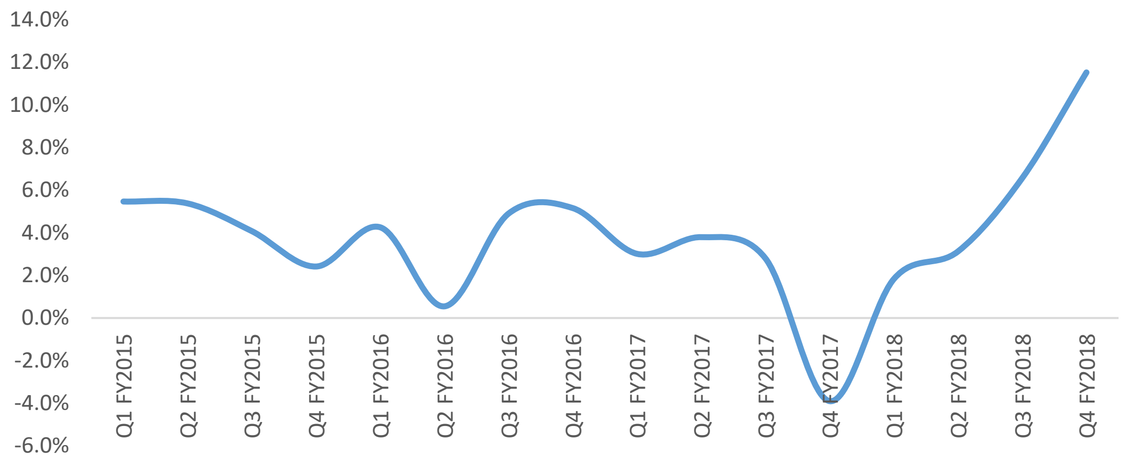
B. Growth in Construction, Capital Goods, Consumer Durables and Automotive Sectors

Domestic steel demand is predominantly driven by key sectors such as construction, infrastructure, capital goods, automobiles and consumer durables, with the combined share of these sectors at about 80% of the total domestic steel consumption.

Construction sector

The construction sector, together with infrastructure, forms a lion's share of about 55-60% in the total domestic steel demand. The sector growth remained subdued during FY2015-FY2017 due to various reasons. However, there has been a smart recovery in demand in the construction sector in FY2018, which benefited from the low base effect, as well as from the activity in the infrastructure sector (including affordable housing) on the back of increased spending by the Government. While, real estate and industrial capex is yet to pick up and consumer sentiment is yet to recover appreciably, ICRA believes that the Government's thrust on infrastructure spending in the Union Budget 2018-19 towards affordable housing, power transmission and railways is likely to result in an uptick in the overall construction activities in the near to medium term.

Exhibit 48: Construction Output Growth



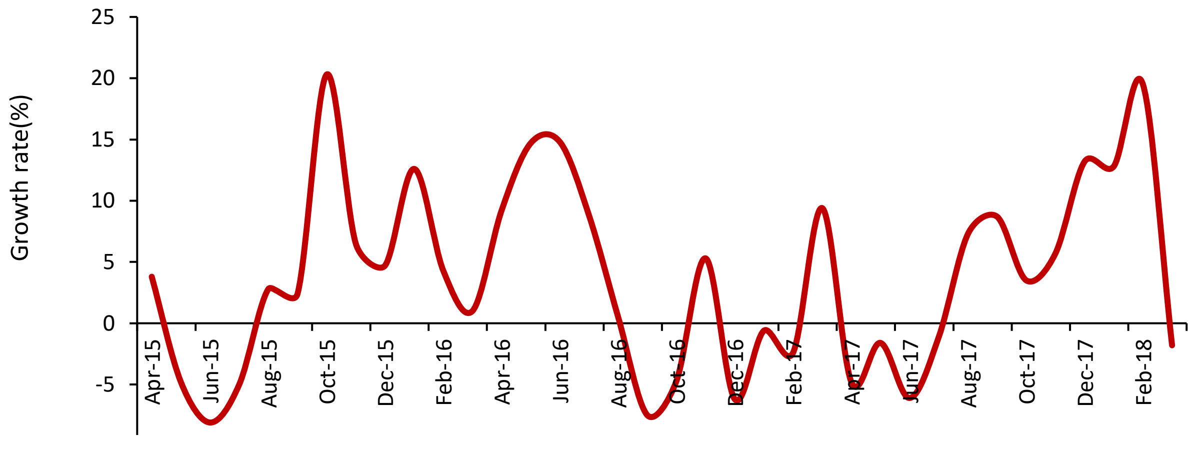
Source: CSO, ICRA research

Capital goods sector

Demand from the capital goods sector, which forms about 10-12% of the domestic steel demand, continues to face a challenging environment in the last few years. The sector has witnessed some recovery in the second half of FY2018 due to which the overall growth in the sector stood at 4.4% in FY2018 as against 3.2% in FY2017. The improvement was particularly pronounced in Q4FY2018, which witnessed a growth of 9% as compared to a growth of 2.6% in Q4FY2017 and 7.5% in Q3FY2018. However, a YoY contraction of 1.8% in March 2018, which is the worst performance in the last nine months, signals the uncertainty of the recovery in demand from this sector. While project announcement and completion remained subdued in Q4FY2018, sustained contraction recorded in the capital goods sector from April 2017 to July 2017 suggests that the sector may revert to displaying modest growth in the next few months owing to the low base effect.

There has been some pickup in demand recently, which is reflected from a growth of 5.9% in Q4FY2018, in contrast to the contraction of 2.4% in Q4 FY2017 and 1.5% in Q3 FY2018.

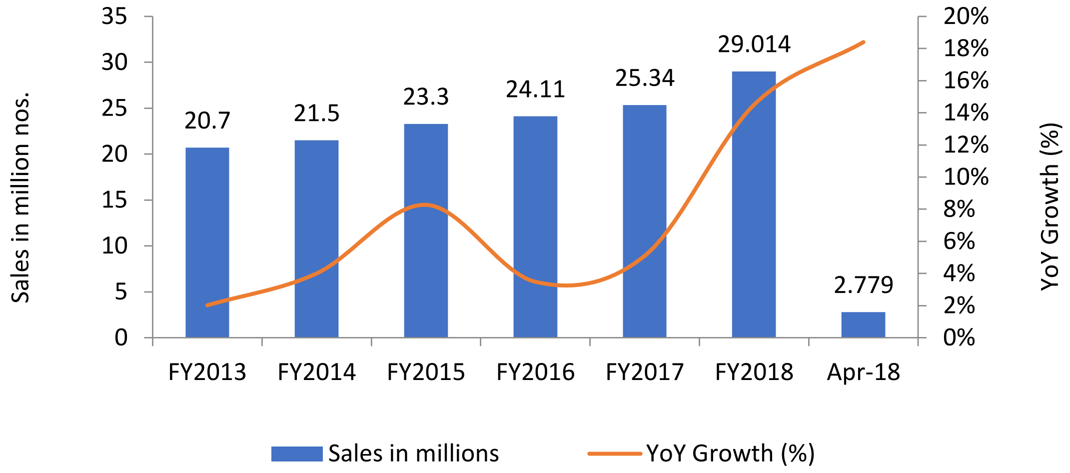
Exhibit 49: Capital Goods Output Growth



Source: CSO, ICRA research

Automobile sector

Exhibit 51: Automobile Sector Growth Trend



Source: SIAM, ICRA research

Strong growth reported across the two-wheeler (2W), three-wheeler (3W) and commercial vehicle (CV) segments resulted in the total vehicle sales growth increasing to 14.5% in FY2018 from 5.1% in FY2017. Overall passenger vehicles (PV) sales growth in FY2018 reduced marginally to 6% from 6.1% in 10MFY2018 because of the weaker passenger car segment growth of 1.7% (2.1% in 10MFY2018) while the growth in the utility vehicle segment remained strong at 18.7%.

Despite a contraction of 19% in the passenger segment within the M&HCV category, a 17.2% growth in the goods carrier segment helped the M&HCV segment report a healthy 11% growth in FY2018 while a buoyant 19.5% growth in the LCV segment (16.2% growth) led to a 15.9% growth in the commercial vehicle (CV) segment. Healthy growth in both scooter (19.3%) and motorcycle (15%) segments helped the two-wheeler volumes by 15.4% in FY2018 (14.3% in 10M FY2018). Supported by a 33.2% growth in passenger category, the 3W segment reported a healthy growth rate of 29.7% in FY2018. Continuing with the strong momentum in April 2018, the outlook for the auto sector remains favourable on the back of expected resilience in CV and 2W segments.

C. R&D and Innovation

As per the Ministry of Steel findings, substantial R&D in the iron and steel sector is currently being carried out by the leading steel companies in the areas of raw material beneficiation, agglomeration and product development. However, in general, a major focus of R&D is limited to day to day operations and hence, lacks disruptive innovation. India’s R&D investment in the steel sector is limited not only in absolute terms but also as a percentage of turnover, which is 0.05 - 0.6% as against up to 1% in the case of leading steel companies abroad. The Ministry of Steel has been pursuing the Indian steel companies to gradually enhance their R&D expenditure to at least 1% of their turnover by 2020.

R&D expenditure by various steel majors in the last few years is shown in the table below.

Exhibit 52: Company-wise R&D spends

R&D expenditure as a % of turnover	SAIL	Rashtriya Ispat Nigam Ltd	JSW Vijayanagar	JSW Dolvi	Tata Steel Jamshedpur
FY2015	0.52	0.28	0.06	0.01	0.32
FY2016	0.64	0.18	0.03	0.03	0.34
FY2017	0.69	0.18	0.06	0.02	0.27

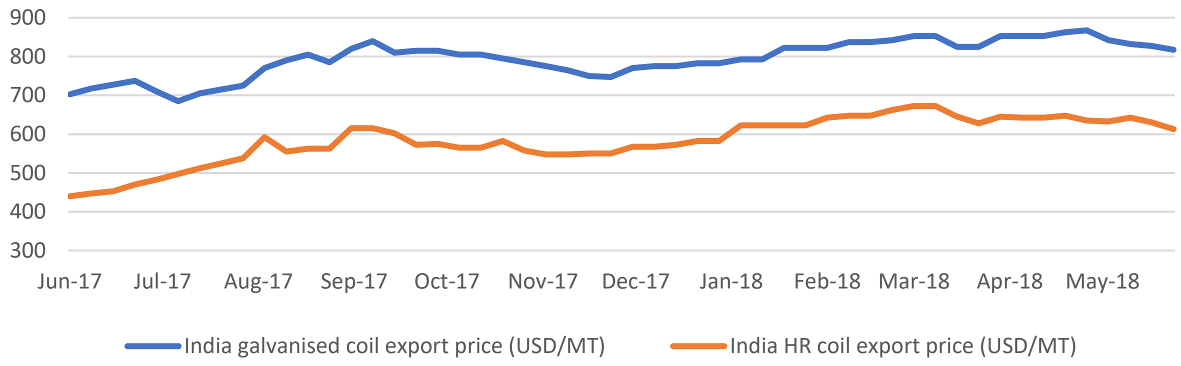
Source: Ministry of Steel, ICRA research

The Ministry of Steel has also set up an institutional platform namely Steel Research and Technology Mission of India (SRTMI) with an objective to spearhead R&D of national importance in iron and steel sector. Boosting innovation, encouraging higher corporate spending on research, product development in order to reduce imports of high-end auto-grade steel, electrical steel etc. remain the key areas of focus under the SRTMI. Also, the Indian steel industry is currently importing technology and critical equipment and systems for steel plants. Hence, necessary efforts will be required under the aegis of SRTMI to raise the level of R&D and acquire such manufacturing capabilities to develop these equipment and systems.

D. Export Price Rise

Favourable realisations in the export markets remained one of the key reasons for the growth in the Indian steel industry in the last couple of years. India primarily exports flat products in the overseas markets with HR coil, CR coil, galvanised coil and colour coated coil/sheet as the key sub-products. ICRA notes that export prices of HR coil and galvanised coil in the last one year have increased by 39%, and 16% respectively on account of improving global demand conditions and increased competitiveness of India against China due to anti-dumping duties imposed by the USA and EU on the latter.

Exhibit 53: Export price trends for India



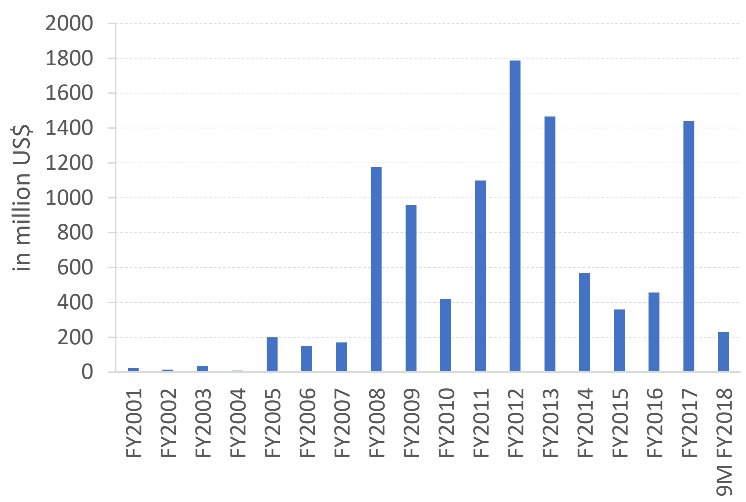
Source: Metalbulletin, ICRA research

However, going forward, the possibility of retaliatory tariffs by other nations in response to US' steel and aluminium tariffs could affect India's export competitiveness to an extent. As a result, export volumes and realisations may come under pressure in the near-to-medium term, if a tariff war breaks out going forward.

F. Foreign Direct Investment (FDI) in the Steel Sector

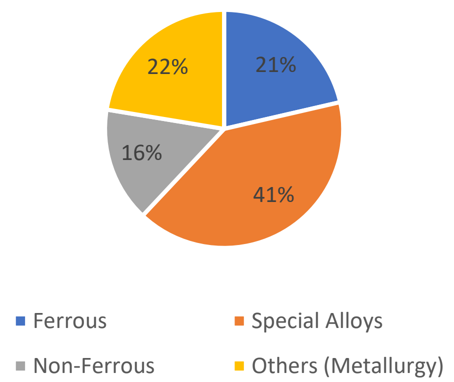
The Government has allowed 100% FDI through the automatic route for the steel sector, significantly reducing barriers for the flow of overseas capital. Between FY2001 and 9M FY2018, cumulative FDI equity inflows to the metallurgical sector remained at US$ 10.56 billion and ranked 12th in the hierarchy of sectors attracting the most FDI inflows. Share of non-ferrous within the overall FDI investment pool for the metallurgical sector remained at 16%, with the balance 84% being contributed by the steel sector, split between carbon steelmaking (21%), value added alloy steel making (41%), and other metallurgical products (22%).

Exhibit 54: FDI equity inflows in the metallurgical industries



Source: Department of Industrial Policy and Promotion, Ministry of Commerce and Industry

Exhibit 55: Sub-sector wise break up of FDI equity inflows (Jan'2000 to Dec'2016)



Source: Department of Industrial Policy and Promotion, Ministry of Commerce and Industry

Exhibit 56: Notable FDI investments in the domestic steel sector

Name of Manufacturer	Name of Foreign Collaborator	Amount of FDI (in million US$)
JSW Steel Ltd.	JFE Steel Corporation	1779
Essar Steel Ltd.	Essar Logistics Holdings Ltd.	452
Essar Steel Ltd.	Essar Steel Holdings Ltd.	256
Essar Steel Ltd.	Essar Steel Asia Holdings Ltd.	81
Essar Steel (Hazira) Ltd.	Essar Steel Holdings Ltd.	114
Essar Steel Orissa Ltd.	Essar Steel Holdings Ltd.	73
Welspun Corporation Ltd.	Granele Ltd.	166
Welspun Gujarat Stahl Rohren Ltd.	Various FII's	76
POSCO Maharashtra Steels Pvt. Ltd.	POSCO	193
Tata Steel Ltd.	Mahaboob Abdu	121
Kalyani Geradu Steels Ltd.	Corporacion Sidenor CIA RC	58
Jamshedpur Continuous Annealing and Processing Company Ltd.	Nippon Steel & Sumitomo Metal Corporation	39

Source: Department of Industrial Policy and Promotion, Ministry of Commerce and Industry

Opportunities for End Uses of Steel in India

Domestic steel demand is expected to grow at healthy levels in the medium to long term, supported by India's rapid economic growth (over other comparable peer nations), and the Government's commitment to infrastructure investments as well as positioning India as a destination for best-in-class manufacturing hub. Several transformational large scale infra projects are currently being undertaken across various core sectors which promises new opportunities for domestic steel players. The below table highlights some of the sectoral developments that has the potential to spur domestic steel demand:

Exhibit 57: Opportunities for steel demand from key end-use sectors

End-Use Sectors	Potential opportunities for incremental domestic steel
Infrastructure	• Government remains committed to increasing infra spending. Allocation to the infrastructure sector has been growing at a healthy rate from ₹ 3.59 lakh crore in FY2017 to ₹ 5.97 lakh crore in FY2019 (CAGR of 29%)
Railway	• Capital outlay by Indian Railways have been growing at a CAGR of 16.1% between FY2016 and FY2019; Budgetary allocation of ₹ 1.45 lakh crore in FY2019BE • Eastern and Western Dedicated Freight Corridor projects to be completed by April 2020 at an investment outlay of ₹. 81,459 crore • Mumbai-Ahmedabad bullet train project to be developed at a cost of ₹ 1.1 lakh crore • Metro rail projects currently under execution in 15 cities
Roads	• Road development projects worth ₹ 6.92 lakh crore to be taken up till FY2022 under the flagship 'Bharatmala' project and ongoing schemes of the Ministry of Road Transport & Highways • Average per day national highway execution has increased from 12 km/day in FY2015 to 27 km/day in FY2018
Building Construction	• 'Pradhan Mantri Awas Yojana' conceived for construction of 2 crore affordable houses by 2022; ₹ 61,598 crore has been allocated between FY2016 and FY2018, and ₹ 27,505 crore allocated in FY2019BE
Power	• 175 GW of renewable power capacity addition targeted by FY2022 to increase demand for structural steel

Source: ICRA research

Raw Material Supply

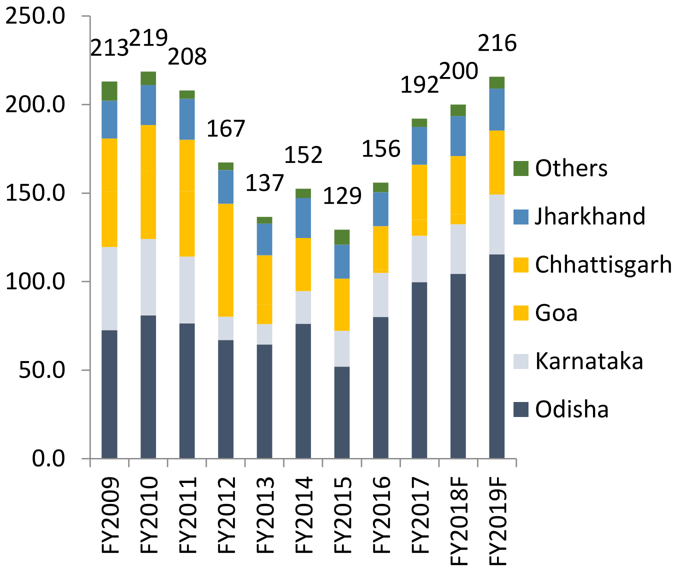
Steelmaking is a highly raw material and logistics intensive business, with one tonne of steel requiring the movement of four tonne of raw materials. For a secondary steel producer, raw materials account for around 70% of the cost of steelmaking. Iron ore and coal are the two most critical steelmaking ingredients, and proximity to iron ore and/or coal mines give considerable competitive advantage to a steel player due to lower logistics costs for raw material procurement. Given this cost dynamics, steel mills situated in clusters surrounding the mining belts of states having large reserves of iron ore and/or coal like Odisha (Barbil region), Jharkhand (Jamshedpur region), Chhattisgarh (Raipur/ Raigarh regions), and Karnataka (Bellary region) enjoy a competitive advantage over access to cheaper raw material. The following sections take a closer look at the raw material scenario for iron ore, coal, and intermediate/semi-finished products like sponge iron and pellets.

A. Iron Ore

Following the change in mining regulation after the enactment of the 'Mines and Minerals (Development and Regulation) Amendment Act, 2015' in March 2015, domestic iron ore supplies started to steadily improve from FY2016, helped by the reopening of closed mines falling under the second deemed renewal clause. Domestic iron ore production grew by a robust 23% YoY in both FY2016 and FY2017, led by production ramp-up from Odisha-based miners. The domestic ore production growth, however, tempered to 4.7% in FY2018 following the closure of a few mines in Odisha having capacities accumulating to 23 mtpa during Q4 FY2018 following the failure to pay compensation amounting to 100% of the value of iron ore mined illegally within the deadline of December 31, 2017, as per the judgment of the Hon'ble Supreme Court. However, out of the 23 mtpa of closed capacity in Odisha, around 19.6 mtpa capacity has resumed operations following the payment of compensation to the State Government, and the domestic ore supply situation has gradually eased.

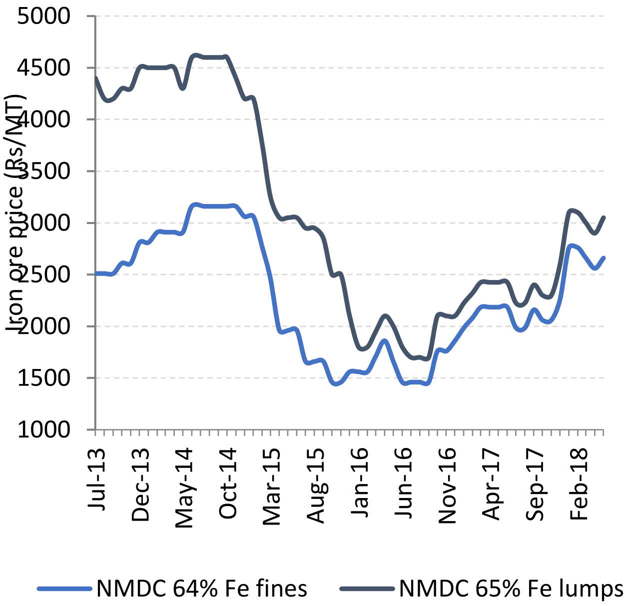
Notwithstanding a slowdown in Q4 FY2018, iron ore production is estimated to reach 200 mt in FY2018 against 192 mt in FY2017, supported by the healthy growth registered during the first nine months of the year. Going forward, in FY2019, given the resumption of closed mines in Odisha, and an increase in the production ceiling for Karnataka from 30 mtpa to 35 mtpa, iron ore production from Odisha is expected to increase by 11 mt, and from Karnataka by 5.7 mt over levels achieved in FY2018, leading to higher domestic ore availability for steel mills. Along with softer seaborne ore prices, the domestic iron ore price would remain rangebound till FY2020. However, with the expiry of many mining leases (especially in Odisha) post March 31, 2020, there emerges the possibility of a scarcity in domestic ore availability from FY2021 onwards, especially given the long delays in securing regulatory clearances for new mines, as well as the slow pace of mine auctions done by the respective State Governments thus far. This is likely to push domestic iron ore prices northwards from FY2021 till the time auctioned mines can fill up the supply vacuum.

Exhibit 58: Trend in domestic iron ore production from key states



Source: PIB, IBM, ICRA research

Exhibit 59: Trend in iron ore prices (ex-mines, excl. taxes/duties) by NMDC from Chhattisgarh



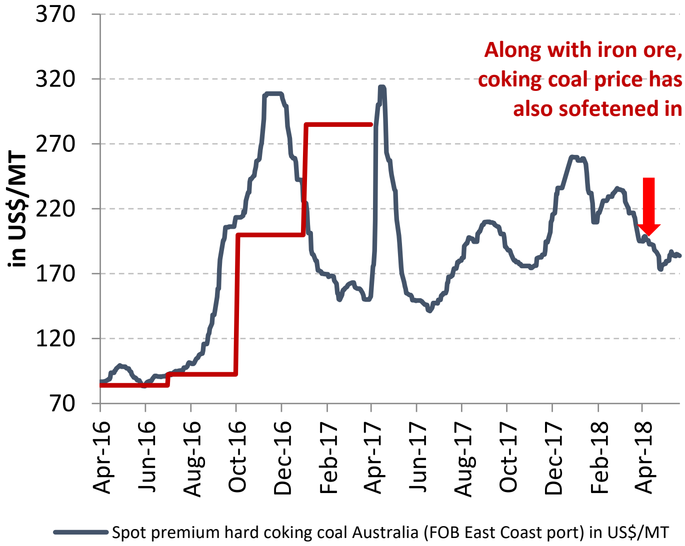
Source: NMDC, ICRA research

B. Coal

India has abundant reserves of thermal coal, but limited reserves of coking coal. Therefore, domestic blast furnace operators source two-thirds of their coking coal requirements via imports. Domestic sponge iron producers, who require thermal coal in the kiln, use a mix of high ash-low calorific value Indian coal, as well as low ash-high calorific value imported coal. Steel players having captive thermal power plants largely source domestic coal.

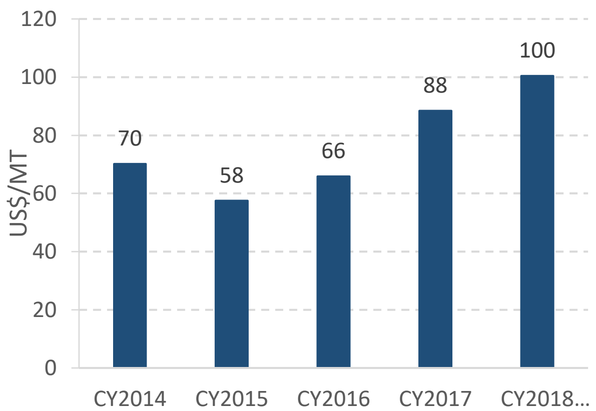
Seaborne coking coal prices have displayed exceptional volatility since April 2016 due to coal mining restrictions in China, and weather-related disruptions in Australia. The spot price of premium hard coking coal averaged at US$ 186/MT in CY2017 against US$ 143/MT in CY2016 and US$ 90/MT in CY2015. In CY2018 thus far, coking coal spot prices declined from US$ 260/MT (fob Australia) in end-December 2017 to US$ 183/MT in the fourth week of May 2018. The softening in coking coal prices has been led by the rising domestic coal supplies in China (following the withdrawal of mining restrictions), leading to a 28% YoY decline in Chinese coking coal imports in Q1 CY2018. Moreover, given the structural shift in preference by Chinese mills to use higher grade iron ore, which would require a lower specific coke consumption, the coking coal import demand by China is expected to gradually weaken in the near to medium term, which would weigh down on international coking coal prices. The spot price for seaborne premium hard coking coal, which averaged at US$ 186/MT in CY2017, is expected to average at US$ 187/MT in CY2018, and trend lower to US$ 151/MT in CY2019 and US$ 146/MT in CY2020.

Exhibit 60: Premium hard coking coal average spot price



Source: Bloomberg, ICRA research

Exhibit 61: 6300 kcal/kg GCV Newcastle spot coal prices



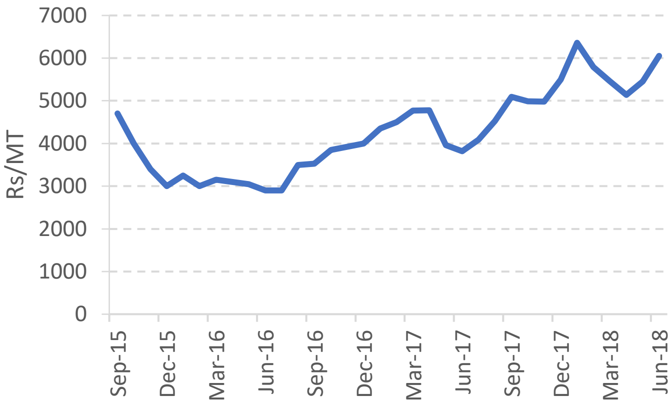
Source: Ministry of Coal, ICRA research

Following up on a strong recovery in CY2017, international thermal coal prices have continued the rally in CY2018 thus far. The spot price of 6,300 gross calorific value (GCV) thermal coal from Newcastle (fob Australia) increased from US$ 88/MT in CY2017 to US$ 100/MT in January to April CY2018. On the domestic front, thermal coal prices have remained hot from August 2017, following production slippages from Coal India Limited as well as logistical bottlenecks due to a shortage in railway rake availability. Steel players using coal in sponge iron production and captive power generation had to rely more on imported coal to tide over the domestic coal shortage in Q3 FY2018. Though coal availability to the non-regulated sector improved sequentially in Q4 FY2018 over Q3 FY2018, and the trend has continued in April 2018 as well, domestic e-auction coal prices have continued to remain at elevated levels, fueled by the strong demand from the power sector because of their critical coal inventory levels. Over the medium term, international coal prices are expected to soften on the back of a structural shift in energy mix towards renewables. As per World Bank estimates, 6300 GCV thermal coal average spot prices from Newcastle are expected to decline to US$ 85/MT in CY2018 and US$ 75/MT in CY2019 from US$ 88/MT in CY2017. In FY2019, Coal India Limited has targeted to produce 630 mt against 567 mt in FY2018 (11% YoY growth). If the Central miner can meet the FY2019 production guidance, the same would partially alleviate the domestic coal shortage existing at present, helping temper domestic coal prices.

C. Pellets and Sponge Iron

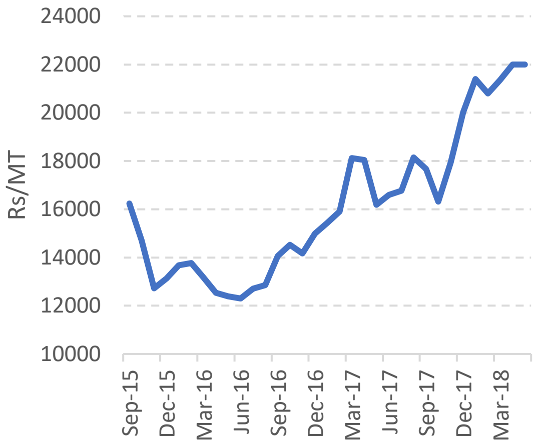
India is the largest global producer of sponge iron, which is an intermediary product used by secondary producers in making steel through the electric/induction furnaces. In FY2018, India produced 28.51 mt of sponge iron, mostly through the coal-based route. Apart from sponge iron, India also has a cumulative installed pellet capacity of around 90 mtpa, which uses iron ore fines (fines are unusable in a blast furnace or sponge iron kiln, and either need to be processed as pellets or sinters). Apart from meeting domestic demand, India has been steadily increasing iron ore pellet exports from 0.76 mt in FY2015 to 9.34 mt in FY2018. Aided by the recovery in domestic steel prices, prices of iron ore pellets and sponge iron have registered significant gains, leading to better profitability for sponge iron and pellet producers in FY2017 and FY2018 over FY2016.

Exhibit 62: Trend in pellet prices (ex-works) from Barbil, Odisha



Source: Steelmint, ICRA research

Exhibit 63: Trend in domestic sponge iron prices



Source: Metalbulletin, ICRA research

OUR BUSINESS

Some of the information in the following discussion, including information with respect to our plans and strategies, contains forward looking statements that involve risks and uncertainties. You should read the section "Forward-Looking Statements" beginning on page 20 for a discussion of the risks and uncertainties related to those statements and also the section "Risk Factors" beginning on page 22 for a discussion of certain factors that may affect our business, financial condition or results of operations. Our actual results may differ materially from those expressed in or implied by these forward-looking statements. Our Financial Year ends on March 31 of each year, and references to a particular Financial Year are to the twelve-month period ended March 31 of that year. You should carefully consider all the information in this Draft Red Herring Prospectus, including this section, "Risk Factors", "Industry Overview", "Restated Financial Statements" and "Management's Discussion and Analysis of Financial Condition and Results of Operations" beginning on pages 22, 125, 228 and 431, respectively, before making an investment in the Equity Shares.

Unless otherwise indicated, industry and market data used in this section has been derived from industry publications and other publicly available information, including, in particular, the ICRA Report. Unless otherwise indicated, all financial, operational, industry and other related information derived from the CRISIL Report and included herein with respect to any particular year refers to such information for the relevant financial year.

Overview

Shri Bajrang Power and Ispat Limited, the flagship company of Goel group of companies, is an integrated manufacturer of long steel products in India. Our current product portfolio comprises of TMT bars, wire rod, HB wires, sponge iron, pellets, steel billets, ferro alloys, and fly ash bricks. The Goel group is involved in, inter-alia, the manufacturing of steel, generation and sale of hydro-power, generation of captive power, and operating a regional television channel.

Our Company is led by an experienced management team, consisting of professionals with experience across various sectors. Each of our individual Promoters, namely Suresh Goel, Rajendra Goel, Narendra Goel, and Anand Goel have more than three decades of hands on experience in the steel industry. Our Company believes that our management team's collective experience and capabilities enable us to understand and anticipate market trends, manage our business operations and growth, leverage customer relationships and respond to changes in customer preferences.

Our TMT Bars and HB wires, are sold under the brands "Goel TMT" and "Goel TMT WireX" respectively which, our Company believes, are well recognized brands in their respective categories. Revenues from sale of TMT Bars and HB Wires has been the pre-dominant revenue stream for our Company and contributes 58.57% of our standalone revenues for Financial Year 2017 - 2018.

Our Company caters primarily to the infrastructure and construction industry in India especially across the central and western regions of India which is serviced through 6 distributors with a network of 385 dealers.

Our Company is an integrated steel manufacturer, with three strategically located manufacturing facilities in Raipur, which is the capital of the state of Chhattisgarh – a state rich in various minerals, including coal and iron ore which are the primary and critical raw materials that our Company requires for manufacturing its products. (*source: http://chhattisgarhmines.gov.in/sites/default/files/MiningBooklet_2017_web.pdf*). Availability of these raw materials in close proximity to our manufacturing facilities, helps our Company in minimising our operating costs and achieve operational efficiencies.

Our customer base during the Financial Year 2017 - 2018 was spread across 24 states, with primary market presence being in the central and western regions of India. During Financial Year 2017 - 2018, our revenue share from state of Chhattisgarh, Madhya Pradesh and Maharashtra constituted 61.90%, 16.52% and 9.63% respectively of our standalone restated revenues.

Our Company endeavors to be innovative in its sector and has relied on process re-design and re-engineering to reduce the time and cost involved in manufacturing of its products. In an effort to enhance our backward integration, increase raw material security, and enhance profits, our Company has applied for, and have been allotted exclusive mining rights, in connection with an iron ore mine located in the Uttar Bastar Kanker district at Chhattisgarh. Our Company also have exclusive mining rights in connection with an open-cast manganese ore mine located in Vizianagaram district, in Andhra Pradesh with an area of 3.95 Ha.

Details of our manufacturing facilities are as follows:

	Name and location of facility	Facility Commissioned in	Installed Capacity (as on July 31, 2018)							
			(in MTPA)							(No.'s)
			Pellets	Iron Ore Beneficiation plant	Sponge Iron	Billets and Blooms	Rerolled Steel Products	HB Wire	Silico Manganese	Fly Ash Bricks
1.	**Unit I:** Borjhara, Raipur	2005	NA	NA	210,000	129,600	120,000	NA	14,400	20,000,000
2.	**Unit II:** Gondawara. Raipur	2002*	NA	NA	NA	105,600	225,000	30,000	NA	6,000,000
3.	**Unit III:** Tilda, Raipur	2013	1,200,000	1,320,000	150,000	NA	NA	NA	NA	10,000,000
	Total:		1,200,000	1,320,000	360,000	235,200	345,000	30,000	14,400	36,000,000

Source: Certificate from Er. Shreyansh Agrawal (Chartered Engineer) dated August 1, 2018 with license number AM086382/6.
**Unit II has been upgraded in the Financial Year 2007-2008.*

Our captive power generating facilities:

The details of our captive power installed capacity, are as follows:

	Name and location of facility	Captive power installed capacity (MW)	Generated from
1.	**Unit I:** Borjhara, Raipur	18	waste heat recovery
		8	bio-mass
2.	**Unit II:** Gondawara, Raipur	16	thermal coal
3.	**Unit III:** Tilda, Raipur	16	waste heat recovery
	Total installed capacity in our Company:	**58**	

Source: Certificate from Er. Shreyansh Agrawal (Chartered Engineer) dated August 1, 2018 with license number AM086382/6.

Some of our key financial parameter as per Restated Consolidated Financial Statements are set forth below:

(₹ in million)

Particulars	Financial Year 2017 - 2018	Financial Year 2016 - 2017	Financial Year 2015 - 2016	CAGR
Revenue from operations	18,512.00	15,618.40	14,106.44	9.48%
Gross Margin*	4,946.49	3,539.73	2,717.96	22.09%
Gross Margin* as % of Revenue	26.72%	22.66%	19.27%	-
EBIDTA	2,832.57	2,161.76	1,570.81	21.72%

Particulars	Financial Year 2017 - 2018	Financial Year 2016 - 2017	Financial Year 2015 - 2016	CAGR
EBIDTA Margin as % of Revenue from operations	15.30%	13.84%	11.14%	-
PAT	368.88	282.19	(194.66)	Not meaningful
PAT Margin as % of Revenue from operations	1.99%	1.81%	(1.38)%	-
Net Debt**	11,590.82	11,827.27	9,103.61	8.38%
Net Worth***	6,739.17	4,437.10	4,144.35	17.59%

* *Gross Margin has been defined as Revenues from operations minus cost of materials consumed minus purchase of traded goods minus change in inventory of finished goods, work in progress, traded goods and stores and spares*

** *Net Debt has been defined as Long Term Debt plus Short Term Debt plus Current Maturities of Long Term Debt minus Cash and Cash equivalents.*

*** *net worth means the aggregate of the paid up share capital, share premium account, and reserves and surplus (excluding revaluation reserve) as reduced by the aggregate of miscellaneous expenditure (to the extent not adjusted or written off) and the debit balance of the profit and loss account;*

Our Strengths:

- ***Our Company is an integrated manufacturer of long steel products in India, with a diversified product portfolio and well recognized brands 'Goel TMT' and 'Goel TMT WireX'.***

  Our Company is an integrated manufacturer of long steel products in India with a diversified products portfolio which are focused on the infrastructure and construction industry in India. Our backward integration into iron ore mining and captive power generation capabilities helps our Company in minimizing operating costs and maximizing operational efficiencies and profitability. Further, our focus on value added long products viz. TMT Bars, wire rods and HB Wires vis-à-vis sale of pellets or billets helps us capture larger proportion of value chain.

  Our products in categories of TMT bars, and HB Wires are sold under the brand of "Goel TMT" and "Goel TMT WireX" respectively. Our Company believes that 'Goel TMT', is one of the established brands for TMT bars in the Central India region and both the brands are well recognized in the end user market in central India and parts of western India. Sale of "Goel TMT" and "Goel TMT WireX" branded products constituted 58.57 % of our standalone restated revenues. Additionally, our Company manufactures ferroalloys both for internal consumption as well as for sale in the market. Ferroalloys are sold by our Company to the aluminum industry and the steel manufacturing industry. The sale of these ferroalloys is one of the revenue contributors for our Company. Our ferroalloy sales for the Financial Year 2017 - 2018, Financial Year 2016 - 2017 and Financial Year 2015 - 2016 was ₹ 550.46 million, ₹ 678.70 million and ₹ 345.58 million respectively.

- ***Efficient operations with focus on product quality and cost optimization***

  All of our products are manufactured at our manufacturing facilities located in Raipur, Chhattisgarh. At the aforesaid facilities our Company has set up steel melting shops, rolling mills, captive electricity generation units, palletization plant and iron ore beneficiation plant. our Company has obtained, and maintain, a number of prestigious quality management system certificates in line with industry standards, including ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 for Unit I and Unit II. This helps in our Company achieving efficiencies of over 100% for certain processes.

  Our Company endeavors to be innovative in its sector and has relied on process re-design and re-engineering to reduce the time and cost involved in our manufacturing operations. One such initiative has been the adoption of direct rolling process in Unit I and Unit II for manufacturing of rerolled products. Direct rolling process is a technical evolution of hot charging, where continuous cast billet is directly pushed to the rolling mill, without the need of an intermediate process of re-heating. This process eliminates the need for re-heating the ingots/ billets and results in savings in fuel as well as emission of greenhouse gases.
  (<u>source</u>: *http://www.in.undp.org/content/dam/india/docs/EnE/0-34-321_BOOK_WEB.PDF)*

Our other initiatives and infrastructure including captive iron ore mine, captive power generation capacity, captive source of water, private railway siding, iron ore beneficiation plant which helps beneficiate low grade fines with an average grade of Fe 55% to usable ore with an average grade of Fe 62%., coal linkage with South Eastern Coalfields Limited, manufacturing of ferroalloys for internal consumption and use of Producer Gas (Producer gas is fuel gas that is manufactured from material such as coal) at our Unit III helps us to manage our operations in cost efficient manner.

For our Unit II, our Company received recognition from the Ministry of Steel, GoI, and the United Nations Development Programme Global Environmental Finance Unit, ("UNDP-GEF") in 2014 for: (1) "Removal of Barriers to Energy Efficiency Improvement in Steel Re-rolling Mill Sector in India"; and, (2) being a "Model Unit For Energy Efficiency Interventions".

- ***Established relationships with channel partners supported by large distribution network:***

  Our Company has established strong customer relations during our sixteen years of operations. our Company manages the channel and retail business through distributors who in turn manage a network of dealers throughout the central and western regions of India. As of July 31, 2018, our Company had a network of 385 dealers and 6 distributors. For details of the geographies in which our Company sells the products, please see "*Our Business - Sales and distribution*" on page 175. Our Company manages our channel partners and retail sales through a sales and marketing team of 63 employees as at July 31, 2018, who aid the distribution process and are primarily engaged in distributor/dealer relationship management, appointment of dealers and distributors, procuring orders, product promotions and collections.

- ***Strategically located manufacturing facilities***

  Steelmaking is a highly raw material and logistics intensive business, with one tonne of steel requiring the movement of four tonne of raw materials. For a secondary steel producer, raw materials account for around 70% of the cost of steelmaking. Iron ore and coal are the two most critical steelmaking ingredients, and proximity to iron ore and/or coal mines give considerable competitive advantage to a steel player due to lower logistics costs for raw material procurement. Given this cost dynamics, our manufacturing facilities are situated in Raipur surrounding the mining belts of states having large reserves of iron ore and/or coal enjoying a competitive advantage over access to cheaper raw material. Our manufacturing facilities are located in Chhattisgarh, a state rich in various minerals, including coal and iron ore which are the primary and critical raw materials that our Company requires for manufacturing its products. Chattisgarh has coal reserves equivalent to approximately 18.15% of India's coal reserves and Iron Ore (Haemetite) reserves of approximately 19.59% of India's reserves for the mineral and was the leading producer of coal and second largest producer of iron ore in the country. Coal and iron ore are voluminous commodities and proximity of sources of such minerals helps our Company in minimising our operating costs and achieve operational efficiencies. (*source: http://chhattisgarhmines.gov.in/sites/default/files/MiningBooklet_2017_web.pdf)*

  Further, due to the voluminous nature of our products, transportation cost is a critical aspect. Our core markets of central and western India are expected to witness significant construction activity driven by various schemes including 'Bharatmala' project, 'Pradhan Mantri Urja Ganga' programme, 'Pradhan Mantri Awas Yojana', 'Sagarmala' programme and 'Atal Mission of Rejuvenation & Urban Transformation' (AMRUT).

- ***Strong track record of robust financial performance***

  Our Company believes that our integrated production facilities, high capacity utilization, productivity and low operating costs due to refined technological processes are the inherent strength of our Company, which protects our Company against the cyclical trends of the steel sector. Our Company has maintained healthy leverage and credit rating despite the various challenges in the sector.

  For Financial Year 2015 - 2016 to Financial Year 2017 - 2018, we achieved a CAGR of 9.48 % in revenue from operations, and CAGR of 21.72 % in EBITDA as per the Restated Consolidated Financial Statements. The debt to equity ratio of our Company as of Financial Year 2017 - 2018 was 1.44 as per the Restated Standalone Financial Statements. According to Brickwork ratings, our Company was rated BWR A-/A2+ with outlook stable on May 10, 2017. Our Company has made an application to Brickwork Ratings for renewal of our credit rating.

- ***Strong management team backed by experienced Promoters***

  Our Company believes that it benefits from the vision, leadership, skills, experience and relationships of several members of our senior management including our Promoters Suresh Goel, (Executive Director and Chairman), Narendra Goel (Managing Director), Rajendra Goel (Executive Director), and, Anand Goel, Executive Director, each of whom has more than three decades of experience in manufacturing of iron and steel and related products. Our Company's senior management team comprises of members with extensive experience, in-depth knowledge and professional qualifications in the steel industry and regulatory environment.

  Our management team's collective experience, industry knowledge and project execution skill enable us to understand and anticipate market trends, manage our business operations and growth, leverage customer relationships and respond to changes in customer preferences. Our Company believes that the skill and experience of our management, drawn from several years of experience in setting up and managing our existing operations, and executing large scale projects, will help us in expanding our operations and implementing our organic growth strategy. Our Company will continue to leverage on the experience of our management team and their understanding of the industry, to take advantage of current and future market opportunities.

Our Strategies:

- ***Improve asset utilization and enhance our production capacities***

  Our products are largely used in construction industry and given the Government's thrust on infrastructure creation, and gradual recovery of construction sector, our Company anticipates industry wide volumes to grow at approximately 4.0% during Fiscal 2019 and Fiscal 2020, and around 7.5% between Fiscal 2021 and Fiscal 2023. Our Company believes that it is well positioned to out-pace the industry growth and increase our market share in respective segment. For details of our aggregate installed capacity, production volumes, and the capacity utilization of each of the products manufactured by our Company, for the last three years, please see "*Our Business – Capacity & Capacity Utilization*" on page 172.

  In addition to our existing facilities at Units I, II and III, our Company plans to increase our production capacities through:

  iv Setting up of an additional sponge iron plant, of 150,000 TPA, at the Unit III Tilda facility. This would significantly enhance our sponge iron output and doubling it from 150,000 TPA to 300,000 TPA.

  v Setting up a replacement facility at Unit III, comprising of: (a) steam turbines capable of generating 30 MW per day, (b) waste heat recovery boilers with an aggregate capacity of 62 TPH; and, (c) machinery for facilitating the transfer of surplus power from Unit III to Unit I, (namely an external combustor, 132 Kva power transmission lines, and, a sub-station with 20/25 Mva generator transformer).

  vi Replacement of existing 8 x 4 Induction furnace with 15 MT x 4 Induction Furnace, at Unit I, with a billet caster, so as to enhance our steel melting and rolling capacity.

  The facilities above are expected to be fully commissioned during Financial Year 2020. On completion of the above expansion plans, our Company's aggregate installed capacity is expected to increase from 360,000 TPA to 510,000 TPA, for sponge iron production; and from 235,200 MTPA to 264,000 MTPA, for Billets and Blooms.

  Our manufacturing facility at Unit III at Tilda has an unutilized land area of 105.615 hectares has the necessary infrastructure facilities and also the environment clearances for setting up of our future projects. Thus, our Company has the advantage of setting up new projects with minimum costs and reduced timelines.

Our future plans for expansion also includes manufacturing of new products including, seamless tubes, alloy steel products and ductile iron pipes.

- ***Continued focus on cost optimization***

  Our Company believes that despite the standardized nature of processes in our industry, our Company has been able to create an effective cost advantage through relentless focus on cost optimization by investments in infrastructure, re-engineering initiatives and operational excellence. Our Company intends to set-up additional facilities like blast furnace, coke oven plant and sinter plant, which will lead to further economies of scale for our Company. In addition, our Company intends to continuously re-evaluate our processes and ecosystem to reduce costs.

- ***Expand our network and further strengthen our key brands***

  Our Company currently sells our products through a network of approximately 385 dealers largely focused around central and western India. Our Company intends to expand our geographical presence for instance, in Financial Year 2017 - 2018, our Company entered the western regions of Orissa. Our Company will continue to evaluate such other geographically contiguous areas which are viable from cost of transportation perspective.

  Our Company will continue to improve our penetration in our existing markets by enhancing our retail distribution network, further strengthening the internal sales and marketing teams and improved visibility of our key brands. Our Company believes that our key brands 'Goel TMT' and 'Goel TMT WireX' enjoy wide recognition in their target markets and will invest in further strengthening them through increased but targeted media spends and better engagement with customers, professional customers and intermediaries.

  Our Company also believes that it will be able to capitalize on our reputation for quality, consistent performance and consumer satisfaction in our existing markets and product verticals to target new consumers.

- ***Focus on sustainable and profitable growth***

  Our Company continuously seeks to improve our financial profile and maintain a strong focus on sustainable growth. Our Company intends to maintain our attention to cost optimization and maintain profitable operations across commodity cycles. Further, our Company is committed to achieving the optimization of financial cost supported by credit rating improvement and proactive debt management. Our Company has been able to complete the incremental capital expenditure required across all Units over the last two primarily through internal accruals, and did not significantly increase our debt for the said capital expenditure. In keeping with the expected volume ramp up and the low capital intensity of our capital expenditures, our Company believes that it is well positioned to achieve improved leverage and return ratios. Our Company also believes that repayment/pre-payment of loan will help to reduce our outstanding indebtedness and enable utilization of our accruals for further investment in our business growth and expansion. In addition, we believe that the strength of our balance sheet and leverage capacity of our Company will improve our ability to raise further resources in the future to fund our potential business development opportunities and plans to grow and expand our business. For further details, please see "*Objects of the Issue*" on page 111.

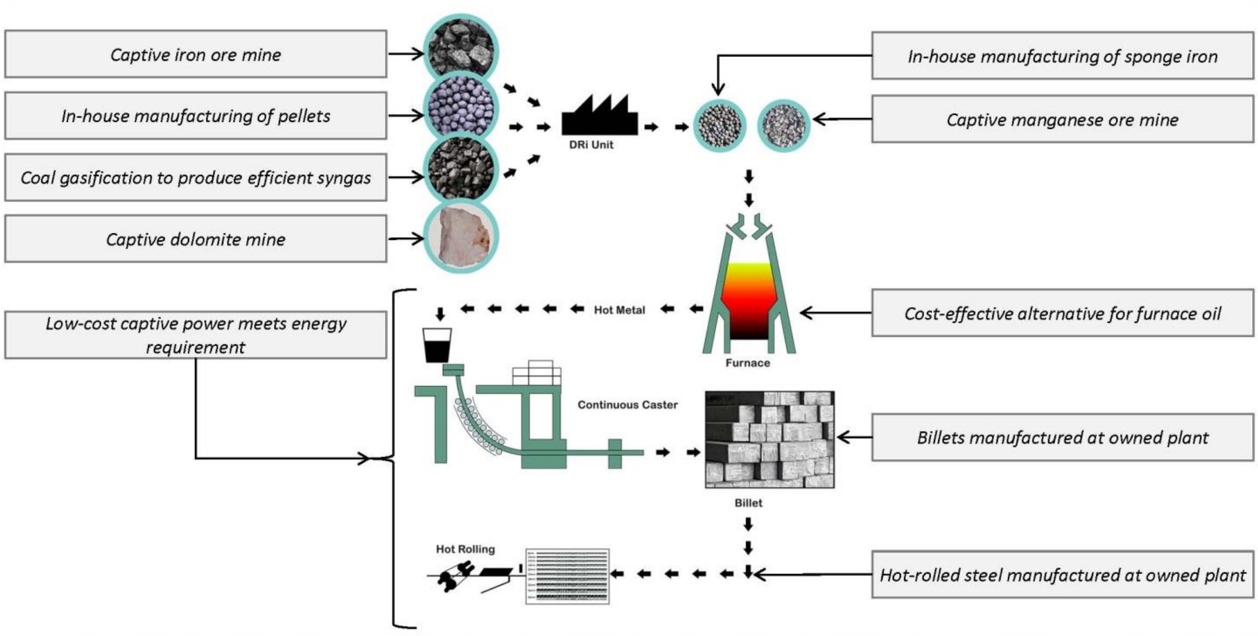
Our product portfolio:

Our primary products include: (i) TMT bars, (ii) Wire Rods, and (iii) HB Wires, (which are used across infrastructure and construction industry).

Our other products include: (i) Pellets, (ii) Billets, (iii) Sponge Iron, and (iv) Ferro Alloys.

Our manufacturing facilities and our captive power capabilities:

The following illustrates the standard steel-making process:



The various processes that are adopted by our Company to manufacture its end products, are as follows:

Manufacturing of TMT bars, Wire rods, HB Wire, Billets, Pellets and Sponge Iron:

a. *Raw material procurement*

The basic raw materials for our manufacturing facilities are iron ore, coal and dolomite. Please see "*Our Business – Raw Materials*" on page 174 of this DRHP for further details of our raw material procurement arrangements.

b. *Process for upgrading the iron ore content in iron ore, (beneficiation)*

Lower grade of iron ore and smaller particles of iron ore, ("fines"), need to be processed to improve its ferrous content and make it suitable for further processing. Impurities are removed from these iron ore fines, by crushing and grinding the fines, and then removing impurities, from such crushed and ground fines, by magnetic separation followed by floatation. This process is also referred to as "beneficiation". After such beneficiation, the enhanced fines are suitable to be used as raw material for pelletizing.

c. *Pelletizing*

For the process of pelletizing, the enhanced fines are mixed with binding agents and coal and fed to balling discs or drums to produce green pellets of size typically about 9-16mm. The green pellets are then fired in a kiln, so as to convert the fines into compact hard spheres. In order to obtain the optimal characteristics, the pellets are subjected to thermal processing, which involves three stages, namely, drying, burning, and, after-burn cooling, (in a cooling tower). The duration of each stage and the temperature that the pellets are subjected to, greatly influences the quality of the final product.

d. *DRI production process*

Direct reduction refers to processes which reduce iron oxides to metallic iron at temperatures below the melting point of iron. The product of such solid state processes is called direct reduced iron or sponge iron. For the production of sponge iron, a mixture of iron ore, coal and dolomite is fired in a rotary kiln, at temperatures of approximately 850° C - 1050° C. The material discharged from the kiln is taken to a rotary cooler, and the cooled product is separated from byproducts.

e. *Steel making*

Sponge iron, Ferroalloys and other ingredients are fed into, an electric arc furnace, ("**EAF**")/induction furnace ("**IF**"), which uses electrical energy to melt the sponge iron. Carbon, added as a part of the process, reacts with oxygen producing carbon dioxide which bubbles through the mixture creating foamy slag, ("charged material"). The charged material melts at about 1650^{o} C in the EAF/IF and thereafter refining is done by reducing impurities of steel. At the end of the refining stage slag is removed from the EAF/IF. The molten steel from the EAF/IF, is then tapped into a ladle, and taken to the continuous casting machine, ("**CCM**").

f. *Billet formation*

The liquid steel flows from the ladle into a rotary cooler, for cooling, and the cooled product, namely the billet/s, are separated from impurities. Billets coming out of the CCM are cut into required length. As part of our quality control measures, sample billets are used for chemical analysis and visual inspection.

g. *Rolling mill*

The hot billets from CCM are rolled into specific sizes of TMT Bars and/or HB Wire in a completely automatic rolling mill. For the production of TMT Bars, our rolling mill uses technology obtained from Thermex, which gives the TMT Bar extra strength and ductility. In this regard, our Company has been granted the License Rights to use the 'Thermex Quenching System and Technology', from M/s Henninsdorfer Stahl Engineering GmBH, Germany. The Thermex process is done in the following three stages:

i. Quenching - After leaving the last rolling mill stand, the TMT Bar is passed through the Thermex cooling pipe where it is rapidly water quenched. This hardens the surface of the TMT Bar, to an optimum depth, by forming a cooled outer surface, ("marten site"). However, the core remains hot and austenitic.

ii. Self-Tempering - When the bar leaves the quenching box, the core remains hot, as compared to the surface, allowing heat to flow from the core to the surface causing tempering of the outer marten site layer, into a structure called "Tempered Martensite".

iii. Atmospheric Cooling – This takes place on the cooling bed where the non-corrosive core, is transformed into ductile ferrite-pearlite structure. Thus the final structure consists of an optimum combination of strong outer layer (tempered-martensite) with a ductile core (Ferrite-Pearlite). This gives TMT Bars its unique combination of higher strength and ductility. Finally the bars are handled in an Automatic Rake type cooling bed, and cut as per length requirements. The process of bundling and bending is also automated to ensure a clean finish.

Manufacturing of Ferroalloys

Ferroalloy is an alloy of iron, with some elements other than carbon and is used to introduce certain properties into molten metal, usually during the steel manufacturing process. Ferroalloys impart distinctive qualities to steel and cast iron, and serve important functions during iron and steel production cycles. The principal Ferroalloys are those of chromium, manganese, and silicon. Chromium provides corrosion resistance to stainless steels. Manganese is essential to counteract the harmful effects of Sulphur in the production of virtually all steels and cast irons. Silicon is used primarily for the deoxidisation in steel and as an alloying agent in cast iron. Our Company manufactures ferroalloys both for internal consumption as well as for sale in the market. Ferroalloys are sold by our Company to the aluminum industry and the steel manufacturing industry. Our ferroalloy sales on a restated standalone basis for the Financial Year 2017 - 2018, Financial Year 2016 - 2017 and Financial Year 2015 - 2016 was ₹ 550.46 million, ₹ 678.70 million and ₹ 345.58 million respectively. The sale of Ferroalloys contributes 3.10%, 4.87%, 2.75% to our restated standalone revenue, for the Financial Year 2017 - 2018, Financial Year 2016 - 2017 and Financial Year 2015 - 2016, respectively.

A submerged arc furnace, (“**SAF**”), is used for the production of ferroalloys. In SAF, carbon is used as a reducing agent to reduce ore, producing ferroalloy. In the SAF electric power heats the raw materials and provides the energy to reduce the ore to a metallic state.

Our Facilities:

Our Company is an integrated steel manufacturer, with three manufacturing facilities in Raipur, as follows:

	Name and location of facility	Facility Commissioned in	Installed Capacity (as on July 31, 2018)							
			(in MTPA)							(No.'s)
			Pellets	Iron Ore Beneficiation plant	Sponge Iron	Billets and Blooms	Rerolled Steel Products	HB Wire	Silico Manganese	Fly Ash Bricks
1	**Unit I:** Borjhara, Raipur	2005	NA	NA	210,000	129,600	120,000	NA	14,400	20,000,000
2	**Unit II:** Gondawara. Raipur	2002*	NA	NA	NA	105,600	225,000	30,000	NA	6,000,000
3	**Unit III:** Tilda, Raipur	2013	1,200,000	1,320,000	150,000	NA	NA	NA	NA	10,000,000
	Total:		1,200,000	1,320,000	360,000	235,200	345,000	30,000	14,400	36,000,000

Source: Certificate from Er. Shreyansh Agrawal (Chartered Engineer) dated August 1, 2018 with license number AM086382/6.
**Unit II has been upgraded in the Financial Year 2007-2008*

Details of the abovementioned manufacturing facilities (Units), are as follows:

Unit I:
Commissioned in 2005 the unit manufactures TMT bars and HB wires, ferroalloys, billets, sponge iron and fly ash bricks.

Comprises of the following facilities: (a) a sponge iron manufacturing facility; (b) a fly ash production facility; (c) a steel melting facility; (d) ferroalloy manufacturing facility; (e) a TMT Bar manufacturing facility; and, (f) The unit is supported by our in-house captive power generating facilities with an installed capacity of 18MW from WHRB, and 8 MW from biomass. These operating divisions are fully equipped with machineries and plants with high technical specifications such as: two rotary kilns, each having diameter of 4.30 meter and length of 76 meter, steam turbines, sub merge arc furnace, furnace transformers, 80 ton pressing capacity mould, waste heat recovery boilers, biomass based boilers, solar panels, fly ash brick making machines, induction furnace, furnace transformer, hot billet transfer mechanism, and other accessories. The unit is ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 certified.

Unit II:

Commissioned in 2002 and upgraded in Financial Year 2007 - 2008 under the erstwhile Shri Bajrang Metalics and Power Limited, subsidiary of our Company, the unit became a part of our Company as a result of merger between our Company and Shri Bajrang Metalics and Power Limited which was approved through an amalgamation order passed by the High Court of Chhattisgarh in 2011. The unit manufacturers TMT bars, Wire Rods, HB wires, billets and blooms, and fly ash bricks. The unit comprises of steel melting shop, TMT Bar and Wire Rod manufacturing facilities, HB wire manufacturing facilities, a captive thermal power plant of 16 MW, fly ash brick production facilities, crushers, grabbing cranes, mist cooling systems, and other ancillary accessories. The unit is ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 certified and also received recognition from the Ministry of Steel, and the United Nations Development Programme Global Environmental Finance Unit, (“**UNDP-GEF**”), in 2013, for ‘removal of barriers to energy efficiency improvement in steel re-rolling mill sector in India’ and for being a ‘model unit for energy efficiency interventions’.

Unit III:

Commissioned in 2013, the unit manufactures pellets and sponge iron, and produces fly ash bricks and comprises of iron ore beneficiation facility, pelletizing facility, sponge iron production facility, 16MW WHRB captive power generation facility, fly ash brick manufacturing facility, railway sliding, and a captive source of water. Our Company believes that the infrastructure available in Unit III is adequate for our present manufacturing activities as well as our future expansion requirements. This unit is equipped with a pelleting disc, grinding mill, pumps (including slurry pumps), ash handling system, HT motors, klin, kiln cooler, 'tramp iron separator', vibro feeders, DG sets, coal crusher, coal injector, pneumatic cylinders, magnetic separator amongst other machinery and other accessories. This unit converts low grade fines (Fe 55 and higher), into high grade green pellets (Fe 63 or higher), at its beneficiation facility which feeds into the pelletizing facility. Our pelletizing facility utilizes a straight grate technology which decreases the time that is otherwise taken for the production of pellets and hence improves operational efficiencies.

This Unit includes adjacent staff accommodation for senior management, junior management, middle management, and workmen.

Our captive power generating facilities:

The details of our captive power installed capacity are as follows:

	Name and location of facility	Captive power installed capacity (MW)	Generated from
1.	**Unit I:** Borjhara, Raipur	18	waste heat recovery
		8	bio-mass
2.	**Unit II:** Gondawara, Raipur	16	thermal coal
3.	**Unit III:** Tilda, Raipur	16	waste heat recovery

Source: Certificate from Er. Shreyansh Agrawal (Chartered Engineer) dated August 1, 2018 with license number AM086382/6.

Technical and financial collaborations:

Our Company has been granted the license rights to use the 'Thermex Quenching System and Technology', ("**QST**"), from M/s Henninsdorfer Stahl Engineering GmBH, Germany, for Unit I and Unit II. The QST technology involves subjecting the bar to predetermined quantity of high-pressure water after the last rolling mill stand. This treatment converts the bar surface to a hardened structure. The subsequent phase involves cooling at ambient temperature to allow the hot core to temper the surface through thermal exchange. This technology helps our Company to produce high strength TMT Bars. The license to use this technology is renewable from year to year, and is currently valid upto March 31, 2019.

Our Company has no financial collaborations.

Capacity & Capacity Utilization

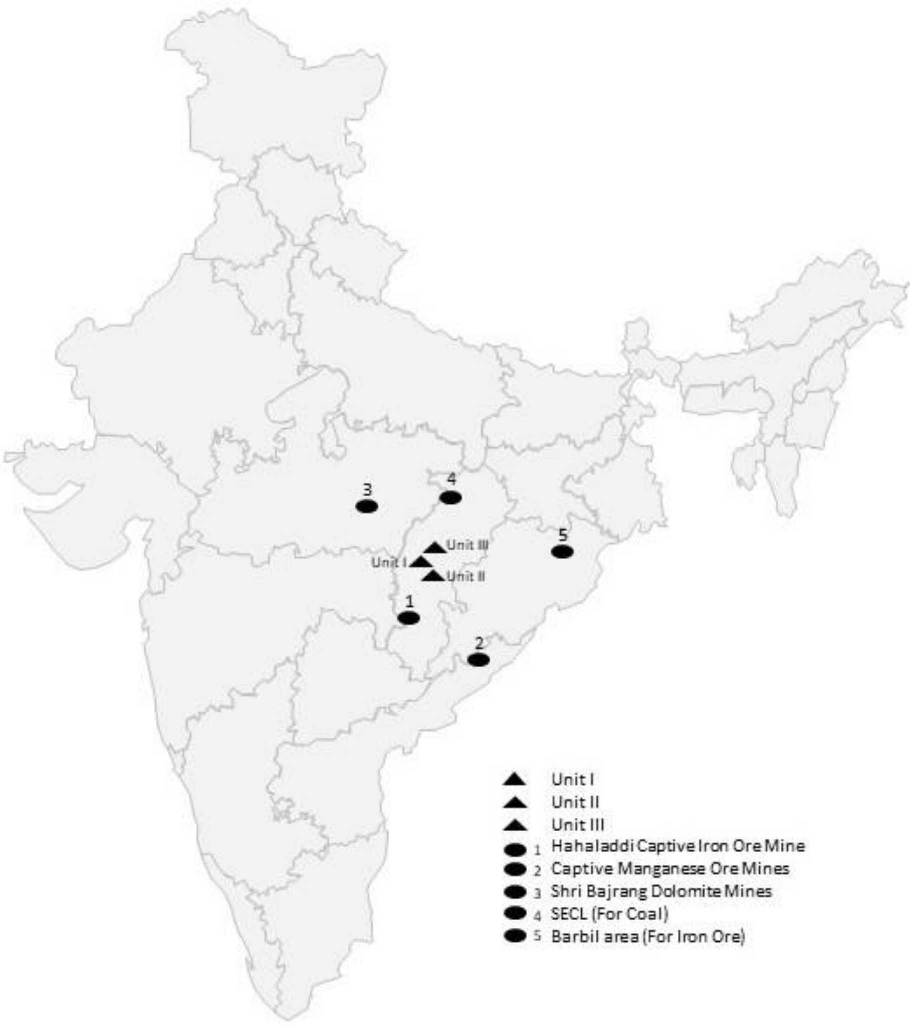
Our aggregate installed capacity, production volumes, and the capacity utilization of each of the products manufactured by our Company, for the last three years, is as follow:

Product	**Unit**	**Installed Capacity**	**Actual Production for the Financial Year**			**Capacity Utilization (%) for the Financial Year**		
			2015-2016	**2016-2017**	**2017-2018**	**2015-2016**	**2016-2017**	**2017-2018**
Unit I								
Sponge iron	MT	210, 000	220,610	225,009	202,484	105.05	107.15	96.42
Power Plant	KW	187,200	164,682	196,058	192,853	87.97	104.73	103.02
Billets and blooms	MT	129,600	91,201	105,630	106,300	70.37	81.50	82.02
Silico manganese	MT	14,400	9,3365,870	13,944	13,295	64.83	96.83	92.33
Rerolled product	MT	120,000	74,566	85,471	93,420	62.14	71.23	77.85
Fly ash bricks	Nos.	20,000,000	9,740,702	9,737,299	8,554,564	48.70	48.69	42.77
Unit II								
Rerolled product	MT	225,000	18,7256	192,112	218226	83.22	85.38	96.98

Product	Unit	Installed Capacity	Actual Production for the Financial Year			Capacity Utilization (%) for the Financial Year		
			2015-2016	2016-2017	2017-2018	2015-2016	2016-2017	2017-2018
Billets and blooms	MT	105,600	68,949	80,202	87,223	65.29	75.95	82.60
H.B. Wire	MT	30,000	13,064	11,377	15,613	43.55	37.92	52.04
Power Plant	KW	126,720	125,864	125,697	129,164	99.32	99.20	101.93
Fly ash bricks	Nos.	6,000,000	4,332,205	4,617,995	4,388,138	72.20	76.97	73.14
Unit III								
Sponge iron	MT	150,000	176,631	171,342	155,569	117.75	114.23	103.71
Pellets	MT	1,200,000	761,468	868,244	995,497	63.46	72.35	82.96
Power Plant	KW	115,200	83,218	71,838	68,185	72.23	62.36	59.19
Fly ash bricks	Nos.	10,000,000	5,608,099	6,206,050	6,785,745	56.08	62.06	67.86

Backward Integration:

Our Company sources raw products from various locations throughout India as better illustrated in the following map:



In an effort to secure our raw material supplies and optimize costs, our Company has entered into various arrangements with respect to various raw materials:

Raw Materials

a. *Iron ore*

Our Company has been allotted iron ore mine at Kanker district, Chhattisgarh state. Our Company has executed a lease agreement dated November 21, 2014, with the Government of Chhattisgarh for leasing of the iron ore mines for a period of thirty years. This ensures uninterrupted supply of basic raw material for production of pellets which in turn are the prime raw materials required for manufacturing of sponge iron.

b. *Coal*

Our Company has executed multiple Fuel Supply Agreements, ("**FSAs**"), with South Eastern Coalfields Limited for the supply of coal. Additionally, as a backup arrangement, our Company has procured coal from local vendors who in turn source the coal from domestic sources as well as imports primarily from South Africa. Our Company believe the FSAs help us source relatively lower cost coal which forms a significant part of our raw material cost.

During the period of 2013 to 2018, our Company has executed twenty three different Fuel Supply Agreements, ("**FSAs**"), with South Eastern Coalfields Limited, a subsidiary of Coal India Limited, ("**Seller**") for the supply of coal.

c. *Manganese Ore*

Our Company has exclusive mining rights in connection with an open-cast manganese ore mine located in Vizianagaram district, in Andhra Pradesh. Our Company has been granted these rights till September 27, 2020. Our Company has an environmental clearance to extract 13,114 tons per annum. Alternatively, our Company can also procure Manganese ore from MOIL Limited having own mines".

d. *Dolomite:*

Our Company purchases dolomite from local markets after analyzing quotes provided by various suppliers.

e. *Limestone:*

Limestone, which acts as catalyst, is required for manufacturing of Fly Ash Bricks and Silico Manganese. Our Company purchases limestone from local markets after analyzing quotes provided by various suppliers.

f. *Bentonite:*

Bentonite Powder is required for Manufacturing of Pellets. Our Company purchase bentonite from local markets after analyzing quotes provided by various suppliers.

Other infrastructure facilities

Water

For Unit-I and Unit-II, 1.50 million cubic meter water is sourced from Kharun river. For Unit-III, our Company has approval from Water Resource Department of the Government of Chhattisgarh, to draw upto 5.40 million cubic meters per year which is sourced from Shivnath river.

Export obligations:

There are no export obligations on our Company.

Sales and distribution:

Our Company has structured sales operations into two segments, namely retail sales, and institutional sales.

Retail Sales

Our Company currently has a retail sales distribution network in four states, namely Chhattisgarh, Madhya Pradesh, Maharashtra, and Orissa. As on July 31, 2018 our Company has 6 distributors with a network of 385 dealers. Our Company has entered into exclusive arrangement with our distributors wherein they have agreed to exclusively sell our TMT bars and H.B. Wires in these four states through network of dealers. The 6 distributors has dealer network as on July 31, 2018 is spread across the various states in the following manner:

State	Number of Dealers
Chhattisgarh	188
Madhya Pradesh	115
Maharashtra	40
Orissa	42
Total	**385**

We, through our distributors, have set various policies for our dealers including regarding rates, discounts, territory, promotions to ensure that the end customer experience across our various dealers is relatively similar. Our direct and frequent contact with our large dealer network helps our Company to stay up to date with changing preferences in the segment which helps us to proactively provide product enhancements and react faster to changes in the end user segment. Our in-house retail sales team comprises of 52 people as on July 31, 2018.

Institutional Sales

Our institutional sales comprises of 94.21% 92.53%, 91.73%, 73.23% and 87.99%, of our restated standalone revenues for the Financial Year 2018, 2017, 2016, 2015 and 2014, respectively. Our Company has a dedicated and experienced in-house marketing team of 11 people to handle our institutional sales as on July 31, 2018. Our institutional sales team focuses on managing relations with our large institutional clients and ensuring that our Company is empanelled with large institutional buyers and that our product portfolio and pricing remains competitive.

Marketing:

Our Company has continuously sought to increase the market share of our products, build brand awareness and recall value for our products and expand our geographical network. Towards these goals, our Company has adopted various marketing strategies, which include marketing through newspapers, media advertisements, banners, hoardings, in-shop promotions and demonstrations and frequent interactions with customers and influencers. The expenditure incurred by our Company in the last three financial years on newspapers and media advertisements, was ₹ 29.20 million; is ₹ 83.30 million; and ₹ 234.20 million in Financial Year 2015 - 2016 , Financial Year 2016 - 2017 and Financial Year 2017 - 2018 respectively. Our sales and marketing efforts are driven by our top management team supported by a team of 63 employees as on July 31, 2018 who exclusively focus on managing our channel distribution and retail sales. Our Company plans to widen our geographical reach by adding more distributors and dealers covering pan India presence. Our Company is utilizing new advertising and publicity tools including social media platforms so as to increase our market presence.

Quality control and Research and Development

Our Company maintains a number of quality management system certificates in line with industry standards, including ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007 for certain of our units. Certain of our products are certified by the Bureau of Indian Standards and our quality assurance department, comprising of 31 people as on July 31, 2018, helps us to monitor the quality of raw materials used by us and the end products produced by us. Robust process and product audit and quality rating are conducted, and quality check parameters are laid down to ensure adherence to defined process and product specifications. Audits for new products are also launched at various stages of production. Our quality assurance department uses chemical and physical testing facilities, like spectrometer, infrared thermometers, Computerised Universal Testing Machine (UTM) to ensure that our end products adhere to our quality policies.

In order to maintain the quality of our raw materials, our Company has set up a research and development division, comprising of 16 professionals experienced in the field of metallurgy. This division, explores ways and means to improve the quality of our raw materials, as well as our manufactured products through monitoring and testing of hydrothermal extraction of metals from fly ash, purification of metal, salt solution obtained from digestion of fly ash, reactive and cooling crystallization of pure metal salts, precipitated silica, zeolite synthesis, and hydrometallurgical/thermal sintered dephosphorization of iron ore.

Safety, Health and Environment

Unit I and Unit II are OHSAS 18001:2007 certified in connection with occupational, health and safety hazard systems for its employees. Our Company will continue to comply with applicable health and safety regulations and other requirements in our operations and have adopted safety, health and environment procedures that are aimed at complying with statutory and other requirements.

Unit I and Unit II are ISO 14001:2015 certified in connection with environmental best practices.

Our Company is committed to ensure a safe and healthy workplace for our employees and minimise our potential impact on the environment. Our Company operates in compliance with all relevant environmental legislation and will strive to use commercially viable pollution prevention and environmental best practices in activities carried on by our Company. Our Company is committed to: (i) promoting environmental awareness among our employees and encourage them to work in an environmentally responsible manner; (ii) reducing waste through re-use and recycling and by purchasing recycled, recyclable or re-furbished products and materials where these alternatives are available; economical and suitable; (iii) promoting efficient use of materials and resources throughout our facilities including water, electricity, raw materials and other resources, particularly those that are non-renewable; and (iv) purchasing and using environmentally responsible products.

Our Unit II received recognition from the Ministry of Steel, GoI, and the United Nations Development Programme Global Environmental Finance Unit, in 2013, for 'removal of barriers to energy efficiency improvement in steel re-rolling mill sector in India' and for being a 'model unit for energy efficiency interventions'. Further, our Company has received the CII Energy ENCON Awards for 2016-2017. Our Company has also received various other awards such as 'Sustainable Energy Development Award in 2016', 'Energy Efficiency Award 2016' and 'Energy Efficiency Award 2015. For further details, please refer to "*History and Certain Corporate Matter*" on page 185.

Information Technology (IT):

Our IT systems are vital to our business and our Company has adopted IT procedures to assist us in our operations. Our Company has implemented ERP system in the following areas of our operations namely, financial and accounting, sales, purchase, human resource management and inventory management. Additionally, our IT team has developed the 'Goel TMT Mobile App', which provides timely updates to our customers on order confirmations, dispatch details, outstanding dues etc.

Insurance:

Our Company maintains a number of insurance policies which are in line with industry practices. Our Company maintains comprehensive fire industrial all risk insurance cover for the majority of our assets which includes material damage and business interruptions due to fire, accidents and natural disasters, (including earthquakes), as well as losses associated with the breakdown of equipment and machinery. Our Company also maintains marine cargo policy for goods in transit, group health policy, workmen's compensation policy for our employees and workmen, terrorism cover for our manganese ore mine. Our insurance policies have standard exclusions. Our insurance coverage and choice of policies or the nature of risks covered are not subjected to any independent third-party review. Our Company believes that our insurance policies and coverage is sufficient for our business and operational needs as per industry standards.

Human Resources:

As on July 31, 2018, our Company had a total work force of 3254 individuals comprising of 2,823 employees and 431 individuals engaged by us on a contractual basis. The following table illustrates the break-up of our work force on the basis of the unit in which they are primarily employed:

Facility / Unit	Number of Employees	Number of individuals engaged on a contractual basis
Unit I	1,015	140
Unit II	690	104
Unit III	1,118	187
Total	2,823	431

Our Company also engages contract workers from time to time, through independent contractors for specific job contracts. Our Company is registered as a principal employer under the Contract Labour Regulation (Abolition) Act, 1960.

Our Subsidiaries IAHEPL and SBEPL has employed 114 and 2 full time employees respectively.

Our employees are not unionized.

Our Company regularly conducts: (1) training for fire and safety drills, for our employees; (2) technical training for our engineers and workers; (3) HR training to workers pertaining to HR Policies, ESIC & EPF benefits; and (4) soft skill training sessions for our worker and engineers.

Our Company are focused on the welfare of our employees and have taken various initiatives in this regard. Our Company has established health centers at each of our Units, which deal with day to day health problems, minor injuries and periodic check-ups. For certain of our employees, Our Company also provide free accommodation, free transportation facilities, canteen facilities, sports facilities for recreation, an interest-free financial assistance policy, an annual leave policy, provident fund, pension and group gratuity schemes. Our workers are also covered under specific accident insurance schemes, which provide cover in the event of injuries or death sustained in course of employment.

Corporate Structure of the Goel Group of companies

Our Company has two subsidiaries and one joint venture company as detailed below:

Subsidiaries:

IA Hydro Energy Private Limited

IA Hydro Energy Private Limited which is our subsidiary company has entered into an implementation agreement on May 15, 2017, for 40 years, with the Government of Himachal Pradesh, for setting up a 36 MW Hydro power plant. Our Company owns 90.46% stake in IA Hydro Energy Private Limited. This hydro plant is located in the Chammba district of Himachal Pradesh. The Unit I & II and Unit-III of hydro power project was commissioned in February 2017 and July 2017 respectively. The unique aspect of this project, is that the project is powered by a perennial river, which is fed by the rains during the rainy season and is fed by melting glaciers during the summer season. IAHEPL has entered into Power Purchase Agreement ("**PPA**") dated May 21, 2018 with Haryana Power Purchase Centre for sale of power. The PPA is submitted to Haryana Electricity Regulatory Commission on May 22, 2018 for requisite approval as per section 86(1) of the Electricity Act, 2003.

Shri Bajrang Energy Private Limited

Shri Bajrang Energy Private Limited is a subsidiary company of our Company. Shri Bajrang Energy Private Limited was incorporated as a public company under the Companies Act, 1956 on December 20, 2007, and received its certificate for commencement of business on February 15, 2008. Shri Bajrang Energy Private Limited is engaged in the business of Electric power generation, transmission and distribution and to carry on business of retail trading.

For further details please refer to '*Our Subsidiaries'* on page 192

Joint Venture:

Our Company is one of the joint venture partners in Chhattisgarh Captive Coal Mining Limited and our Company owns 19.75% stake in this joint venture. The other joint venture partners are: **(i)** Godawari Power and Ispat Limited, (**"GPIL"**); **(ii)** Ind Energy Limited, (**"IEL"**); **(iii)** Shree Nakoda Ispat Limited, (**"SNIL"**); and, **(iv)** Vandana Global Limited (**"VGL"**). However, CCCML is not operational currently.

The Ministry of Coal, Government of India, had vide their letter No. 13016 / 3 4/2005 - CA - I dated January 13, 2006 granted allocation of coal blocks of Nakia I and II, Mandanpur (North) and Madanpur (South) ("the Coal Block") jointly to GPIL, SNIL, VGL, ISL and SBPIL for working through a Joint Venture Company ("JVC") to meet the coal requirement of all the aforesaid companies, as per the allocation letter. The parties entered into a Joint Venture Agreement on January 27, 2006, ("**JVA**"), for development and operation of Coal Blocks. This JVA was terminated vide Deed of Termination dated January 27, 2006 on account of certain anomalies in allocated quantities of the coal amongst the parties. Subsequently, The Ministry of Coal, Government of India, vide their letter No.13016/34/2005- CA-1 dated May 31, 2007, accepted the revised proposal of the JVC and revised the quantities of coal allocated to each of the parties as per the request of the parties. Thus, our Company, GPIL, IEL, SNIL and VGL executed a shareholder's agreement dated August 6, 2007, to develop the allocated Coal Blocks. However, the Coal Block has been de-allocated by the order of the Supreme Court.

Strategic Partners:

Our Company does not have any strategic partners**.**

Competition:

India is our primary market and our Company faces competition in the steel market from domestic as well as international producers. Due to the commodity nature of most of our product categories, as well as our raw material purchases, competition in these markets is based primarily on demand. As a result, to remain competitive in our market, our Company must continuously strive to reduce our operating costs and improve our operating efficiencies. Further, our Company believes that our well recognized brands also help us in competing effectively in the TMT Bar and HB Wire categories.

As our product categories are voluminuous in nature, our Company believes that the relevant competition is from companies having manufacturing presence in central and western India. Our competition consists of producers of long products including JSW Steel Limited, Jindal Steel & Power Limited, Prakash Industries Limited, Godawari Power & Ispat Limited, Sarda Energy & Mineral Limited, Kamadhenu Limited, Tata Sponge Iron Limited.

Corporate Social Responsibility, ("CSR")

Our Company has adopted a CSR policy in compliance with the requirements of the Companies Act, 2013, and the Companies (Corporate Social Responsibility) Rules, 2014, as notified by the Central Government. Our vision on CSR is to pursue a corporate strategy that enables shareholder value enhancement and societal value creation in a mutually reinforcing and synergistic manner. Towards that end, our Company has identified promotion of education, environment protection and energy conservation, rural development, healthcare, allieviation of poverty and women empowerment as our thrust areas for CSR.

Awards and accolades

Some of the key awards that have been received by our Company are as follows:

1. CII Energy ENCON Awards as second runner-up in the large scale category of Energy Conservation Awards, for the year 2016-2017.

2. ‘Sustainable Energy Development Award – 2016’, ‘Energy Efficiency Award 2016’ and ‘Energy Efficiency Award 2015’ which were jointly granted to us by, (a) the Chhattisgarh State Renewal Energy Development Agency; (b) National Institute of Technology, Raipur; and, (c) The New Management Association of Chhattisgarh, in the ‘Iron and Steel – Sponge Iron Category’;
3. Second prize for “The National Energy Conservation Award - 2014” in the steel re-rolling sector awarded by the Ministry of Power, GoI;
4. For Unit II, our Company has in 2013, received recognition from the Ministry of Steel, GoI, and the United Nations Development Programme Global Environmental Finance Unit, for ‘removal of barriers to energy efficiency improvement in steel re-rolling mill sector in India’ and for being a ‘model unit for energy efficiency interventions’. As part of this recognition, our Company also received a grant of ₹ 4.25 million.

Intellectual Property/ Trademarks:

Our Company has registered our trademarks, namely ‘Goel TMT’ brand, and Goel TMT WireX on July 27, 2013, (valid from Aug 19, 2010) and August 19, 2010 respectively. The ‘Goel TMT’ trademark and Goel TMT WireX, were registered under Class 17 under Number 201124 and Number 2011128 respectively. The registration of trademark ‘Goel TMT’ was obtained by our erstwhile subsidiary, namely Shri Bajrang Metallics and Power Limited, which was merged with our Company in 2011. Pursuant to the said merger, the rights to the said trademark vested with our Company. The logo , is currently used by our Company, for which we have already made the necessary application. For further details in relation to our trademarks, please see “Risk Factor - *Our Company has made an application to register the logo appearing on the cover page of this Draft Red Herring Prospectus*” on page 46.

Immoveable Properties:

The following table provides brief details of the main properties presently owned or leased by us as on March 31, 2018.

Property	**Leasehold/Freehold**	**Total land area (in hectares)**
Registered Office		
Borjhara, Raipur[#]	(1) Freehold and Leasehold. Our Company has executed two lease deeds dated March 26, 2004 and June 08, 2007 for a period of 99 years commencing from the date of execution.	Freehold land – 219.50 Leasehold land - 12.47
Manufacturing facilities		
- Borjhara, Raipur	Freehold and Leasehold. Our Company has executed two lease deeds dated March 26, 2004 and June 08, 2007 for a period of 99 years commencing from the date of execution.	Freehold land - 219.50 Leasehold land - 12.47
- Gondwara, Raipur	Freehold*	Freehold land - 17.29
- Tilda, Raipur	Freehold and Leasehold. Lease is for a period of 99 years commencing from February 05, 2011	Freehold land – 184.21 Leasehold land – 19.61

* *Certain parcels of our freehold land admeasuring 13.94 hectares at Gondwara, Raipur are acquired from our Group Company, Shri Bajrang Ispat and Plywood Limited.*

The premises used for our registered office is part of the manufacturing facilities at Borjhara.

In addition to the above our Company owns four residential flats and four residential bungalows in Raipur and a commercial office at One BKC, Mumbai. Our Subsidiaries IAHEPL and SBEPL owns/ has taken on lease the land on which its manufacturing facilities are located.

REGULATIONS AND POLICIES

The following description is a summary of certain sector specific laws currently in force in India, which are applicable to our Company. The information detailed in this section has been obtained from publications available in the public domain. The regulations set out below are not exhaustive, they are only intended to provide general information to the investors, and they are neither designed nor intended to be a substitute for professional legal advice. The statement below are based on the current provisions of Indian Law, and the judicial and administrative interpretation thereof, which are subject to change or modifications by subsequent legislative, regulatory, administrative or judicial decisions.

The National Steel Policy 2017:

The New Steel Policy, 2017, aspires to achieve a nation-wide steel-making capacity of 300MT by 2030. This would translate into an additional investment of ₹ 10 lakh Crore by 2030-31. The New Steel Policy seeks to increase consumption of steel in the infrastructure, automobiles and housing sectors. The New Steel Policy seeks to increase per capita steel consumption to the level of 160 Kgs by 2030, from existing level of around 60 Kgs. The New Steel Policy recognizes the potential of Micro, Small and Medium Enterprises, ("**MSMEs**"), in the steel sector. The New Steel Policy stipulates that adoption of energy efficient technologies in the MSME steel sector, will be encouraged to improve the overall productivity and to reduce energy consumption. The Steel Ministry will facilitate research and development in the steel sector, through the establishment of the Steel Research and Technology Mission of India ("**SRTMI**"). The initiative is aimed at spearheading research and development of national importance in the iron and steel sectors, by utilizing tripartite synergies amongst industry, national research and development laboratories, and academic institutes. The Steel Ministry through policy measures, seeks to ensure the availability of raw materials like Iron ore, coking coal, non-coking coal, natural gas etc. at competitive rates. The National Steel Policy-2017, seeks to align production with the anticipated pace of growth in consumption.

The Policy on Preference to Domestically Manufactured Iron and Steel Products, ("DMI&SP"):

The Government has approved a policy for providing preference to domestically manufactured iron and steel products in government procurement, (government tenders), and has notified the same in May 2017. The DMI&SP policy aims at promoting growth and development of the domestic steel Industry under the "Make in India" banner, by providing a level playing field for domestic manufacturers, and by discouraging inefficient manufacturing practices. The DMI&SP policy mandates that there must be a domestic value addition of 15% on imported steel, for it to be eligible for use in big ticket public procurement requirements in steel. The DMI&SP policy is applicable to all projects and procurements, where the aggregated estimated value of the "iron & steel products" is either INR 500 million or more.

The DMI&SP policy also encourages downstream companies to set up capacities for steel products which were otherwise getting directly imported in the past, so as to minimize the outflow of foreign exchange.

The Mines and Minerals (Development and Regulations) Act, 1957:

The Mines and Minerals (Development and Regulations) Act, 1957, as amended, ("**MMDR Act**"), was enacted to provide for the development and regulation of mines and minerals, under the control of the Union of India. The MMDR Act lays down the substantive law pertaining to the grant, renewal and termination of reconnaissance, mining and prospecting licenses, and mining leases. The Mineral Concession Rules, 1960, outline the procedures for obtaining a prospecting license or a mining lease, as well as the terms and conditions of such licenses and the model form in which they are to be issued. The Central Government has also framed the Mineral Conservation and Development Rules, 1988, that lay down guidelines for ensuring mining is carried out in a scientific and environmentally friendly manner.

The National Mineral Policy:

The Central Government announced the National Mineral Policy in 1993, which was modified in 2008, to sustain and develop mineral resources, so as to ensure their adequate supply for the present needs and future requirements of India, in a manner which will minimize adverse effects of mineral development on forests, the environment, and the ecosystem, through appropriate protective measures.

The Coal Mines (Special Provisions) Act, 2015:

The Coal Mines (Special Provisions) Act 2015, provides for allocation of coal mines and vesting of the right, title and interest in and over the land, and mine infrastructure, together with mining leases, to successful bidders and allottees, with a view to ensure continuity in coal mining operations and production of coal, and for promoting optimum utilisation of coal resources consistent with the requirement of India.

The Electricity Act, 2003, ("Electricity Act"):

The Electricity Act regulates and governs the generation, transmission and distribution of electricity in India, including by specification of safety standards in relation to the same. The Electricity Act also controls the transmission and use of electricity, including through specifying action to be taken in relation to any electric line or appliance under the control of a consumer, for the purpose of eliminating or reducing the risk of personal injury and damage to property. Pursuant to the Electricity Act, every licensee must supply electricity only through the installation of a correct meter in accordance with the regulations as prescribed by the Central Electricity Authority. The Central and state Electricity Regulatory Commissions, are empowered to adjudicate upon matters relating to any non-compliance in this regard. Additionally, the Electricity Act levies penalties, including imprisonment, for tampering with electricity meters and for the use of unauthorized electricity meters.

The Electricity Rules, 2005:

The Electricity Rules, 2005, as amended, were framed under the Electricity Act. These Rules prescribe the requirements that govern the activities of captive generating plants and generating stations. The authorities constituted under these Rules may give appropriate directions for maintaining transmission systems.

The Central Goods and Services Act, 2017:

The Central Goods and Service Tax Act, 2017, ("**GST Act**"), provides for the levy of a comprehensive tax on manufacture, sale and consumption of goods and service at a national level. The GST Act, has been passed to integrate all indirect taxes levied on goods and services by the Central and State governments in India. The GST Act levies a two-rate structure, namely: (I) a lower rate for necessary items and items of basic importance; and, (ii) a standard rate for goods in general. The GST Act also provides for a special rate for precious metals and a list of exempted items.

The Iron Ore Mines, Manganese Ore Mines, and Chrome Ore Mines, Labour Welfare Fund Act, 1976, ("MLWF Act"):

The MLWF Act, seeks to promote the welfare of persons employed in iron/manganese/chrome ore mines. The MLWF Act also provides for the creation of a Central Government Fund, ("**Fund**"), from the proceeds of customs and excise duties as payable pursuant to the Iron Ore Mines, Manganese Ore Mines and Chrome Ore Mines Labour Welfare Cess Act, 1976. Further, under the MLWF Act, the Central Government is empowered to constitute Advisory Committees, in each of the States that produces iron/manganese/chrome ore, which committees advise the Central Government on inter-alia, matters pertaining to the administration and application of the said Fund.

The Limestone and Dolomite Mines Labour Welfare Fund Act, 1972, ("LDMLWF Act"):

The LDMLWF Act provides for the levy and collection of a cess on limestone and dolomite, for the financing of activities to promote the welfare of persons employed in the limestone and dolomite mines. The LDMLWF Act also provides for the creation of a Limestone and Dolomite Labour Welfare Fund which shall be applied to promote the welfare of persons employed in limestone or dolomite mines.

Environmental laws:

The Environment Protection Act, 1986 (the "Environment Protection Act"):

The Environment Protection Act was enacted to act as an "umbrella" legislation, designed to provide a frame work for coordination of the activities of various central and state authorities as established under previous laws. The Environment Protection Act authorises the Central Government to protect the environment by controlling and reducing pollution.

The Air (Prevention and Control of Pollution) Act, 1981, ("Air Act"):

The Air Act was enacted and designed for the prevention, control, and abatement, of air pollution, and establishes Central and State pollution control boards for the aforesaid purposes. In accordance with the provisions of the Air Act, any individual, industry or institution responsible for emitting smoke or gases by way of use of fuel or chemical reactions, must apply in a prescribed form and obtain consent from the state pollution control board prior to commencing any such activity.

The Water (Prevention and Control of Pollution) Act, 1974, ("Water Act"), and, The Water (Prevention and Control of Pollution) Cess Act, 1977, ("Water Cess Act"):

The Water Act was enacted to provide for the prevention and control of water pollution. Further, the Water Act also provides for the establishment of boards with a view to carrying out the aforesaid purpose, and for conferring on and assigning to such boards, the powers and functions relating thereto. In addition, the Water Cess Act was enacted to provide for the levy and collection of a cess on water consumed by persons carrying on certain industrial activities, and by local authorities, with a view to augment the resources of the aforementioned central board and state boards, for the prevention and control of water pollution.

Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 (the "Hazardous Waste Rules"):

The objective of the Hazardous Waste Rules, is inter-alia, to monitor and control, the collection, reception, treatment and storage of hazardous waste. The Hazardous Waste Rules prescribes that every person who is engaged in generation, treatment, processing, package, storage, transportation, use, collection, destruction, conversion, recycling, offering for sale, import, export, transfer or the like, of the hazardous and other wastes, must obtain an authorisation from the relevant state pollution control board for conducting such activities.

The Public Liability Insurance Act, 1991, ("PLI Act"):

The PLI Act imposes liability on the owner or controller, of hazardous substances, for any damage arising out of an accident involving such hazardous substances. The government by way of a notification has enumerated a list of hazardous substances. The owner of such hazardous substances is also required to obtain an insurance policy, insuring against liability under the PLI Act. The Rules made under the PLI Act, provides details of contributions that have to be made towards the environmental relief fund in connection with the handling of such hazardous substances.

The Manufacture, Storage and Import of Hazardous Chemical Rules, 1989, ("Hazardous Chemical Rules"):

The Hazardous Chemical Rules, as amended, were framed under the Environment Protection Act, 1986. The Hazardous Chemical Rules apply to workplaces in which certain hazardous chemicals are manufactured or stored. An "occupier" who has control of an industrial activity, is required to provide evidence to show that it has identified the major accident hazards, and has taken adequate steps to prevent such major accidents, as well as to limit their consequences to persons and the environment. Further, the said occupier is required to provide to persons working on the site, the information, training and equipment, (including antidotes), that are necessary for ensuring their safety. Under the Hazardous Chemical Rules, the said occupier is required to submit safety reports as specified in Schedule 8 therein. Among other things, the said occupier is required to prepare and keep updated on site, emergency plan as per Schedule 11 of the Hazardous Chemical Rules, detailing how a major accident will be dealt with on site.

The Customs Act, 1962 and the Customs Tariff Act, 1975

Imports and the taxes imposed on them are predominantly covered within the ambit of the Customs Act, 1962, as amended and the Customs Tariff Act, 1975, as amended (together, the "Custom Regulations"). While, the Customs Act, 1962 classifies and segregates various goods in several categories, the Customs Tariff Act, 1975 determines the rate of the duty, which is to be imposed on importing a particular good. Customs Tariff Act, 1975 also provides for Anti-dumping measures. Anti-dumping and anti-subsidies & countervailing measures in India are administered by the Directorate General of Anti-Dumping and Allied Duties (DGAD) functioning in the Dept. of Commerce in the Ministry of Commerce and Industry and the same is headed by the "Designated Authority". The Designated Authority's function, however, is only to conduct the anti-dumping/anti-subsidy & countervailing duty investigation and make recommendation to the Government for imposition of anti-dumping or anti-subsidy measures. Such duty is finally imposed/levied by a Notification of the Ministry of Finance. Thus, while the Department of Commerce recommends the anti-dumping duty, it is the Ministry of Finance, which levies such duty.

Industrial and labour laws:

Our Company is subject to various labour and industrial laws relating to safety, protection, working conditions, employment terms, and welfare of labourers and/or employees.

The Factories Act, 1948, ("Factories Act"):

The Factories Act defines a "factory" as any premises which employs ten or more workers, and in which any manufacturing process is carried on, with the aid of power, and, any premises where there are at least twenty workers even though there is no electrically aided manufacturing process being carried on. Each State Government has rules in respect of the prior submission of plans and their approval, in connection with the establishment, registration, and licensing of factories.

The Factories Act provides, that an occupier of a factory, (i.e. the person who has ultimate control over the affairs of the factory, and in the case of a company, any one of the directors), must ensure the health, safety and welfare of all workers. There is a prohibition on employing children below the age of fourteen years in any factory. The occupier and the manager of a factory may be punished in accordance with the Factories Act for different offences in case of contravention of any of the provisions of the Factories Act, and in case of a continuing contravention after conviction, an additional fine for each day of contravention may be levied.

Other labour laws:

In respect of our manufacturing facilities, we use the services of certain licensed contractors who in turn employ contract labour, whose number exceeds 20 (twenty), in respect of certain facilities. Accordingly, we are regulated by the provisions of the Contract Labour (Regulation and Abolition) Act, 1970, as amended (the "**CLRA Act**"), and the Rules framed thereunder, which requires us to be registered as a principal employer and prescribes certain obligations with respect to welfare and health of contract labour. The CLRA Act imposes certain obligations on the contractor, in relation to establishment of canteens, rest rooms, drinking water, washing facilities, first aid, other facilities and the payment of wages. In the event the contractor fails to provide these amenities, the principal employer is under an obligation to provide these facilities within a prescribed time period. Penalties, including both fines and imprisonment, may be levied for contravention of the provisions of the CLRA Act.

The Industrial Disputes Act, 1947, as amended, provides for statutory mechanism of settlement of all industrial disputes, a term which primarily refers to a dispute or difference between employers and workmen, concerning the relevant terms of employment, or working conditions.

The Workmen's Compensation Act, 1923, ("**Workmen's Compensation Act**"), aims at providing financial protection to workmen and their dependents, in case of accidental injury, by means of payment of compensation by the relevant employers. The said compensation is also payable for some occupational diseases contracted by workmen during the course of their employment. The Employee's Compensation (Amendment) Act, 2017, which is a further amendment to the Workmen's Compensation Act, provides that it is the employer's responsibility and duty to inform an employee of his rights, and also scraps the provision that allowed for withholding of certain payments by the employees during an appeal.

Our Company is subject to other laws concerning condition of working, welfare benefits etc., of our labourers and employees, such as the Apprentices Act, 1961, the Child Labour (Protection Regulation) Act, 1986, the Employees (Provident Fund and Miscellaneous Provisions) Act, 1952, the Employees State Insurance Act, 1948, the Equal Remuneration Act, 1976, the Industrial Employment (Standing Orders) Act, 1946, the Interstate Migrant Workmen Act, 1979, the Maternity Benefit Act, 1961, the Minimum Wages Act, 1948, the Payment of Bonus Act, 1965, the Payment of Gratuity Act, 1972, the Payment of Wages Act, 1936, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and the Trade Unions Act, 1926.

Intellectual Property Laws:

Certain laws relating to intellectual property rights such as, trademark protection under the Trade Marks Act, 1999, product patent protection under the Patents Act, 1970, copyright protection under the Copyright Act, 1957, and design protection under the Designs Act, 2000 are applicable to us.

The Trade Marks Act, 1999, ("Trade Marks Act"):

The Trade Marks Act, which came into force on December 30, 1999, along with the rules and regulations made thereunder, govern the law pertaining to trade marks in India. A trade mark is essentially any mark capable of being represented graphically, which distinguishes goods or services of one person from those of others, and includes a device, brand, heading, label, ticket, name, signature, word, letter, numeral, shape of goods, packaging or combination of colours, or any combination thereof. In India, trademarks enjoy protection under both statutory and common law. Registration of a trade mark grants the owner a right to exclusively use the trade mark as a mark of goods and services and prevents the fraudulent use of marks in India.

The Trade Marks Act permits the registration of trade marks for goods and services. Certification trademarks and collective marks can also be registered under the Trade Marks Act. The Registrar of Trade Marks is the authority responsible for, among other things, registration of trade marks, settling opposition proceedings and rectification of the register of trade marks. The Trade Marks (Amendment) Act, 2010, has been enacted to cover Indian nationals as well as foreign nationals to secure simultaneous protection of trade marks in other countries. The Trade Marks (Amendment) Rules, 2013, were enacted to give effect to the Trade Mark (Amendment) Act, 2010.

The Patents Act, 1970, ("Patents Act"):

The patent regime in India is governed by the Patents Act, and the rules and regulations prescribed thereunder. Pursuant to the Patents (Amendment) Act, 2005, and the Agreement on Trade-Related Aspects of Intellectual Property Rights, which came into effect January 1, 1995, product patent regime with a protection period of 20 years became applicable in India. The patent regime protects inventions through patents. The amended Patents Act defines an "inventive step" to mean a feature of an invention that involves a technical advance, as compared to the existing knowledge. Any person claiming to be the true and first inventor of the invention, or the assignee of the true and first inventor, or the legal representative of any deceased person who was entitled to make an application immediately before death, may apply for a patent for an invention. In addition, India is a party to international intellectual property related instruments including the Patent Co-operation Treaty, 1970.

Other Indian laws:

In addition to the above, we are also governed by the provisions of the Companies Act and rules framed thereunder, relevant central and state tax laws, foreign exchange and investment laws, foreign trade laws, and other applicable laws and regulations as prescribed by the Central Government and State Governments.

HISTORY AND CERTAIN CORPORATE MATTERS

Incorporation

Our Company was incorporated on July 25, 2002 at Gwalior as a public limited company under the Companies Act, 1956 pursuant to a certificate of incorporation issued by the Registrar of Companies, Madhya Pradesh & Chhattisgarh. Our Company received the certificate for commencement of business dated February 5, 2004, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh. Pursuant to the Scheme between our Company and SBMPL, a certificate of registration of order of high court on scheme of amalgamation of companies dated December 7, 2011 was issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh.

Number of Shareholders

As on the date of this Draft Red Herring Prospectus, our Company has forty three shareholders.

Changes in the Registered Office

The details of changes in the registered office of our Company since incorporation are set forth below:

Date of change	Details of the address of registered office	Reason for change
April 2, 2004	Registered office of our Company was changed from Village Gondwara, district Raipur – 493221 to 522/C, Urla Industrial Area, Raipur-493221, Chhattisgarh	Administrative convenience.
June 20, 2006	Registered office of our Company was changed from 522/C, Urla Industrial Area, Raipur-493221, Chhattisgarh to Village Borjhara, Guna Road, Urla Growth Center, Raipur- 493221, Chhattisgarh	Administrative convenience.

Note: Address of Registered office of our Company was corrected from Village Borjhara, Guna Road, Urla Growth Center, Raipur- 493221, Chhattisgarh to Village Borjhara, Guma Road, Urla Growth Center, Raipur- 493221, Chhattisgarh on March 23, 2017

Main Objects of our Company

The main objects contained in the Memorandum of Association are as follows:

1. *To carry on in India or elsewhere the business as manufacturers, producers, processors, re-rollers converters, consultants, job workers, dealers, stockiest, distributors, agents, brokers, importers, exporters of all kinds of Iron and steel products-Ferrous and non-Ferrous metals their alloys and products including aluminum, brass, tin, nickel, raw steel, mild steel, carbon steel, alloy steel, special steel, spring steel; wrought iron, stainless steel, pig iron, sponge iron, Ferro alloys, nickel alloy, silicon alloy, miners, smelters or any combination thereof and to set up steel furnace, arc furnace, induction furnace and continuous casting and hot and cold rolling mill plants for producing ferrous and non-ferrous metals, alloy steels, ingots, billets blooms, and all kinds and all sizes of iron steel re-rolled sections i.e. flats, bars, beems, angles, rounds, squires, rails, joists, channel, slabs, bright bars, shafting, hexagons, octagons, structures, sections, strips, sheets, plates, rods, deformed bars, plain and cold twisted bars, TMT bars and shafting, wire and wires products, nuts, bolts, nails, tools, and types of hardware items and to do all kinds of foundry works.*

2. *To manufacture in India and /or abroad, produce, assemble, process, take on lease and other wise steel or traffic steel, alloy steel, cast iron, alloyed cast iron, steel forgings, sponge iron, alloyed cast pig iron, hardware brass, copper, lead, zinc, mica, and aluminum materials and its scrap or by products and to carry on business as Re-rolling mill, rolling mill, extrusion mill, foundry proprietors and mine owners and to buy sell, extract, prepare for market, manipulate, import and export all kinds of steel, cast iron, alloyed cast iron, sponge iron, iron scrap, pig iron, Ferro alloys, hardware, brass copper, lead zinc, and mica and aluminium material, circles and utensils.*

3. *To carry on the trade or business of steel melters, fabricators, steel converters, furniture makers, iron masters, miners, smelters, engineers, wire drawing, tin plate makers, iron founders and items like strips, foils, tapes, wires, wire spring patta, rods, plates and any other sections, shapers or forms.*

4. *To carry on in India and /or abroad the business to produce, generate process, transform, formulate,*

buy, sell or in any way deal in, acquire, store, pack, transport, distribute dispose off, utilize Electrical Energy, Thermal Energy, Bio-Energy, Solar Energy, Hydro Power, Bio gas Coal Gas, Natural Gas, Hydrogen Gas, Steam Water Gas, Methane Gas, Petroleum Gas, RLH Gas, and fuel gases of all or any other kinds and to convert/or to otherwise deal with or dispose off the generated bye products, wastes, effluents and emissions into saleable materials like coke, Ash, Bricks, Char, Briquettes, Charcoal, Cinders, Tar, Carbolic Acids, Gypsum and other Chemicals or distilled products.

5. *To carry on the business of manufacturers, fabricators, processors, growers, makers, importers, exporters buyers, sellers, suppliers, stockiest, agents, merchants, distributors and concessionaires of and dealers in commodities of all or any drugs medicines, herbals, medicinal plants and all types of mixtures, powders, tablets, capsules, injections, oils, compounds, creams, soaps, scents, glycerine, detergents, glue gelatin, lotions, toilet goods, piedmonts and all kinds of cosmetics, forest products and medicinal preparation required or used for beauty and personal hygiene or in allopathic ayurvedic, homeopathic uniani or natural care method of orthopaedic and stores including prophylactics,*

6. *To carry on the business of Manufacturers, developers, buyers, sellers, traders, importers, exporters, processor, commission agents, distributors, dealers, relabellers re-packers and representatives in any legal form for all kinds of food and beverages including but not limited to fruits, vegetables, confectionery, infant nutrition, clinical nutrition, performance nutrition, cereals, coffee, tea, wheat, flour, food grains, pulses, cereals, rice, spices, sugar, sugar products, vegetable ghee, edible oil, cooking oil, mineral oil, cocoa based and other food products, uses and packs of consumer food items, their by-products. ingredients, derivatives, residues, including foods and vegetables, packed foods, powders, pastes, liquids, drinks, beverages, juices, jams, jelly, murabbas, jaggery, squashes, pickles, sausages, concentrates, extracts, essences, flavours, syrups, sarbats, flavoured drinks, cream, cheese, butter, toffees. fun foods, breakfast foods, Ready to Serve Food(RTS), dietic products, strained baby foods, instant foods, cereal products, table delicacies, Ayurvedic Health Boosters like Chawanprash, Health Drinks and all other items whether natural, artificial or synthetic. and to establish Industrial Unit(s) for manufacturing of food and beverages.*

7. *To carry on the business as manufacturers, processors, Traders of and dealers in dairy, farm, and garden produce of all kinds, such as milk, cream, butter, ghee, cheese, condensed milk, milk powder, malt products, milk foods and milk preparations of all description, vegetables and fruits of all kinds and business of milling of grains by taking on lease, hiring, purchasing, erecting, or otherwise acquiring rice mills, husking mills, grinding mills, cleaning, grading, polishing of all kinds of pulses, rice, spices, and other food grains and cereals in any or all its branches as would be required for effective discharge of these objects.*

Amendments to our Memorandum of Association

Set out below are the amendments to our Memorandum of Association since the incorporation of our Company.

Date of Shareholders' Resolution	Particulars
February 03, 2004	Amendment to Clause V of our MoA pursuant to an increase in the authorized share capital of our Company from ₹ 2,500,000/- divided into 250,000 Equity Shares of ₹ 10/- each to ₹ 90,000,000/- divided into 9,000,000 Equity Shares of ₹ 10/- each.
September 18, 2004	Amendment to Clause V of our MoA pursuant to an increase in the authorized share capital of our Company from ₹90,000,000 divided into 9,000,000 Equity Shares of ₹ 10/- each to ₹100,000,000/- divided into 10,000,000 Equity Shares of ₹ 10 each.
January 31, 2006	Amendment to Clause V of our MoA pursuant to an increase in the authorized share capital of our Company from ₹100,000,000/- divided into 10,000,000 Equity Shares of ₹ 10 each to ₹110,000,000/- divided into 11,000,000 Equity Shares of ₹ 10 each.
May 19, 2007	Amendment to Clause V of our MoA pursuant to an increase in the authorized share capital of our Company from ₹110,000,000/- divided into 11,000,000 Equity Shares of ₹ 10 each to ₹130,000,000/- divided into 13,000,000 Equity Shares of ₹ 10 each.
September 01, 2007	Amendment to Clause V of our MoA pursuant to an increase in the authorized share capital of our Company from ₹130,000,000/- divided into 13,000,000 Equity Shares of ₹ 10 each to ₹240,000,000/- divided into 24,000,000 Equity Shares of ₹ 10 each.
October 29, 2007	Amendment of Clause II (C) under "Other Objects" of our MoA by inserting the following Clause 72.

Date of Shareholders' Resolution	Particulars
	"To carry on the business of manufacturing of all kinds of Cement, Clinker along with byproducts and waste products and dealers, miners, traders, importers, exporters in Coal, Iron Ore, Chromium Ores, Manganese Ores, Lime Stone, Asbestos, Nickel, Copper, Lead, Tin, Gold, Silver, Graphite, Dolomite, Titanium, Vanadium, Zink, Lead Copper, Fluoride, Nickel, Clay, Red Ochre, Semi-precious minerals, bauxite ores, all ferrous & non-ferrous ores of every description & grade and processing, cleaning, washing, beneficiation, melting, forging, grading and machining to convert the ores into marketable products."
January 16, 2008	Amendment to Clause V of our MoA pursuant to an increase in the authorized share capital of our Company from ₹240,000,000/- divided into 24,000,000 Equity Shares of ₹ 10 each to ₹450,000,000/- divided into 45,000,000 Equity Shares of ₹ 10 each.
January 30, 2008	Amendment of the following sub clause 72 of Clause II (C) under "Other Objects" of our MoA by shifting it to sub clause 5 of Clause II (A) under "The Main objects of the Company to be pursued by the Company on its incorporation" of our MoA. *"To carry on the business of manufacturing of all kinds of Cement, Clinker along with byproducts and waste products and dealers, miners, traders, importers, exporters in Coal, Iron Ore, Chromium Ores, Manganese Ores, Lime Stone, Asbestos, Nickel, Copper, Lead, Tin, Gold, Silver, Graphite, Dolomite, Titanium, Vanadium, Zink, Lead Copper, Fluoride, Nickel, Clay, Red Ochre, Semi-precious minerals, bauxite ores, all ferrous & non-ferrous ores of every description & grade and processing, cleaning, washing, beneficiation, melting, forging, grading and machining to convert the ores into marketable products."*
November 14, 2011(1)	Amendment to Clause V of our MoA pursuant to an increase in the authorized share capital of our Company from ₹450,000,000/- divided into 45,000,000 Equity Shares of ₹ 10 each to ₹600,000,000/- divided into 60,000,000 Equity Shares of ₹ 10 each through scheme of amalgamation.
May 31, 2018	Amendment to (Clause III A) of MoA by inserting the following sub-clause under Part A of Clause III, after the existing sub-clause 4: *5. To carry on the business of manufacturers, fabricators, processors, growers, makers, importers, exporters buyers, sellers, suppliers, stockiest, agents, merchants, distributors and concessionaires of and dealers in commodities of all or any drugs medicines, herbals, medicinal plants and all types of mixtures, powders, tablets, capsules, injections, oils, compounds, creams, soaps, scents, glycerine, detergents, glue gelatin, lotions, toilet goods, piedmonts and all kinds of cosmetics, forest products and medicinal preparation required or used for beauty and personal hygiene or in allopathic ayurvedic, homeopathic uniani or natural care method of orthopaedic and stores including prophylactics,* *6. To carry on the business of Manufacturers, developers, buyers, sellers, traders, importers, exporters, processor, commission agents, distributors, dealers, relabellers re-packers and representatives in any legal form for all kinds of food and beverages including but not limited to fruits, vegetables, confectionery, infant nutrition, clinical nutrition, performance nutrition, cereals, coffee, tea, wheat, flour, food grains, pulses, cereals, rice, spices, sugar, sugar products, vegetable ghee, edible oil, cooking oil, mineral oil, cocoa based and other food products, uses and packs of consumer food items, their by-products. ingredients, derivatives, residues, including foods and vegetables, packed foods, powders, pastes, liquids, drinks, beverages, juices, jams, jelly, murabbas, jaggery, squashes, pickles, sausages, concentrates, extracts, essences, flavours, syrups, sarbats, flavoured drinks, cream, cheese, butter, toffees. fun foods, breakfast foods, Ready to Serve Food(RTS), dietic products, strained baby foods, instant foods, cereal products, table delicacies, Ayurvedic Health Boosters like Chawanprash, Health Drinks and all other items whether natural, artificial or synthetic. and to establish Industrial Unit(s) for manufacturing of food and beverages.* *7. To carry on the business as manufacturers, processors, Traders of and dealers in dairy, farm, and garden produce of all kinds, such as milk, cream, butter, ghee, cheese, condensed milk, milk powder, malt products, milk foods and milk preparations of all description, vegetables and fruits of all kinds and business of milling of grains by taking on lease, hiring, purchasing, erecting, or otherwise acquiring rice mills, husking mills, grinding mills, cleaning, grading, polishing of all kinds of pulses, rice, spices, and other food grains and cereals in any or all its branches as would be required for effective*

Date of Shareholders' Resolution	Particulars
	discharge of these objects.
September 3, 2018	Amendment to Clause V of our MoA pursuant to an increase in the authorized share capital of our Company from ₹600,000,000/- divided into 60,000,000 Equity Shares of ₹ 10 each to ₹ 1,000,000,000/- divided into 100,000,000 Equity Shares of ₹ 10 each.

(1) Date of the order passed by the High Court of Chhattisgarh approving the scheme of amalgamation of Shri Bajrang Metallics and Power Limited with our Company.

Major events and milestones of our Company

The table below sets forth the key events in the history of our Company:

Financial Year	Particulars
2002	Incorporation of our Company
2004	Obtained certificate of Importer – Exporter Code from Foreign Trade, Ministry of Commerce & Industries, Government of India
2005	Establishment of Unit I
2010	Allotment of exclusive mining rights of manganese ore mine located in the Vizianagaram district in Andhra Pradesh.
2011	Amalgamation of SBMPL with our Company
2013	Establishment of Unit III.
2014	Allotment of exclusive mining rights of iron ore mine located in the Uttar Bastar Kanker district at Chhattisgarh.
2017	Investment in power business through our subsidiary company, IAHEPL.
2018	Our in-house R&D Centre has been recognized before the Ministry of Science & Technology, Department of Scientific and Industrial Research.

Awards and Accreditations

Financial Year	Award / Certification / Recognition
2013	Award for successfully implementing energy efficient technologies and contributing to the reduction of greenhouse gas emission and also recognized as a model unit by the project "Removal of barriers to energy efficiency improvement in steel re-rolling mill sector in India" from Ministry of Steel, Government of India.
2014	'National Energy Conservation Award', for energy conservation in the steel re-rolling sector Government of India, Ministry of Power.
	Recognition by the Ministry of Steel as the first model unit under the MoS-UNDP-GEF project "Removal of Barriers to energy efficiency in steel rerolling mills in India" to come forward and implement the "Direct Rolling" technology.
2015	'Energy Efficiency Awards, 2015' in Iron and Steel – sponge iron category from Chhattisgarh State Renewal Energy Development Agency in association with National Institute of Technology, Raipur & The New Management Association of Chhattisgarh for Energy Efficiency Measures.
2016	'Sustainable Energy Development Award for the FY 2015-16' in Iron & Steel - Sponge Iron category from Chhattisgarh State Renewal Energy Development Agency in partnership with National Institute of Technology, Raipur & The New Management association of Chhattisgarh for Energy Efficiency Measures.
	First prize in "Electrical Installation" from Directorate General of Mines Safety, Bilaspur and Raigarh region.
2017	Adjudged second runner up in the large scale category of Energy conservation Awards, CII eastern region, for the year 2016-2017.
	Third prize in "Air Quality Management" by Indian Bureau Of Mines, Raipur Region.
2018	First prize in "Mineral Conservation" by Indian Bureau of Mines, Raipur Region.
	Second prize in "Mineral Beneficiation" by Indian Bureau of Mines, Raipur Region.
	Second prize in "Publicity & Propaganda" by Indian Bureau of Mines, Raipur Region.
	Third prize as "Rolling Trophy" in overall performance of mines by Indian Bureau of Mines, Raipur Region.

Financial Year	Award / Certification / Recognition
	First prize in "Overburden & Ore Transportation from Mines" by Director General of Mines Safety, Bilaspur Region.
	Third prize in "Dust Suppression Measure In The Mine" by Director General of Mines Safety, Bilaspur Region.

Other Details regarding our Company

For details regarding the description of our activities, products, facilities, capacity & capacity utilization, location of facilities, growth, major suppliers and customers, technology, marketing, competition, etc. see "*Our Business*", "*Management's Discussion and Analysis of Financial Condition and Results of Operations*" and "*Industry Overview*" on pages 162, 431 and 125 respectively.

For details regarding our management and its managerial competence, see "*Our Management*" on page 194.

Capital raising activities through equity or debt

For details regarding our capital raising activities through equity and for details of outstanding debt as on July 31, 2018, as applicable, see "*Capital Structure*" on page 90 and "*Financial Indebtedness*" on page 461 respectively.

Injunctions or restraining order against our Company

As of the date of this Draft Red Herring Prospectus, there are no injunctions or restraining orders against our Company.

Changes in the activities of our Company during the last five years:

There have been no changes in the activities of our Company during the last five years which may have had a material adverse effect on the profits and loss account of our Company, including discontinuance of lines of business, loss of agencies or markets and similar factors.

Accumulated Profits or Losses

There are no accumulated profits or losses of any of our subsidiaries, not accounted for, by our Company.

Defaults or rescheduling of borrowings from financial institutions/ banks and conversion of loans into equity

There have been no defaults that have been called by any financial institution or bank in relation to borrowings from financial institutions or banks.

Except as stated below, there has been no rescheduling of the borrowings by our Company.

During Financial Year 2015**,** due to macro and micro economic adverse conditions the operating efficiency of our Company was impacted and we had approached the Consortium Lenders for flexible structuring of outstanding amount. The existing term loans amounting to ₹ 5,072.20 million of our Company had been structured under the RBI scheme "Flexible Structuring of Long Term Loan" with the Consortium Lenders. Accordingly the term loan outstandings and maturity portions were rescheduled and consequently the repayment tenor had been extended for a period of 15 years without any material change in other terms and conditions. For further details, please see "*Risk Factors – In the year Financial Year 2015 -2016 the existing term loans of our Company have been structured pursuant to the scheme issued by Reserve Bank of India i.e. "Flexible Structuring of Long Term Loan". Any cash flow mismatch, or restructuring of loans, could adversely affect our profitability and/or operations*", on page on 44.

Lock outs and Strikes

There have been no lock outs or strikes at any of the offices of our Company or our Subsidiaries.

Details regarding acquisition of business/undertakings, mergers, amalgamations and revaluation of assets

Except as stated below, our Company has not acquired any business or undertaking, and has not undertaken any merger, amalgamation

Scheme of amalgamation between our Company and Shri Bajrang Metallics and Power Limited. ("SBMPL")

Pursuant to an order dated November 14, 2011, the High Court of Chhattisgarh sanctioned a scheme of amalgamation under Sections 391 and 394 of the Companies Act 1956, whereby SBMPL was amalgamated into our Company, ("**Scheme**"). The Appointed Date according to the Scheme was April 01, 2008.

Pursuant to the Scheme, the shares held by our Company in SBMPL were cancelled as SBMPL was wholly owned subsidiary of our Company. Hence, our Company was not required to issue any further shares in the Scheme. The amalgamation was considered as "amalgamation in nature of merger" in terms of Accounting Standard -14 as issued by the Institute of Chartered Accountants. The assets, liabilities and reserves of SBMPL were accounted for as the "the pooling of interests method" as required under the aforesaid accounting standard. The Effective Date of the Scheme was December 7, 2011.

Revaluation of assets

Our Company has undertaken a revaluation of its assets in accordance with IND AS. For further details, see *"Restated Financial Statements"* on page 228.

Corporate Guarantees given by our Promoter

As on the date of this Draft Red Herring Prospectus, our Promoters have not given any corporate guarantees.

Our Holding Company

As on the date of this Draft Red Herring Prospectus, our Company has no holding company.

Our Subsidiaries

As on the date of this Draft Red Herring Prospectus, our Company has two subsidiaries, which are, Shri Bajrang Energy Private Limited and IA Hydro Energy Private Limited. For details regarding our Subsidiaries, see "*Our Subsidiaries*" beginning on page 192.

Details of our Joint Venture

As on the date of this Draft Red Herring Prospectus, our Company has entered into one joint venture namely, Chhattisgarh Captive Coal Mining Limited. For details regarding our joint venture, see "*Our Business*" beginning on page 162.

Financial and Strategic Partners

Our Company does not have a financial or strategic partner as of the date of this Draft Red Herring Prospectus.

Summary of Key Agreements

Our Company has entered into three Power Purchase Agreements with Chhattisgarh State Power Distribution Company Limited ("**Procurer"**) with respect to Unit I, Unit II and Unit III of our Company each dated June 23, 2017 ("**PPAs**"). Some of the salient features of the PPAs are as follows: The PPAs deals with sale of unscheduled power by our Company under the Deviation Settlement Mechanism Regulations, 2016. The Procurer has agreed to purchase minimum 01 MW and maximum 04 MW unscheduled power under each PPA for a period from May 1, 2017 to July 31, 2018. The price for the supply of power has been agreed to be in accordance with the CSERC (Intra-State Availability Tariff and Deviation Settlement Mechanism) Regulation 2016. During the period of the agreement, our Company is not allowed to sell any part of the maximum quantum to any third party through scheduling. The Procurer reserves the right to terminate the agreement by serving one month notice. In case of dispute arising with regard to the terms of the power purchase, the same shall be adjudicated by the State Commission as per provisions of the Electricity Act, 2003. The Courts of Raipur, Chhattisgarh have exclusive jurisdiction over the matters arising out of the agreement.

The Procurer and our Company subsequently entered into Amendment Agreements to the PPAs with respect to Unit I, Unit II and Unit III of our Company, dated January 02, 2018, pursuant to which the Procurer agreed to change the quantum of purchase of unscheduled power from 'minimum 01MW to maximum 04MW' to 'minimum 01MW to maximum 10MW'. We have made the necessary application for renewal of the PPAs.

Shareholders' agreement

As on date of this Draft Red Herring Prospectus, there are no subsisting shareholders' agreements among our shareholders vis-à-vis our Company that our Company is aware of.

Time and cost overrun

Except as stated below, our Company has not experienced any time or cost overruns in the past.

Sr. No	Year	Name of the project	Time over run	Cost over run	Reason for time/cost-run
1.	2012	Setting up of sponge iron division and captive power plant at Unit III.	Project was expected to be completed by October 2012 but there was a delay and the project was completed by March 2013.	-	The time over run was on account of: 1. Delay in sanction from some of the consortium member banks. 2. Execution of consortium document, and also due to 3. Extended rainy season, up to the end of September 2012.
2.	2017	Setting up of hydro power project by our Subsidiary I.A Hydro Energy Private Limited at Himachal Pradesh.	Project was expected to be completed by March 2017 but there was a delay and the project was completed by July 2017.	The cost of the project had increased from ₹ 2,950.90 million to ₹ 6,311.96 million.	The time and cost overrun was on account of flash floods and geological issues during construction.

For further details, please see "*Risk Factors - As a part of our business expansion plan, we are currently in the process of commissioning a fully integrated steel plant in our Unit III at Tilda. Such expansion may be subject to the risks of cost and time overruns. Any inability to successfully complete our current or future expansion plans/ business strategies, in a timely and cost effective manner, could in turn have an adverse effect may have an adverse effect on our business, financial condition and results of operations"* on page 29.

OUR SUBSIDIARIES

Our Company has the following two Subsidiaries:

1. I.A. Hydro Energy Private Limited
2. Shri. Bajrang Energy Private Limited

Details of the Subsidiaries

I.A. Hydro Energy Private Limited (“**IAHEPL**”)

Corporate Information

IAHEPL was registered as a partnership firm on June 18, 2010 as M/S I. A. Energy under the Partnership Act 1932. Subsequently, it was converted into a private limited company on March 23, 2017 under the Companies Act 2013. The corporate identity number of IAHEPL is U40300HP2017PTC006529. Its registered office is situated at D-17, Sector-1 Lane-1, New Shimla – 171009. IAHEPL is engaged in generation of power through 36MW hydro power plant situated at Chanju-1, district Chamba, Himachal Pradesh,

Power Purchase Agreement

IAHEPL has entered into Power Purchase Agreement (“**PPA**”) dated May 21, 2018 with Haryana Power Purchase Centre for sale of power. The PPA is submitted to Haryana Electricity Regulatory Commission on May 22, 2018 for requisite approval as per section 86(1) of the Electricity Act, 2003. For further details, please see “*Risk Factors – The profitability of our power business is dependent on the sale of power at favourable terms. Our financial condition could be adversely affected if the sale of such power can not be continued on favourable terms or at all.”* on page 33**.**

Capital Structure

Particulars	Aggregate value at face value (₹) (in million)
Authorised capital (35,000,000 equity shares of ₹10 each)	350.00
Issued, subscribed and paid-up capital (32,500,000 equity shares of ₹10 each)	325.00

Shareholding Pattern

Sr. No	Name of the shareholder	No. of equity shares of ₹ 10 each	Percentage of shareholding (%)
1.	Shri Bajrang Power and Ispat Limited.	29,400,000	90.46
2.	Shri Bajrang Energy Private Limited.	2,600,000	8.00
3.	Bajrang Goel	100,000	0.31
4.	Ashutosh Goel	100,000	0.31
5.	Anand Goel	100,000	0.31
6.	Sandeep Goel	100,000	0.31
7.	Pawan Goel	100,000	0.31
Total		**32,500,000**	**100.00**

2. Shri Bajrang Energy Private Limited, (“SBEPL”)

Corporate Information

SBEPL was incorporated as a public limited company on December 20, 2007 under the Companies Act 1956 as Shri Bajrang Energy Limited. Subsequently, it was converted into a private limited company and a fresh certificate of incorporation was issued on July 28, 2009 under the Companies Act, 1956. The corporate identity number of IAHEPL is U40101CT2007PTC020484. The registered office of SBEPL is Village Borjhara, Guma Road, Urla Growth Center, Raipur - 493221, Chhattisgarh. SBEPL is involved in the business of generation, transmission, distribution of electrical energy, thermal energy, bio energy, solar energy, hydro power, bio power and other related activities.

Capital Structure

Particulars	Aggregate value at face value (₹)(in million)
Authorised capital (15,000,000 equity shares of ₹10 each)	150.00
Issued, subscribed and paid-up capital (252,860 equity shares of ₹10 each)	2.53

Shareholding Pattern

Sr. No	Name of the shareholder	No. of equity shares of ₹ 10 each	Percentage of total equity holding (%)
1.	Shri Bajrang Power and Ispat Limited	201,860	79.83
2.	Suresh Goel	10,000	3.95
3.	Rajendra Goel	10,000	3.95
4.	Narendra Goel	10,000	3.95
5.	Anand Goel	10,000	3.95
6.	Dinesh Goel	5,000	1.98
7.	Sandeep Goel	5,000	1.98
8.	Shimmer Goel	1,000	0.40
Total		**252,860**	**100.00**

Other Confirmations

None of our Subsidiaries have made any public or rights issue in the three years preceding the date of this Draft Red Herring Prospectus.

None of our Subsidiaries are listed on any stock exchange in India or abroad, nor have our Subsidiaries been refused listing by any stock exchange in India or abroad.

None of our Subsidiaries have become sick companies under the meaning of the erstwhile SICA or equivalent provisions thereof under the Insolvency and Bankruptcy Code, 2016, nor are they under winding up.

There are no accumulated profits or losses of our Subsidiaries which are not accounted for by our Company in Restated Cosnsolidated Financial Statements.

Interest of the Subsidiaries in our Company

None of our Subsidiaries have any business interest in our Company except as stated in "*Related Party Transactions*" on page 226. For further details of the transactions between our Company and our Subsidiaries, see "*Related Party Transactions*" on page 226.

Significant sales or purchases

There are no sales or purchase between our Company and any of our Subsidiaries where such sales or purchases exceed in value in aggregate of 10% of the total sales or purchases of our Company.

Common Pursuits

Our Subsidiaries are engaged in activities similar to that of our Company or are enabled under their respective memorandums of association, as applicable, to engage in similar activities to that of our Company. Our Company will adopt the necessary procedures and practices as permitted by law to address any conflict situation if and when they arise.

OUR MANAGEMENT

In terms of our Articles of Association, our Company is required to have not less than three Directors and not more than fifteen Directors. As on the date of this Draft Red Herring Prospectus, our Board comprises of ten Directors including five Independent Directors and one women director.

The following table sets forth details regarding our Board:

Name, designation, address, occupation, nationality, term and DIN	Age (years)	Other Directorships
Suresh Goel ***Designation***: Executive Director and Chairman ***Address***: Near Dhebar Gali, Hari Chhaya, Shankar Nagar, Raipur- 492007, Chhattisgarh ***Occupation****:* Business ***Nationality****:* Indian ***Term****:* For a term of five consecutive years and liable to retire by rotation. ***DIN****:* 00115834	68	• Shri Bajrang Steel and Power. • Shri Bajrang Alloys Limited • S. B. Multimedia Private Limited • Shri Bajrang Hydro Energy Private Limited
Rajendra Goel ***Designation***: Executive Director ***Address****:* Gurudwara Road, Hari Kripa Ravi Nagar, Pandri Raipur , Chhattisgarh-492004 ***Occupation****:* Business ***Nationality****:* Indian ***Term****:* To retire by rotation. ***DIN****:* 01263958	62	• Shri Bajrang Energy Private Limited. • Shri Bajrang Devcon Private Limited • Shimmer Investments Private Limited
Narendra Goel ***Designation***: Managing Director ***Address****:* Near Dhebar Gali, Hari Chhaya, Shankar Nagar, Raipur- 492007, Chhattisgarh ***Occupation****:* Business ***Nationality****:* Indian ***Term****:* For a period of five years with effect from April 01, 2016 to March 31, 2021 ***DIN****:* 00115883	59	• Shri Bajrang Alloys Limited • Chhattisgarh Captive Coal Mining Limited. • Madanpur (North) Coal Company Private Limited. • S. B. Multimedia Private Limited • Shri Bajrang Energy Private Limited • Shri Bajrang Hydro Energy Private Limited • IA Energy Private Limited • IA Hydro Energy Private limited • Popular Mercantile Private Limited
Anand Goel	53	• Shri Bajrang Alloys Limited • Shri Bajrang Steel and Power Limited

Name, designation, address, occupation, nationality, term and DIN	Age (years)	Other Directorships
Designation: Executive Director ***Address***: Behind Ganesh Temple, Hari Prateek, C-10, Anupam Nagar, Raipur – 492007, Chhattisgarh ***Occupation***: Business ***Nationality***: Indian ***Term***: For a term of five consecutive years, liable to retire by rotation. **DIN**: 00796135		• S.B.Multimedia Private Limited • M/s Bonus Dealcom Private Limited • IA Energy Private Limited • Popular Mercantile Private Limited
Shravan Kumar Goyal ***Designation***: Whole Time Director ***Address***: Flat No. 4 C, Block C, Mallika Merlin Jaishree Vihar, New Mandi Road Raipur 492001 Chhattisgarh ***Occupation***: Professional ***Nationality***: Indian ***Term***: For a period of five years with effect from October 10, 2016 to September 30, 2021. ***DIN***: 01829618	53	NIL
Hemendra Nath ***Designation***: Independent director ***Address***: J- 205, Shivalik Nagar, B.H.E.L. Haridwar, Uttarakhand - 249401 ***Occupation***: Business ***Nationality***: Indian ***Term***: For a period of five years with effect from September 30, 2014 up to the AGM to be held in 2019. ***DIN***: 02020546	75	NIL
Ravinder Singh Rajput ***Designation***: Independent director ***Address***: 38, Housing Colony, Phase – 2, Bilaspur (209), Himachal Pradesh - 174001 ***Occupation***: Self Employed	58	NIL

Name, designation, address, occupation, nationality, term and DIN	Age (years)	Other Directorships
Nationality: Indian ***Term:*** For a term of five years with effect from June 22, 2018. ***DIN:*** 08145449		
Hema Thakur ***Designation:*** Independent director ***Address:*** D-103, Akar Pinnacle, M and M chs, Dattapada road, Near Dattapada Muncipal School, Borivali (East), Mumbai – 400066, Maharashtra. ***Occupation:*** Service ***Nationality:*** Indian ***Term:*** For a term of five years with effect from June 22, 2018. ***DIN:*** 01363454	64	• Shahi Shipping Limited • Eurotex Industries and Exports Limited • Brics Corporate Advisors Private Limited
Rakesh Bhargava ***Designation:*** Independent director ***Address:*** Block – E/1, Flat No. 3C, Sail City New Pundag, Ranchi – 834007 ***Occupation:*** Service ***Nationality:*** Indian ***Term:*** For a term of five years with effect from June 22, 2018. ***DIN:*** 06485964	62	Nil
Anshul Dave ***Designation***: Independent Director ***Address***: 45/176, Edward Road, Sadar Bazar, Raipur - 492001, Chhattisgarh ***Occupation:*** Self Employed ***Nationality:*** Indian	35	NIL

Name, designation, address, occupation, nationality, term and DIN	Age (years)	Other Directorships
***Term**:* For a term of five years with effect from July 24, 2018. ***DIN**:* 05123750		

Relationship between our Directors

Other than as stated below, none of the Directors are related to each other:

Suresh Goel, Rajendra Goel, Narendra Goel and Anand Goel are brothers.

Brief biographies of Directors

Suresh Goel aged 68 years, is the Executive Director and Chairman of our Company. He has passed Bachelor's degree in Commerce (initial) from the Ravishankar Vishwavidyalaya, Raipur. He has been a Director on the Board of our Company since incorporation i.e. July 25, 2002 and had in between resigned for a brief period from the Board of the Company on September 25, 2006 due to his pre-occupation. He was again re-appointed on the Board of the Company w.e.f. January 25, 2007.

Narendra Goel aged 59 years is the Managing Director of our Company. He has passed Bachelors degree in Commerce (Part 1) from the Ravishankar Vishwavidyalaya, Raipur. He has been associated with our Company since December 13, 2003 as Director and was appointed as Managing Director of the Company w.e.f. March 31, 2006 and has over 15 years of experience in the steel industry. He looks after the organizational development and finance of our Company. He has also been associated with news channel of Chhattisgarh namely IBC-24.

Rajendra Goel aged 62 years is the Executive Director of our Company. He holds a Bachelors degree in Commerce from the Ravishankar Vishwavidyalaya, Raipur. He has been a Director on the Board of our Company since incorporation i.e. July 25, 2002 and has over 16 years of experience in the steel industry. He looks after banking and finance and tax related matters of our Company.

Anand Goel, aged 53 years, is the Executive Director of the Company. He has passed Bachelor of Commerce (Prv.) from Ravishankar Vishwavidyalaya, Raipur. He joined our Company as a Non – Executive Director since June 22, 2018.

Shravan Kumar Goyal, aged 53 years is the Whole - Time Director of our company. He has a Bachelors degree in Electrical Engineering. He has been a director in our Company since October 1, 2006. He looks after pre-feasibility studies and monitoring of upcoming projects, liaising with Government and private agencies and related activities.

Hemendra Nath aged 75 years is the Independent Director of our Company. He holds a Ph.D in philosophy and a diploma in heat treatment technology from IIT, Bombay. He also holds a Bachelors degree in metallurgical engineering from the Banaras Hindu University. He has been an Independent Director in our Company since January 1, 2008.

Ravinder Singh Rajput aged 58 years is the Independent Director of our Company. He holds a MSC Organic Chemistry from Ravishankar University Raipur in 1981. He has been an Independent Director in our Company since June 22, 2018.

Hema Thakur aged 64 years is the Independent Director of our Company. She holds Bachelors degree of Arts (Special) and Bachelors of Law (General) degree from University of Bombay. Her Professional Qualifications include a Certificate Associate from Indian Institute of Bankers and a Diploma in Business Finance from the Institute of Chartered Financial Analyst of India. She has been an Independent Director in our Company since June 22, 2018.

Rakesh Bhargava aged 62 years is the Independent Director of our Company. He holds a Bachelor of Science (Engineering) degree from Sambalpur University. He was appointed as CEO of Bokaro Power Suppy Company Limited in September 2012. Later in December 2014, he was also posted in Mozambique by International Coal

Ventures Private Limited. He was also a Director in NTPC-SAIL Power Company Limited from June 2013 to February 2016. In January 2018 and was appointed as a Country Director of Powergen Developers. He has been an Independent Director in our Company since June 22, 2018.

Anshul Dave, aged 35 years is the Independent Director of our Company. He holds a Bachelor of Commerce degree from PT. Ravishankar Shukla University and is also a qualified Chartered Accountant. In addition, he holds NSE Certifications in Securities Market (Basic) Module, Dealers Market (Dealers) Module and a certificate from Thomson Tax & Accounting, Mircomash, USA, in Accounting for Investments in Debt and Equity Securities. He has multiple years of experience in handling accounts and finance. Previously, he has worked with Deloitte & Touche Assurance & Enterprise Risk Svcs (I) Private Limited as Audit Senior Assistant and with Spandana Sphoorty Financial Limited as Manager – Accounts. He has been an Independent Director in our Company since July 24, 2018.

Confirmations

None of our Directors is or was a director of any listed company during the last five years preceding the date of this Draft Red Herring Prospectus, whose shares have been or were suspended from being traded on the Stock Exchanges, during the term of their directorship in such company.

None of our Directors are, or were, directors of any listed company which has been, or was delisted from any stock exchanges, except for Rajendra Goel, the details for which are provided as under:

Name of the company which was delisted	Swastik Mercantiles Limited
Name of the stock exchange(s) on which the company was listed	U.P. Stock Exchange
Date of delisting on stock exchange	June 9, 2015
Whether the delisting was compulsory or voluntary delisting	Compulsory
Reasons for delisting	De-recognition of U.P. Stock exchange vide exit order WTM/RKA /MRD/49/2015 issued by SEBI dated June 9, 2015.*
Whether the company has been relisted	No
Date of relisting, in the event the company is relisting	Not Applicable
Name of the stock exchange(s) on which the company was relisted	Not Applicable
Term (along with relevant dates) in the above company	Rajendra Goel was a director of Swastik Mercantiles Limited with effect from August 23, 1985 up to January 10, 2008.

** Pursuant to NSE Circular no. 0817 /2018 dated July 18, 2018 and SEBI Circular no. SEBI/HO/MRD/DSA/CIR/P/2016/110 dated October 10, 2016, Swastik Mercantiles Limited has been removed from dissemination board of NSE. Swastik Mercantiles Limited has made an application to the Registrar of Companies, Uttar Pradesh requesting for change in CIN on delisting of equity shares consequent to de-recognition of U.P. Stock Exchange.*

None of our Directors has been or was identified as a Wilful Defaulter.

Terms of appointment of our Executive Directors

Suresh Goel

He has been a Director on the Board of our Company since incorporation i.e. July 25, 2002 and had in between resigned for a brief period from the Board of the Company on September 25, 2006 due to his pre-occupation. He was again re-appointed on the Board of the Company w.e.f. January 25, 2007. Our Board of Directors in its meeting held on September 2, 2018 and our shareholders in the AGM dated September 3, 2018 approved the re-appointment of Suresh Goel as an Executive Director for a term of five consecutive years and liable to retire by rotation with effect from September 3, 2018.

The details of annual remuneration governing his appointment as set out in the board resolution dated September 2, 2018 and shareholders' resolutions dated September 3, 2018 are stated below:

Particulars	Terms of remuneration (₹ in million)
Basic Salary	3.00
Perquisites and benefits	House rent allowance: 1.50 Medical allowance: 0.75 Conveyance allowance: 0.75

Anand Goel

Anand Goel was appointed as an Additional Director by our Board of Directors in its meeting dated June 22, 2018. Our Board of Directors in its meeting held on September 2, 2018 and our shareholders in the AGM dated September 3, 2018 approved the re-appointment of Anand Goel as an Executive Director for a term of five consecutive years, liable to retire by rotation with effect from September 3, 2018.

The details of annual remuneration governing his appointment as set out in the board resolution dated September 2, 2018 and shareholders' resolutions dated September 3, 2018 are stated below:

Particulars	Terms of remuneration (₹ in million)
Basic Salary	2.40
Perquisites and benefits	House rent allowance: 1.20 Medical allowance: 0.60 Conveyance allowance: 0.60

Narendra Goel

Narendra Goel has been associated with our Company since December 13, 2003 as Director and was appointed as Managing Director of the Company w.e.f. March 31, 2006. Our Board of Directors in its meeting held on March 03, 2016 and our shareholders in the AGM dated September 30, 2016 approved the re-appointment of Narendra Goel as our Managing Director for the period of five years with effect from April 1, 2016 to March 31, 2021.

The details of annual remuneration governing his appointment as set out in the board resolution dated September 2, 2018 and shareholders' resolutions dated September 3, 2018 are stated below:

Particulars	Terms of remuneration (₹ in million)
Basic Salary	2.70
Perquisites and benefits	House rent allowance: 1.35 Medical allowance: 0.67 Conveyance allowance: 0.67

Shravan Kumar Goyal

Shravan Kumar Goyal has been associated with our Company since October 1, 2006. Our Board of Directors in its meeting held on August 23, 2016 and our shareholders in the AGM dated September 30, 2016 approved the re-appointment of Shravan Kumar Goyal as our Whole Time Director for the period of five years with effect from October 1, 2016 to September 30, 2021.

The details of annual remuneration governing his appointment as set out in the board resolution dated September 2, 2018 and shareholders' resolutions dated September 3, 2018 are stated below:

Particulars	Terms of remuneration (₹ in million)
Basic Salary	1.08
Perquisites and benefits	House rent allowance: 0.50 Medical allowance: 0.25 Conveyance allowance: 0.25

Rajendra Goel

Rajendra Goel has been associated with our Company since July 25. 2002. Our shareholders in the AGM dated September 30, 2016 approved the re-appointment of Rajendra Goel as a Director and is liable to retire by rotation.

The details of annual remuneration governing his appointment as set out in the board resolution dated September 2, 2018 and shareholders' resolutions dated September 3, 2018 are stated below:

Particulars	Terms of remuneration (₹ in million)
Basic Salary	2.55
Perquisites and benefits	House rent allowance: 1.27 Medical allowance: 0.64 Conveyance allowance: 0.64

Payment or benefit to Directors of our Company

The sitting fees/other remuneration paid to our Directors in Financial Year 2017 - 2018 are as follows:

S. No.	Name of Director	Remuneration paid (₹ in million)
1.	Suresh Goel	Nil
2.	Narendra Goel	2.10
3.	Rajendra Goel	1.80
4.	Anand Goel#	Nil
5.	Shravan Kumar Goyal	1.64
6.	Hemendra Nath	0.05
7.	Ravinder Singh Rajput#	Nil
8.	Hema Thakur#	Nil
9.	Rakesh Bhargava#	Nil
10.	Anshul Dave*	Nil

 # Anand Goel, Ravinder Singh Rajput, Hema Thakur and Rakesh Bhargava were appointed with effect from June 22, 2018, and hence have not received any remuneration for the Financial Year 2017 - 2018.
** Anshul Dave was appointed with effect from July 24, 2018 and hence have not received any remuneration for the Financial Year 2017 - 2018.*

Remuneration from our Subsidiaries

As on the date of this Draft Red Herring Prospectus, none of our Directors are entitled to remuneration from our Subsidiaries.

Arrangement or understanding with major shareholders, customers, suppliers or others

There is no arrangement or understanding with major shareholders, customers, suppliers or others, pursuant to which any of our Directors or Key Management Personnel have been appointed or selected as a Director or a member of senior management.

Shareholding of Directors in our Company

The shareholding of our Directors in our Company as of the date of this Draft Red Herring Prospectus is set forth below:

Name of Director	Number of Equity Shares	Percentage shareholding (%)
Suresh Goel	648,000	1.24
Rajendra Goel	640,000	1.22
Anand Goel	628,400	1.20
Narendra Goel	428,000	0.82
Total	**2,344,400**	**4.48**

Our Articles of Association do not require our Directors to hold any qualification shares.

Shareholding of Directors in our Subsidiaries

Except as stated below, none of our Directors hold any equity shares in our Subsidiaries.

Details of equity shares held in IAHEPL:

Name of the shareholder	No. of equity shares of ₹ 10 each	Percentage of total equity holding (%)
Anand Goel	100,000	0.81

Details of equity shares held in SBEPL:

Sr. No.	Name of the shareholder	No. of equity shares of ₹ 10 each	Percentage of total equity holding (%)
1.	Suresh Goel	10,000	3.95
2.	Rajendra Goel	10,000	3.95
3.	Narendra Goel	10,000	3.95
4.	Anand Goel	10,000	3.95
Total		**40,000**	**15.82**

Appointment of relatives of our Directors to any office or place of profit

Except as disclosed below, none of the relatives of our Directors currently hold any office or place of profit in our Company.

Bajrang Goel, son of Narendra Goel, is the Chief Accounts Officer of our Company. Bajrang Goel's current annual remuneration is ₹ 3.30 million.

Sandeep Goel, son of Suresh Goel, is the Chief Financial Officer of our Company. Sandeep Goel's current annual remuneration is ₹ 4.80 million.

Ashutosh Goel, son of Anand Goel, is an employee of our Company. Ashutosh Goel's current annual remuneration is ₹ 4.80 million.

Aayush Goel, son of Anand Goel, is an employee of our Company. Aayush Goel's current annual remuneration is ₹ 4.80 million.

Sarla Goel, wife of Suresh Goel, is an employee of our Company. Sarla Goel's current annual remuneration is ₹ 1.80 million.

Aruna Goel, wife of Narendra Goel, is an employee of our Company. Aruna Goel's current annual remuneration is ₹ 1.80 million.

Neeta Goel, wife of Rajendra Goel, is an employee of our Company. Neeta Goel's current annual remuneration is ₹ 1.80 million.

Kiran Goel, wife of Anand Goel, is an employee of our Company. Kiran Goel's current annual remuneration is ₹ 1.80 million.

Suman Goel, Suresh Goel's Son's wife, is an employee of our Company. Suman Goel's current annual remuneration is ₹ 1.80 million.

Interest of Directors

All Directors may be deemed to be interested to the extent of fees and commission, as applicable, payable to them for attending meetings of the Board or a Committee thereof as well as to the extent of reimbursement of expenses payable to them. Our Executive Directors may be deemed to be interested to the extent of remuneration payable to them for services rendered as an officer or employee of our Company.

The Directors may also be deemed to be interested to the extent of the Equity Shares, if any, held by them or any of their relatives directly or indirectly and in any dividend distribution which may be made by our Company in the future.

Further, our Company has entered into an agreement with Narendra Goel dated April 1, 2014, ("**Dolomite Purchase Agreement**") for purchase of dolomite for a period of five years. The price of dolomite is agreed to be decided mutually with regards to the market conditions, ruling raw material and packing materials rates, labour, power, transport cost etc.

Our Directors have no interest in any property acquired by our Company within two years from the date of this Draft Red Herring Prospectus or proposed to be acquired by our Company as of the date of this Draft Red Herring Prospectus.

Other than as disclosed in "*Related Party Transactions*" on page 226 no sum has been paid or agreed to be paid to our Directors or to firms or companies in which they may be members, in cash or shares or otherwise by any person either to induce him/her to become, or to qualify him/her as, a Director, or otherwise for services rendered by him/her or by such firm or company, in connection with the promotion or formation of our Company.

Other than, Suresh Goel, Rajendra Goel, Anand Goel and Narendra Goel, our Directors have no interest in the promotion of our Company.

Except as disclosed in this Draft Red Herring Prospectus, no amount or benefit has been paid or given within the two preceding years or is intended to be paid or given to any of our Directors except the normal remuneration for services rendered as Directors.

Except as stated at "*Interest of Directors*" above and *Related Party Transactions*" on page 226 of this Draft Red Herring Prospectus, respectively, our Directors have not entered into any transactions with our Company and do not have any other interest in the business of our Company.

No loans have been availed by our Directors or the Key Management Personnel from our Company. None of the beneficiaries of any loans or advances granted by our Company are related to our Directors. Further, none of the sundry debtors are related to our Directors.

None of the Directors is party to any bonus or profit sharing plan of our Company other than the performance linked incentives given to each of the Directors.

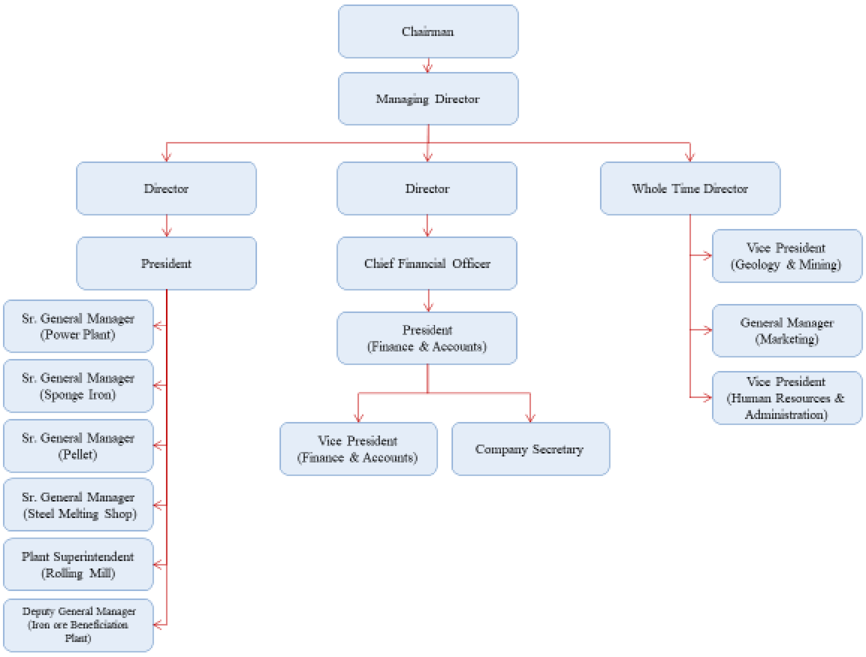
Changes in our Board in the last three years.

Name	Date of Appointment/ Change/Cessation	Reason for change
Pradeep Tiwari	July 23, 2016	Appointment as an additional director
	September 30, 2016	Change in designation to director
Devjyoti Jyotishi	July 23, 2016	Cessation due to resignation
Pradeep Tiwari	May 08, 2018	Cessation due to resignation
Kailash Thatoi	May 08, 2018	Cessation due to resignation
Prerna Singhal	June 22, 2018	Cessation due to resignation
Ravinder Singh Rajput	June 22, 2018	Appointment as an additional director
	September 3, 2018	Change in designation to director
Anand Goel	June 22, 2018	Appointment as an additional director
	September 3, 2018	Change in designation to director
Hema Thakur	June 22, 2018	Appointment as an additional director
	September 3, 2018	Change in designation to director
Rakesh Bhargava	June 22, 2018	Appointment as an additional director
	September 3, 2018	Change in designation to director
Hari Anant Ghanekhar	September 2, 2018	Cessation due to resignation
Anshul Dave	July 24, 2018	Appointment as an additional director
	September 3, 2018	Change in designation to director

Borrowing Powers of our Board

In accordance with the Articles of Association of our Company, our Board of Directors has been empowered to borrow funds in accordance with applicable law. Pursuant to the resolution dated January 21, 2015 passed by our shareholders, our Board of Directors has been authorized to borrow an amount up to ₹ 20,000 million.

Management Organisation Chart



Key Management Personnel

In addition to Narendra Goel, our Managing Director and Shravan Kumar Goyal, our Whole Time Director, whose details are provided in "*–Brief Profiles of our Directors*" above, the details of our other Key Managerial Personnel as on the date of this Draft Red Herring Prospectus are set forth below.

Sandeep Goel, is Chief Financial Officer our Company. He has passed B.Com. (Honours) Part I from University of Delhi. He has been associated with our Company since September 4, 2018.

Parul Verma, is Company Secretary and Compliance Officer of our Company. She is a qualified company secretary. She has been associated with our Company since July 8, 2015. During Financial Year 2017 - 2018, she was paid remuneration of ₹ 0.48 million.

Senior Management of our Company

Srinivasan Manoharan, aged 63 years is the President (Finance) of our Company. He holds a bachelor of law degree from Mangalore University, post graduate diploma in personnel management, industrial relations and labour welfare awarded by the Coimbatore Productivity Council Management, Coimbatore. He is also M.A. in Philosophy from Annamalai University. He was appointed as the President of our Company with effect from November 19, 2009. Prior to joining our Company, he served as assistant general manager at Lakshmi Vilas Bank Limited, Bangalore. He has also worked as assistant personnel manager with Syndicate Bank. During the Financial Year 2017 - 2018, he was paid compensation of ₹ 1.50 million.

Vikas Goyal, aged 49 years is the President (Project) of our Company. He has been associated with our Company since November 27, 2017. He holds a Bachelor's degree in electronics and communication engineering from Mangalore University. He is also a certified energy auditor and energy manager by National Productivity Council. Prior to joining our Company, he worked with Jindal Power Limited as deputy general manager. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 0.79 million.

Ashok Kumar Harlalka, aged 46 years, is the Vice President (Accounts & Finance) of our Company. He has been associated with our Company since March 1, 2004. He is a qualified Chartered Accountant. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 0.96 million.

Pradeep Tiwari, aged 56 years, is the Vice President (Admin.) of our Company. He holds a post graduate diploma in business administration from Institute of Productivity & Management, Ghaziabad. He was appointed as the Vice President (Admin.) of our Company with effect from August 1, 2013. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 1.91 million.

Bhag Singh, aged 54 years, is the Plant Superintendent of our Company. He has passed a Bachelor's degree in arts (Part 1) from Guru Nanak Dev University. He was appointed as the General Manager of our Company with effect from June 5, 2008. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 3.00 million.

Bibeka Nand Singh, aged 63 years, is the Senior General Manager (Power Plant) of our Company. He holds a B.Sc in electrical engineering from Birla Institute of Technology. He was appointed as the General Manager of our Company with effect from October 01, 2014. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 1.79 million.

Sanjay Kambhoj, aged 43 years, is the General Manager (Marketing) of our Company. He has passed Master's in business administration (Part –II) from Barkatullah University, Bhopal. He was appointed as the general manager of our Company with effect from April 1, 2010. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 1.19 million.

Pampapathi J. Hubballi, aged 45 years, is the Deputy General Manager of our Company. He has passed M.Phil and M.Tech in mineral processing from Gulbarga University. He was appointed as the general manager of our Company with effect from January 2, 2012. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 1.43 million.

Sita Ram Singh, aged 69 years, is the General Manager (Works) of our Company. He holds a Bachelor's degree in science in Metallurgy Engineering from Banaras Hindu University. He was appointed as the General Manager of our Company with effect from September 1, 2003. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 1.56 million.

SK Acharya, aged 52 years, is the Vice-President (Geology & Mining) of our Company. He holds a M.SC in Geology from Berhampur University. He was appointed in our Company with effect from October 10, 2014. During the Financial Year 2017 - 2018, he was paid a compensation of ₹ 2.28 million.

All the Key Management Personnel are permanent employees of our Company.

There are no arrangements or understanding with major shareholders, customers, suppliers or others, pursuant to which any of our Key Management Personnel or our senior management were selected.

Shareholding of Key Management Personnel

Except as disclosed below, as on the date of this Draft Red Herring Prospectus, none of our Key Management Personnel hold any Equity Shares:

Name of the Key Management Personnel	Number of Equity Shares	Percentage of shareholding (%)
Narendra Goel	428,000	0.82
Sandeep Goel	1,658,400	3.17

Bonus or profit sharing plan of the Key Management Personnel

None of our Key Management Personnel is party to any bonus or profit sharing plan of our Company.

Interests of Key Management Personnel

Except Narendra Goel, who is also interested in the promotion of our Company as a promoter and receives a payment from our Company for supply of dolomite under the Dolomite Purchase Agreement, the Key

Management Personnel do not have any interest in our Company other than to the extent of the remuneration or benefits to which they are entitled to as per their terms of appointment and reimbursement of expenses incurred by them in the ordinary course of business and in the course of performance of their duties. The Key Management Personnel may also be deemed to be interested to the extent of any dividend payable to them and other distributions in respect of Equity Shares held by them in our Company, if any. For further details, please see "*Our Management – Interest of Directors*" on page 201.

There is no contingent or deferred compensation payable to our Key Management Personnel.

Except statutory entitlements for benefits upon termination of their employment in our Company or retirement, no officer of our Company, including our Directors and Key Management Personnel, is entitled to any benefits upon termination of employment under any service contract entered into with our Company.

Changes in our Key Management Personnel in the last three years

Position	Name of the KMP	Date of Appointment/Change/ Cessation	Description of Appointment/ Change/Cessation and Reason
Chief Financial Officer	Pawan Goel	September 4, 2018	Cessation due to resignation
Chief Financial Officer	Sandeep Goel	September 4, 2018	Appointment

Payment of non-salary related benefit to officers of our Company

Except as stated otherwise in this Draft Red Herring Prospectus and any statutory payments made by our Company, no amount or non-salary related benefit has been paid or given, in the two years preceding the date of this Draft Red Herring Prospectus, or is intended to be paid or given to any of our Company's officers except remuneration for services rendered as Directors, officers or employees of our Company.

Corporate Governance

The provisions of the SEBI Listing Regulations with respect to corporate governance will be applicable to us immediately upon the listing of the Equity Shares with the Stock Exchanges. Our Company is in compliance with the requirements of the applicable regulations, including the SEBI Listing Regulations, the Companies Act, 2013 and other applicable SEBI ICDR Regulations, in respect of corporate governance including constitution of our Board of Directors and committees thereof. The corporate governance framework is based on an effective independent Board, separation of our Board of Directors' supervisory role from the executive management team and constitution of the Board committees, as required under law.

Our Board of Directors has been constituted in compliance with the Companies Act, 2013 and the SEBI Listing Regulations. Our Board of Directors function either as a full board or through various committees constituted to oversee specific functions.

Currently, our Board of Directors has ten Directors. In compliance, with the requirements of the SEBI Listing Regulations, we have five Executive Directors and five Independent Directors (of whom one is a woman Director) on our Board of Directors.

Committees of our Board of Directors

In addition to the committees of our Board of Directors detailed below our Board of Directors may, from time to time constitute committees for various functions.

Audit Committee

The members of the Audit Committee are:

1. Hema Thakur – Chairperson
2. Anshul Dave
3. Anand Goel

The Audit Committee was constituted by way of resolution passed by our Board of Directors on March 15, 2004. Further, the Audit Committee was re-constituted by way of a resolution passed by our Board of Directors dated September 2, 2018. The scope and function of the Audit Committee is in accordance with Section 177 of the Companies Act, 2013 and the SEBI Listing Regulations and its terms of reference include the following:

ROLE

a) oversight of our Company's financial reporting process and the disclosure of its financial information to ensure that the financial statement is correct, sufficient and credible;

b) recommendation for appointment, remuneration and terms of appointment of auditors;

c) approval of payment to statutory auditors for any other services rendered by the statutory auditors;

d) reviewing, with the management, the annual financial statements and auditor's report thereon before submission to the board for approval, with particular reference to:

   i) matters required to be included in the director's responsibility statement to be included in the board's report in terms of clause (c) of sub-section (3) of Section 134 of the Companies Act, 2013;

   ii) changes, if any, in accounting policies and practices and reasons for the same;

   iii) major accounting entries involving estimates based on the exercise of judgment by management;

   iv) significant adjustments made in the financial statements arising out of audit findings;

   v) compliance with listing and other legal requirements relating to financial statements;

   vi) disclosure of any related party transactions;

   vii) modified opinion(s) in the draft audit report;

e) reviewing, with the management, the quarterly, half-yearly and annual financial statements before submission to the board for approval;

f) reviewing, with the management, the statement of uses / application of funds raised through an issue (public issue, rights issue, preferential issue, etc.), the statement of funds utilised for purposes other than those stated in the offer document / prospectus / notice and the report submitted by the monitoring agency monitoring the utilisation of proceeds of a public or rights issue, and making appropriate recommendations to the board to take up steps in this matter. This also includes monitoring the use/application of the funds raised through the proposed initial public offer by our Company;

g) reviewing and monitoring the auditor's independence and performance, and effectiveness of audit process;

h) approval or any subsequent modification of transactions with related parties;

i) scrutiny of inter-corporate loans and investments;

j) valuation of undertakings or assets, wherever it is necessary;

k) evaluation of internal financial controls and risk management systems;

l) reviewing, with the management, performance of statutory and internal auditors, adequacy of the internal control systems;

m) Establishing a vigil mechanism for directors and employees to report their genuine concerns or grievances;

n) reviewing the adequacy of internal audit function, if any, including the structure of the internal audit department, staffing and seniority of the official heading the department, reporting structure coverage and frequency of internal audit;

o) discussion with internal auditors of any significant findings and follow up there on;

p) reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the board;

q) discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post- audit discussion to ascertain any area of concern;

r) to look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non-payment of declared dividends) and creditors;

s) to review the functioning of the whistle blower mechanism;

t) approval of appointment of chief financial officer or any other person heading the finance function or discharging that function after assessing the qualifications, experience and background, etc. of the candidate; and

u) Carrying out any other function as is mentioned in the terms of reference of the audit committee.

REVIEW

The Audit Committee shall mandatorily review the following information:

a) management discussion and analysis of financial condition and results of operations;
b) statement of significant related party transactions (as defined by the audit committee), submitted by management;
c) management letters / letters of internal control weaknesses issued by the statutory auditors;
d) internal audit reports relating to internal control weaknesses; and
e) the appointment, removal and terms of remuneration of the chief internal auditor shall be subject to review by the audit committee; and
f) statement of deviations:

    i) quarterly statement of deviation(s) including report of monitoring agency, if applicable, submitted to stock exchange(s) in terms of Regulation 32(1) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.

    ii) annual statement of funds utilised for purposes other than those stated in the offer document / prospectus / notice in terms of Regulation 32(7) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.

POWER

The powers of the Audit Committee include the following:

a) To investigate any activity within its terms of reference;

b) To seek information from any employees;

c) To obtain outside legal or other professional advice; and

d) To secure attendance of outsiders with relevant expertise, if it considers necessary.

NRC Committee:

The members of the NRC Committee are:

1. Ravinder Singh Rajput, Chairman
2. Hemendra Nath,
3. Hema Thakur
4. Suresh Goel

The NRC Committee was constituted by way of resolution passed by our Board of Directors on January 1, 2008. Further, the NRC Committee was re-constituted by way of a resolution passed by our Board of Directors on dated September 2, 2018. The scope and function of the NRC Committee is in accordance with Section 178 of the Companies Act, 2013 and the SEBI Listing Regulations. The terms of reference of the NRC Committee include the following:

a) formulation of the criteria for determining qualifications, positive attributes and independence of a director and recommend to the board of directors a policy relating to, the remuneration of the directors, key managerial personnel and other employees;
b) formulation of criteria for evaluation of performance of independent directors and the board of directors;
c) devising a policy on diversity of board of directors;

d) identifying persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down, and recommend to the board of directors their appointment and removal.
e) whether to extend or continue the term of appointment of the independent director, on the basis of the report of performance evaluation of independent directors.
f) analyzing, monitoring and reviewing various human resource and compensation matters;
g) determining our policy on specific remuneration packages for executive directors including pension rights and any compensation payment, and determining remuneration packages of such directors;
h) determining compensation levels payable to the senior management personnel and other staff (as deemed necessary), which shall be market-related, usually consisting of a fixed and variable component;
i) reviewing and approving compensation strategy from time to time in the context of the then current Indian market in accordance with applicable laws;
j) performing such functions as are required to be performed by the compensation committee under the Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014, as amended.
k) framing suitable policies and systems to ensure that there is no violation, by an employee of any applicable laws in India or overseas, including:

    a. The SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended; or

    b. The Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to the Securities Market) Regulations, 2003.

l) performing such other activities as may be delegated by the Board and/or specified/provided under the Companies Act, 2013 or the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, or by any other regulatory authority.

CSR Committee

The members of the Corporate Social Responsibility Committee are:

1. Ravinder Singh Rajput, Chairman
2. Shravan Kumar Goyal
3. Narendra Goel
4. Rakesh Bhargava

The Corporate Social Responsibility Committee was constituted by our Board at its meeting held on May 12, 2014 and was last re-constituted by our Board at its meeting held on June 22, 2018. The terms of reference of the Corporate Social Responsibility Committee include the following:

1. Recommend to the Board a suitable Corporate Social Responsibility (CSR) Policy which shall cover subjects enumerated in Schedule VII of the Companies Act,2013.
2. Recommend to the Board projects or programs as per Schedule VII of the Companies Act, 2013 as amended from time to time, to be implemented as per the CSR Policy of the Company.
3. Ensure that the CSR activities undertaken by the Company shall be as per the CSR Policy adopted and as per the Companies (CSR Policy) Rules, 2014 as amended from time to time.

Stakeholders Relationship Committee

The members of the Stakeholders Relationship Committee are:

1. Anshul Dave
2. Anand Goel
3. Shravan Kumar Goyal
4. Narendra Goel

The Stakeholders Relationship Committee was constituted by way of resolution passed by our Board of Directors on September 2, 2018. The scope and functions of the Stakeholder Relationship Committee is in accordance with Section 178 of the Companies Act, 2013 and the SEBI Listing Regulations.

(a) The Committee shall consider and resolve the grievances of the security holders of the listed entity including complaints related to transfer of shares, non-receipt of annual report and non-receipt of declared dividends.

(b) investigating complaints relating to allotment of shares, approval of transfer or transmission of shares, debentures or any other securities;

(c) issue of duplicate certificates and new certificates on split/consolidation/renewal; and

(d) carrying out any other function as may be decided by the Board or prescribed under the Companies Act, 2013, the SEBI Listing Regulations, or by any other regulatory authority.

IPO Committee

The members of the IPO Committee are:

1. Ravinder Singh Rajput
2. Anand Goel
3. Narendra Goel

The IPO Committee was constituted by a meeting of our Board held on September 2, 2018 and is authorized to undertake the following actions:

a. Positioning of the Issue including appointing and enter into arrangements with all intermediaries for the Issue including book running lead managers to the Issue, ("**BRLMs**"), Domestic and International legal Counsels, Issue Grading Agency, Registrar to the Issue, Escrow Collection Banks, Printers, Advertising Agency, Underwriters etc;

b. To make applications or seek clarification where necessary, to the Department of Industrial Policy and Promotion, Reserve Bank of India, Securities Exchange Board of India ("**SEBI**") and any other governmental or statutory authorities as may be required in connection with the Issue and accept on behalf of the Board such conditions and modifications as may be prescribed or imposed by any of them while granting such approvals, permissions and sanctions as may be required;

c. To finalize the disclosures in consultation with the BRLMs where applicable, the DRHP, the RHP the Prospectus, the preliminary and final international wrap and any amendments, supplements, notices, addenda or corrigenda thereto, (collectively referred as "**Offering Documents**") and take all such actions as may be necessary for the submission and filing of these documents including incorporating such alterations/corrections/ modifications as may be required by SEBI, the RoC or any other relevant governmental and statutory authorities or in accordance with Applicable Laws;

d. To decide in consultation with the BRLMs on the size, timing, pricing, discount, reservation and all the terms and conditions of the Issue of the equity shares of face value of Rs. 10 each of the Company ("Equity Shares"), including bid period, Issue price within the Price Band decided by the Board and to accept any amendments, modifications, variations or alterations thereto;

e. To negotiate, finalise and settle and to execute and deliver or arrange the delivery of the DRHP, the RHP, the Prospectus, issue agreement, syndicate agreement, underwriting agreement, cash escrow agreement, and all other documents, deeds, agreements and instruments as may be required or desirable in relation to the Issue;

f. To seek, if required, the consent of the lenders of the Company and its subsidiaries, parties with whom the Company has entered into various commercial and other agreements, all concerned government and regulatory authorities in India, and any other consents that may be required in relation to the Issue or any actions connected therewith;

g. To open and operate bank accounts in terms of the escrow agreement and to authorize one or more officers of the Company to execute all documents/deeds as may be necessary in this regard;

h. To open and operate bank accounts of the Company in terms of Section 40(3) of the Companies Act, 2013, as amended, and to authorize one or more officers of the Company to execute all documents/deeds as may be necessary in this regard;

i. To authorize and approve incurring of expenditure and payment of fees, commissions, brokerage, and reimbursement of expenses in connection with the Issue;

j. To issue receipts/allotment letters/confirmation of allotment notes either in physical or electronic mode representing the underlying Equity Shares in the capital of the Company with such features and attributes as may be required and to provide for the tradability and free transferability thereof as per market practices and regulations, including listing on one or more stock exchange(s), with power to authorize one or more officers of the Company to sign all or any of the aforestated documents;

k. To authorize and approve notices, advertisements in relation to the Issue in consultation with the relevant intermediaries appointed for the Issue;

l. To do all such acts, deeds, matters and things and execute all such other documents, etc., as may be deemed necessary or desirable for such purpose, including without limitation, to finalise the basis of allocation and to allot the equity shares to the successful allottees as permissible in law, issue of allotment letters/confirmation of allotment notes, share certificates in accordance with the relevant rules;

m. To do all such acts, deeds and things as may be required to dematerialise the Equity Shares and to sign and / or modify, as the case maybe, agreements and/or such other documents as may be required with the National Securities Depository Limited, the Central Depository Services (India) Limited, registrar and transfer agents and such other agencies, authorities or bodies as may be required in this connection and to authorize one or more officers of the Company to execute all or any of the aforestated documents;

n. To make applications for listing of the Equity Shares in one or more stock exchange(s) for listing of the Equity Shares and to execute and to deliver or arrange the delivery of necessary documentation to the concerned stock exchange(s) in connection with obtaining such listing including without limitation, entering into listing agreements and affixing the common seal of the Company where necessary;

o. To take such action, give such directions, as may be necessary or desirable as regards the Issue and to do all such acts, matters, deeds and things, including but not limited to the allotment of Equity Shares against the valid applications received in the Issue, as are in the best interests of the Company;

p. To negotiate, finalize, settle, execute and deliver any and all other documents or instruments and to do or cause to be done any and all acts or things as the IPO Committee may deem necessary, appropriate or advisable in order to carry out the purposes and intent of this resolution or in connection with the Issue and any documents or instruments so executed and delivered or acts and things done or caused to be done by the IPO Committee shall be conclusive evidence of the authority of the IPO Committee in so doing."

OUR PROMOTERS AND PROMOTER GROUP

Our Promoters

The Promoters of our Company are:

1. Suresh Goel
2. Rajendra Goel
3. Narendra Goel
4. Anand Goel
5. Atlanta Securities Private Limited.
6. Banka Finance & Securities Private Limited.

Details in relation to our Individual Promoters are as follows:

Suresh Goel

	Suresh Goel, Executive Director and Chairman For a complete profile of Suresh Goel, i.e., his age, residential address, educational qualifications, professional experience, positions / posts held in the past and other directorships, special achievements, business and other activities, see "*Our Management*" on page 194. His driving license number is CG0420010012856 and his voter ID is TIS0703546.

Rajendra Goel

	Rajendra Goel, Executive Director For a complete profile of Rajendra Goel, i.e., his age, residential address, educational qualifications, professional experience, positions / posts held in the past and other directorships, special achievements, business and other activities, see "*Our Management*" on page 194 His driving license number is CG1719870013778 and his voter ID is TIS0019646.

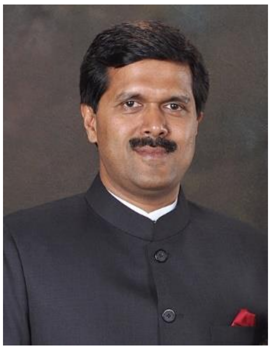
Narendra Goel

Narendra Goel, Managing Director

For a complete profile of Narendra Goel, i.e., his age, residential address, educational qualifications, professional experience, positions / posts held in the past and other directorships, special achievements, business and other activities, see "*Our Management*" on page 194.

His driving license number is CG1719800001686 and voter ID TIS1247030.

Anand Goel



Anand Goel, Executive Director

For a complete profile of Anand Goel, i.e., his age, residential address, educational qualifications, professional experience, positions / posts held in the past and other directorships, special achievements, business and other activities, see "*Our Management*" on page 194.

His driving license number is CG0420170007487. Voter ID of Anand Goel is not available.

Our Company confirms that the permanent account number, bank account number and passport number of Suresh Goel, Rajendra Goel, Narendra Goel and Anand Goel shall be submitted to the Stock Exchanges at the time of filing of this Draft Red Herring Prospectus.

Brief details/history of our Corporate Promoters

Atlanta Securities Private Limited ("**ASPL**")

ASPL was incorporated on August 9, 1995 under the Companies Act, 1956 as a private limited company with CIN U67120CT1995PTC007618. The registered office of ASPL is located at C1/602, V.I.P. Karishma, Kachna, Raipur – 492001, Chhattisgarh. ASPL is registered with RBI under the registration number B-3.00188 to carry on the business of non banking financial institution without accepting public deposits.

Promoters of ASPL

The following are the Promoters of ASPL:

1. Swastik Mercantiles Limited,
2. Shimmer Investments Private Limited,
3. Banka Finance & Securities Private Limited,
4. Shri Bajrang Ispat & Plywood Limited,
5. Mahesh Kumar Agarwal

Brief details of corporate promoters of ASPL:

Sr. No	Corporate promoters of ASPL	Directors of corporate promoters of ASPL
1.	Swastik Mercantiles Limited	1. Dinesh Goel 2. Sarla Goel 3. Dinesh Kumar Aggarwal 4. Vikash Kumar Khedia 5. Bajrang Goel 6. Prahlad Singhal
2.	Shimmer Investments Private Limited	1. Rajendra Goel 2. Kiran Goel
3.	Banka Finance & Securities Private Limited[1]	1. Sandeep Goel 2. Pawan Goel
4.	Shri Bajrang Ispat and Plywood Limited.	1. Vikash Kumar Khedia 2. Bajrang Goel 3. Pawan Goel

1. *There are no individuals holding 15% or more of the voting rights in any corporate promoter of ASPL except, Girish Chandra Satish Chandra Jain, who holds 19.05 % in Banka Finance & Securities Private Limited.*

Board of directors of ASPL

As on the date of this Draft Red Herring Prospectus, following are the directors on the board of directors of ASPL:

Sr No	Name	Designation	Director since
1.	Mahesh Kumar Agarwal	Director	March 01, 1997
2.	Prahlad Singhal	Director	July 31, 2010

Shareholding Pattern of ASPL

Set forth below is the shareholding pattern of ASPL as on the date of this Draft Red Herring Prospectus:

Sr. No	Name of shareholder	No. of equity shares	Percentage of shareholding (%)
1.	Swastik Mercantiles Limited.	131,000	18.95
2.	Shimmer Investment Private Limited.	131,000	18.95
3.	Banka Finance & Securities Private Limited.	137,200	19.84
4.	Shri Bajarang Ispat& Plywood Private Limited.	131,000	18.95
5.	Dinesh Agarwal	44,000	6.35
6.	Mahesh Kumar Agarwal	102,000	14.75
7.	Aruna Goel	15,000	2.17
Total		**691,200**	**100.00**

Change in control or management of ASPL

There has been no change in control or management of ASPL in the three years immediately preceding the filing the Draft Red Herring Prospectus with the SEBI

Banka Finance & Securities Private Limited ("**BFSPL**")

BFSPL was incorporated on February 20, 1995 under the Companies Act, 1956 as a private limited company with CIN U67120CT1995PTC007619. The registered office of BFSPL is located at C1/602, V.I.P. Karishma, Kachna, Raipur - 492001. BFSPL is registered with RBI under the registration number B-3.00184 to carry on the business of non banking financial institution without accepting public deposits.

Promoters of BFSPL

The following are the Promoters of BFSPL:

1. Sandeep Goel
2. Pawan Goel
3. Atlanta Securities Private Limited
4. Swastik Mercantiles Limited
5. Shimmer Investments Private Limited
6. Girish Chandra Satish Chandra Jain
7. Shri Bajrang Ispat & Plywood Limited

Brief details of corporate promoters of BFSPL

Sr. No	Corporate promoters of BFSPL	Directors of corporate promoters of BFSPL
1.	Atlanta Securities Private Limited	1. Mahesh Kumar Agarwal 2. Prahlad Singhal
2.	Swastik Mercantiles Limited	1. Dinesh Goel 2. Sarla Goel 3. Bajrang Goel 4. Dinesh Kumar Aggarwal 5. Vikash Kumar Khedia 6. Prahlad Singhal
3.	Shimmer Investments Private Limited	1. Rajendra Goel 2. Kiran Goel
4.	Shri Bajrang Ispat & Plywood Limited	1. Vikash Kumar Khedia 2. Bajrang Goel 3. Pawan Goel

There are no individuals holding 15% or more of the voting rights in any corporate promoter of BFSPL.

Board of directors of BFSPL

As on the date of this Draft Red Herring Prospectus, following are the directors on the board of directors of BFSPL:

Sr No	Name	Designation	Director since
1.	Sandeep Goel	Director	February 19, 2018
2.	Pawan Goel	Director	February 19, 2018

Shareholding Pattern

Set forth below is the shareholding pattern of BFSPL as on the date of this Draft Red Herring Prospectus.

Sl. No	Name of Shareholder	No. of equity shares held	Percentage of shareholding (%)
1.	Swastik Mercantiles Limited.	133,600	18.85
2.	Shimmer Investment Private Limited.	136,900	19.31
3.	Girish Chandra Satish Chandra Jain	135,000	19.05
4.	Shri Bajarang Ispat & Plywood Limited.	136,000	19.19
5.	Atlanta Securities Private Limited.	132,800	18.74
6.	Mahesh Kumar Agarwal	34,200	4.83
7.	Suresh Goel (Karta)	10	Negligible
8.	Rajendra Goel (Karta)	10	Negligible
9.	Narendra Goel (Karta)	10	Negligible
10.	Anand Goel (Karta)	10	Negligible
11.	Dinesh Goel (Karta)	10	Negligible
12.	Sandeep Goel (Karta)	10	Negligible
13.	Bajrang Goel (Karta)	10	Negligible
14.	Pawan Goel (Karta)	10	Negligible
15.	Rajendra Goel	10	Negligible
16.	Aayush Goel	5	Negligible
17.	Shimmer Goel	5	Negligible

Sl. No	Name of Shareholder	No. of equity shares held	Percentage of shareholding (%)
Total		**708,600**	**100**

Change in control or management of BFSPL

There has been no change in control or management of BFSPL in the three years immediately preceding the filing the Draft Red Herring Prospectus of the Company with the SEBI.

Our Company confirms that the PAN, bank account numbers, and company registration number of BFSPL and ASPL and the address of the registrar of companies where BFSPL and ASPL are registered shall be submitted to the Stock Exchanges at the time of filing of this Draft Red Herring Prospectus.

Interests of Promoters:

Our Promoters are interested in our Company to the extent that they have promoted our Company and to the extent of their respective shareholding in our Company and the dividends payable, if any, and any other distributions in respect of the Equity Shares held by them. For further details of our Promoters' shareholding, see "*Capital Structure" on page* 90. Our Promoters, who are also Directors, may be deemed to be interested to the extent of their remuneration / fees and reimbursement of expenses, payable to them. Further, our Individual Promoters are also directors on the boards, or are members, of certain Promoter Group entities and may be deemed to be interested to the extent of the payments made by our Company, if any, to these Promoter Group entities.

Other than as disclosed in "*Related Party Transactions"*, "*Our Management"* and "*Our Promoters and Promoter Group*" on page 226, 194 and 211 our Company has not entered into any contract, agreements or arrangements during the preceding two years from the date of this Draft Red Herring Prospectus or proposes to enter into any such contract in which our Promoters or the members of our Promoter Group are directly or indirectly interested and no payments have been made to them in respect of the contracts, agreements or arrangements which are proposed to be made with.

Our Promoters have no interest in any property acquired by or leased to our Company during the two years immediately preceding the date of the Draft Red Herring Prospectus or proposed to be acquired or leased to our Company, or in any transaction by our Company for acquisition of land, construction of building or supply of machinery.

Certain entities forming part of our Promoter Group are also engaged in business activities similar to those of our Company. Additionally, other than as disclosed in "*Our Group Companies*", "*Our Subsidiaries*" and "*Our Promoters and Promoter Group*" on page 219, page 192 and page 211 respectively, our Promoters do not have any interest in any venture that is involved in any activities similar to those conducted by our Company. Our Company will adopt the necessary procedures and practices as permitted by law to address any conflict situation as and when it arises.

Other than as disclosed in "*Related Party Transactions*" on page 226 none of our Promoters are interested as a member of a firm or company and no sum has been paid or agreed to be paid to any of our Promoters or to any such firm or company in cash or shares or otherwise by any person either to induce him to become, or to qualify him as, a director, or otherwise, for services rendered by such Promoter(s) or by such firm or company in connection with the promotion or formation of our Company.

For details of related party transactions entered into by our Promoter, Promoter Group and our Company during the last financial year, the nature of transactions and the cumulative value of transactions, see "*Related Party Transactions*" on page 226. Except as disclosed in "*Related Party Transactions*" on page 226, our Promoters are not related to any of the sundry debtors or beneficiaries of loans and advances of our Company.

Payment or benefits to our Promoters or our Promoter Group:

Except as stated in "*Related Party Transactions*" and "*Our Management*" on pages 226 and 194, respectively and as stated below, there has been no payment of benefits to our Promoters or Promoter Group during the two years preceding the filing of this Draft Red Herring Prospectus nor is there any intention to pay or give any benefit to our Promoters or Promoter Group.

Our Company had entered into contract with Aayush Goel dated April 1, 2018 pursuant to which Aayush Goel has agreed to provide the engineering consulting services for upcoming project at Unit III of our Company for a period of 12 months. The price agreed to be paid by our Company for the services to be provided by Aayush Goel is ₹ 4.80 million. The said agreement has been terminated with effect from September 1, 2018.

Further, our Company had also entered into contract with Ashutosh Goel dated April 1, 2018 pursuant to which Ashutosh Goel has agreed to provide the engineering consulting services for Unit I of our Company for a period of 12 months. The price agreed to be paid by our Company for the services to be provided by Ashutosh Goel is ₹ 4.80 million. The said agreement has been terminated with effect from September 1, 2018.

Except as stated in "*Related Party Transactions*" on page 226 and as disclosed below, our Company has not paid remuneration to any member of the Promoter Group:

Name of the member of the Promoter Group	Remuneration paid from April 1, 2018 till date of filing DRHP (₹ in million)
Pawan Goel	0.75
Sandeep Goel	Nil
Bajrang Goel	0.75
Ashutosh Goel	Nil
Aayush Goel	Nil
Shimmer Goel	Nil
Sarla Goel	0.75
Aruna Goel	0.75
Neeta Goel	0.75
Kiran Goel	0.75
Suman Goel	0.75

Confirmations:

Our Promoters, their relatives and members of our Promoter Group have not been declared as Wilful Defaulters and there are no violations of securities laws committed by our Promoters in the past and no proceedings for violation of securities laws are pending against them.

Our Promoters and members of our Promoter Group have not been prohibited from accessing or operating in capital markets under any order or direction passed by SEBI or any other regulatory or governmental authority.

Our Promoters are not and have never been a promoter, director or person in control of any other company which is prohibited from accessing or operating in capital markets under any order or direction passed by SEBI or any other regulatory or governmental authority.

Except as disclosed under "*Outstanding Litigation and Material Developments*" on page 464 there is no litigation or legal action pending or taken by any ministry, department of the Government or statutory authority during the last five years preceding the date of this Draft Red Herring Prospectus against our Promoters.

Our Promoters are not interested in any entity which holds any intellectual property rights that are used by our Company.

Change in the management and control of our Company

There has not been any change in the management or control of our Company.

Companies with which our Promoters have disassociated in the last three years

Our Promoters have not disassociated themselves from any company in the last three years preceding the date of filing of this Draft Red Herring Prospectus.

Our Promoter Group:

Individuals forming part of the Promoter Group:

Sr. No	Name of the Individuals
1.	Premlata Singhal
2.	Sarla Goel
3.	Dinesh Goel
4.	Sandeep Goel
5.	Santosh Mangala
6.	Neeta Goel
7.	Pawan Goel
8.	Kavita Bansal
9.	Shweta Bansal
10.	Satish Singhal
11.	Asha Bansal
12.	Urmila Agrawal
13.	Nirmal Gupta
14.	Aruna Gupta
15.	Sarita Gupta
16.	Anju Bansal
17.	Aruna Goel
18.	Bajrang Goel
19.	Archit Goel
20.	Nikita Agarwal
21.	Ramlal Aggerwal
22.	Shyamlal Aggerwal
23.	Kiran Goel
24.	Ashutosh Goel
25.	Aayush Goel
26.	Ramgopal Khedia
27.	Gayatri Khedia
28.	Krishna Khedia
29.	Mahesh Kumar
30.	Girish Chandra Satish Chandra Jain
31.	Smita Arya

Entities forming part of the Promoter Group

The entities forming a part of our Promoter Group are as follows:

Sr.No	Name of the entity
1.	Swatisk Merchantiles Limited
2.	Shri Bajrang Ispat and Plywood Limited
3.	Sukanya Merchandise Private Limited.
4.	Bonus Dealcom Private Limited
5.	Shimmer Investment Private Limited
6.	SB Multimedia Private Limited.
7.	IA Energy Private Limited.
8.	Shri Bajrang Hydro Energy Private Limited.
9.	Shri Bajrang Steel & Power Limited
10.	Onward Promoters Private Limited.
11.	Tatkal Dealcom Private Limited.
12.	Shri Bajrang Devcon Private Limited
13.	Saurabh Strips Private Limited.
14.	OPS Wood Industries Private Limited
15.	Priority Construction Private Limited
16.	Shri Bajrang Alloys Limited
17.	Kalpataru Properties Private Limited

Hindu Undivided Families forming part of the Promoter Group

The Hindu Undivided Families forming a part of our Promoter Group are as follows:

Sr. No	Name of the HUF
1.	Jainarayan Hariram Goel & Sons
2.	Suresh Goel & Sons
3.	Rajendra Goel & Sons
4.	Narendra Goel & Sons
5.	Anand Goel & Sons
6.	Dinesh Goel & Sons
7.	Sandeep Goel & Sons
8.	Bajrang Goel & Sons
9.	Pawan Goel & Sons

Partnership firms forming part of the Promoter Group

The Partnership firms forming a part of our Promoter Group are as follows:

Sr.No	Name of the Partnership firm
1.	Bajrang Rice Mills
2.	JJ Rerollers
3.	Hariram Goel & Co
4.	Suresh Goel & Bros
5.	Hariram Goel &Sons

OUR GROUP COMPANIES

In terms of the SEBI ICDR Regulations, Group Companies include such companies which are covered under applicable accounting standards and such other companies as are considered material by the Board. Pursuant to a resolution of our Board dated September 2, 2018, for the purposes of disclosure in connection with the Issue, a company shall be considered material and disclosed as a 'Group Company' in the event it constitutes a part of the related parties of our Company, other than the Subsidiaries, under the relevant accounting standards, as per the Restated Financial Statements of our Company as at and for the Financial Year 2017 – 2018 and also any other companies considered material by the Board

Accordingly, in terms of the policy adopted by our Board of Directors for determining group companies, we have set out below the details of our Group Companies. Our Board of Directors has also approved that, as on the date of the aforesaid resolution, there are no other group companies of our Company other than the companies disclosed below

Based on the above, following companies are the Group Companies of our Company:

1. Shri Bajrang Alloys Limited.
2. S. B. Multimedia Private Limited.
3. Shimmer Investments Private Limited.
4. Swastik Mercantiles Limited.
5. Shri Bajrang Ispat & Plywood Limited.
6. Shri Bajrang Hydro Energy Private Limited.
7. Shri Bajrang Steel & Power Limited.
8. Chhattisgarh Captive Coal Mining Limited.
9. IA Energy Private Limited.

Details of the top five Group Companies

The details of Shri Bajrang Alloys Limited, which is a listed entity and other top four Group Companies on the basis of turnover are as follows:

Shri Bajrang Alloys Limited ("SBAL")

Corporate Information

SBAL was incorporated on August 16, 1990 as a public limited company under the Companies Act, 1956 and received a certificate for commencement of business on November 7, 1990. Its registered office is situated at 521/C, Urla Industrial Complex, Urla, Raipur - 493221. SBAL is engaged in the business of manufacturing of sponge iron, pig iron, all other kinds of ferrous as well as non-ferrous metals, all sizes of iron steel re-rolled sections and other related activities.

Interest of our Promoters

Sr. No	Name of shareholder	No of shares of face value ₹ 10 each.	Percentage of total shareholding (%)
1.	Narendra Goel	6,32,700	7.03
2.	Anand Goel	3,49,469	3.88
3.	Rajendra Goel	2,09,900	2.33
4.	Suresh Goel	67,800	0.75
Total		**1,259,869**	**13.99**

Source: BSE Limited

Our Promoters, Suresh Goel, Narendra Goel and Anand Goel are also directors in SBAL and may be deemed to be interested in SBAL to that extent.

Financial Information

The following table sets forth details of the audited financial results for the Financial Years 2017 - 2018, 2016 - 2017 and 2015 - 2016, being the last three audited Financial Years:

(in ₹ million, except per share data)

Particulars	For the Financial Years		
	2017 - 2018	2016 - 2017	2015 - 2016
Equity capital	90.00	90.00	90.00
Reserves (excluding revaluation reserves) and Surplus	243.41	190.98	181.45
Revenue from operations and other income	1028.01	746.27	683.98
Profit / (loss) after tax	11.76	9.52	(12.60)
Basic EPS (in ₹)	1.31	1.06	(1.40)
Diluted EPS (in ₹)	1.31	1.06	(1.40)
Net asset value per share (in ₹)	37.04	31.22	30.16

Notes:

(i) Financial Information for Financial Year 2017 - 2018 is as per Ind AS.

(ii) Financial Information for Financial Year 2016 - 2017 and Financial Year 2015 - 2016 is as per Indian GAAP.

There are no significant notes of the auditors in relation to the aforementioned financial statements.

Share Price Information

The following table provides details of the highest and lowest price on BSE during the preceding six months:

Sr. No	Month	Monthly high	Monthly low
1.	August 2018	22.00	16.55
2.	July 2018	22.80	15.00
3.	June 2018	24.35	15.90
4.	May, 2018	22.50	16.05
5.	April, 2018	25.25	17.25
6.	March, 2018	20.65	15.75

Source: www.bseindia.com

The closing equity share price of SBAL as on September 11, 2018 on BSE was 17.95.

Mechanism for redressal of investor grievance

The board of directors of SBAL has constituted a shareholders/investors grievance committee in accordance with SEBI Listing Regulations to look into the redressal of shareholder/investor complaints. SBAL normally takes 30 days to dispose investor complaints.

Investor Grievance

SBAL received one investor complaint in the last three years. As of June 30, 2018, there were no pending investor complaints pending against SBAL.

S. B. Multimedia Private Limited ("SBMMPL")

Corporate information

SBMMPL was originally incorporated on May 26, 2006 as Shri Krishna Mining Corporation Limited under the Companies Act, 1956 and also received its certificate for commencement of business on May 26, 2006. Subsequently, a fresh certificate of incorporation was issued pursuant to change of name and conversion of public limited company into private limited company with effect from February 22, 2008. SBMMPL's registered office is situated at 1st Floor, Aarson Motors, Lodhipara Chowk, Raipur - 492001. SBMPL is engaged in the business of advertising, event media & print media and other related activities.

Interest of our Promoters

The shareholding of our Promoters in SBMMPL is as follows:

Sr No.	Name of shareholder	No of shares of face value ₹ 10 each.	Percentage of total shareholding (%).
1.	Narendra Goel	592,000	16.58
2.	Banka Finance & Securities Private Limited	520,000	14.57
3.	Suresh Goel	129,000	3.61
4.	Rajendra Goel	57,000	1.60
5.	Anand Goel	7,000	0.20
Total		**1,305,000**	**36.56**

Our Promoters, Suresh Goel, Narendra Goel and Anand Goel are also directors in SBMMPL and may be deemed to be interested in SBMMPL to that extent.

Financial Information

The following table sets forth details of the audited financial results for the Financial Years 2017 - 2018, 2016 - 2017 and 2015 - 2016, being the last three audited Financial Years:

(in ₹ million, except per share data)

Particulars	For the Financial Years		
	2017 – 2018	2016 – 2017	2015 - 2016
Equity capital	35.70	35.70	35.70
Reserves (excluding revaluation reserves) and Surplus	12.55	7.51	15.27
Revenue from operations and other income	338.99	268.88	302.72
Profit / (loss) after tax	5.03	(7.75)	6.56
Basic EPS (in ₹)	1.41	(2.17)	1.84
Diluted EPS (in ₹)	1.41	(2.17)	1.84
Net asset value per share (in ₹)	13.52	12.10	14.28

***Note:** Financial Information as per Indian GAAP.*

Excepted as stated below for the Financial Year 2015 - 2016, there are no significant notes of the auditors in relation to the aforementioned financial information.

Basis for Qualified Opinion

"Attention drawn to the Note.2.06 and 2.17 of the Financial Statement, whereof provision for gratuity are not as per Accounting Standard 15(Employee Benefits)(R), as the provision of gratuity amount is not determined as per actuarial valuation and its effect on Statement of profit and loss can not be ascertained with reasonable accuracy, which constitutes a departure from the Accounting Standards referred to in section 133 of the Companies Act '2013."

Swastik Mercantiles Limited ("SML")

Corporate information

SML was incorporated on November 13, 1984 as a public limited company under the Companies Act, 1956 and received its certificate for commencement of business on November 26, 1984. Its registered office is situated at 26/109, Birhana Road, Near Pheelkhana Police Station, Kanpur - 208001. SML is involved in the business of dealing in cotton, jute, cotton goods, textiles, yarns and related products. SML is also involved in the business of acquisition of land, houses, buildings and other related activities.

Interest of our Promoters

The shareholding of our Promoters in SML is as follows:

Sr. no	Name of shareholder	No of shares of face value ₹ 10 each.	Percentage of total shareholding (%)
1.	Atlanta Securities Private Limited	110,000	11.22
2.	Rajendra Goel	47,500	4.85
3.	Anand Goel	1,000	0.10
Total		**158,500**	**16.17**

None of our Promoters are directors of SML.

Financial Information

The following table sets forth details of the audited financial results for the Financial Years 2017 - 2018, 2016 - 2017 and 2015 - 2016, being the last three audited Financial Years:

(in ₹ million, except per share data)

Particulars	For the Financial Years		
	2017 - 2018	2016 - 2017	2015 - 2016
Equity capital	9.80	9.80	9.80
Reserves (excluding revaluation reserves) and Surplus	37.15	37.09	37.64
Revenue from operations and other income	24.58	25.46	31.62
Profit / (loss) after tax	0.06	(0.56)	(0.12)
Basic EPS (in ₹)	0.06	(0.57)	(0.12)
Diluted EPS (in ₹)	0.06	(0.57)	(0.12)
Net asset value per share (in ₹)	47.90	47.84	48.41

Note: *Financial Information as per Indian GAAP.*

There are no significant notes of the auditors in relation to the aforementioned financial statements.

Shimmer Investments Private Limited ("SIPL")

Corporate Information:

SIPL was incorporated on April 13, 1992 as a private limited company under the Companies Act, 1956. Its registered office is situated at New Timber Market, Fafadih Raipur - 492001, Chhattisgarh. SIPL is engaged in the business of production, manufacturing, trading of all kinds of iron and steel products and also to carry on the business of selling, dealing, investing in land, house or other property.

Interest of our Promoters:

The shareholding of our Promoters in SIPL is as follows:

Sr. No	Name of Shareholder	No of shares of face value ₹ 10 each.	Percentage of total shareholding.
1.	Atlanta Securities Private Limited	118,000	19.83
2.	Suresh Goel	16,700	2.81
3.	Rajendra Goel	5,900	0.99
4.	Anand Goel	4,900	0.82
5.	Narendra Goel	900	0.15
Total		**146,400**	**24.60**

One of our Promoters, Rajendra Goel is also director in SIPL and may be deemed to be interested in SIPL to that extent.

Financial Information:

The following table sets forth details of the audited financial results for the Financial Years 2017 - 2018, 2016 - 2017 and 2015 - 2016, being the last three audited Financial Years:

(in ₹ million, except per share data)

Particulars	For the Financial Year		
	2017-2018	2016-2017	2015-2016
Equity capital	5.95	5.95	5.95
Reserves (excluding revaluation reserves) and Surplus	49.31	48.15	47.23
Revenue from operations and other income	14.78	76.79	97.45
Profit / (loss) after tax	1.16	0.92	1.59
Basic EPS (in ₹)	1.96	1.54	2.69
Diluted EPS (in ₹)	1.96	1.54	2.69
Net asset value per share (in ₹)	92.88	90.92	89.38

Note: *Financial Information as per Indian GAAP.*

There are no significant notes of the auditors in relation to the aforementioned financial statements.

Shri Bajrang Ispat & Plywood Limited ("SBIPL")

Corporate Information:

SBIPL was incorporated on February 22, 1996 as a Shri Bajrang Ispat Limited under the Companies Act, 1956. Subsequently its name changed to Shri Bajrang Ispat & Plywood Limited and a fresh certificate of incorporation was issued on June 8, 1998. Its registered office is situated at Flat no.1403, Krushal Tower, B Wing, MG Road, Amar Mahal, Ghatkopar, Mumbai - 400089. SBIPL is engaged in the business of manufacturing and allied activities of all kinds of iron and steel products.

Interest of our Promoters

The shareholding of our Promoters in SBIPL is as follows:

Sr. no	Name of shareholder	No of shares of face value ₹ 10 each.	Percentage of total shareholding (%)
1.	Atlanta Securities Private Limited	265,100	14.45
2.	Suresh Goel	216,100	11.78
3.	Rajendra Goel	30,100	1.64
4.	Anand Goel	8,100	0.44
5.	Narendra Goel	100	0.01
Total		**519,500**	**28.41**

None of our Promoters are directors of SBIPL.

Financial Information:

The following table sets forth details of the audited financial results for the Financial Years 2017 - 2018, 2016 - 2017 and 2015 - 2016, being the last three audited Financial Years:

(in ₹ million, except per share data)

Particulars	For the Financial Year		
	2017-2018	2016-2017	2015-2016
Equity capital	18.34	18.34	18.34
Reserves (excluding revaluation reserves) and Surplus	27.16	27.08	27.19
Revenue from operations and other income	0.85	0.71	0.86
Profit / (loss) after tax	0.08	(0.11)	(0.12)

Particulars	For the Financial Year		
	2017-2018	2016-2017	2015-2016
Basic EPS (in ₹)	0.04	(0.06)	(0.07)
Diluted EPS (in ₹)	0.04	(0.06)	(0.07)
Net asset value per share (in ₹)	24.80	24.77	24.83

Note: *Financial Information as per Indian GAAP.*

There are no significant notes of the auditors in relation to the aforementioned financial statements.

Nature and Extent of Interest of Group Companies

(a) ***In the promotion of our Company***

None of our Group Companies have any interest in the promotion of our Company.

(b) ***In the properties acquired or proposed to be acquired by our Company in the past two years before filing this Draft Red Herring Prospectus with SEBI***

Except as disclosed under "*Related Party Transactions*" on page 226, none of our Group Companies are interested in the properties acquired by our Company in the two years preceding the date of filing of this Draft Red Herring Prospectus or proposed to be acquired by it as on the date of this Draft Red Herring Prospectus.

(c) ***In transactions for acquisition of land, construction of building and supply of machinery***

None of our Group Companies is interested in any transactions by our Company for the acquisition of land, construction of building or supply of machinery.

Common Pursuits among the Group Companies and our Company

Other than SBMMPL, our Group Companies are engaged in activities similar to that of our Company or are enabled under their respective memorandums of association, as applicable, to engage in similar activities to that of our Company. Our Company will adopt the necessary procedures and practices as permitted by law to address any conflict situation if and when they arise.

Related business transactions within the Group Companies and significance on the financial performance of our Company

For information on related business transactions of the Group Company, see "*Related Party Transactions*" on page 226.

Significant Sale/Purchase between Group Companies and our Company

Our Company is not involved in any sales or purchases with any of our Group Companies where such sales or purchases exceed in value in the aggregate of 10% of the total sales or purchases of our Company.

Business Interest of Group Companies

Except as disclosed below and in "*Related Party Transactions*" on page 226, none of our Group Companies have any business interest in our Company:

Defunct Group Companies

None of our Group Companies remain defunct and no application has been made to the respective registrar of companies for striking off the name of any of our Group Companies during the five years preceding the date of filing of this Draft Red Herring Prospectus with SEBI.

Further, none of our Group Companies fall under the definition of sick companies under the erstwhile SICA or equivalent thereof under the Insolvency and Bankruptcy Code, 2016 and none of them is under winding up.

Loss making Group Companies

The following tables set forth the details of our Group Companies which have incurred loss in the last Financial Year and profit/(loss) made by them in the last three Financial Years, on the basis of latest audited financial statements available:

(Amount in ₹ million unless otherwise stated)

Name of the entity	Profit/(loss) Financial Year		
	2018*	2017	2016
CCCML	(0.14)	(0.61)	(0.40)

**The financial results are as per the management certified accounts.*

None of our Group Companies have a negative net-worth.

Other Confirmations

Except as listed below, none of our Group Companies have taken unsecured loans:

1) SBMMPL

2) SML

3) CCCML

Other than SBAL, which is listed on BSE, none of the Group Companies are listed.

Further, SML was delisted from the U.P. stock exchange pursuant to de-recognition of U.P. Stock exchange vide exit order WTM/RKA /MRD/49/2015 issued by SEBI dated June 9, 2015. However, pursuant to NSE Circular no. 0817 /2018 dated July 18, 2018 and SEBI Circular no. SEBI/HO/MRD/DSA/CIR/P/2016/110 dated October 10, 2016, SML has been removed from dissemination board of NSE. SML has made an application to the Registrar of Companies, Uttar Pradesh requesting for change in CIN on delisting of equity shares consequent to de-recognition of U.P. stock exchange.

None of our Group Companies have failed to list on any stock exchange in India or abroad.

No public issue or rights issue has been undertaken by our Group Companies in the last three years.

No portion of the Issue proceeds is proposed to be paid to our Group Companies.

For further confirmations, see *"Other Regulatory and Statutory Disclosures – Prohibition with respect to willful defaulters"* and *"Other Regulatory and Statutory Disclosures*" on page 520.

None of the Group Companies have been identified as a Wilful Defaulter**.**

Litigation

For details relating to the legal proceedings involving the Group Companies, see "*Outstanding Litigation and Other Material Developments*" on page 464.

RELATED PARTY TRANSACTIONS

For details of the related party transactions, as per the requirements under the relevant accounting standards and as reported in the Restated Financial Statements, see *"Restated Financial Statements"*, on page 228.

DIVIDEND POLICY

The declaration and payment of dividends will be recommended by the Board of Directors and approved by the Shareholders, at their discretion, subject to the provisions of the Articles of Association and the Companies Act. Our Board approved the formal dividend distribution policy of our Company, at the Board meeting held on September 2, 2018, which includes parameters to be considered by the Board for declaration of dividend, with an objective of rewarding the shareholders of our Company.

The financial parameters and other internal and external factors that would be considered for declaration of dividend, are, distributable surplus available as per the Companies Act and regulations, Company's liquidity position and future cash flow needs, track record of dividends distributed by the Company, payout ratios of comparable companies, prevailing taxation policy or any amendments expected thereof, with respect to dividend distribution, capital expenditure requirements considering the expansion, modernization, additional investment in joint ventures/subsidiaries and acquisition opportunities, cost and availability of alternative sources of financing, stipulations/ covenants of loan agreements, macroeconomic and business conditions in general, any other relevant factors that the board may deem fit to consider before declaring dividend.

Our Company has not declared any dividend for last five Financial Years.

SECTION V: FINANCIAL INFORMATION

RESTATED FINANCIAL STATEMENTS

Auditors' Report on the Restated Consolidated under Indian Accounting Standards ("Ind AS") Financial Information of Shri Bajrang Power and Ispat Limited

To,
The Board of Directors
Shri Bajrang Power and Ispat Limited
Village Borjhara, Urla Industrial Area,
Raipur (C.G)-493221

Independent Auditors' Report on the Restated Consolidated Ind AS Financial Information prepared in connection with the proposed initial public offering (the "IPO") by Shri Bajrang Power and Ispat Limited.

Dear Sirs,

1. We have examined the attached Restated Consolidated Ind AS Financial Information of Shri Bajrang Power and Ispat Limited (the "**Company**") and its subsidiaries i.e. Shri Bajrang Energy Private Limited, I. A Hydro Energy Private Limited, S B Power, Joint Ventures i.e. Chhattisgarh Captive Coal Mining Limited and its Associate i.e. I A Energy, (together referred to as the "**Group**") which comprises of the Restated Consolidated Ind AS Summary Statement of Assets and Liabilities as at March 31, 2018, March 31, 2017 and March 31, 2016, the Restated Consolidated Ind AS Summary Statement of Profit and Loss (including other comprehensive income) the Restated Consolidated Ind AS Summary Statement of Cash Flows for each of the years ended March 31, 2018, March 31, 2017 and March 31, 2016, the Restated Consolidated Ind AS Statement of Changes in Equity and the Significant Accounting Policies and Other Information – including schedules, notes and annexures thereto for the respective periods (collectively referred to as the "**Restated Consolidated Ind AS Financial Information**"), for the purpose of inclusion in the Draft Red Herring Prospectus ("Offer Documents") to be prepared by the Company in connection with its proposed IPO of equity shares of face value of ₹ 10 each as approved by the Board of Directors of the Company, prepared in terms of the requirements of the relevant provisions of the:

   a. Section 26 of Part I of Chapter III of the Companies Act, 2013 (the "**Act**") and

   b. the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 as amended from time to time in pursuance of provisions of Securities and Exchange Board of India Act, 1992 ("**SEBI ICDR Regulations**").

   The preparation of the Restated Consolidated Ind AS Financial Information is the responsibility of the management of the Company. The management's responsibility includes designing, implementing and maintaining adequate internal control relevant to the preparation and presentation of the Restated Consolidated Ind AS Financial Information. The management is also responsible for identifying and ensuring that the Company complies with the SEBI ICDR Regulations.

2. We have examined such Restated Consolidated Ind AS Financial Information taking into consideration:

   a. the terms of reference and terms of our engagement agreed with you vide our engagement letter dated. August 14, 2018, requesting us to carry out the assignment, in connection with the proposed initial public offering of the Company;

   b. Guidance Note on Reports in Company Prospectus (Revised 2016) issued by the Institute of Chartered Accountants of India ("**ICAI**") as amended from time to time (the "**Guidance Note**") which include the concept of test checks and materiality. This Guidance note requires us to obtain reasonable assurance based on verification of evidence supporting the Restated Consolidated Ind AS Financial Information. The Guidance Note also requires that we comply with the ethical requirements of the code of Ethics issued by the Institute of Chartered Accountants of India.

3. The Restated Consolidated Ind AS Financial Information have been compiled by the management of the Company from:

   a. the audited consolidated financial statements of the Company as at and for the year ended March 31, 2018, prepared in accordance with have been prepared under Indian Accounting Standards ("**Ind AS**") notified under the Companies (Indian Accounting Standards) Rules, 2015 read with Section 133 of the Act and which have been approved by the Board of Directors at their meetings held on July 24, 2018; and

   b. the audited consolidated financial statements of the Company as at and for each of the years ended March 31, 2017 and 2016 prepared in accordance with accounting principles generally accepted in India ("**Indian GAAP**") at the relevant time which have been approved by the Board of Directors at their meetings held on July 25, 2017 and August 23, 2016, respectively; as adjusted for changes on account of Ind AS.

   c. Audit for the financial year ended 2017 and 2016 was conducted by the previous auditors , R.K. Singhania & Associates , Chartered Accountants, Raipur , and accordingly reliance has been placed on the consolidated financial information examined by them for the said years .The financial report included for these years i.e. 2017 and 2016 are based solely on the report submitted by them.

d. We did not audit the financial statements of the subsidiaries and joint venture for the period ended March 31, 2018 whose financial statements reflect total assets of ₹ 6,750.40 million and total revenue of ₹ 232.09 Million. These financial statements have been audited by another firm of Chartered Accountants, whose reports have been furnished to us and our opinion in so far as it relates to the amounts included in these Restated Consolidated Summary Statement of Asset and Liabilities and Restated Consolidated Summary Statement of Profit and Loss Account are based solely on the report of other auditor.

e. The financial information in relation to the Company's subsidiaries and Joint venture as listed below, which are audited by the other auditors and included in the Restated Consolidated Ind AS Financial Information:

Name of the entity	**Name of the audit Firm**	**Relationship of the entity with the Company**	**Audit for Period (Financial Year)**
I A Hydro Energy Private Limited	R. Malu & Associates	Subsidiary	2016-2017 & 2017-2018
Shri Bajrang Energy Private Limited	R . K . Singhania & Associates	Subsidiary	2015-2016 to 2017-2018
S . B Power	PSA Jain and Co.	Firm (treated as Subsidiary)	2015-2016 to 2017- 2018
Chhattisgarh Captive Coal Mining Ltd	R . K . Singhania & Associates	Joint Venture	2015-2016 & 2016-2017 *Unaudited Financial Statement for Fiscal 2017-18 have been certified by management and our opinion, in so far as it relates to the amounts included in these Restated Consolidated Ind AS Financial Information, are based solely on the representation of the management.*

These financial statements have been audited by other firms of Chartered Accountants as mentioned above, whose reports have been furnished to us and our opinion in so far as it relates to the amounts included in these Restated Consolidated Ind AS Financial Information are based solely on the report of other auditor.

These other auditors, as mentioned above and the Company have confirmed that the Restated Consolidated Ind AS Financial Information:

- have been made after incorporating adjustments for the changes in accounting policies retrospectively in respective financial years to reflect the same accounting treatment as per changed accounting policy for the reporting periods;
- have been made after incorporating adjustments for the material amounts in the respective financial years to which they relate; and
- do not contain any extra-ordinary items that need to be disclosed separately in the Restated Consolidated Ind AS Financial Information;
- There were qualifications in the auditors' reports on the audited consolidated financial statements of the Company as at March 31, 2017 and March 31, 2016 for which adjustment have been done to the Restated Consolidated Ind AS Financial Information. *(Refer Annexure 6 for details)*
- do not contain any exceptional items that need to be disclosed separately in the Restated Consolidated Ind AS Financial Information.

4. In accordance with the requirements of Section 26 of Part I of Chapter III of the Act the SEBI ICDR Regulations and the Guidance Note we report that: the Restated Consolidated Ind AS Financial Information including March 31, 2017 & March 31, 2016 examined and reported upon by R.K .Singhania & Associates , Chartered Accountants Raipur ,on which reliance has been placed by us and March 31, 2018 examined by us, as set out in Annexure to this report, have been arrived after making adjustments and regrouping/ reclassifications as in our opinion were appropriate below and have been fully described in Annexure 6: Statement of Restatement Adjustments to Audited Ind AS Consolidated Financial Statements and based on our examination, we report that:

a. The Restated Consolidated Ind AS Consolidated Summary Statement of Assets and Liabilities of the Group as at March 31, 2018, 2017 and 2016, as set out in Annexure 1 to this report;
b. The Restated Consolidated Ind AS Consolidated Summary Statement of Profit and Losses of the Group for each of the years ended March 31, 2018, 2017 and 2016, as set out in Annexure 2 to this report;
c. The Restated Ind AS Consolidated Summary Statement of Cash Flows of the Group for each of the years ended March 31, 2018, 2017 and 2016, as set out in Annexure 3 to this report;
d. The Restated Ind AS Consolidated Summary Statement of Changes in Equity of the Group for each of the years ended March 31, 2018, 2017 and 2016, as set out in Annexure 4 to this report; and

Based on the above and according to the information and explanations given to us, we further report that the Restated Consolidated Ind AS Financial Information of the Group, as attached to this report and as mentioned above, read with basis of preparation and respective significant accounting policies given in Annexure 5 as described in paragraph 1 have been prepared in accordance with the SEBI ICDR Regulations and these Restated Consolidated Ind AS Financial Information:

a. have been made after incorporating adjustments for the changes in accounting policies retrospectively in respective financial years to reflect the same accounting treatment as per changed accounting policy for the reporting periods;
b. have been made after incorporating adjustments and regroupings for the material amounts in the respective financial year to which they relate;
c. as per requirements of Ind AS, do not contain any extra-ordinary items that need to be disclosed separately in the Restated Consolidated Ind AS Financial Information;
d. There were qualifications in the auditors' reports on the audited consolidated financial statements of the Company as at March 31 2017 and March 31, 2016 and for which adjustment have been made to the Restated Consolidated Ind AS Financial Information. *(Refer Annexure 6 for Details)*
e. Other matter, with respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, included in the auditor's report on the consolidated financial statement as at and for the year ended March 31, 2018, March 31, 2017 & March 31, 2016 which do not require any corrective adjustment in the Restated Ind AS Consolidated Financial Information, are as follows

Adequacy and operating effectiveness of the internal financial controls over financial reporting in so far as it relates to subsidiary companies and Joint venture incorporated in India is based on the corresponding report of the auditor of the company.

Our opinion is not qualified in this matter.

5. We have also examined the following Restated Consolidated Ind AS Financial Information set out in Annexures prepared by the management and approved by the Board of Directors of the Company and annexed to this report relating to the Group as at and for each of the years ended March 31, 2018, 2017 and 2016:

1. Restated Consolidated Ind AS Summary Statement of Assets and Liabilities in **Annexure 1**;
2. Restated Consolidated Ind AS Summary Statement of Profit and Loss in **Annexure 2**;
3. Restated Consolidated Ind AS Summary Statement of Cash Flows in **Annexure 3**;
4. Restated Consolidated Ind AS Statement of Changes in Equity in **Annexure 4**;
5. Notes to the Restated Consolidated Ind AS Financial Information - Significant Accounting Policies in **Annexure 5**;
6. Statement of Restatement Adjustments to Audited Ind AS Consolidated Financial Statements in **Annexure 6;**
7. Restated Consolidated Ind AS Statement of Property, Plant and Equipment included in **Annexure 7**;
8. Restated Consolidated Ind AS Statement of Intangible Assets included in **Annexure 7**;
9. Restated Consolidated Ind AS Statement of Loan Non-Current Financial Assets-Investment included in **Annexure 8**;
10. Restated Consolidated Ind AS Statement of Other Non-Current Financial Assets included in **Annexure 9**;
11. Restated Consolidated Ind AS Statement of Deferred Tax Assets (net) included in **Annexure 10**;
12. Restated Consolidated Ind AS Statement of Other Non-Current Assets included in **Annexure 11**;
13. Restated Consolidated Ind AS Statement of Inventories included in **Annexure 12**;
14. Restated Consolidated Ind AS Statement of Trade Receivables included in **Annexure 13**;
15. Restated Consolidated Ind AS Statement of Cash and Bank Balances included in **Annexure 14**;
16. Restated Consolidated Ind AS Statement of Current Financial Assets-Loan included in **Annexure 15**;
17. Restated Consolidated Ind AS Statement of Other Current Financial Assets included in **Annexure 16**;
18. Restated Consolidated Ind AS Statement of Other Current Assets included in **Annexure 17**;
19. Restated Consolidated Ind AS Statement of Equity Share Capital included in **Annexure 18**;
20. Restated Consolidated Ind AS Statement of Other Equity included in **Annexure 19**;
21. Restated Consolidated Ind AS Statement of Non-Current Financial Liabilities-Borrowings included in **Annexure 20**;
22. Restated Consolidated Ind AS Statement of Long Term Provisions included in **Annexure 21**;
23. Restated Consolidated Ind AS Statement of Other Long Term Liabilities included in **Annexure 22**;
24. Restated Consolidated Ind AS Statement of Other Current Financial Liabilities included in **Annexure 23**;
25. Restated Consolidated Ind AS Statement of Trade included in **Annexure 24**;
26. Restated Consolidated Ind AS Statement of Other Current Financial Liabilities included in **Annexure 25**;
27. Restated Consolidated Ind AS Statement of Other Current Liabilities included in **Annexure 26**;
28. Restated Consolidated Ind AS Statement of Short Term Provisions included in **Annexure 27**;
29. Restated Consolidated Ind AS Statement of Revenue from Operations included in **Annexure 28**;
30. Restated Consolidated Ind AS Statement of Other Income included in **Annexure 29**;
31. Restated Consolidated Ind AS Statement of Raw Material Consumed included in **Annexure 30**;
32. Restated Consolidated Ind AS Statement of Increase/Decrease on Stock in Trade included in **Annexure 31**;
33. Restated Consolidated Ind AS Statement of Employee Benefit Expenses included in **Annexure 32**;
34. Restated Consolidated Ind AS Statement of Finance Cost included in **Annexure 33**;
35. Restated Consolidated Ind AS Statement of Other Expenses included in **Annexure 34**;
36. Restated Consolidated Ind AS Statement of Current Tax included in **Annexure 35**;
37. Restated Consolidated Ind AS Statement of Earnings Per Share included in **Annexure 36**;
38. Restated Consolidated Ind AS Statement of First time adoption of Ind AS included in **Annexure 37**;
39. Notes to Restated Consolidated Ind AS Statement included in **Annexure- 38 to 47;**
40. Restated Consolidated Ind AS Statement of Accounting Ratios included in **Annexure 48;**

41. Restated Consolidated Ind AS Statement of Capitalisation included in **Annexure 49**;
42. Restated Consolidated Ind AS Statement of Tax Shelter included in **Annexure 50**,
43. Miscellaneous Disclosure in **Annexure-51;**

According to the information and explanations given to us and also as per the reliance placed on the statutory audit reports of the previous auditors furnished to us and representations made by the Company's management, in our opinion, the Restated Consolidated Ind AS Financial Information and the above mentioned restated Ind AS financial information contained in Annexures 1 to 51 accompanying this report, read with Notes to the Restated Consolidated Ind AS Financial Information - Significant Accounting Policies disclosed in Annexure 5, are prepared after making adjustments and regroupings as considered appropriate and disclosed in Annexure 6 and have been prepared in accordance with Section 26 of Part I of Chapter III of the Act, the SEBI ICDR Regulations and the Guidance Note and in all material respect, give a true and fair view in conformity with Ind AS, of the state of affairs of the Company as at March 31, 2018, March 31, 2017 and March 31, 2016 and its profit, total comprehensive income, the changes in equity and its cash flows for the year ended March 31, 2018, March 31, 2017 and March 31, 2016.

6. This report should not in any way be construed as a re-issuance or re-dating of any of the previous audit reports issued by the previous auditors of the Company or by us nor should it be construed as a new opinion on any of the financial statements referred to therein.

7. We have no responsibility to update our report for events and circumstances occurring after the date of the report.

8. Our report is intended solely for use of the management for inclusion in the offer document to be filed with SEBI, National Stock Exchange of India Limited and BSE Limited in connection with the proposed IPO of the Company. Our report should not be used, referred to or distributed for any other purpose except with our prior consent in writing.

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur

Date: September 2, 2018

Annexure 1
Restated Consolidated Ind AS Summary Statement of Assets and Liabilities

(₹ 'in Million)

Particulars	Annexure	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
I. ASSETS				
(1) Non-current Assets				
(a) Property, Plant & Equipment	7	14629.76	14902.65	8999.83
(b) Capital work-in-progress	7	359.22	441.51	390.11
(c) Investment Property	7	189.83	193.01	196.19
(d) Intangible Assets	7	142.21	147.21	152.21
(e) Goodwill (Consolidated)		2123.91	98.91	98.91
(f) Financial Assets				
(i) Investments	8	21.65	22.39	22.37
(ii) Others	9	58.38	59.17	49.58
(g) Deferred Tax Assets (Net)	10	54.57	54.96	83.89
(h) Other Non-current assets	11	205.02	72.49	62.42
Total Non-Current Assets		**17,784.56**	**15,992.30**	**10,055.51**
(2) Current Assets				
(a) Inventories	12	2,430.73	2,119.57	2,433.84
(b) Financial Assets				
(i) Trade Receivables	13	737.86	526.01	479.56
(ii) Cash and cash equivalents	14	18.91	75.33	18.23
(iii) Bank Balance other than Cash	14	145.07	180.23	158.35
(iv) Loans	15	-	-	1,886.73
(v) Other Financial Assets	16	28.13	39.38	66.76
(c) Current Tax Assets (Net)		0.45	68.26	100.21
(d) Other current assets	17	888.38	1,025.72	1,077.54
Total Current Assets		**4,249.54**	**4034.49**	**6221.21**
	Total	**22,034.10**	**20,026.80**	**16,276.72**
II. EQUITY AND LIABILITIES				
(1) Equity				
(a) Equity Share Capital	18	130.71	130.71	130.71
(b) Other Equity	19	7,421.64	5,119.56	4,826.71
Equity Attributable to owners of the Company		**7,552.35**	**5,250.27**	**4,975.43**
Non-Controlling Interests		70.95	19.74	20.46
Total Equity		**7,623.31**	**5,270.01**	**4,977.89**
(2) Non-Current Liabilities				
(a) Financial Liabilities				
(i) Borrowings	20	8,064.63	7,858.05	5214.38
(b) Provisions	21	57.85	44.57	32.72
(c) Deferred Tax Liabilities (Net)		-	-	-
(d) Other Long-Term Liabilities	22	60.80	60.80	60.80
Total Non-Current Liabilities		**8,183.28**	**7,963.42**	**5,307.90**

(3) Current Liabilities				
(a) Short-Term Borrowings				
(i) Borrowings	23	2,887.36	3,393.64	3,545.77
(ii) Trade Payable	24	2,009.98	1,915.57	1,568.85
(ii) Other Financial Liab.	25	943.36	1,114.30	645.98
(b) Other Current Liabilities	26	232.11	338.04	205.88
(c) Short-Term Provisions	27	34.61	31.81	24.45
(d) Current Tax Liabilities (net)		120.09	-	-
Total Current Liabilities		**6,227.51**	**6,793.36**	**5,990.93**
Total		**22,034.10**	**20,026.80**	**16,276.72**

The above should be read with Statement of Restatement Adjustments to Audited Ind AS Consolidated Financial Statements in Annexure 6 and Significant Accounting Policies and notes forming part of the Restated Consolidated Financial Statements.

For S S S D & CO **Chartered Accountants** **Firm Registration Number: 020203C**	**For and behalf of** **Shri Bajrang Power and Ispat Limited**	
	Pawan Goel **Chief Financial Officer**	**Suresh Goel** **Chairman** **DIN: 00115834**
Vidhan Chandra Srivastava **Partner** **Membership Number: 073712** **Place: Raipur** **Date : September 2, 2018**	**Parul Verma** **Company Secretary**	**Narendra Goel** **Managing Director** **DIN : 00115883**

Annexure 2

Restated Consolidated Summary Statement of Profit and Loss Account

(₹ 'in Million)

Particulars		Annexure	For The Year Ended 31.03.2018	For The Year Ended 31.03.2017	For The Year Ended 31.03.2016 (Proforma)
I.	Revenue from Operations	28	18,512.00	15,618.40	14,106.44
II.	Other Income	29	132.28	45.24	47.24
III.	**Total Revenue (I+II)**		**18,644.28**	**15,663.64**	**14,153.68**
IV.	**Expenses**				
	Cost of Materials Consumed	30	12,745.79	9,455.66	9,570.27
	Purchase of Stock in Trade		201.75	35.92	153.15
	(Increase) / Decrease in Stock in Trade	31	(485.18)	508.09	(239.16)
	Excise Duty on Sales		523.22	1,681.64	1,519.89
	Employees benefit Expenses	32	573.92	448.71	417.36
	Financial Costs	33	1,470.70	1,222.29	979.91
	Depreciation	7	708.19	564.81	547.24
	Other Expenses	34	2,252.21	1,371.86	1,154.69
		Total	**17,990.60**	**15,288.97**	**14,103.36**
V.	**Profit Before Exceptional and**				
	Items & Tax (III-IV)		**653.68**	**374.67**	**50.32**
VI.	Exceptional items		-	-	6.67
VII.	**Profit Before Tax (VII-VIII)**		**653.68**	**374.67**	**43.65**
VIII.	**Tax expenses:**				
	Net current Tax		294.68	113.05	8.66
	Deferred Tax		0.36	28.88	229.26
IX	**Profit/ (Loss) for the period**		**358.65**	**232.73**	**(194.28)**
	Add: Share in Profit of Joint Venture		(0.03)	(0.12)	(0.42)
	Less: Minority Share in Profit		(12.61)	(5.73)	-
	Less: Loss of Firm transferred to Partners Capital Account		-	(45.16)	-
			371.23	**283.51**	**(194.70)**
X.	**Other Comprehensive Income:**				
	a) Re-measurements of the defined benefit plans		**(2.41)**	**(1.40)**	**-**
	b) Equity instruments through other comprehensive income		0.10	0.13	0.06
	c) Income tax relating to items that will not be				
	reclassified to profit or loss		(0.03)	(0.05)	(0.02)
	Less: Minority Share in Other Comprehensive Income		(0.00)	-	-
			(2.35)	**(1.31)**	**0.04**

XI.	**Total Comprehensive Income for the year**	**368.88**	**282.19**	**(194.66)**
XII.	**Basic / Diluted Earnings per Equity Share**	**28.22**	**21.59**	**(14.89)**
See accompanying Accounting Policies and Notes to Basic consolidated financial statements.				
The above should be read with Statement of Restatement Adjustments to Audited Ind AS Consolidated Financial Statements in Annexure 6 and Significant Accounting Policies and notes forming part of the Restated Consolidated Financial Statements.				

For S S S D & CO **Chartered Accountants** **Firm Registration Number: 020203C**	**For and behalf of** **Shri Bajrang Power and Ispat Limited**	
	Pawan Goel **Chief Financial Officer**	**Suresh Goel** **Chairman**
Vidhan Chandra Srivastava **Partner** **Membership Number: 073712**		**DIN: 00115834**
Place: Raipur	**Parul Verma**	**Narendra Goel**
Date: September 2, 2018	**Company Secretary**	**Managing Director** **DIN : 00115883**

Annexure 3

Restated Consolidated Ind AS Summary Statement of Cash Flows

(₹ 'in Million)

	As At	As At	As At
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
A CASH FLOW FROM OPERATING ACTIVITIES			
Net Profit before Tax	653.68	374.67	43.65
ADJUSTMENTS FOR:			
Depreciation	708.19	564.81	547.24
Interest & Financial Expenses	1470.70	1222.29	979.91
Interest Received	(63.97)	(37.93)	(32.09)
Provision for Bad & Doubtful Debt	1.94	0.38	4.84
Share in Loss of Partnership Firm	-	45.16	-
Share in Profit of Joint Venture	(0.03)	(0.12)	(0.42)
Bad Debts Written off	(1.39)	-	-
Equity instruments through other comprehensive income	0.10	0.13	0.06
Re-measurements of the defined benefit plans	(2.41)	(1.40)	-
Income Disclosed Under IDS (Net of Tax)	-	11.00	-
Dividend Income	(0.00)	(0.00)	(0.00)
Impact of Restatement of Financial Statement	(27.98)	(0.45)	(0.44)
Profit/(Loss) on Sale of Fixed Asset	22.22	0.31	7.10
OPERATING PROFIT BEFORE WORKING CAPITAL CHANGES	**2761.06**	**2178.85**	**1549.86**
ADJUSTMENTS FOR CHANGE IN CURRENT ASSETS& LIABILITIES:			
(Increase)/Decrease in Inventories	(311.17)	314.27	(323.94)
(Increase)/Decrease in Trade Receivables	(212.41)	(46.83)	347.77
(Increase)/Decrease in Other Current Assets	216.40	1997.87	(1083.63)
Increase/(Decrease) in Current Liabilities & Provisions	(59.57)	954.56	(273.62)
Increase/(Decrease) in Non Current Provisions	13.28	11.85	10.82
CASH GENERATED FROM OPERATIONS	**2407.58**	**5410.58**	**227.26**
Direct Taxes Paid/Deducted at Source	294.68	113.05	8.66
NET CASH FROM OPERATING ACTIVITIES	**2112.90**	**5297.53**	**218.60**
B CASH FLOW FROM INVESTING ACTIVITIES			
Deletion/(Addition) to PPE (Including Goodwill)	(435.18)	(6537.07)	(605.28)
Increase/(Decrease) in Long-Term Loans & Advances	(131.75)	(19.66)	58.65
Sale of Fixed Asset	68.14	26.02	79.76
Dividend Income	0.00	0.00	0.00
Interest Received	63.97	37.93	32.09
(Increase) / Decrease in Bank Balance other than Cash & Cash Equivalent	35.16	(21.88)	(26.55)
(Increase) / Decrease in Investments	0.74	(0.02)	17.78
NET CASH USED IN INVESTING ACTIVITIES	**(398.91)**	**(6514.68)**	**(443.56)**
C CASH FLOW FROM FINANCING ACTIVITIES			
(Increase) / Decrease in Long-Term Borrowings	206.58	2643.67	527.82
Proceeds from issue of Share Capital (incl. Application Money			
& Premium	-	5.00	-
Increase/(Decrease) in Short-Term Borrowings	(506.28)	(152.13)	399.62
Interest & Financial Expenses	(1,470.70)	(1,222.29)	(979.91)
NET CASH USED IN FINANCING ACTIVITIES	**(1,770.40)**	**(1,274.25)**	**(52.47)**
NET INCREASE / (DECREASE) IN CASH &			
CASH EQUIVALENTS (A+B+C)	**(56.41)**	**57.10**	**(277.44)**
Cash and Cash Equivalents at the beginning of the year	**75.33**	**18.23**	**295.66**

Cash and Cash Equivalents at the end of the year	**18.91**	**75.33**	**18.23**
Components of cash and cash equivalents as at			
Cash in hand	3.77	5.95	9.01
With bank: On Current Account	15.14	69.38	9.21
Cash and cash Equivalents at the end of the year	**18.91**	**75.33**	**18.23**

Notes to cash flow statement

1. Figures for the previous year have been regrouped/ rearranged wherever found necessary.
2. The Cash Flow Statement has been prepared under the "Indirect Method" as set out in IND AS - 7 on Cash Flow Statement issued by the Institute of Chartered Accountants of India.

The above should be read with Statement of Restatement Adjustments to Audited Ind AS Consolidated Financial Statements in Annexure 6 and Significant Accounting Policies and notes forming part of the Restated Consolidated Financial Statements.

For S S S D & CO **Chartered Accountants** **Firm Registration Number: 020203C**	**For and behalf of** **Shri Bajrang Power and Ispat Limited**	
	Pawan Goel **Chief Financial Officer**	**Suresh Goel** **Chairman** **DIN: 00115834**
Vidhan Chandra Srivastava **Partner** **Membership Number: 073712** **Place: Raipur** **Date: September 2, 2018**	**Parul Verma** **Company Secretary**	**Narendra Goel** **Managing Director** **DIN : 00115883**

Annexure-4
Restated Consolidated Ind AS Statement of Changes in Equity

A. Equity Share Capital

(₹ 'in Million)

Particulars	Balance as on 01/04/2018	Movement during the year	Balance as on 31/03/2017	Movement during the year	Balance as on 31/03/2016 (Proforma)
Equity Share Capital	1307.11	-	1307.11	-	1307.11

B. Other Equity

(₹ 'in Million)

Particulars	Reserve & Surplus					Other	Total
	Retained Earnings	Securities Premium Reserve	Amalgamation Reserve	Capital Redemption Reserve	Revaluation Reserve	Comprehensive Income	Attributable to Equity Holder of the Company
Balance as of March 31, 2016	**2,256.16**	**1,534.79**	**110.74**	**111.90**	**813.07**	**0.06**	**4,826.71**
Fair valuation of Land,	-	-	-	-	0.11	-	**0.11**
Profit/Loss for period	283.51	-	-	-	-	-	**2,83.51**
Impact of Restatement Of Financial Statement	(0.45)	-	-	-	-	-	**(0.45)**
Income Disclosed under IDS (Net of Tax)	11.00	-	-	-	-	-	11.00
Other comprehensive income For the Year	-	-	-	-	-	(1.31)	(1.31)
Balance as on March 31, 2017	**2,550.21**	**1534.79**	**110.74**	**111.90**	**813.18**	**(1.26)**	**5,119.56**
Impact of Restatement, Of Financial Statement	(27.98)	-	-	-	-	-	**(27.98)**
Profit/(loss) for the period	371.23	1961.17	-	-	-	-	2,332.40
Other comprehensive z income For the Year	-	-	-	-	0.00	(2.35)	(2.34)
Balance as of March 31, 2018	**2,893.46**	**3,495.96**	**110.74**	**111.90**	**813.18**	**(3.60)**	**7,421.64**

Annexure 5

Notes to the Restated Consolidated Ind AS Financial Information - Significant Accounting Policies

1. CORPORATE INFORMATION

(i) Shri Bajrang Power & Ispat Limited is a public limited company (CIN : U27106CT2002PLC015184) ("**Company**") having its registered office at Village Borjhara, Urla Industrial Area, Borjhara, Raipur (Chhattisgarh) and its places of business are UNIT-I at Borjhara, UNIT-II (TMT) at Gondwara, & UNIT-III at Tilda. The company is engaged in manufacturing of Sponge Iron, Billets, Pellets, TMT Bars, Wire rod, Ferro Alloys, Fly Ash Bricks and generation of electricity.

(ii) The Company is having its major operation in steel, power & other incidental & ancillary operations related to steels & mining. During the year research & development activities have been started in UNIT - I (Borjhara).

(iii) The consolidated financial statement of the group includes (Shri Bajrang Power & Ispat limited (The parent company), Shri Bajrang Energy Private Limited (the subsidiary company) & IA Hydro Energy Private Limited (the subsidiary Company, earlier partnership firm till March 22, 2017), S.B. Power (Partnership Firm), Chhattisgarh Captive Coal Mining Limited (the Joint Venture Company) and I A Energy (Associate Partnership Firm) are included in consolidation for the year.

(iv) The Company, its subsidiaries and its associates & joint venture (jointly referred to as the "**Group**" herein under) considered in these consolidated financial statements are:

	Name of Company	**Country of Incorporation**	**Ownership in %**		
A	**Subsidiaries**		**2017-18**	**2016-17**	**2015-16 (Proforma)**
	(i) Shri Brajang Energy Private Limited	India	79.83%	79.83%	79.83%
	(ii) IA Hydro Energy Private Limited	India	90.46%	74.00%	NA
	(iii) S B Power (Partnership Firm)	India	51.00%	51.00%	51.00%
B	**Joint Venture**				
	Chhattisgarh Captive Coal mining Limited	India	19.75%	19.75%	19.75%
C	**Associates**				
	I.A. Energy (Partnership Firm)* (including Indirect holding through Subsidiary)	India	NA	NA	40.93%

*Note: The company was a partner in "IA energy" w.e.f. June 18, 2010 which was later on converted into private limited company on March 23, 2017. The Company is having stake of 90.46% shareholding in newly formed company named "IA HYDRO ENERGY PRIVATE LIMITED".

Purpose of Financial Statement

The restated consolidated financial statement comprising of Balance Sheet, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of changes in Equity , Cash Flow Statement and a summary of significant accounting policies and other explanatory notes for year ended March 31, 2018, March 31, 2017 and March 31, 2016 (herein after collectively referred as "Restated Consolidated Financial Statement") have been specifically prepared for inclusion in the offer documents to be filed by the Company with the Securities and Exchange Board of India ("**SEBI**"), Registrar of Companies, Bilaspur (Chhattisgarh) and the concerned Stock Exchanges. These Restated Consolidated Financial Statements have been prepared in accordance with Indian Accounting Standards ("**Ind-AS**") notified under the Companies (Indian Accounting Standards) Rules, 2015 and Companies (Indian Accounting Standards) Amendment Rules, 2016.

These Restated Consolidated Financial Statements have been prepared to comply in all material respects with the requirements of Part I of Chapter III to the Companies Act, 2013 and the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009, as amended ("the **SEBI ICDR Regulations**") as amended from time to time.

2. SIGNIFICANT ACCOUNTING POLICIES

2.1 BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES

(i) These Restated Consolidated Financial Statements are prepared in accordance with Indian Accounting Standards (Ind AS) notified by Ministry of Corporate Affairs pursuant to Section 133 of the Companies Act 2013 ("Act") read with the Companies (Indian Accounting Standards) Rules, 2015 as amended and other relavant provisions of the Act

(ii) For all the period upto and including the year 2015-16 & 2016-17, the company prepared its consolidated financial statements in accordance with accounting standards notified as Companies (Accounting Standards) Rules, 2006 and considered as "Previous GAAP" and other pronouncements of the Institute of Chartered Accountants of India (ICAI), relevant applicable provisions of Companies Act 1956 and Companies Act 2013 to the extent applicable.

(iii) These financial statements for the year ended 31st March, 2018 are the Company's first Ind AS Consolidated financial statements.

(iv) The Consolidated financial statements have been prepared on a historical cost basis, except for the following assets and liabilities which have been measured at fair value:
- Certain financial assets and liabilities (including derivative instruments) and
- Defined Benefit Plans – Plant Assets

(v) The consolidated financial statements have been prepared using uniform accounting policies for like transactions and other events in similar circumstances. The accounting policies adopted in the preparation of financial statements are consistent with those of previous year. The financial statements of the Company and its subsidiaries have been combined on a line-by-line basis by adding together the book values of like items of assets, liabilities, income and expenses, after eliminating intra-group balances, intra-group transactions and the unrealised profits/losses, unless cost/revenue cannot be recovered.

(vi) The excess of cost to the Group of its investment in subsidiaries, on the acquisition dates over and above the Group's share of equity in the subsidiaries, is recognised as 'Goodwill on Consolidation' being an asset in the consolidated financial statements. The said Goodwill is not amortised, however, it is tested for impairment at each Balance Sheet date and the impairment loss, if any, is provided for. On the other hand, where the share of equity in subsidiaries as on the date of investment is in excess of cost of investments of the Group, it is recognised as 'Capital Reserve' and shown under the head 'Reserves and Surplus' in the consolidated financial statements.

(vii) Non-controlling interests in the net assets of consolidated subsidiaries is identified and presented in the consolidated Balance Sheet separately within equity

(viii) Non-controlling interests in the net assets of consolidated subsidiaries consists of :
a) The amount of equity attributable to non-controlling interests at the date on which investment in a subsidiary is made; and
b) The non-controlling interests share of movements in equity since the date parent subsidiary relationship came into existence.

(ix) Investments in associates and joint venture are accounted for using the equity method of accounting, after initially being recognised at cost. Under the equity method of accounting, the investments are adjusted thereafter to recognise the Company's share of the post-acquisition profits or losses of the investee in the profit & loss, and the Company's share of other comprehensive income of the investee in the other comprehensive income.

(x) The Company's financial statements are presented in Indian Rupees (₹), which is also its functional currency.

2.2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

a. Property, Plant and Equipment (PPE)

i. Property, plant and equipment are stated at cost, net of recoverable taxes, trade discount and rebates less accumulated depreciation and impairment losses, if any. Such cost includes purchase price, borrowing cost and any cost directly attributable to bringing the assets to its working condition for its intended use, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the assets.

ii. Subsequent costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the entity and the cost can be measured reliably. In the carrying amount of an item of PPE, the cost of replacing the part of such an item is recognized when that cost is incurred if the recognition criteria are met. The carrying amount of those parts that are replaced is derecognized in accordance with the de-recognition principles.

iii. Expenses incurred relating to project, net of income earned during the project development stage prior to its intended use, are considered as pre - operative expenses and disclosed under Capital Work - in - Progress.

iv. "Depreciation on property, plant and equipment is provided using straight line method. Depreciation is provided based on useful life of the assets as prescribed in Schedule II to the Companies Act, 2013 except, in respect of Rolls (Rolling Mill Division), where useful life taken for one year only as per the technical advice. Each part of an item of Property, Plant & Equipment with a cost that is significant in relation to total cost of the Machine is depreciated separately, if its useful life is different than the life of the Machine. The residual values, useful lives and methods of depreciation of property, plant and equipment are reviewed at each financial year end and adjusted prospectively, if appropriate.

v. Gains or losses arising from de-recognition of a property, plant and equipment 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 and Loss when the asset is de-recognised.

vi. Spare parts procured along with the Plant & Machinery or subsequently which meet the recognition criteria are capitalized and added in the carrying amount of such item. The carrying amount of those spare parts that are replaced is derecognized when no future economic benefits are expected from their use or upon disposal. Other machinery spares are treated as "stores & spares" forming part of the inventory.

vii. The company has adopted a revaluation model for Freehold Land, wherein the assets which have been revalued shall be reviewed on an periodical basis and any accretion or decretion in value arising out of such revaluation shall be credited / debited to the revaluation reserve.

b. Leases

i. Leases are classified as finance leases whenever the terms of the lease, transfers substantially all the risks and rewards of ownership to the lessee. All other leases are classified as operating leases.

ii. Leased assets: Assets held under finance leases are initially recognised as assets of the Company at their fair value at the inception of the lease or, if lower, at the present value of the minimum lease payments. The corresponding liability to the lessor is included in the balance sheet as a finance lease obligation.

iii. Lease payments are apportioned between finance expenses and reduction of the lease obligation so as to achieve a constant rate of interest on the remaining balance of the liability. Finance expenses are recognised immediately in Statement of Profit and Loss, unless they are directly attributable to qualifying assets, in which case they are capitalized. Contingent rentals are recognised as expenses in the periods in which they are incurred.

iv. 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.

v. Operating lease payments are recognised as an expense in the Statement of Profit and Loss on a straight-line basis over the lease term except where another systematic basis is more representative of time pattern in which economic benefits from the leased assets are consumed.

c. Intangible assets

i. Intangible Assets are stated at cost of acquisition net of recoverable taxes, trade discount and rebates less accumulated amortization /depletion and impairment loss, if any. Such cost includes purchase price, borrowing costs, and any cost directly attributable to bringing the asset to its working condition for the intended use, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the intangible assets.

ii. Subsequent costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the entity and the cost can be measured reliably.

iii. 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 and Loss when the asset is derecognised

d. Capital Work in Progress

i. Expenditure incurred on assets under construction (including a project) is carried at cost under Capital Work in Progress. Such costs comprises purchase price of asset including import duties and non-refundable taxes after deducting trade discounts and rebates and costs that are directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

ii. Cost directly attributable to projects under construction include costs of employee benefits, expenditure in relation to survey and investigation activities of the projects, cost of site preparation, initial delivery and handling charges, installation and assembly costs, professional fees, expenditure on maintenance and up-gradation etc. of common public facilities, depreciation on assets used in construction of project, interest during construction and other costs if attributable to construction of projects. Such costs are accumulated under "Capital works in progress" and subsequently allocated on systematic basis over major assets, other than land and infrastructure facilities, on commissioning of projects.

iii. Capital Expenditure incurred for creation of facilities, over which the Company does not have control but the creation of which is essential principally for construction of the project is capitalized and carried under "Capital work in progress" and subsequently allocated on systematic basis over major assets, other than land and infrastructure facilities, on commissioning of projects, keeping in view the "attributability" and the "Unit of Measure" concepts in Ind AS 16- "Property, Plant & Equipment". Expenditure of such nature incurred after completion of the project, is charged to Statement of Profit and Loss.

e. Research and Development Expenditure

Revenue expenditure pertaining to research is charged to the Statement of Profit and Loss. Development costs of products are charged to the Statement of Profit and Loss unless a product's technological and commercial feasibility has been established, in which case such expenditure is capitalised.

f. Finance Cost

i. Borrowing costs include exchange differences arising from foreign currency borrowings to the extent they are regarded as an adjustment to the interest cost. 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. A qualifying asset is one that necessarily takes substantial period of time to get ready for its intended use.

ii. Interest income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalisation.

iii. All other borrowing costs are expensed in the period in which they occur.

g. Inventories

i. Items of inventories are measured at lower of cost and net realisable value after providing for obsolescence, if any, except in case of by-products which are valued at net realisable value. Cost of inventories comprises of cost of purchase, cost of conversion and other costs including manufacturing overheads net of recoverable taxes incurred in bringing them to their respective present location and condition.

ii. Cost of raw materials, stores and spares, packing materials, trading and other products are determined at Cost, with moving average price on FIFO basis

iii. Cost of Finished Goods includes direct materials, labour, conversion and proportion of manufacturing overheads incurred in bringing the inventories to their present location and condition.

h. Impairment of non-financial assets - property, plant and equipment and intangible assets

i. The Company assesses at each reporting date as to whether there is any indication that any property, plant and equipment and intangible assets or group of assets, called Cash Generating Units (CGU) may be impaired. If any such indication exists the recoverable amount of an asset or CGU is estimated to determine the extent of impairment, if any. When it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the CGU to which the asset belongs.

ii. An impairment loss is recognised in the Statement of Profit and Loss to the extent, asset's carrying amount exceeds its recoverable amount. The recoverable amount is higher of an asset's fair value less cost of disposal and value in use. Value in use is based on the estimated future cash flows, discounted to their present value using pre-tax discount rate that reflects current market assessments of the time value of money and risk specific to the assets.

iii. The impairment loss recognised in prior accounting period is reversed if there has been a change in the estimate of recoverable amount.

i. Provisions, Contingent Liabilities and Contingent Assets and Commitments

i. Provisions are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. Such provisions are determined based on management estimate of the amount required to settle the obligation at the balance sheet date. When the Company expects some or all of a provision to be reimbursed, the reimbursement is recognised as a standalone asset only when the reimbursement is virtually certain.

ii. 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 recognised as a finance cost.

iii. Contingent liabilities are disclosed on the basis of judgment of management. These are reviewed at each balance sheet date are adjusted to reflect the current management estimate.

iv. Contingent assets are not recognized but are disclosed in the financial statements when inflow of economic benefits is probable.

j. Income Taxes

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

i. Current tax
Current tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities, based on tax rates and laws that are enacted or substantively enacted at the Balance sheet date.

ii. Deferred tax
Deferred tax is recognised on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period. The carrying amount of deferred tax liabilities and assets are reviewed at the end of each reporting period.

k. Foreign Currency Transactions

i. Transactions in foreign currencies are initially recorded at the exchange rate prevailing on the date of transaction. Monetary assets and liabilities denominated in foreign currencies are translated at the functional currency closing rates of exchange at the reporting date.

ii. Exchange differences arising on settlement or translation of monetary items are recognised in Statement of Profit and Loss except to the extent of exchange differences which are regarded as an adjustment to interest costs on foreign currency borrowings that are directly attributable to the acquisition or construction of qualifying assets, are capitalized as cost of assets.

iii. Non-monetary items that are measured in terms of historical cost in a foreign currency are recorded using the exchange rates at the date of the transaction. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was measured. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e., translation differences on items whose fair value gain or loss is recognised in OCI or Statement of Profit and Loss are also recognised in OCI or Statement of Profit and Loss, respectively).

l. Employee Benefits Expense

Short Term Employee Benefits

The undiscounted amount of short term employee benefits expected to be paid in exchange for the services rendered by employees are recognised as an expense during the period when the employees render the services.

Post-Employment Benefits

Defined Contribution Plans
A defined contribution plan is a post-employment benefit plan under which the Company pays specified contributions to a separate entity. The Company makes specified monthly contributions towards Provident Fund, Superannuation Fund and Pension Scheme. The Company's contribution is recognised as an expense in the Statement of Profit and Loss during the period in which the employee renders the related service.

Defined Benefits Plans
"The cost of the defined benefit plan and other post-employment benefits and the present value of such obligation are determined using actuarial valuations. An actuarial valuation involves making various assumptions that may differ from actual developments in the future. These include the determination of the discount rate, future salary increases, mortality rates and future pension increases. Due to the complexities involved in the valuation and its long-term nature, a defined benefit obligation is highly sensitive to changes in these assumptions. All assumptions are reviewed at each reporting date.

The liability in respect of gratuity and other post-employment benefits is calculated using the Projected Unit Credit Method and spread over the period during which the benefit is expected to be derived from employees' services.
Re-measurement of defined benefit plans in respect of post- employment are charged to the Other Comprehensive Income.

Value of encashable leave are encashed during the year is equivalent to one month salary and charged to Profit & Loss Account.

m. Mining Assets

i. Exploration and Evaluation Assets

Upon obtaining the legal rights to explore a specific area but before the technical feasibility and commercial viability of extracting a mineral resource are demonstrable, the expenditure incurred on finding specific mineral resources are capitalised as Exploration and Evaluation Assets. These expenditure include expenses on acquisition of rights to explore; topographical, geological, geochemical and geophysical studies; exploratory drilling; trenching; sampling; activities in relation to evaluating the technical feasibility and commercial viability of extracting a mineral resource and such other related expenses. When the technical feasibility and commercial viability of extracting a mineral resource are demonstrated, the Exploration and Evaluation Assets are reclassified as part of the right to mine.

At the initial recognition the Exploration and Evaluation Assets are measured at cost. After recognition, the Company continues to use the cost model.

Exploration and Evaluation Assets are assessed for impairment when facts and circumstances suggest that the carrying amount of such assets may exceed its recoverable amount.

After the reclassification of the Exploration and Evaluation Assets as part of the Right to Mine, the cost is then amortised over the remaining useful life of the mining rights.

ii. Stripping Activity

During the development phase of the mine (before production begins), stripping costs are capitalised as part of the cost of right to mine.

During the production phase, two benefits accrue from the stripping activity: usable ore that can be used to produce inventory and improved access to further quantities of material that will be mined in future periods.

To the extent that the benefit from the stripping activity is realised in the form of inventory produced, the costs of that stripping overburden removal activity is accounted for in accordance with the principles of Ind AS 2, Inventories.

To the extent the benefit is improved access to ore, these costs are recognised as Stripping Activity Asset, if the following criteria are met:-

- it is probable that the future economic benefit (improved access to the ore body) associated with the stripping activity will flow;
- the component of the ore body for which access has been improved can be identified; and
- the costs relating to the stripping activity associated with that component can be measured reliably.

The Stripping Cost capitalised during the development phase or during the production phase is amortised using the units or production method.

In accordance with Ind AS 101 First Time Adoption of Ind AS, the previously recognised asset balance that resulted from stripping activity undertaken during the production phase ('predecessor stripping asset' classified as Iron Ore Mines under Intangible Assets) is reclassified as a part of an existing asset i.e Right to Mine to which the stripping activity relates, to the extent that there remains an identifiable component of the ore body with which the predecessor stripping asset can be associated. Such balances will be amortised over the remaining expected useful life of the Right to Mine.

n. Revenue recognition

Revenue from sale of goods is recognised when the significant risks and rewards of ownership have been transferred to the buyer, recovery of the consideration is probable, the associated cost can be estimated reliably, there is no continuing effective control or managerial involvement with the goods, and the amount of revenue can be measured reliably.

Revenue from rendering of services is recognised when the performance of agreed contractual task has been completed. Revenue from sale of goods is measured at the fair value of the consideration received or receivable, taking into account contractually defined terms of payment and excluding taxes or duties collected on behalf of the government.

Revenue from operations includes sale of goods, services, service tax, excise duty and adjusted for discounts (net), and gain/ loss on corresponding hedge contracts.

Revenue from Power Supply is accounted for on the basis of billing to consumers and generally all consumers are billed on the basis of recording of consumption of energy by installed meters. Shortfall of Power Unit supplied and Actual Received is recorded as Power Sale Discount and its charges recorded in Profit and Loss Account."

Sale of Power (Hydro Power Plant)

Revenue from Generation, Transmission and Distribution of power is recognised on an accrual basis and includes unbilled revenues accrued upto the end of the accounting year.

The Group determines surplus/deficit (i.e. excess/shortfall of/in aggregate gain over Return on Equity entitlement) for the year in respect of its regulated operations based on the principles laid down under the relevant Tariff Regulations/Tariff Orders as notified by respective State Regulatory Commissions. In respect of such surplus/deficit, appropriate adjustments as stipulated under the regulations are made during the year. Further, any adjustments that may arise on annual performance review by respective State Regulatory Commissions under the aforesaid Tariff Regulations/Tariff Orders is made after the completion of such review."

Interest income
Interest income from a financial asset is recognised using effective interest rate (EIR) method.

Dividends
Revenue is recognised when the Company’s right to receive the payment has been established, which is generally when shareholders approve the dividend.

Carbon Credit (Certified Emission Reduction)
Revenue is recognized in accordance with Approved Consolidated Monitoring Methodology issued by United Nation Framework Convention of Climate Change (UNFCCC) on receipt basis.

Renewable Energy Certificates
Revenue is recognised when the Company Sold certification of quantity of Renewable Energy Certificates.

o. Insurance Claims

Insurance claims are accounted for on the basis of claims admitted/ expected to be admitted to the extent that there is no uncertainty in receiving the claims.

p. Financial Instruments

i. Financial Assets

A. Initial recognition and measurement

All financial assets and liabilities are initially recognized at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities, which are not at fair value through profit or loss, are adjusted to the fair value on initial recognition. Purchase and sale of financial assets are recognised using trade date accounting.

B. Subsequent measurement

Financial assets carried at amortised cost

A financial asset is measured at amortised cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Financial assets at fair value through other comprehensive income (FVTOCI)

A financial asset is measured at FVTOCI 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.

Financial assets at fair value through profit or loss (FVTPL)

A financial asset not classified as either amortised cost or FVOCI, is classified as FVTPL.

C. Investment in subsidiaries, Associates and Joint Ventures

"The Company has elected to measure investment in subsidiaries, joint venture and associate at cost. On the date of transition, the fair value has been considered as deemed cost.

Investment in Equity shares & Mutual Funds etc., are classified at fair value through the profit and loss account."

D. Other Equity Investments

All other equity investments are measured at fair value, with value changes recognised in Statement of Profit and Loss, except for those equity investments for which the Company has elected to present the value changes in 'Other Comprehensive Income'.

E. Impairment of financial assets

"In accordance with Ind AS 109, the Company uses 'Expected Credit Loss' (ECL) model, for evaluating impairment of financial assets other than those measured at fair value through profit and loss (FVTPL).

Expected credit losses are measured through a loss allowance at an amount equal to:

- The 12-months expected credit losses (expected credit losses that result from those default events on the financial instrument that are possible within 12 months after the reporting date); or
- Full lifetime expected credit losses (expected credit losses that result from all possible default events over the life of the financial instrument)
- For trade receivables Company applies 'simplified approach' which requires expected lifetime losses to be recognised from initial recognition of the receivables. The Company uses historical default rates to determine impairment loss on the portfolio of trade receivables. At every reporting date these historical default rates are reviewed and changes in the forward looking estimates are analysed.
- For other assets, the Company uses 12 month ECL to provide for impairment loss where there is no significant increase in credit risk. If there is significant increase in credit risk full lifetime ECL is used."

ii. Financial Liabilities

A. Initial recognition and measurement

All financial liabilities are recognized at fair value and in case of loans, net of directly attributable cost. Fees of recurring nature are directly recognised in the Statement of Profit and Loss as finance cost.

B. Subsequent measurement

Financial liabilities are carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

Derivative financial instruments and Hedge Accounting

The Company uses various derivative financial instruments such as interest rate swaps, currency swaps, forwards & options and commodity contracts to mitigate the risk of changes in interest rates, exchange rates and commodity prices. Such derivative financial instruments are initially recognised at fair value on the date on which a derivative contract is entered into and are also subsequently measured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative.

Any gains or losses arising from changes in the fair value of derivatives are taken directly to Statement of Profit and Loss, except for the effective portion of cash flow hedges which is recognised in Other Comprehensive Income and later to

Statement of Profit and Loss when the hedged item affects profit or loss or treated as basis adjustment if a hedged forecast transaction subsequently results in the recognition of a non-financial assets or non-financial liability.

Hedges that meet the criteria for hedge accounting are accounted for as follows:

a. Cash flow hedge

The Company designates derivative contracts or non derivative financial assets / liabilities as hedging instruments to mitigate the risk of movement in interest rates and foreign exchange rates for foreign exchange exposure on highly probable future cash flows attributable to a recognised asset or liability or forecast cash transactions. When a derivative is designated as a cash flow hedging instrument, the effective portion of changes in the fair value of the derivative is recognized in the cash flow hedging reserve being part of other comprehensive income. Any ineffective portion of changes in the fair value of the derivative is recognized immediately in the Statement of Profit and Loss. If the hedging relationship no longer meets the criteria for hedge accounting, then hedge accounting is discontinued prospectively. If the hedging instrument expires or is sold, terminated or exercised, the cumulative gain or loss on the hedging instrument recognized in cash flow hedging reserve till the period the hedge was effective remains in cash flow hedging reserve until the underlying transaction occurs. The cumulative gain or loss previously recognized in the cash flow hedging reserve is transferred to the Statement of Profit and Loss upon the occurrence of the underlying transaction. If the forecasted transaction is no longer expected to occur, then the amount accumulated in cash flow hedging reserve is reclassified in the Statement of Profit and Loss.

b. Fair Value Hedge

The Company designates derivative contracts or non derivative financial assets / liabilities as hedging instruments to mitigate the risk of change in fair value of hedged item due to movement in interest rates, foreign exchange rates and commodity prices.

Changes in the fair value of hedging instruments and hedged items that are designated and qualify as fair value hedges are recorded in the Statement of Profit and Loss. If the hedging relationship no longer meets the criteria for hedge accounting, the adjustment to the carrying amount of a hedged item for which the effective interest method is used is amortised to Statement of Profit and Loss over the period of maturity.

De-recognition of financial instruments

The Company derecognizes a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the financial asset and the transfer qualifies for de-recognition under Ind AS 109. A financial liability (or a part of a financial liability) is derecognized from the Company's Balance Sheet when the obligation specified in the contract is discharged or cancelled or expires.

q. Operating Cycle

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

An asset is treated as current when it is:

a. Expected to be realized or intended to be sold or consumed in normal operating cycle;
b. Held primarily for the purpose of trading;
c. Expected to be realized within twelve months after the reporting period, or
d. Cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period All other assets are classified as non-current.

A liability is current when:

a. It is expected to be settled in normal operating cycle;
b. It is held primarily for the purpose of trading;
c. It is due to be settled within twelve months after the reporting period, or
d. There is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period

All other liabilities are classified as non-current.

Deferred tax assets and liabilities are classified as non-current assets and liabilities.
The Company has identified twelve months as its operating cycle.

r. Earnings per Share

Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders by weighted average number of equity shares outstanding during the period. The weighted average number of equity shares outstanding during the period are adjusted for events of bonus issue; bonus element in a right issue to existing shareholders.

For the purpose of calculating diluted earnings per share, the net profit or loss for the year attributable to equity shareholders and the weighted average number of shares outstanding during the year are adjusted for the effects of all dilutive potential equity shares.

s. Borrowing Cost

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 the company 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.

t. Segment Reporting Policies

Identification of segments: 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 and loss and is measured consistently with profit and loss in the financial statements. The Operating segments have been identified on the basis of the nature of products.

Inter segment Transfers :The Company generally accounts for intersegment sales and transfers as if the sales or transfers were to third parties at current market prices.

Allocation of common costs:Common allocable costs are allocated to each segment according to the relative contribution of each segment to the total common costs.

Unallocated items :The Corporate and Other segment includes general corporate income and expense items which are not allocated to any business segment.

u. Government Grant

Grant from the government are recognized at the fair value where there is a reasonable assurance that the grant will be received and the Company will comply with the attached conditions.

v. Dividend Distribution

Dividend distribution to the shareholders is recognised as a liability in the company's financial statements in the period in which the dividends are approved by the Company's shareholders.

w. Statement of Cash Flows

i. Cash and Cash equivalents

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

ii. Statement of Cash Flows is prepared in accordance with the Indirect Method prescribed in the relevant Accounting Standard.

2.3 CRITICAL ACCOUNTING JUDGMENTS AND KEY SOURCES OF ESTIMATION UNCERTAINTY

The preparation of the consolidated financial statements in conformity with the Ind AS requires management to make judgments, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities and disclosures as at date of the financial statements and the reported amounts of the revenues and expenses for the years presented. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates under different assumptions and conditions. The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised if the revision affects only that period or in the period of the revision and future periods if the revision affects both current and future periods.

a. Depreciation / amortisation and useful lives of property plant and equipment / intangible assets

Property, plant and equipment / intangible assets are depreciated / amortised over their estimated useful lives, after taking into account estimated residual value. Management reviews the estimated useful lives and residual values of the assets annually in order to determine the amount of depreciation / amortisation to be recorded during any reporting period. The useful lives and residual values are based on the Company's historical experience with similar assets and take into account anticipated technological changes. The depreciation / amortisation for future periods is revised if there are significant changes from previous estimates.

b. Recoverability of trade receivable

Judgements are required in assessing the recoverability of overdue trade receivables and determining whether a provision against those receivables is required. Factors considered include the credit rating of the counterparty, the amount and timing of anticipated future payments and any possible actions that can be taken to mitigate the risk of non-payment.

c. Provisions

Provisions and liabilities are recognized in the period when it becomes probable that there will be a future outflow of funds resulting from past operations or events and the amount of cash outflow can be reliably estimated. The timing of recognition and quantification of the liability requires the application of judgment to existing facts and circumstances, which can be subject to change. The carrying amounts of provisions and liabilities are reviewed regularly and revised to take account of changing facts and circumstances.

d. Impairment of non-financial assets

The Company assesses at each reporting date whether there is an indication that an asset may be impaired. If any indication exists, the Company estimates the asset's recoverable amount. An asset's recoverable amount is the higher of an asset's or Cash Generating Units (CGU's) fair value less costs of disposal and its value in use. It is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or a groups of assets. Where the carrying amount of an asset or CGU exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount.

In assessing value in use, the estimated future cash flows are discounted to their present value using pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. In determining fair value less costs of disposal, recent market transactions are taken into account, if no such transactions can be identified, an appropriate valuation model is used.

e. Impairment of financial assets

The impairment provisions for financial assets are based on assumptions about risk of default and expected cash loss rates. The Company uses judgment in making these assumptions and selecting the inputs to the impairment calculation, based on Company's past history, existing market conditions as well as forward looking estimates at the end of each reporting period.

f. Measurement of defined benefit obligations

The measurement of defined benefit and other post-employment benefits obligations are determined using actuarial valuations. An actuarial valuation involves making various assumptions that may differ from actual developments in the future. These include the determination of the discount rate, future salary increases, mortality rates and future pension increases. Due to the complexities involved in the valuation and its long-term nature, a defined benefit obligation is highly sensitive to changes in these assumptions. All assumptions are reviewed at each reporting date.

2.4 First Time adoption of Ind AS

The Company has adopted Ind AS with effect from 1st April 2017 with comparatives being restated. Accordingly the impact of transition has been provided in the Opening Reserves as at 1st April 2016. The figures for the previous period have been restated, regrouped and reclassified wherever required to comply with the requirement of Ind AS and Schedule III of the Companies Act, 2013.

a. Exemptions from retrospective application

i. Business combination exemption

The Company has applied the exemption as provided in Ind AS 101 on non-application of Ind AS 103, "Business Combinations" to business combinations consummated prior to April 1, 2016 (the "Transition Date"), pursuant to which goodwill/capital reserve arising from a business combination has been stated at the carrying amount prior to the date of transition under Indian GAAP. The Company has also applied the exemption for past business combinations to acquisitions of investments in subsidiaries / associates / joint ventures consummated prior to the Transition Date

ii. Fair value as deemed cost exemption

The Company has elected to measure items of property, plant and equipment and intangible assets at its carrying value at the transition date.

iii. Cumulative translation differences

The Company has elected to apply Ind AS 21 - The effects of changes in Foreign Exchange Rate prospectively. Accordingly all cumulative gains and losses recognised are reset to zero by transferring it to retained earnings.

iv. Investments in subsidiaries, joint ventures and associates

The Company has elected to measure investment in subsidiaries, joint venture and associate at fair value.

Annexure 6

Statement of Restatement Adjustments to Audited Ind AS Consolidated Financial Statements

The summary of results of restatement made in the audited previous Ind AS Consolidated financial statements for the respective years and its impact on the profit of the Company is as follows:

(₹ in Million)

	As at	**As at**	**As at**
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Net Profit/(loss) as per audited financial statement	**350.73**	**377.63**	**(194.71)**
Restated Adjustment:			
A) Audit Qualification			
---Recognition of Uncertified unit of CER	-	-	-
Sub total (A)	**-**	**-**	**-**
B) Other Material Adjustment			
---Sundry Balances Written off/back	(23.20)	(0.49)	0.38
---Insurance Claim Received	-	0.20	(0.20)
---Prior Period Tax	-	0.26	(0.51)
---Service Tax, Excise Duty etc. paid	(0.64)	0.64	-
---Employee Related Expense	(0.30)	-	-
---Expenses of earlier year (Interest, legal & Professional,			
registration charges, Fines & Penalty and Rent, Rates & Taxes,	(3.84)	(1.06)	(0.11)
---Change in Tax	9.83	95.89	(0.03)
---Impact due to Change in Consolidation Method	-	-	0.42
Sub-total (B)	**(18.15)**	**95.44**	**(0.05)**
C) Change in Accounting Policy			
---Change in Revenue Recognition (CER)	-	-	-
Sub-total (C)	**-**	**-**	**-**
Total (A+B+C)	**(18.15)**	**95.44**	**(0.05)**
Net Profit/(loss) as per Restated financial statement	**368.88**	**282.19**	**(194.66)**

Adjustments

Adjustments for Audit Qualifications:

The Company had recognized the uncertified unit of Certified Emission Reduction (CER) in closing stock as per the company's policy, which was not certified by the CDM Board due to which the profit of company has been enhanced. The rectification/adjustment for the year March 31, 2017 and March 31, 2016 has been done in the respective financial year respective financial year of company’s first Ind As Financial Statement of March’18.

Other Material Adjustments

1. In the audited financial statements of the company for the years ended March 31,2018, March 31, 2017 , March 31, 2016, certain amounts have been written off for which advances have been given to vendors which are considered bad & doubtful hence are appropriately adjusted in the respective years to which they relate.

In the audited financial statements of the Company for the years ended March 31,2018, March 31, 2017 , March 31, 2016, certain provisions/ liabilities created in earlier years were written back. For the purpose of this statement, the said provisions/ liabilities have been appropriately adjusted in the respective years in which they were originally created.

2. In the audited financial statements of the company for the years ended March 31,2018, March 31, 2017 , March 31, 2016, certain amounts has been received for insurance claim were appropriately adjusted in the respective year to which they relate.

3. In the audited financial statements of the company for the years ended March 31, 2018, March 31, 2017 , March 31, 2016, certain amounts of tax adjustment for prior period were appropriately adjusted in the respective year to which they relate.

4. In the audited financial statements of the company for the years ended March 31,2018, March 31, 2017 , March 31, 2016, certain amounts of expenses were appropriately adjusted in the respective year to which they relate.

5. The Tax rate applicable for the respective year has been used to calculate the deferred tax impact on other material adjustments.

6. Investment in Joint Venture is now accounted by using the Equity Method.

Change in Accounting Policy

Carbon Credit (Certified Emission Reduction)

Revenue was recognized in accordance with approved consolidated monitoring methodology issued by United Nation Framework Convention of Climate Change (UNFCCC) on receipt basis, earlier which was on accrual basis of accounting, assuming the CER will be certified & received in future from CDM Board. The impact for change in accounting policy for the years March 31, 2017 and March 31, 2016 has been done in the respective financial year respective financial year of company’s first Ind As Financial Statement of Mrach’18.

Annexure 7

Restated Consolidated Ind AS Statement of Property, Plant and Equipment **(₹ 'in Millions)**

PARTICULARS	Land & Site Development	Leasehold Land	Factory Building	Plant & Machinery	Office Equipment	Computer	Furniture & Fixtures	Vehicles	TOTAL	Investment Property	Intangible Assets (Right to Mines	GRAND TOTAL
GROSS BLOCK CARRYING VALUE												
At 01/04/2016 (Proforma)	1,294.81	18.52	1,043.55	6,406.29	7.56	6.30	22.41	200.38	**8,999.83**	196.19	152.21	9,348.23
Additions	14.12	-	60.86	5,988.47	0.72	1.71	0.56	56.37	**6,122.81**	-	-	6,122.81
Disposals*	-	-	-	32.67	-	-	-	12.96	**45.63**	-	-	45.63
Other Adjustments**	109.06	103.81	8.37	124.80	1.24	0.16	0.65	8.23	**356.31**	-	-	356.31
At 31/03/2017	**1,417.99**	**122.33**	**1,112.77**	**12,486.90**	**9.52**	**8.18**	**23.61**	**252.03**	**15,433.33**	**196.19**	**152.21**	**15,781.73**
Additions	2.47	-	60.39	341.72	2.47	2.06	0.54	74.17	**483.82**	-	-	483.82
Disposals	5.51	-	-	29.27	-	-	-	42.47	**77.25**	-	-	77.25
Other Adjustments	-	-	-	-	-	-	-	-	**-**	-	-	-
At 31/03/2018	**1,414.95**	**122.33**	**1,173.15**	**12,799.34**	**11.99**	**10.23**	**24.16**	**283.73**	**15,839.90**	**196.19**	**152.21**	**16,188.30**
DEPRECIATION												
At 01/04/2016 (Proforma)	-	-	-	-	-	-	-	-	-	-	-	-
Charge for the year	5.58	0.53	100.10	404.69	2.54	3.26	2.94	36.99	556.62	3.18	5.00	564.81
(Disposal)/Adjustment	6.48	-	(1.08)	(24.04)	0.90	(0.02)	0.35	(8.53)	(25.94)	-	-	(25.94)
At 31/03/2007	**12.06**	**0.53**	**99.02**	**380.64**	**3.44**	**3.24**	**3.29**	**28.46**	**530.68**	**3.18**	**5.00**	**538.87**
Charge for the year	21.71	4.61	98.49	523.57	2.34	2.56	3.03	43.68	700.00	3.18	5.00	708.19
(Disposal)/Adjustment	-	-	9.92	(4.37)	0.08	0.00	0.22	(17.41)	(20.55)	-	-	(20.55)
At 31/03/2018	**33.77**	**5.14**	**198.43**	**899.85**	**5.86**	**5.80**	**6.54**	**54.73**	**1,210.13**	**6.37**	**10.00**	**1,226.50**
NETT BLOCK												
At 01/04/2016 (Proforma)	1,294.81	18.52	1,043.55	6,406.29	7356	6.30	22.41	200.38	8,999.83	196.19	152.21	9,348.23
At 31/03/2017	1,405.93	121.80	1,013.75	12,106.25	6.08	4.94	20.32	223.57	14,902.65	193.01	147.21	15,242.87
At 31/03/2018	1,381.18	117.19	974.73	11,899.49	6.13	4.43	17.51	229.00	14,629.76	189.83	142.21	14,961.80
CAPITAL WORK IN PROGRESS												
At 01/04/2016 (Proforma)	-	-	-	-	-	-	-	-	390.11	-	-	390.11
At 31/04/2017	-	-	-	-	-	-	-	-	441.51	-	-	441.51
At 31/03/2018	-	-	-	-	-	-	-	-	359.22	-	-	359.22

Note:-

i. Pursuant to the enactment of Companies Act 2013, the company has applied the estimated useful lives as specified in Schedule II, except in respect of certain assets as disclosed in Accounting Policy in Depreciation, Amortization and Depletion. Accordingly the unamortized carrying value is being depreciated / amortized over the revised/remaining useful lives.

ii. The amount shown under Lease hold asset was the cost incurred for the Lease by the lessee for the agreed period. The company being the lessee is the beneficial owner of these asset for the above period.

iii. *Deduction of Gross Block includes loss of fixed assets (Annexure 51(3)) in the incident at UNIT-III (TILDA DIVISION).

iv. ** Other adjustments includes assets transfer from partnership firm on account of conversion from Partnership firm to Company.

v. Company has made following addition in Fixed assets relating to "Research & Development" during the year as mentioned below:

	₹ in Million
Building	4.12
Plant & Machinery	26.02
Other Equipment	1.00

Annexure 8

Restated Consolidated Ind AS Statement of Non-Current Financial Assets- Investments

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Trade Investments			
In Joint Venture (At Cost)			
Chhattisgarh Captive Coal Mining Limited	19.79	19.82	19.94
[2,61,181(P.Y. 2,61,181) Equity shares of Rs. 10/- each, fully paid-up]			
(Includes Goodwill of Rs. 870434)			
In Partnership Firm (At Cost)			
I A Energy	-	-	0.49
Investment in Shares - Unquoted, Fully Paid up (At Cost)			
Shri Bajrang Hydro Energy Limited	0.01	0.01	0.01
[5,100 (P.Y. 5,100) equity shares of Rs. 10/- each, fully paid-up]			
Investment in Shares - Quoted, Fully Paid up (At Fair Value through OCI)			
Bhushan Steel Limited	0.01	0.01	0.01
(250 equity shares of Rs. 10/- each, fully paid-up, Market Price Rs. 57.65 per share)			
Essar Steels Limited	0.00	0.00	0.01
(100 equity shares of Rs. 10/- each, fully paid-up, Market Price Rs. 12.80 per share)			
JSW Steels Limited	0.01	0.01	0.04
(50 equity shares of Rs. 10/- each, fully paid-up, Market Price Rs. 187.60 per share)			
Prakash Industries	0.02	0.01	0.00
(100 equity shares of Rs. 10/- each, fully paid-up, Market Price Rs. 77.05 per share)			
Steel Authority of India Limited	0.01	0.01	0.00
(100 equity shares of Rs. 10/- each, fully paid-up, Market Price Rs. 61.20 per share)			
Tata Steel Limited	0.03	0.02	0.02
(50 equity shares of Rs. 10/- each, fully paid-up, Market Price Rs. 482.65 per share)			
Investment in Debenture - Unquoted, Fully Paid up			
9.5% Non Convertible Debenture of			
Yes Bank Limited	1.00	1.00	1.00
(1 unit of Rs. 10,00,000/- each, fully paid-up)			
Investment in Gold Coin			
(10 numbers (P.Y. 10 numbers) of 10 gm. each)	-	0.31	0.31
Investment in Mutual Fund (At Fair Value through OCI)			
Baroda pioneer Mutual Fund	-	0.50	-
SBI Infrastructure Fund -1- Growth	0.76	0.68	0.53
Total	**21.65**	**22.39**	**22.37**
Aggregate Amount of Quoted Investments	**0.08**	**0.06**	**0.08**
Aggregate Amount of Unquoted Investments	**21.57**	**22.33**	**22.29**

Annexure 9

Restated Consolidated Ind AS Statement of Other Non-Current Financial Assets

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Unsecured, considered good			
(a) Security Deposits			
Deposit	58.38	59.17	49.58
Total	**58.38**	**59.17**	**49.58**

Annexure 10

Restated Consolidated Ind AS Statement of Deferred Tax (Assets)/ Liabilities

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Deferred Tax Liability			
- Difference between Book & Tax base Related to PPE	1,219.47	1,111.88	994.13
- Difference between Book & Tax base Related to Investments	0.10	0.07	0.02
TOTAL (A)	**1,219.57**	**1,111.95**	**994.15**
Deferred Tax Assets			
- Unabsorbed Depreciation & Carried Forward Losses	493.11	640.22	693.84
- Disallowance u/s 43B of Income Tax 1961	30.20	50.73	16.16
TOTAL (B)	**523.31**	**690.95**	**710.00**
Net Liability (A-B)	**696.26**	**421.00**	**284.14**
Mat Credit Entitlement	(750.83)	(475.96)	(368.04)
Total	**(54.57)**	**(54.96)**	**(83.89)**

Reconciliation of Deferred Tax (Asset) / Liability

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Deferred Tax Asset / (Liability) at the beginning of the year	**421.00**	**284.14**	**(16.90)**
Deferred Tax (Income) / Expense Recognized During the			
Period in Profit & Loss	275.22	136.81	301.02
Deferred Tax (Income) / Expense Recognized During the Period in			
Other Comprehensive Income	0.03	0.05	0.02
Deferred Tax Asset / (Liability) at the End of the year	**696.25**	**421.00**	**284.14**

Movement in MAT Credit Entitlement

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Balance at the beginning of the year	475.96	368.04	296.28
Add : MAT Credit entitlement availed during the year	274.87	107.92	71.76
Less : MAT Credit entitlement Utilised during the year	-	-	-
Balance at the end of the year	**750.83**	**475.96**	**368.04**

Annexure 11
Restated Consolidated Ind AS Statement of Other Non-Current Assets

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Unsecured, considered good			
(a) Capital Advances *	189.74	51.85	34.41
(b) Security Deposits			
Deposit with Governments Authorities	15.28	20.64	15.74
(c) Unamortised Preliminary Expenses	**-**	-	12.27
Total	**205.02**	**72.49**	**62.42**

Debts due by Private Company / Firm in which director is a member / Partner

*Advance to Creditors for Capital Goods stated above	60.61	-	-

Annexure 12
Restated Consolidated Ind AS Statement of Inventories

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
(As valued, verified and certified by the management)			
(All Stock are Valued at cost or Net realizable value whichever is Lower)			
(a) Raw Materials and components	910.85	1,062.72	897.52
(b) Finished goods	968.81	528.79	1,094.67
(c) Stores and spares	551.07	523.90	436.64
(d) Trading	-	4.16	5.01
Total	**2,430.73**	**2,119.57**	**2,433.84**

Annexure 13
Restated Consolidated Ind AS Statement of Trade Receivables

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Unsecured, considered good			
Trade receivables	743.64	531.23	484.40
Less : Provision for Doubtful Debt	5.78	5.22	4.84
Total	**737.86**	**526.01**	**479.56**
*** Trade Receivable stated above include debts due by:**			
Private Company / Firm in which director is a member / Partner	4.51	0.70	60.44

Partiular	31.03.2018	31.03.2017	31.03.2016 (Proforma)
Ageing analysis			
Upto 3 months	675.84	445.98	423.23
3-6 months	11.83	18.04	29.64
More than 6 months	50.20	63.27	26.69
	737.86	**527.29**	**479.56**

Annexure 14
Restated Consolidated Ind AS Statement of Cash and Bank Balances

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Cash & Cash Equivalents			
(a) Balances with banks	15.14	69.38	9.21
(b) Cash on hand	3.77	5.95	9.01
	18.91	**75.33**	**18.23**
Bank Balance other than cash and cash equivalents			
(a) Margin Money with banks	145.07	180.23	158.35
Total	**163.98**	**255.56**	**176.58**

Annexure 15
Restated Consolidated Ind AS Statement of Current Financial Assets - Loans

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Unsecured, considered good			
(a) Loans and advances	-	-	1,886.73
(b) Others	-	-	-
Total	**-**	**-**	**1,886.73**

Annexure 16
Restated Consolidated Ind AS Statement of Other Current Financial Assets

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Interest Receivable	2.71	1.41	1.41
Insurance Claim Receivable	15.64	15.64	58.42
Advance Recoverable in Cash or in kind or Value to be received	9.63	10.11	6.84
Royalty Receivable	0.16	12.23	0.09
Total	**28.13**	**39.38**	**66.76**

Annexure 17
Restated Consolidated Ind AS Statement of Other Current Assets

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Advance to Supplier (Other than Capital Advance)	758.11	845.75	946.44
Balance with Central Excise & Sales Tax Department	61.47	90.72	64.18
Prepaid Expenses	31.67	28.04	22.22
Deferred Forward Contract Premium	37.13	61.21	44.70
Total	**888.38**	**1,025.72**	**1,077.54**

Annexure 18
Restated Consolidated Ind AS Statement of Equity Share Capital

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
(a) Authorised, Issued, Subscribed and paid-up share capital			
Authorised Share Capital			
6,00,00,000 Equity Share of Rs.10/- each	600.00	600.00	600.00
(Previous Year 6,00,00,000 Equity Share of Rs.10/- each)			
Total	**600.00**	**600.00**	**600.00**
Issued, Subscribed & Fully Paid-up Share Capital			
1,30,71,155 Equity Share of Rs.10/- each fully paid up	130.71	130.71	130.71
(Previous Year 1,30,71,155 Equity Share of Rs.10/- each)			
Total	**130.71**	**130.71**	**130.71**

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

(₹ 'in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
No. of shares outstanding as at the beginning of the year	13.07	13.07	13.07
Add : Number Of Shares Allotted During The Year As Fully Paid-Up	-	-	-
Number of shares outstanding as at the end of the year	**13.07**	**13.07**	**13.07**

(c) Shares in the company held by each shareholder holding more than 5% shares

Name of the shareholder	**AS AT 31.03.2018**		**AS AT 31.03.2017**		**AS AT 31.03.2016**	
					(Proforma)	
	No. of shares held in the Company	**% of Shares held**	**No. of share held in the Company**	**% of Shares held**	**No. of share held in the Company**	**% of Shares held**
Atlanta Securities Private Limited	2,039,500	15.60	2,039,500	15.60	2,039,500	15.60
Banka Finance & Securities Pvt. Ltd.	2,078,381	15.90	2,078,381	15.90	2,078,381	15.90
Bonus Dealcom Pvt Ltd.	717,300	5.49	717,300	5.49	717,300	5.49
Sukanya Merchandise Private Ltd	724,254	5.54	724,254	5.54	724,254	5.54

(d) The Company has only one class of shares referred to as equity shares having a par value of Rs.10/-. Each holder of equity shares is entitled to one vote per share.

Annexure 19

Restated Consolidated Ind AS Statement of Other Equity

(₹' in Million)

	Reserve & Surplus					**Other**	**Total Equity**
Particulars	**Surpulus**	**Securities Premium Reserve**	**Amalgamation Reserve**	**Capital Redemption Reserve**	**Revaluation Reserve**	**Comprehensive Income**	**Attributable to Equity Holder of the Company**
Balance as on April 1, 2015 (Proforma)	**2,451.31**	**1,534.79**	**110.74**	**111.90**	**-**	**-**	**4,208.74**
Revaluation of land	-	-	-	-	813.07	-	**813.07**
Impact of Restatement of Financial Statement	(0.44)	-	-	-	-	-	**(0.44)**
Profit/(loss) for the period	(194.70)	-	-	-	-	-	**(194.70)**
Other comprehensive income For the Year	(0.02)	-	-	-	-	0.06	**0.04**
Balance as on March 31, 2016 (Proforma)	**2,256.16**	**1,534.79**	**110.74**	**111.90**	**813.07**	**0.06**	**4,826.71**
Revaluation of Land	-	-	-	-	0.11	-	**0.11**
Impact of Restatement of							

Financial Statement	(0.45)	-	-	-	-	-	**(0.45)**
Profit/(loss) for the period	283.51	-	-	-	-	-	**283.51**
Income Disclosed under IDS (Net of Tax)	11.00	-	-	-	-	-	**11.00**
Other comprehensive Income For the Year	-	-	-	-	-	(1.31)	**(1.31)**
Balance as of March 31, 2017	**2,550.21**	**1,534.79**	**110.74**	**111.90**	**813.18**	**(1.26)**	**5,119.56**
Impact of Restatement of, Financial Statement	(27.98)	-	-	-	-	-	**(27.98)**
Profit/(loss) for the period	371.23	1,961.17	-	-	-	-	**2332.40**
Other comprehensive income For the Year	-	-	-	-	0.01	(2.35)	**(2.34)**
Balance as of March 31, 2018	**2,893.46**	**3,495.96**	**110.74**	**111.90**	**813.18**	**(3.60)**	**7,421.64**

(i) Capital Subsidy

The company is entitled to get Infrastructure Capital Subsidy amounting to Rs. 110.74 Million for the Investment made in Infrastructure development which is to be adjusted towards the liabilities on account of Sales Tax, as sanctioned in the eligibility order.

(ii) Revaluation Reserve

The Company has done revaluation of Freehold Land in accordance with Indian Accounting Standard (Ind -AS) - 16 Property, Plant and Equipments) resulting in a accretion amounting to Rs 813.18 Million being credited to revaluation reserve for which the Company has used an independent valuation report. Revalution surplus amounting to Rs 813.18 Million is not available for distribution to the shareholders. It may be transferred to revenue reserves when the asset is derecognized. This may involve transferring the whole of the revaluation surplus when the asset is retired or disposed off.

(iii) Security Premium Reserve

Securities premium reserve is credited when shares are issued at premium. It is utilised in accordance with the provisions of the Act, to issue bonus shares, to provide for premium on redemption of shares or debentures,write-off equity related expenses like underwriting costs, etc.

(iv) Amalgamation Reserve

Amalgamation Reserves are mainly the reserves created during business combination for the gain on bargain purchase. Company's capital reserve is mainly on account of acquisition of Shri Bajrang Mettalics and power Limited.

Annexure 20

Restated Consolidated Ind AS Statement of Non-Current Financial Liabilities - Borrowings

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
(a) Term Loans From Banks *			
Secured Loan			
Term Loans from State Bank of India	1,407.31	1,508.37	1,609.60
(Repayable in 177 monthly instalments starting from July 2015 and			
last instalment falling due on March 2030)			
Effective Rate of Interest:			
(Rate of Interest 11.55% p.a.)			
Term Loans from Bank of India	514.33	552.24	579.98
(Repayable in 174 Monthly instalments starting from October 2015			
and last instalment falling due on March 2030.)			
Effective Rate of Interest:			
(Rate of Interest 12.45% p.a.)			
Term Loans from Bank of Baroda	1,583.79	1,699.68	1,815.57
(Repayable in 177 Monthly instalments starting from July 2015 and			
last instalment falling due on March 2030.)			
Effective Rate of Interest:			
(Rate of Interest 12.50% p.a.)			
Term Loans from Karnataka Bank	268.94	288.02	303.41
(Repayable in 177 Monthly instalments starting from July 2015 and			
last instalment falling due on March 2030.)			
Effective Rate of Interest:			
(Rate of Interest 12.50% p.a.)			
Term Loans from Karnataka bank	92.30	98.96	104.32
(Repayable in 177 Monthly instalments starting from July 2015 and			
last instalment falling due on March 2030.).			
Effective Rate of Interest:			
(Rate of Interest 13.25% p.a.)			
Term Loans I (Bank of Baroda)	549.79	590.30	-
(Repayable in 115 Monthly instalments starting from January 2017			
and last instalment falling due on July 2026.).			
Effective Rate of Interest:			
(Rate of Interest 12.60% p.a.)			
Term Loans II (Bank of India)	528.67	573.85	-
(Repayable in 115 Monthly instalments starting from January 2017			
and last instalment falling due on July 2026.).			

<u>Effective Rate of Interest:</u>			
(Rate of Interest 12.75% p.a.)			
Term Loans III (Bank of Maharashtra)	437.62	478.04	-
(Repayable in 115 Monthly instalments starting from January 2017			
and last instalment falling due on July 2026.).			
<u>Effective Rate of Interest:</u>			
(Rate of Interest 12.60% p.a)			
Term Loans IV (Corporation Bank)	514.74	573.86	-
(Repayable in 115 Monthly instalments starting from January 2017			
and last instalment falling due on July 2026.).			
<u>Effective Rate of Interest:</u>			
(Rate of Interest 12.75% p.a.)			
Term Loans V (Bank of Baroda)	242.00	253.30	-
(Repayable in 137 Monthly instalments starting from January 2017			
and last instalment falling due on May 2028.).			
<u>Effective Rate of Interest:</u>			
(Rate of Interest 12.60% p.a.)			
Term Loans VI (Bank of India)	232.60	246.05	-
Repayable in 137 Monthly instalments starting from January 2017			
and last instalment falling due on May 2028.).			
<u>Effective Rate of Interest:</u>			
(Rate of Interest 12.75% p.a.)			
Term Loans VII (Bank of Maharashtra)	192.39	205.02	-
Repayable in 137 Monthly instalments starting from January 2017			
and last instalment falling due on May 2028.).			
<u>Effective Rate of Interest:</u>			
(Rate of Interest 12.60% p.a.)			
Term Loans VIII (Corporation Bank)	217.70	241.09	-
Repayable in 137 Monthly instalments starting from January 2017			
and last instalment falling due on May 2028.).			
<u>Effective Rate of Interest:</u>			
(Rate of Interest 12.75% p.a.)			
(b) Term Loans From Others**			
Secured Loan			
L & T Infrastructure Finance Company Limited	-	12.51	27.08
(Repayable in 72 installments starting from December 2012 and last			
installment falling due on November 2018).			
<u>Effective Rate of Interest:</u>			
(Rate of Interest 14.50% p.a.)			
L&T Fincorp Limited	-	70.92	153.47
(Repayable in 65 installments starting from July 2013 and last			
installment falling due on November 2018).			
<u>Effective Rate of Interest:</u>			
(Rate of Interest 14.50% p.a.)			

Unsecured Loan			
LIC Housing Finance Limited	156.60	-	-
('Term Loan is Repayable in 180 installments starting			
from May 2018 & ending on March 2033))			
(c) Long Term Maturities' of Finance Lease Obligations ***			
Secured Loan	113.70	141.28	156.52
(Hypothecated by Asset Acquired under Finance Lease)			
(d) Loans and Advances From Related Parties			
Unsecured :			
From Corporate Body	877.91	110.32	342.42
From Others	134.22	214.24	122.01
Total	**8,064.63**	**7,858.05**	**5,214.38**

Note: There are defaults upto 60 days for monthly repayments of term Loan in aggregate amounting to ₹. 505.00 Million & ₹ 712.12 Million Of Principal & interest Respectively. However these defaults of remedied before the Financial Statement were approved for issue.

Note: There was no prepayment of Loan in any of the respective previous year.

Note: Penal Interest had been charged due to delay payment of principal & interest.

Note: Current Maturities of Long term debts disclosed under the head "CURRENT FINANCIAL LIABILITIES - OTHERS".

Security and terms & conditions for above loans from Banks :*

The Term Loan granted under consortium finance from State Bank of India, Commercial Branch, Raipur working as a lead banker, Bank of Baroda, Mid-corporate banking Branch, Bank of India, Mid-corporate banking Branch, Raipur and Karnataka Bank, Main Branch, Raipur are secured by:

a. Hypothecation of plant and machinery and other movable assets and EM of Leasehold (from CSIDC) factory land at village: Borjhara, Urla Industrial Estate, Raipur (C.G.), Area of land 21.25 acres on pari-passu basis with other participating term lenders.
b. Equitable Mortgage of 39.15 acres of free hold factory land at village: Borjhara, Urla Industrial Estate, Raipur (C.G.) on first parri-passu basis.
c. First parri-passu charge with other participating lenders on the entire Fixed assets of Gondwara Divisions, along with EM of the land situated at khasara No. 2/1, 22, 23/2, 25, 26, 27/2, 30/1, 30/2, 32, 33 admeasuring 4.039 Hectare situated at Vill : Gondwara, Industrial Estate, Urla, Raipur(C.G.)
d. First mortgage charge on the company’s present and future movable Immovable assets on parri passu basis with other participating lenders.
e. Equitable Mortgage on pari passu basis in favour of lenders on 312.60 acres Land (excluding the 37.4 acres of the land for green belt which cannot be diverted) at Dharsiwa, Tilda, Raipur (C.G.).

Personal Guarantee of director:
Shri Suresh Goel S/o. Late Hari Ram Goel
Rajendra Goel S/o. Late Hari Ram Goel
Narendra Goel S/o. Late Hari Ram Goel

Guarantee of Relative of Directors:
Shri Anand Goel S/o. Late Hari Ram Goel
Shri Sandeep Goel S/o. Shri Suresh Goel
Shri Dinesh Goel S/o. Shri Suresh Goel
Smt. Suman Goel W/o. Shri Dinesh Goel

Corporate Guarantee :
M/s. Shri Bajrang Alloys Limited Shri
M/s. Swastik Mercantile Limited Shri
M/s. Shimmer Investment Pvt. Ltd.

** Security and terms & conditions for above loans from Banks :

The Term Loan granted under a consortium finance from Bank of Baroda as a lead banker, Bank of Baroda, Mid-corporate banking Branch, Raipur are secured by First pari pasu hypothecation of all the present and future movable assets including but not limited to hydro turbine generators and ancillary equipments, electricity generation plant and machinery, set up transformers and switch gears, switch yard, cables, panels or other appurtenants equipment, machinery spares, tools and accessories of the project.

First pari - passu charge on Letter of Assurance issued by Dept. of Energy, Govt. of Himachal Pradesh addressed to Consortium Leader (BOB) in lieu of mortgage charge on forest land admeasuring 34.697 hect.

First Paripassu charge of mortgage of private land admeasuring 0.507 hectare valued at Rs 03.00 Million and charge on unit building, shed & civil work, Plant & Machinery and all fixed assets of the proposed Power Plant located at Chanju – 1, Chamba-Kathwar Road, District Chamba, Himachal Pradesh.

*** Security and terms & conditions for above loans from Others:

The Term Loan from L & T Infrastructure Finance company Limited & L&T Fincorp Limited (Non-Banking financial Institution) are secured by "second pari pasu" charged by all movable & immovable assets including all current assets of the Company. The above loans are additionally secured by pledge of 26% shares (as on the date of pledge of shares) of the company in the name of corporate shareholders and also pledge of 40% share (as on the date of pledge of shares) of the Shri Bajrang Energy Private Limited in the name of director & relatives along with Demand Promissory Note.

In respect of Fixed Assets acquired on finance lease as per Indian Accounting Standard on Leases (IND AS -19), the minimum lease rentals outstanding as on March 31, 2018 are as follows:

(₹ 'in Million)

Due	**Total Minimum Lease Payments Outstanding as at**		**Interest not due**		**Present Value of the minimum lease payments as at**	
	31.03.18	**31.03.17**	**31.03.18**	**31.03.17**	**31.03.18**	**31.03.17**
Not later than one year	79.96	78.01	18.28	19.03	61.69	58.98
Later than one year and not						
Later than five years	118.56	122.14	38.75	39.06	79.81	83.08
Later than five year	52.19	78.07	18.30	19.87	33.89	58.20

Annexure 21

Restated Consolidated Ind AS Statement of Long Term Provisions

(₹ 'in Million)

Particulars	**As at 31.03.2018**	**As at 31.03.2017**	**As at 31.03.2016 (Proforma)**
Provision for employee benefits			
Gratuity Payable	57.85	44.57	32.72
Total	**57.85**	**44.57**	**32.72**

Annexure 22

Restated Consolidated Ind AS Statement of Other Long Term Liabilities

(₹ 'in Million)

Particulars	**As at 31.03.2018**	**As at 31.03.2017**	**As at 31.03.2016 (Proforma)**
CSEB Cross Subsidy Payable A/c	60.80	60.80	60.80
Total	**60.80**	**60.80**	**60.80**

Annexure 23
Restated Consolidated Ind AS Statement of Short Term Borrowings

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Loans Repayable on Demand			
Secured :			
Cash Credit Limit (State Bank of India)*	1,020.01	1,102.10	1,113.06
Cash Credit Limit I (Bank of Baroda)*	1,422.07	1,585.20	1,557.49
Cash Credit Limit (Bank of Maharastra)*	399.12	574.11	577.37
Cash Credit Limit I (Bank of Baroda)**	43.72	-	-
Unsecured :			
From Corporate Body	2.44	132.23	297.86
	2,887.36	**3,393.64**	**3,545.77**

Note: There is no default, as at the balance sheet date, in repayment of any of above Loans

Security and terms & conditions for above loans Repayable on Demand : *

Working Capital Facilities, granted under a consortium finance from State Bank of India, Commercial Branch, Raipur working as a lead banker are secured by hypothecation of entire stocks of raw material, finished goods, stocks in trade, Stores and spares, packing material, and other current assets of the company at their factory premises or at some other as approved by bank including goods in transit, outstanding moneys, books in debt, receivable etc. on first parri-passu basis with other consortium member viz. Bank of Baroda, Mid-corporate banking Branch Raipur, and Bank of Maharashtra, Main Branch Raipur.

Security and terms & conditions for above loans Repayable on Demand : **

Working Capital Facilities, granted by Bank of Baroda, Mid Corporate Branch, Raipur are Pari Pasu secured by First Charge over entire current assets and second charge over the fixed assets of the company.

Annexure 24
Restated Consolidated Statement of Trade Payables

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Trade Payable			
Due to Micro & Small Enterprises*	25.73	7.92	3.69
Others	1,984.25	1,907.65	1,565.16
Total	**2,009.98**	**1,915.57**	**1,568.85**

*There is no principal amount and interest overdue to Micro and Small Enterprises. During the year no interest has been paid to such parties. This information has been determined to the extent such parties have been identified on the basis of information available with the company and the same has been relied upon by the auditors.

Annexure 25

Restated Consolidated Ind AS Statement of Other Current Financial Liabilities

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Current Maturities of Long term Borrowings from Bank			
Secured :			
Term Loans I (State Bank of India)	102.52	102.52	58.89
Term Loans III (Bank of India)	37.02	37.02	27.98
Term Loans II (Bank of Baroda)	115.89	115.89	57.95
Term Loans from Karnataka Bank	19.46	19.46	14.06
Term Loans II (Karnataka Bank)	6.86	6.80	3.40
L & T Infrastructure Finance Company Limited	12.33	16.25	18.10
L&T Fincorp Limited	69.84	92.08	102.57
Term Loans I (Bank of Baroda)	40.40	33.90	-
Term Loans II (Bank of India)	39.23	32.90	-
Term Loans III (Bank of Maharashtra)	32.74	27.48	-
Term Loans IV (Corporation Bank)	58.16	32.88	-
Term Loans V (Bank of Baroda)	10.95	18.67	-
Term Loans VI (Bank of India)	10.64	18.14	-
Term Loans VII (Bank of Maharashtra)	8.86	15.11	-
Term Loans VIII (Corporation Bank)	22.80	22.80	-
Current Maturities of Long term Borrowings from Others			
Unsecured :			
LIC Housing Finance Limited	8.36	-	-
(Equitable Mortgage of immovable properties in the name of			
Directors)			
Current Maturities of Finance Lease Obligations			
Secured :	61.69	58.98	78.74
Other Payables			
Creditors for Capital goods *	86.94	169.04	121.68
Other Expenses payables	198.67	294.36	162.61
Total	**943.36**	**1,114.30**	**645.98**

Debts due by Private Company / Firm in which director is a member / Partner

* Creditors for Capital Goods stated above	6.18	71.12	72.94

Annexure 26

Restated Consolidated Ind AS Statement of Other Current Liabilities

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Other Payables			
Advances from Customers **	71.59	112.71	83.12
Excise Duty Payable on Closing Stock	-	49.31	107.96
GST, Sales Tax & Entry Tax Payable	143.48	84.23	5.59
Service Tax payable	0.20	74.08	0.06
TDS Payable	16.84	11.79	9.16
WCT Payable	-	5.92	-
Total	**232.11**	**338.04**	**205.88**

Debts due by Private Company / Firm in which director is a member / Partner			
** Advances from Customers stated above	-	11.31	28.62

Annexure 27

Restated Consolidated Ind AS Statement of Short Term Provisions

(₹ 'in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Short Term Provisions			
Provision for employee benefits	34.61	31.81	24.45
Total	**34.61**	**31.81**	**24.45**

Annexure 28

Restated Consolidated Ind AS Statement of Revenue from Operations

(₹ 'in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Sale of Products			
- Finished Goods	17,969.23	15,462.82	13,768.60
- Trading Goods	214.19	42.42	211.82
Sale of Services			
- Electricity	230.30	21.77	50.38
- REC / CER	98.28	91.39	75.64
Total	**18,512.00**	**15,618.40**	**14,106.44**

Annexure 29

Restated Consolidated Ind AS Statement of Other Income

(₹ 'in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Recurring Income			
Interest on Margin Money	12.50	9.32	12.31
Other Interest Income	51.46	28.61	19.78
Higher Charges Income	1.63	0.53	11.88
Non-Recurring Income			
Profit On Sale Of Fixed Assets	2.50	-	0.19
Freight outward RCV(Own Veh.)	38.84	0.79	-
Foreign Exchange Gain	-	0.81	-
Insurance Claim Received	0.23	0.42	0.42
Dividend	0.00	0.00	0.00
Miscellaneous Income	18.63	4.23	1.39
Write Off (Sundry Balances)	6.49	0.54	1.18
Total	**132.28**	**45.24**	**47.42**

Annexure 30

Restated Consolidated Ind AS Statement of Cost of Raw Material Consumed

(₹ 'in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Opening Stock	1062.72	897.52	856.68
Purchase	13,480.77	10,253.45	10,125.12
	14,543.49	11,150.97	10,981.80
Less: Sales/Disposal	886.85	632.60	504.45
Closing Stock	910.85	1062.72	897.52
	1,797.70	1,695.32	1,411.53
Raw Material Consumed	**12,745.79**	**9,455.66**	**9,570.27**
Breakup of Raw Material Consumed			
Imported	**-**	**-**	**-**
Percentage %	**-**	**-**	**-**
Indigeneous	**12,745.79**	**9,455.66**	**9,570.27**
Percentage %	**100**	**100**	**100**
Value of Imports on CIF Basis (in Rs)	**-**	**-**	**-**

Annexure 31

Restated Consolidated Ind AS Statement of Increase/Decrease in Stock in Trade

(₹ in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Closing Stock of Finished Goods	968.81	528.79	1,094.67
Closing Stock of Trading Goods	-	4.16	5.01
	968.81	532.95	1,099.68
Less: Opening Stock of Finished Goods	528.79	1,094.67	823.88
Less: Opening Stock of Trading Goods	4.16	5.01	19.29
	532.95	1,099.68	843.16
(Increase)/Decrease in Stock of Finished Goods	**(435.87)**	**566.73**	**(256.52)**
(Increase)/Decrease in Excise Duty on Closing Stock	**(49.31)**	**(58.64)**	**17.35**
Net Increase/(Decrease) in Stock of Finished Goods	**(485.18)**	**508.09**	**(239.16)**

Annexure 32

Restated Consolidated Ind AS Statement of Employee Benefit Expenses

(₹ 'in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Salaries, Wages & Other Benefits*	530.98	412.91	387.37
Contribution to Provident and Other Funds	38.66	27.66	24.49
Staff & Workers Welfare Expenses	4.28	8.14	5.50
Total	**573.92**	**448.71**	**417.36**

* It Includes Payment made to Research & Development Personnel amounting to Rs. 45.97 Million.

Annexure 33

Restated Consolidated Ind AS Statement of Finance Cost

(₹ 'in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Other Borrowing Cost	43.70	50.87	43.23
Interest Expenses	1427.00	1,171.42	1,009.67
Less: Interest Capitalised during the year	-	-	72.98
Total	**1,470.70**	**1,222.29**	**979.91**

Annexure 34

Restated Consolidated Ind AS Statement of Other Expenses

(₹ 'in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Manufacturing Expenses			
Power & Fuel	327.04	245.59	250.96
Manufacturing Wages	180.60	157.15	118.44

Consumption of Stores & Spares	579.94	397.36	384.34
Repair & Maintenance			
- Factory Building	51.00	13.16	14.31
- Plant & Machinery	124.70	61.95	40.17
Insurance Charges	16.12	4.82	6.12
Water Cess Expenses	28.39	28.61	14.38
Other Manufacturing Expenses	200.07	62.63	51.30
Administrative Expenses			
Auditor's Remuneration:			
For Statutory Audit	1.38	1.33	1.10
For Tax Audit	0.30	0.30	0.30
For Cost Audit	0.13	-	-
For Secretarial Audit	0.02	-	-
Internal Auditor Remuneration	0.91	0.93	0.46
Director's Remuneration	3.90	3.00	3.00
Director's Sitting Fees	0.23	0.15	0.15
Corporate Social Responsibility	18.63	17.16	9.25
Hiring Charges	1.65	-	-
Insurance Expenses	6.86	6.07	5.60
Subscription to Association & Membership Fees	1.64	0.92	1.37
Loss on Sale of Fixed Assets	24.72	0.31	0.62
Loss on Exchange Differences	10.40	-	0.04
Loss of Partnership Firm	-	42.91	-
Legal & Professional Charges	36.52	15.13	11.71
Office & General Expenses	26.59	10.07	5.80
Rent, Rates and Taxes	18.37	8.37	12.29
Printing & Stationary Expenses	3.10	2.42	2.27
Allowance for Credit Loss	1.94	0.38	4.84
Preliminary Expenses W/O	-	1.98	-
Pre-Operative Expenses W/O	-	11.17	-
Registration & Renewal Fees	5.20	6.26	9.97
Environmental Expenses	7.48	3.23	1.67
Repair & Maintenance (Others)	14.43	8.06	7.02
Director's Traveling Expenses	9.39	5.91	4.33
Traveling Expenses (Other)	21.44	9.47	9.56
Testing & Inspection Charges	1.43	0.92	2.38
Communication Expenses	5.33	5.05	5.24
Canteen Expenses*	6.87	3.03	4.07
Compensation Expenses	3.41	-	-
Conveyance Expenses	8.58	7.24	8.45
Penalty & Fines	0.51	0.32	0.26
Selling & Distribution Expenses			
Advertisement & Publicity	237.33	83.35	29.24
Carriage Outward	48.50	13.88	7.11

Sales Commission	99.67	66.21	49.10
Sales Promotion & Planning	60.89	23.78	27.64
Finished Goods Handling Charges	13.85	17.60	17.35
Sales Tax, Service Tax & Custom Duty	3.13	3.23	5.82
Power Distribution Charges & Discount	18.78	20.44	18.60
Rebate & Discount	20.82	-	-
Total	**2,252.21**	**1,371.86**	**1,154.69**

Breakup of Stores Consumed			
Imported	4.94	1.10	3.37
Percentage %	0.85	0.28	0.88
Indigeneous	574.99	396.26	380.97
Percentage %	99.15	99.72	99.12
Value of Imports on CIF Basis (in Rs)	4.94	1.10	3.37

*Canteen Expenses Includes Payment made to Research & Development Personnel amounting to ₹ 0.04 million .

Annexure 35

Restated Consolidated Ind AS Statement of Current Tax

(₹ 'in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Current Tax (MAT)	294.68	113.05	8.92
Add: Taxes for Earlier Years	-	-	-
Net Current Tax	294.68	113.05	8.92
Deferred Tax:			
Deferred Tax to be recognized in Profit & Loss Account	275.22	136.81	301.02
Mat Credit (Availed)/utilized during the year	(274.87)	(107.92)	(71.76)
	0.36	**28.88**	**229.26**
Deferred Tax to be recognized in other Comprehensive Inocme	0.03	0.05	0.02
	295.07	**141.99**	**237.94**

Provision for Income Tax has been made in terms of the provisions of Sec. 115JB of the Income Tax Act, 1961.

Annexure 36

Restated Consolidated Ind AS Statement of Earnings Per Share

(₹ 'in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Profit/(Loss) afer Taxation as per Profit & Loss Account	368.88	282.19	(194.66)
Weighted Average No of Equity Share Outstanding	13.07	13.07	13.07
Basic/Diluted Earning/(Loss) per Share of Rs. 10/-	28.22	21.59	(14.89)

Annexure 37 (I)

Restated Consolidated Ind AS Statement of First time adoption of Ind AS

(₹ ' in Million)

Particulars	As at 31.03.2017			As at 31.03.2016 (Proforma)		
	Previous GAAP Balance	Effect of Transition To Ind AS	As per Ind As Balance Sheet	Previous GAAP Balance	Effect of Transition To Ind AS	As per Ind AS Balance Sheet
I. ASSETS						
(1) Non-current Assets						
(a) Property, Plant & Equipment	14,261.45	641.19	14,902.65	8,365.73	634.10	8,999.83
(b) Capital work-in-progress	441.51	-	441.51	390.11	-	390.11
(c) Investment Property	-	193.01	193.01	-	196.19	196.19
(d) Intangible Assets	147.21	-	147.21	152.21	-	152.21
(e) Intangible Assets(Goodwill)	98.91	-	98.91	98.91	-	98.91
(f) Financial Assets						
(i) Investments	22.20	0.19	22.39	22.31	0.06	22.37
(ii) Others	53.91	5.26	59.17	49.58	-	49.58
(g) Deffered Tax Assets (Net)	(95.92)	150.88	54.96	(2.74)	86.63	83.89
(h) Other Non-current assets	77.75	(5.26)	72.49	62.42	-	62.42
Total Non-Current Assets	**15,007.03**	**985.27**	**15,992.30**	**9,138.53**	**916.97**	**10,055.51**
(2) Current Assets						
(a) Inventories	2,209.75	(90.18)	2,119.57	2,758.40	(324.56)	2,433.84
(b) Financial Assets						
(i) Trade Receivables	531.23	(5.22)	526.01	484.40	(4.84)	479.56
(ii) Cash and cash equivalents	75.33	-	75.33	18.23	-	18.23
(iii) Bank Balance other than						
Cash and cash equivalents	180.23	-	180.23	158.35	-	158.35
(iv) Loans	-	-	-	1,886.73	-	1,886.73
(v) Other Financial Assets	39.38	-	39.38	66.76	-	66.76
(c) Current Tax Assets (Net)	68.26	-	68.26	100.21	-	100.21
(d) Other current assets	1,458.05	(432.33)	1,025.72	1,445.57	(368.04)	1,077.54
Total Current Assets	**4,562.23**	**(527.74)**	**4,034.49**	**6,918.65**	**(697.44)**	**6,221.21**
Total Assets	**19,569.27**	**457.53**	**20,026.80**	**16,057.18**	**219.53**	**16,276.72**
II. EQUITY AND LIABILITIES						
(1) Equity						
(a) Equity Share Capital	130.71	-	130.71	130.71	-	130.71
(b) Other Equity	4,662.03	457.53	5,119.56	4,607.18	219.53	4,826.71
(c) Non Controlling Interest	19.74	-	19.74	20.46	-	20.46
Total Equity	**4,812.48**	**457.53**	**5,270.01**	**4,758.35**	**219.53**	**4,977.89**
(2) Non-Current Liabilities						
(a) Financial Liabilities						
(i) Borrowings	7,858.05	-	7,858.05	5,214.38	-	5,214.38
(b) Provisions	44.57	-	44.57	32.72	-	32.72
(c) Deferred Tax Liabilities (Net)	-	-	-	-	-	-
(d) Other Long-Term Liabilities	60.80	-	60.80	60.80	-	60.80
Total Non-Current Liabilities	**7,963.42**	**-**	**7,963.42**	**5,307.90**	**-**	**5,307.90**

(3) Current Liabilities						
(a) Financial Liabilities						
(i) Borrowings	3,393.64	-	3,393.64	3,545.77	-	3,545.77
(ii) Trade Payable	1,915.57	-	1,915.57	1,568.85	-	1,568.85
(iii) Other Financial Liabilities	1,114.30	-	1,114.30	645.98	-	645.98
(c) Other Current Liabilities	338.04	-	338.04	205.88	-	205.88
(d) Provisions	31.81	-	31.81	24.45	-	24.45
Total Current Liabilities	**6,793.36**	**-**	**6,793.36**	**5,990.93**	**-**	**5,990.93**
Total Liabilities	**14,756.79**	**-**	**14,756.79**	**11,298.83**	**-**	**11298.83**
Total equity and liabilities	**19,569.27**	**457.53**	**20,026.80**	**16,057.18**	**219.53**	**16,276.72**

Reconciliation Notes explaining Ind AS Adjustments for Balance Sheet

Property, Plant and Equipment (PPE)

a) As per Ind AS 16, PPE are defined as tangible items that are held for use in the production or supply of goods or services, for rental to others, or for administrative purposes; and are expected to be used during more than one period. Certain spare parts now meets the definition of PPE and are accordingly classified as PPE.
b) Fair valuation as deemed cost for Property, Plant and Equipment: The Company have considered fair value for property, viz land situated in India, with impact of ₹ 813.07 million in accordance with stipulations of Ind AS 101 with the resultant impact being accounted for in the reserves.

Investments

Investments in Subsidiaries, Associates and Joint Ventures is accounted for at cost as per para 4 of Ind AS 27 on the date of transition and in case of other Investment in equity instruments, the same are carried at fair value through OCI in Ind AS compared to being carried at cost under IGAAP.

Inventory
Stores and spare parts in the nature of property, plant and equipment has been reclassified.

Trade receivables
Under the GAAP, the company has create provision for impairment of trade receivables consist only in respect of specific amount for incurred loss.

Under the Ind AS, impairment allowance has been determined based on expected credit loss model (ECL).

Other Current Assets
The Unused MAT credit are reclassified to Deffered tax as on date of transition to Ind AS by reclassifying from Other current assets.

Other equity
Adjustments to retained earnings and other comprehensive income has been made in accordance with Ind AS, for the above mentioned line items.

Deferred Tax liabilities
Under the Ind AS, the Deferred Tax is calculated on the basis of the Balance Sheet approach and not the Income approach. Consequently, the Deferred Tax Liabilities (Net) have been increased by ₹ 281.40 million as at April 1, 2016 & ₹ 0.05 million as at March 31, 2017.

Prior Period Error
As per Ind AS 8 'Accounting Policies, Changes in Accounting Estimates and Errors', an entity shall correct material prior period errors retrospectively in the first set of financial statements approved for issue after their discovery by restating the comparative amounts for the prior period(s) presented in which the error occurred or if the error occurred before the earliest prior period presented, restating the opening balances of assets, liabilities and equity for the earliest prior period presented. Accordingly, a prior period error for FY 2015-16 & 2016-17 has been restated and Consequently, the inventory decreased by ₹ 302.06 million & ₹ 55.96 million respectively.

Reclassification
To Comply with the Companies (Accounting Standards) Rules, 2006 , certain account balances have been regrouped as per the format prescribed under Division II of Schedule III to the Companies Act 2013

Annexure 37 (II)
First Time Ind AS Adoption Reconciliations

Effect of Ind AS Adoption on the statement of profit and loss for the year ended March 31, 2017

(₹ ‘ in Million)

Particulars	**For the year ended 31.03.2017**			
	Revised previous GAAP	Effect of Reclassification	Effect of Transition to Ind AS	Balance as per Ind AS
Revenue from Operation	13,936.75	-	1,681.64	15,618.40
Other Income	45.24	-	-	45.24
Total Income	13,982.00	-	1,681.64	15,663.64
Cost of Material Consumed	9,455.66	-	-	9,455.66
Purchase of Stock in Trade	35.92	-	-	35.92
Change in Inventories of Finished Goods, Stock in trade and Work in Progress	754.18	-	(246.10)	508.09
Excise Duty on Sales	-	-	1,681.64	1,681.64
Employee benefit expenses	450.11	-	(1.40)	448.71
Finance Cost	1,222.29	-	-	1,222.29
Depreciation and amortization expenses	556.89	-	7.91	564.81
Manufacturing Expenses	968.76	(968.76)	-	-
Administrative Expenses	147.86	(147.86)	-	-
Selling & Distribution Expenses	229.66	(229.66)	-	-
Other Expenses	25.20	1346.28	0.38	1,371.86
Total Expenses	13,846.53	-	1,442.44	15,288.17
Profit/(Loss) before tax before exceptional items and tax	135.47	-	239.20	374.67
Exceptional Items	-	-	-	-
Profit/(Loss) before Tax	135.47	-	239.20	374.67
Tax Expenses continued operations				
Current Tax	113.05	-	-	113.05
Deferred Tax	28.88	-	-	28.88
Profit/(Loss) for the year from continuing operation	(6.47)	-	239.20	232.73
Add: Share in Profit of Joint Venture	(0.12)	-	-	(0.12)
Less: Minority Share in Profit	(5.73)	-	-	(5.73)
Less: Loss of firm transferred to Partners Capital Account	(45.16)	-	-	(45.16)

	44.30	-	239.20	283.51
Other Comprehensive Income				
A. (i) Items that will not be reclassified to profit or loss				
a) Re-measurements of the defined benefit	-	-	(1.40)	(1.40)
b) Equity instruments through other comprehensive income	-	-	0.13	0.13
c) Income tax relating to items that will not be reclassified to profit or loss	-	-	(0.05)	(0.05)
Total Comprehensive income for the period (Comprising Profit (Los) and Other Comprehensive Period for the period	44.30	-	237.89	282.19

Reconciliation Notes explaining Ind AS Adjustments for Statement of Profit & Loss

Excise Duty

In accordance with Ind AS 18 "Revenue", Revenue from Operations includes Excise Duty. Excise Duty has been presented separately as expenditure.

Employee Benefit Expenses

In accordance with Ind AS 19 'Employee Benefits', Acturial gains/losses on re-measurement of Defined Benefit Plans have been classified under 'Other Comprehensive Income'. Accordingly, the Employee Benefit Expenses have been decreased by ₹ 1.4 Million.

Depreciation

(a) Recognition of additional PPE from spare parts has resulted in additional depreciation charge for the year ended 31 March 2017 amounting to ₹ 5.21 Million.
(b) Significant components of plant and equipment which have different useful life are depreciated based on their specific useful lives. Consequently, the amount of Depreciation charge for the year ended 31st March 2017 has increased by ₹ 2.7 Million

Other Expenses

Other manufacturing expenses, other administrative expenses and selling & distribution expenses have been classified into Other expenses.

Under Indian GAAP, the company has created provision for impairment of receivables consists only in respect of specific amount for incurred losses. Under Ind AS, impairment allowance has been determined based on Expected Credit Loss model (ECL).

Prior Period Error

As per Ind AS 8 'Accounting Policies, Changes in Accounting Estimates and Errors', an entity shall correct material prior period errors retrospectively in the first set of financial statements approved for issue after their discovery by restating the comparative amounts for the prior period(s) presented in which the error occurred or if the error occurred before the earliest prior period presented, restating the opening balances of assets, liabilities and equity for the earliest prior period presented. Accordingly, prior period error for the period before FY 2016-17 has been restated in the changes in Inventories of finished goods and stock-in-trade and decreased by ₹ 246.1 million.

Deferred Tax

Under the Ind AS, the Deferred Tax is calculated on the basis of the Balance Sheet approach and not the Income approach. Consequently, the Deferred Tax Expenses for the year ended 31st March 2017 are lower/higher by ₹ 0.05 Million.

Reconciliation of total comprehensive income for the year ended March 31, 2017

(₹ ' in Million)

Particulars	**For the year ended 31.03.2017**
Revised profit as per previous GAAP	44.30
Adjustments :	
i. Depreciation impact on account of Componenet Accounting	(5.21)
ii. Depreciation impact on Transfer of Store item to PPE	(2.70)
iii. Acturial Gain on Remeasurement of Defined Benefit Plans transferred to OCI	1.40
iv. Rectification of Errors in Previous GAAP	246.10
v. Impairment of Receivable as per ECL Model	(0.38)
Total effect of transition to Ind As	239.20
Profit for the year as per Ind AS	283.51
Other comprehensive income for the year (net of tax)	
vi. Acturial Gain on Remeasurement of Defined Benefit Plans transferred to OCI	(1.40)
vii. Investments in equity instruments measured at fair value	0.13
viii. Tax Impact on above	(0.05)
Total comprehensive income under Ind AS	282.19

Reconciliation of Other Equity as at March 31, 2017 and April 1, 2016

(₹ ' in Million)

Particulars	**As at 31.03.2017**	**As at 31.03.2016 (Proforma)**
Other Equity as per previous GAAP	4637.78	4487.04
Share in Reserve of Joint Venture	(8.93)	(8.93)
Effect of Transition of Ind AS	-	-
i. Net Reversal of Transaction Cost	-	-
ii. Deferred Tax Liability increased	(281.45)	(281.41)
iii. Investment in Equity instruments measured at fair Value	0.19	0.06
iv. Fair Valuation of Land	-	-
v. Impact of Store Transferred to FA	(13.20)	(5.29)
vi. Revaluation of Land	813.18	813.07
vii. Rectification of Errors in previous GAAP	(55.96)	(302.06)
viii.Impairment of Receivable as per ECL Model	(5.22)	(4.84)
ix. Tax impact due to Restatement	33.18	129.07
Total Adjustment to Equity	481.78	339.67
Other Equity under Ind AS	5119.56	4826.71

Annexure 38
Restated Consolidated Ind AS Statement of Gratuity Disclosure
(i) Gratuity
As per Accounting Standard 15 “Employee benefits”, the disclosures as defined in the Accounting Standard are given below

Defined Contribution Plans : -
Contribution to Defined Contribution Plans, recognised as expense for the year is as under :
I) EMPLOYEE BENEFITS

a) Gratuity
As per IND AS 19 "Employee benefits", the disclosures as defined are given below:
a. Defined Contribution Plans : -
Contribution to Defined Contribution Plans, recognised as expense for the year is as under :

(₹ ‘in Million)

Benefit (Contribution to)	**FY Ended 31.03.2018**	**FY Ended 31.03.2017**	**FY Ended 01.04.2016 (Proforma)**
Employer’s Contribution to Provident Fund	25.93	19.37	16.96
Employer’s Contribution to Employee State Insurance	12.99	9.43	7.43

b. Defined Benefit Plan :-
Gratuity
The Company has a defined benefit gratuity plan. Every employee who has completed five years or more of service gets a gratuity on departure at 15 days salary (last drawn salary) for each completed year of service or part thereof in excess of 6 month and its payable on retirement / termination/ resignation. The benefit vests on the employees after completion of 5 Year of service. The gratuity liability has not been externally funded.
The present value of obligation is determined based on actuarial valuation using the Projected Unit Credit Method, which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation.

	Gratuity (Non Funded) (₹ ‘ in Million)		
	As at	**As at**	**As at**
I) Reconciliation of opening & closing balances of defined benefit obligation	**31.03.2018**	**31.03.2017**	**01.04.2016**
			(Proforma)
Defined Benefit obligation at beginning of year	49.29	36.85	24.76
Current Service Cost	12.67	8.57	7.24
Interest Cost	3.92	3.23	2.47
Actuarial (gain) / loss	2.41	1.40	2.81
Benefits paid	(1.33)	(0.75)	(0.43)
Defined Benefit obligation at year end	**66.95**	**49.29**	**36.85**
II) Reconciliation of fair value of assets and obligations	**31.03.2018**	**31.03.2017**	**01.04.2016**
			(Proforma)
Defined Benefit obligation	66.95	49.29	36.85
Fair value of Plan assets	-	-	-
Amount recognised in Balance Sheet	**66.95**	**49.29**	**36.85**

III) Expenses recognised during the year

	FY Ended	FY Ended	FY Ended
Particulars	**31.03.2018**	**31.03.2017**	**01.04.2016**
			(Proforma)
In Income Statement			
Current Service Cost	12.67	8.57	7.24
Interest Cost	3.92	3.23	2.47
Expected return on Plan assets	-	-	-
Net Cost	**16.59**	**11.80**	**9.71**
In Other Comprehensive Income			
Actuarial (gain) / loss	2.41	1.40	2.81
Return on Plan Assets	-	-	-
Net (Income)/Expenses for the period recognised in OCI	**2.41**	**1.40**	**2.81**

	FY Ended	FY Ended	FY Ended
VI) Actuarial assumptions	**31.03.2018**	**31.03.2017**	**01.04.2016**
			(Proforma)
Mortality Table (LIC) Ultimate	IALM (2006-08) Table		
Discount rate (per annum)	7.75%	7.50%	7.50%
Expected rate of return on plan assets (per annum)	-	-	-
Rate of escalation in salary (per annum)	6.00%	6.00%	6.00%
Expected Average remaining working lives of employees Years)	21.03	21.69	21.89

Principal Plan is under Payment of Gratuity Act 1972 (as amended up to date).

The estimates of rate of escalation in salary considered in actuarial valuation, take into account inflation, seniority, promotion and other relevant factors including supply and demand in the employment market. The above information is certified by the actuary.

The expected rate of return on plan assets is determined considering several applicable factors, mainly the composition of Plan assets held, assessed risks, historical results of return on plan assets and the Company's policy for plan assets management.

(₹ ' in Million)

	FY Ended	FY Ended	FY Ended
V) "Quantitative Sensitivity analysis for significant assumption is as below:"	**31.03.2018**	**31.03.2017**	**01.04.2016**
			(Proforma)
Salary Escalation (Up by 1%)	70.63	55.30	41.55
Salary Escalation (Down by 1%)	59.14	44.03	32.75
Discount Rate (Up by 1%)	59.43	44.14	32.85
Discount Rate (Down by 1%)	70.37	55.29	41.50

(ii) Leave Encashment

The obligation for leave encashment is recognised during the year of ₹ 0.35/- million (P.Y. ₹ 0.18/- million), is equivalent to one month salary and charged to Profit & Loss Account."

Annexure 39
Restated Consolidated Ind AS Statement of Financial Risk Management Objective & Policies

The Company's principal financial liabilities comprise of loans and borrowings, trade payables and other financial liabilities. The main purpose of these financial liabilities is to finance the Company's operations. The Company's principal financial assets include investments, loans, trade and other receivables, and cash and short-term deposits that derive directly from its operations. The Company also enters into derivative contracts.
The Company is exposed to the following risks from its use of financial instruments:

- Credit Risk
- Liquidity Risk
- Interest Rate Risk
- Currency Risk
- Price Risk

The Company's board of directors has overall responsibility for the establishment and oversight of the Company's risk management framework. This note presents information about the risks associated with its financial instruments, the Company's objectives, policies and processes for measuring and managing risk, and the Company's management of capital.

Credit Risk

The Company is exposed to credit risk as a result of the risk of counterparties non performance or default on their obligations. The Company's exposure to credit risk primarily relates to investments, accounts receivable and cash and cash equivalents. The Company monitors and limits its exposure to credit risk on a continuous basis. The Company's credit risk associated with accounts receivable is primarily related to party not able to settle their obligation as agreed. To manage this the Company periodically reviews the financial reliability of its customers, taking into account the financial condition, current economic trends and analysis of historical bad debts and ageing of accounts receivables.

Trade receivables

Trade receivables represent the most significant exposure to credit risk and are stated after an allowance for impairment and expected credit loss.

Loans and Advances

Financial assets in the form of loans and advances are written off when there is no reasonable expectations of recovery. Where recoveries are made, these are recognise as income in the statement of profit and loss. The company measures the expected credit loss of dues based on historical trend, industry practices and the business environment in which the entity operates. Loss rates are based on actual credit loss experience and passed trends. Based on historical data, loss on collection of dues is not material hence no additional provisions considered.

Bank, Cash and cash equivalents

Bank, Cash and cash equivalents comprise cash in hand and deposits which are readily convertible to cash. These are subject to insignificant risk of change in value or credit risk.

The carrying amount of financial assets represents the maximum credit exposure. The maximum exposure to credit risk at the reporting date was:

(₹ ‘ in Million)

Particular	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Trade receivables	743.64	531.23	484.40
Loans and advances	-	-	1,886.73
Bank, Cash and cash equivalents	163.98	255.56	176.58

Particular	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Trade receivables (measured under life time excepted credit loss model)			
Opening balance	743.64	531.23	484.40
Provided during the year	7.17	5.22	4.84
Reversal of provision	(1.39)	-	-
Unwinding of discount	-	-	-
Closing balance	737.86	526.01	479.56

Particular	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Ageing analysis			
Upto 3 months	675.84	445.98	423.23
3-6 months	11.83	18.04	29.64
More than 6 months	50.20	63.27	26.69
	737.86	**527.29**	**479.56**

No significant changes in estimation techniques or assumptions were made during the reporting period

Liquidity Risk

The Company is exposed to liquidity risk related to its ability to fund its obligations as they become due. The Company monitors and manages its liquidity risk to ensure access to sufficient funds to meet operational and financial requirements. The Company has access to credit facilities and debt capital markets and monitors cash balances daily. In relation to the Company’s liquidity risk, the Company’s policy is to ensure, as far as possible, that it will always have sufficient liquidity to meet its liabilities when due, under both normal and stressed conditions as they fall due while minimizing finance costs, without incurring unacceptable losses or risking damage to the Company’s reputation.

Financial arrangements

The Company has access to following undrawn borrowing facilities at the end of the reporting period:

(₹ ‘ in Million)

Partiular	31.03.2018	31.03.2017	31.03.2016 (Proforma)
Term Loan	-	-	-
Cash Credit facilities	410.08	-	2.09

Maturities of financial liabilities

The contractual undiscounted cash flows of financial liabilities are as follows:

(₹ ‘ in Million)

As At 31st March' 2018	Less than 1 yr	1 -5 Years	More than 5 Years	Total
Borrowing	4,557.24	2,978.10	4,074.39	**11,609.73**
Trade Payable	2,009.98	-	-	**2,009.98**
Other financial liabilities	285.61			**285.61**

(₹ ‘ in Million)

As At 31st March' 2017	Less than 1 yr	1 -5 Years	More than 5 Years	Total
Borrowing	4,369.11	2,877.61	4,655.88	**11,902.59**
Trade Payable	1,915.57	-	-	**1,915.57**
Other financial liabilities	463.40	-	-	**463.40**

(₹ ‘ in Million)

As At 31st March' 2016 (Proforma)	Less than 1 yr	1 -5 Years	More than 5 Years	Total
Borrowing	4,371.89	1,769.20	2,980.74	**9,121.84**
Trade Payable	1,568.85	-	-	**1,568.85**
Other financial liabilities	284.29	-	-	**284.29**

Interest rate risk

Interest rate risk is the risk that an upward movement in the interest rate would adversely effect the borrowing cost of the company. The Company is exposed to long term and short-term borrowings, Commercial Paper Program. The Company manages interest rate risk by monitoring its mix of fixed and floating rate instruments, and taking action as necessary to maintain an appropriate balance.

The exposure of the Company’s borrowings to interest rate changes at the end of the reporting period are as follows:

a) **Interest rate risk exposure**

(₹ ‘ in Million)

	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Variable rate borrowings	11,610.73	11,902.59	9,121.84
Fixed rate borrowings	-	-	-

b) Sensitivity analysis

Profit or loss estimate to higher/lower interest rate expense from borrowings as a result of changes in

(₹ ' in Million)

Particular	**Impact on profit after tax**		
	FY ended 31.03.2018	**FY ended 31.03.2017**	**FY ended 31.03.2016 (Proforma)**
Interest rates - increase by 70 basis points	(81.27)	(83.32)	(63.85)
Interest rates - decrease by 70 basis points	81.27	83.32	63.85

FOREX EXPOSURE RISK

The Company operates internationally and portion of the business is transacted in several currencies and consequently the Company is exposed to foreign exchange risk through purchases from overseas suppliers in various foreign currencies.

Foreign currency exchange rate exposure is partly balanced by purchasing of goods in the respective currencies.

The Company evaluates exchange rate exposure arising from foreign currency transactions and the Company follows established risk management policies, including the use of derivatives like interest rate swap to hedge exposure to foreign currency risk.

Particular	**Currency in Million**		
	As at 31.03.2018	**As at 31.03.2017**	**As at 31.03.2016 (Proforma)**
Borrowings USD	31.65	31.07	38.11

Profit or loss estimate to higher/lower as a result of changes in foreign exchange rates-

Particular	**Impact on profit after tax**		
	As at 31.03.2018	**As at 31.03.2017**	**As at 31.03.2016 (Proforma)**
Foreign exchange rates - increase by 1%	(0.32)	(0.31)	(0.38)
Foreign exchange rates - derease by 1%	0.32	0.31	0.38

Price Risk

The entity is exposed to equity price risk, which raised out from FVTOCI quoted and unquoted equity shares. The management monitors the proportion of equity securities in its investment portfolio based on market indices. Material investments within the portfolio are managed on an individual basis and all buy and sell decisions are approved by the management. The primary goal of the entity's investment strategy is to maximize investments returns.

Annexure-40
Restated Consolidated Ind AS Capital Management

The Company's main objectives when managing capital are to :

- ensure sufficient liquidity is available (either through cash and cash equivalents, investments or committed credit facilities) to meet the needs of the business;
- ensure compliance with covenants related to its credit facilities; and
- minimize finance costs while taking into consideration current and future industry, market and economic risks and conditions.
- safeguard its ability to continue as a going concern
- to maintain an efficient mix of debt and equity funding thus achieving an optimal capital structure and cost of capital.

The Board of Directors has the primary responsibility to maintain a strong capital base and reduce the cost of capital through prudent management of deployed funds and leveraging opportunities in domestic and international financial markets so as to maintain investor, creditor and market confidence and to sustain future development of the business.

The Company manages its capital on the basis of net debt to equity ratio which is net debt (total borrowings net of cash and cash equivalents) divided by total equity

(₹ ' in Million)

Particular	**As at 31.03.2018**	**As at 31.03.2017**	**As at 31.03.2016 (Proforma)**
Total Liability	11,609.73	11,902.59	9,121.84
Less : Bank, Cash and cash equivalent	163.98	255.56	176.58
Net debt	**11,445.75**	**11,647.03**	**8,945.26**
Total equity	6,739.28	4,437.20	4,144.36
Net debt to equity ratio	**0.59**	**0.38**	**0.46**

Annexure-41
Restated Consolidated Ind AS Financial Instrument- Accounting Classification And Fair Value Measurement

The following methods and assumptions were used to estimate the fair values:

1. Fair value of cash and short-term deposits, trade and other short term receivables, trade payables, other current liabilities, short term loans from banks and other financial institutions approximate their carrying amounts largely due to the short-term maturities of these instruments.

2. Financial instruments with fixed and variable interest rates are evaluated by the Company based on parameters such as interest rates and individual credit worthiness of the counter party. Based on this evaluation, allowances are taken to account for the expected losses of these receivables.

The Company uses the following hierarchy for determining and disclosing the fair value of financial instruments by valuation technique :

Level 1 : quoted (unadjusted) prices in active markets for identical assets or liabilities

Level 2 : other techniques for which all inputs which have a significant effect on the recorded fair value are observable, either directly of indirectly

Level 3 : techniques which use inputs that have a significant effect on the recorded fair value that are not based on observable market data

(₹ ‘ in Million)

Particular	Carrying Amount As at 31.03.18	Level 1	Level 2	Level 3
Financial assets at amortised cost:				
Investments	20.80	-	-	-
Trade receivables	737.86	-	-	-
Loans	-	-	-	-
Bank, Cash and bank balances	163.98	-	-	-
Other Financial Assets	86.52	-	-	-
	1,009.17	**-**	**-**	**-**
Financial assets at fair value through other comprehensive income:				
Investments	0.84	0.84	-	-
Total	**0.84**	**0.84**	**-**	**-**
Financial liabilities at amortised cost:				
Long term borrowings	8,722.38	-	-	-
Short term borrowings	2,887.36	-	-	-
Trade payables	2,009.98	-	-	-
Other financial liabilities	285.61	-	-	-
Total	**13,905.33**	**-**	**-**	**-**

(₹ ‘ in Million)

Particular	Carrying Amount As at 31.03.17	Level 1	Level 2	Level 3
Financial assets at amortised cost:				
Investments	21.65	-	-	-
Trade receivables	526.01	-	-	-
Loans	-	-	-	-
Bank, Cash and bank balances	255.56	-	-	-
Other Financial Assets	98.55	-	-	-
	901.76	**-**	**-**	**-**
Financial assets at fair value through other comprehensive income:				
Investments	0.74	0.74	-	-
Total	**0.74**	**0.74**	**-**	**-**
Financial liabilities at amortised cost:				
Long term borrowings	8,508.95	-	-	-
Short term borrowings	3,393.64	-	-	-
Trade payables	1,915.57	-	-	-
Other financial liabilities	463.40	-	-	-
Total	**14,281.57**	**-**	**-**	**-**

(₹ ‘ in Million)

Particular	Carrying Amount As at 31.03.16 (Proforma)	Level 1	Level 2	Level 3
Financial assets at amortised cost:				
Investments	21.76	-	-	-
Trade receivables	479.56	-	-	-
Loans	1,886.73	-	-	-
Bank, Cash and bank balances	176.58	-	-	-
Other Financial Assets	116.33	-	-	-
	2,680.96	**-**	**-**	**-**
Financial assets at fair value through other comprehensive income:				
Investments	0.61	0.61	-	-
Total	**0.61**	**0.61**	**-**	**-**
Financial liabilities at amortised cost:				
Long term borrowings	5,576.07	-	-	-
Short term borrowings	3,545.77	-	-	-
Trade payables	1,568.85	-	-	-
Other financial liabilities	284.29	-	-	-
Total	**10,974.98**	**-**	**-**	**-**

Annexure-42: Restated Consolidated Payment to Auditors

(₹ ‘ in Million)

SN	Particular	31.03.2018	31.03.2017	31.03.2016 (Proforma)
(a)	Auditors			
	- Statutory Auditors Fees	1.38	1.33	1.10
	- Tax Audit Fees	0.30	0.30	0.30
(b)	Certification and Consultation Fees	-	-	0.01
(c)	Internal Audit Fees	0.91	0.93	0.46
(e)	Secretrial Audit Fees	0.13	-	-
(d)	Cost Audit fees	0.02	-	-

Annexure-43:
Restated Consolidated Contingent Liabilities

Contingent Liabilities and Capital Commitments are not provided for in respect of :-

(₹ ‘ in Million)

SN	Description	As at 31.03.2018		As at 31.03.2017		As at 31.03.2016 (Proforma)	
		Value of Liability	Margin Money	Value of Liability	Margin Money	Value of Liability	Value of Liability
i)	Claims against the Co. / disputed tax liabilities not acknowledged as debt	469.16	NA	132.52	NA	159.18	NA
ii)	Bank Guarantees outstanding	227.30	5.69	213.79	12.93	110.91	12.93
iii)	Letter of Credit & Guarantee issued by bank	104.56	NA	311.12	NA	274.03	NA
		NIL	NA	NIL	NA	NIL	NA
iv)	Jointly and severely corporate guarantee to the bank on behalf of Joint venture company						
v)	Jointly and severely corporate guarantee to the bank on behalf of Subsidiary Company	3311.00	NA	3311.00	NA	3311.00	NA

Annexure 44
Restated Consolidated Ind AS Statement of Related Parties

Information on Related Party as required by Ind As 24, "Related Party Disclosures" issued by The Institute of Chartered Accountants of India, are given below :

a) **Subsidiary (Control Exists)**
-- IA Hydro Energy Pvt. Ltd.
-- Shri Bajrang Energy Private Limited
-- S B Power (Partnership Firm)

b) **Joint Venture**
-- Chhattisgarh Captive Coal Mining Ltd.

c) **Associate**
-- Shri Bajrang Alloys Limited

d) **Enterprises Under Control of KMP & their Relatives**
-- Shri Bajrang Alloys Limited
-- S. B. Multimedia (P) Limited
-- Shri Bajrang Ispat & Plywood Limited
-- Shimmer Investment Private Limited
-- Swastik Mercantiles Limited

-- Shri Bajrang Steel & Power Limited
-- I A Energy Private Limited
-- I A Energy (Partnership Firm)
-- Shri Jainarayan Hariram Goel Charitable Trust
-- Shri Bajrang Hydro Energy Private Limited

d) Key Management Personnel

-- Shri Narendra Goel
-- Shri Pawan Goel
-- Shri Shravan Kumar Goyal
-- Parul Verma

e) Relative of Key Management Personnel

-- Shri Suresh Goel
-- Shri Rajendra Goel
-- Shri Anand Goel
-- Shri Ashutosh Goel
-- Smt Sarla Goel
-- Shri Archit Goel
-- Smt Neeta Goel
-- Smt. Suman Goel
-- Smt. Aruna Goel
-- Smt. Rashmi Goel
-- Smt. Kiran Goel
-- Smt. Esha Goel
-- Shri Dinesh Goel
-- Smt. Ankita Goel
-- Shri Sandeep Goel
-- Shri Shimmer Goel
-- Shri Bajrang Goel

Transaction with Related Parties in the ordinary course of business

(₹ ' in Million)

	As at	**As at**	**As at**
Particulars	**31.03.2018**	**31.03.2017**	**01.04.2016**
			(Proforma)
Subsidiary			
Purchase of Materials	-	-	-
Sale of Materials	-	-	-
Investment	-	-	-
Interest Expenses	-	-	-
Interest Income	-	-	-
Outstandings:			
Payables	-	-	-
Receivables	-	-	-
Associates			
Sale of Materials	-	-	-
Investment	-	-	0.09
Outstandings:			
Receivables	-	-	1,406.53
Joint Venture			
Investments	30.69	30.69	30.69

Outstandings:			
Payables	6.18	6.18	6.01
Enterprises Under the control of KMP & their relative			
Purchase of Materials	51.52	203.44	255.14
Sale of Materials	344.08	320.99	114.63
Interest Expenses	0.13	13.59	13.58
Services Received	123.00	50.00	-
Outstandings:			
Payables	4.87	197.17	120.01
Receivable	60.61	-	37.65
Key Management			
Remuneration Paid	11.52	3.24	3.22
Interest Paid	-	-	-
Services Received	7.20	-	-
Payables	1.08	-	-

The following tables provides the total amount of transactions that have been entered into with related parties for the relevant financial year:-

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016
			(Proforma)
Purchase of Materials:			
Shri Bajrang Alloys Limited	51.52	203.44	255.14
IA Hydro Energy Private Limited	-	-	-
Shri Bajrang Energy Private Limited	-	-	-
Purchase of Fixed Asset:			
Shri Bajrang Alloys Limited	-	-	1.53
Sale of Materials:			
Shri Bajrang Alloys Limited	344.08	320.99	114.63
Shri Jainarayan Hariram Goel Charitable Trust	4.48	0.34	0.59
Shimmer Investments Private Limited	11.85	22.42	6.04
I A Energy (Partnership Firm)	-	-	48.48
IA Hydro Energy Private Limited	-	-	-
Service Received:			
SB Multimedia Pvt. Ltd.	123.00	50.00	-
Shri Bajrang Alloys Limited	-	0.06	0.06
Ashutosh Goel	3.60	-	-
Ayush Goel	3.60	-	-
Remuneration Paid:			
Shri Narendra Goel	2.10	1.80	1.80
Shri Rajendra Goel	1.80	1.80	1.20
Pawan Goel	1.80	1.20	1.20
Sandeep Goel	1.80	-	-
Ashutosh Goel	0.60	1.20	1.20

Pradeep Tiwari	1.73	1.30	-
Shri Shravan Kumar Goyal	1.69	1.44	1.42
Interest Expenses:			
Sanskar Info TV Private Limited	-	13.59	13.58
Shri Bajrang Ispat & Plywood Limited	0.13	-	-
S. B. Power	-	-	-
Interest Income:			
I A Hydro Energy Private Limited	-	-	-

Annexure- 45 Segment-wise Revenue Results:

Basis of preparation:
The Company's operations predominantly relate to manufacturing, trading, generation and sale of sponge iron, billets, ferro alloys and power. The risks and rewards associated with these three businesses are significantly different. Therefore, the primary segment consists of "Iron & Steel" and "Power".

The geographic segments identified as secondary segments are "Domestic Market" and "Export Market". Since there is no significant export market revenue, the same has not been disclosed. The entire capital employed is within India.

Information about business segments - Primary
(₹ in Million)

Business Segment		**Iron & Steel**			**Power**			**Total**	
	2017-18	2016-17	2015-16	2017-18	2016-17	2015-16	2017-18	2016-17	2015-16
			(Proforma)			(Proforma)			(Proforma)
Revenue									
External Turnover (Gross)	18,183.42	15,503.95	13,980.43	328.58	114.44	126.02	18,512.00	15,618.40	14,106.44
Inter-segment Transfer	-	-	-	1,820.99	1,944.83	1,321.79	1,820.99	1,944.83	1,321.79
Eliminations	-	-	-	(1,820.99)	(1,944.83)	(1,321.79)	(1,820.99)	(1,944.83)	(1,321.79)
Total Revenue	18,183.42	15,503.95	13,980.43	328.58	114.44	126.02	18,512.00	15,618.40	14,106.44
Result									
Segment Result	1,019.79	(483.52)	(568.64)	(366.10)	858.19	618.96	653.68	374.67	50.32
Unallocated Expense/Income	-	-	-	-	-	-	-	-	-
Operating Profit	-	-	-	-	-	-	604.28	334.68	18.23
(+) Interest Income	-	-	-	-	-	-	84.20	45.91	32.09
(+) Profit on Sale of Fixed Assets	-	-	-	-	-	-	(22.22)	(0.31)	(0.43)
(-) Income Taxes	-	-	-	-	-	-	294.68	113.05	8.66
(-) Earlier Year Taxes	-	-	-	-	-	-	-	-	-
(-) Deferred Taxes	-	-	-	-	-	-	0.36	28.88	229.26
(+) Other Comprehensive Income	-	-	-	-	-	-	(2.34)	(1.31)	0.04
(+) Exceptional Items	-	-	-	-	-	-	-	(45.16)	(6.67)
Net Profit	**1,019.79**	**(483.52)**	**(568.64)**	**(366.10)**	**858.19**	**618.96**	**368.88**	**282.19**	**(194.66)**
Other Information									
Segment Assets	7,978.28	8,160.33	8,372.43	7,539.27	8,087.73	1,817.18	15,517.55	16,248.06	10,189.61
Unallocated Corporate Assets	-	-	-	-	-	-	6,516.55	3,778.74	6,087.10
Total Assets	7,978.28	8,160.33	8,372.43	7,539.27	8,087.73	1,817.18	22,034.10	20,026.80	16,276.72
Segment Liabilities	7,483.77	7,674.12	7,422.44	4,327.50	4,094.30	977.07	11,811.28	11768.43	8,399.51
Unallocated Corporate Liabilities	-	-	-	-	-	-	2,599.51	2,988.36	2,899.32
Total Liabilities	7,483.77	7,674.12	7,422.44	4,327.50	4,094.30	977.07	14,410.79	14,756.79	11,298.83
Depreciation	501.50	502.30	510.90	206.68	62.50	36.35	708.19	564.81	547.24

Annexure- 46

Remittance in Foreign Currency

Breakup of Raw Material Consumed

(₹ in Million)

Particulars	**FY 2017-18**		**FY 2016-17**		**FY 2015-16 (Proforma)**	
	%	**Amount**	**%**	**Amount**	**%**	**Amount**
Indigenous	100.00%	12,745.79	100.00%	9,455.66	100.00%	9,570.27
Imported	-	-	-	-	-	-
	100.00%	**12,745.79**	**100.00%**	**9,455.66**	**100.00%**	**9,570.27**

Breakup Of Stores Consumed

(₹ in Million)

Particulars	**FY 2017-18**		**FY 2016-17**		**FY 2015-16 (Proforma)**	
	%	**Amount**	**%**	**Amount**	**%**	**Amount**
Indigenous	99.10%	574.99	99.72%	396.26	99.12%	380.97
Imported	0.90%	4.94	0.28%	1.10	0.88%	3.37
	100.00%	**579.93**	**100.00%**	**397.36**	**100.00%**	**384.34**

Value of import on CIF basis

Particulars	**Currency**	**FY2017-18**		**FY 2016-17**		**FY 2015-16 (Proforma)**	
		USD/EURO	**₹ in Million**	**USD/EURO**	**₹ in Million**	**USD/EURO**	**₹ in Million**
- Raw Materials	USD	-	-				
- Stores & Spares	USD	75,202.33	4.86	11,864.36	0.80	53,212.89	3.37
	EURO	950.00	0.08	4286.00	0.30	-	-
- Trading Goods	USD	-	-	-	-	-	-
- Capital Goods	USD	1,52,927.91	12.13	18,592.00	1.24	-	-
	EURO	-	-	563,622.87	42.71	-	-
Exp. in Foreign Currency	USD	34,66,273.20	226.06	23,10,271.58	154.44	810,503.64	46.38
Earning in Foreign Exchange on							
Sale of Finished Goods							
Carbon Credits	EURO	-	-	125,163.50	9.10	128,361.00	9.18
Wire-rod Coil	USD	-	-	703,597.92	46.33	-	-
TMT	USD	-	-	147,601.50	7.26	-	-

Annexure- 47
Restated Consolidated Ind AS Statement of Additional information requirement as per Companies Act 2013

1. Additional information as required by paragraph 2 of the General Instruction for preparation of Consolidated Financial Statements to the Schedule III to the Companies Act,2013 :

Name of the Enterprise	Net Assets i.e. total assets minus total liabilities		Share in profit or loss		Share in Other Comprehensive Income	
	As % of consolid-ated net assets	Amount (₹ in Million)	As % of consolidate d profit or loss	Amount (₹ in Million)	As % of consolidated profit or loss	Amount (₹ in Million)
(a) Parent						
(i) SHRI BAJRANG POWER & ISPAT LIMITED	79.13%	5,976.39	215.20%	798.87	106.44%	(2.49)
(b) Subsidiaries						
(i) SHRI BRAJANG ENERGY PRIVATE LIMITED	0.49%	37.30	2.09%	7.75	0.00%	-
(ii) IA HYDRO ENERGY PRIVATE LIMITED	20.52%	1,549.56	-117.28%	(435.37)	-6.44%	0.15
(iii) SB POWER (PARNERSHIP FIRM)	0.00%	-		-	0.00%	-
(c) Joint Venture						
(i) CHATTISGARH CAPTICE COAL MINING LIMITED	-0.14%	(10.90)	-0.01%	(0.03)	0.00%	-
TOTAL	**100.00%**	**7,552.35**	**100.00%**	**371.23**	**100.00%**	**(2.34)**

2. Further, As set out in sub section (3) of section 129 of the companies Act, 2013 read with rule 5 of Companies (Accounts) Rules, 2014, Statement containing salient features of the financial statement of subsidiaries is as follows:

S.N.	Particulars	SHRI BRAJANG ENERGY PRIVATE LIMITED			IA HYDRO ENERGY PRIVATE LIMITED		
		2017-18	**2016-17**	**2015-16 (Proforma)**	**2017-18**	**2016-17**	**2015-16 (Proforma)**
1	Reporting period	Reporting Period is same			Reporting Period is same		
2	Reporting Currency	**(₹ in Million)**			**(₹ in Million)**		
3	Share Capital	2.53	2.53	2.53	325.00	100.00	-
4	Other Equity	78.53	77.17	98.91	1,573.77	(14.46)	-
5	Total Assets	81.21	404.60	444.95	6,103.84	6,288.62	-
6	Total Liabilities	81.21	404.60	444.95	6,103.84	6,288.62	-
7	Investments	71.49	21.49	0.89	-	-	-
8	Gross Turnover (Including other income)	1.82	2.44	-	220.70	17.49	-
9	Profit Before Taxation	1.69	(21.74)	-	(635.61)	(75.81)	-
10	Provision for Tax (including deferred Tax)	0.33	-	-	(194.03)	(19.07)	-
11	Profit After Taxation	1.36	(21.74)	-	(441.58)	(56.74)	-
12	Proposed Dividend	-	-	-	-	-	-
13	Percentage of Holding	79.83%	79.83%	79.83%	90.46%	74.00%	NA

S.N.	Particulars	S.B. Power		
		2017-18	2016-17	2015-16 (Proforma)
1	Reporting period	Reporting Period is same		
2	Reporting Currency	INR		
3	Share Capital	1.00	1.00	1.00
4	Other Equity	-	-	-
5	Total Assets	210.13	219.40	174.86
6	Total Liabilities	210.13	219.40	174.86
7	Investments	-	-	-
8	Gross Turnover (Including other income)	-	-	-
9	Profit Before Taxation	-	-	-
10	Provision for Tax (including deferred Tax)	-	-	-
11	Profit After Taxation	-	-	-
12	Proposed Dividend	-	-	-
13	Percentage of Holding	51.00%	51.00%	51.00%

3 Statement pursuant to Section 129 (3) of the Companies Act, 2013 related to Salient features of Associate Companies and Joint Ventures as follows :

(₹ in Million)

S No	Particulars	Chhattisgarh Captive Coal Mining Ltd			I A Energy (Partnership Firm)		
1	Latest Audited Balance Sheet Date	31.03.2018	31.03.2017	31.03.2016	31.03.2018	31.03.2017	31.03.2016
2	Share of JV/Associates held by the company on the year end	2,61,181.00	2,61,181.00	2,61,181.00	NA	NA	NA
3	No of shares	1322273	1322273	1322273	NA	NA	NA
4	Amount of Investment	30.69	30.69	30.69	NA	NA	NA
5	Extend of holding (in %)	19.75%	19.75%	19.75%	NA	NA	NA
6	Description of how there is significant influence	Jointly controlled entity	Jointly controlled entity	Jointly controlled entity	Associate	Associate	Associate
7	Net worth attributable to share holding as per latest audited balance sheet	141.02	141.17	27.13	NA	NA	NA
8	Profit/loss for the year	(0.14)	(0.61)	(0.40)	NA	NA	NA
9	Considered in consolidation	(0.02)	(0.12)	(0.08)	NA	NA	NA
10	Not Considered in consolidation	(0.11)	(0.49)	(0.32)	NA	NA	NA

* Figures of 2017-18 of Joint Venture are Unaudited.

4 (i) A Legal case pending with the Honorable First Class Judicial Magistrate, Raipur against Advance to supplier for Rs. 9.31 million.

(ii) Amount of Rs. 60.80 Million is hown under other Long Term Liability related to electricity duty of earlier years due to litigation pending with High Court Bilaspur.

Annexure 48
Restated Consolidated Statement of Accounting Ratio

(₹. in Million)

SI NO	PARTICULARS		31.03.2018	31.03.2017	31.03.2016 (Proforma)
	Basic earnings per share (Rs.) (refer note 3(a) below)	A/C	28.22	21.59	(14.89)
	Diluted earnings per share (Rs.) (refer note 3(b) below)	B/D	28.22	21.59	(14.89)
	Return on Net Worth (%) (refer note 3(c) below)	A/E	5.47%	6.36%	-4.70%
	Net asset value per equity share (Rs.) (refer note 3(d) below)	E/F	515.58	339.47	317.06
1	Restated Profit/loss after tax, attributable to equity shareholders	A	368.88	282.19	(194.66)
	Add: Adjustment for loss on fair valuation of convertible preference shares		-	-	-
	Net Profit/loss available for calculation of DEPS	B	368.88	282.19	(194.66)
2	Weighted average number of equity shares considered for calculating basic earnings per share	C	13.07	13.07	13.07
	Effect of dilution:				
	Stock option under ESOP		-	-	-
	Compulsory convertible preference shares		-	-	-
	Weighted average number of equity shares considered for calculating diluted earnings per share	D	13.07	13.07	13.07
3	Restated net worth at the end of the year (refer note 5 below)	E	6,739.29	4,437.20	4,144.36
	Face value per share		10.00	10.00	10.00
	Total number of equity shares outstanding at the end of the year	F	13.07	13.07	13.07
	Weighted average number of equity shares outstanding during the year, after giving the impact of bonus shares, used for diluted earning per share	H	13.07	13.07	13.07

Notes:

1. The figures disclosed above are based on the Restated Ind AS Unconsolidated Summary Statements of the Company.
2. The above statement should be read with the otes to the Restated Consolidated Ind AS Financial Information - Significant Accounting Policies - Annexure 5 and Restatement Adjustments to Audited Ind AS Consolidated Financial Statements – Annexure 6
3. The Ratios have been computed as below

a)	Basic Earnings per share (Rs.)	Restated Profit/loss after tax, attributable to equity shareholders / Weighted average number of equity shares considered for calculating Basic Earning Per Share
b)	Diluted Earnings per share (Rs.)	Restated Net Profit/loss available for calculation of DEPS / Weighted Average number of diluted equity shares
c)	Return on Net Worth(%)	Restated Profit/loss after tax attributable to equity shareholders / Restated Net worth at the end of the year
d)	Net Assets Value per share (Rs)	Restated Net worth at the end of the year / Total number of Equity Share outstanding at the end of the year

4. Weighted average number of equity shares is the number of equity shares outstanding at the beginning of the year adjusted by the number of equity shares issued during year multiplied by the time weighting factor. The time weighting factor is the number of days for which the specific shares are outstanding as a proportion of total number of days during the year
5. Net worth includes Equity share capital + Other equity (including Share Premium, General Reserve, Employee share based payment reserve and Retained earnings)
6. Earnings per share calculations are in accordance with Ind AS 33 (Earnings per Share).
7. The Company has allotted bonus shares to the existing equity shareholders on September 4 2018 in the ratio of 1:3 as approved by the shareholders at the general meeting held on September 3 2018. Consequently, the numbers of shares have increased from 13,071,155 equity shares to 52,284,620 equity shares.

Annexure 49
Restated Consolidated Ind AS Statement of Capitalisation

(₹. in Million)

Particular	Pre -Issue as at 31.03.2018	As adjusted for Issue
Borrowing		
Long-term borrowings (A)	8,064.63	-
Current maturities of long term borrowings (B)	657.75	-
Total long-term borrowings (C)=(A)+(B)	**8,722.38**	**-**
Short-term borrowings	2,887.36	
Total Borrowings (D)	**11,609.73**	**-**
Shareholders' funds		
Share capital	130.71	-
(1,30,71,155 Equity Shares of Rs. 10/- each fully paid up)		
Reserves and surplus		
Securities premium	3495.96	-
Amalgamation Adjustment reserve	111.90	-
Capital Subsidy	110.74	-
Surplus i.e. balance in the restated consolidated summary statement of profit and loss	2,889.86	-
Total shareholders' funds (E)	**6,739.17**	**-**
Long-term borrowings / Shareholders' funds (C/E)	**1.29**	**-**
Total borrowings / Shareholders' funds (D/E)	**1.72**	**-**

Note : Since March 31, 2018 (which is the last date as of which financial information has been given in para of this report) share capital was increased form Rs.130.71 million to Rs.522.84 million by the issue of bonus shares in the ratio of 3 equity share for every 1 equity shares.

Annexure 50
Restated Consolidated Ind AS Statement of Tax Shelter

(₹ 'in Million)

SN	PARTICULAR	31.03.2018	31.03.2017	31.03.2016
				(Proforma)
A	Restated Profit/ Loss Before Tax	653.68	374.67	43.65
B	Tax Rate	30.90%	30.90%	30.90%
C	Tax Thereon on Above Rate (A x B)	201.99	115.77	13.49
D	**Adjustment for Permanent Difference**			
1	**Expenses disallowed under Income Tax Act**			
	Loss on Sale of Fixed Assets & Investment	22.22	0.31	15.35
	Profit on Sale of Fixed Assets	0.00	0.00	(0.19)
	Loss in Share of Subsidiary	0.00	33.42	0.00
	Interest on TDS	0.40	0.05	0.10
	Penalty & Fine	0.29	0.14	0.61
	Donation	0.19	0.13	0.14
	Corporate Social Responsibility	18.63	17.16	9.25
	Dividend Exempt Under IT ACT	0.00	0.00	0.00
	ROC Filing Fees	2.32	0.00	0.00
	Preliminary Expenses	(0.18)	0.00	0.00
	Deduction u/s 32AC	0.00	(47.73)	(57.82)
	TOTAL (D)	**43.87**	**3.48**	**(32.57)**
E	**Adjustments for Timing Differences**			
	"Difference in book depreciation and Depreciation under	(169.63)	(258.94)	(339.13)
	Income Tax Act 1961"			
	Preliminary Expenses	0.00	0.71	0.00
	Expenses allowable on payment basis	(16.35)	(14.50)	(20.50)
	Provision for gratuity	17.79	13.20	12.52
	Provision for leave encashment	3.79	1.47	0.00
	Provision for Bonus	18.95	14.77	13.75
	Provision for Doubtful advances	1.94	0.00	0.00
	Deduction allowed as per Sec. 35(2) & 35(2AB)	(46.95)	0.00	0.00
	TOTAL (E)	**(190.46)**	**(243.30)**	**(333.37)**
	Net Adjustments (D+E)	**(146.59)**	**(239.81)**	**(365.94)**
	Taxable income/(loss) before set off of losses			
	Taxable Income for the year	507.09	134.86	(322.29)
	Brought forward Losses			
	- Business Losses	447.75	54.52	0.00
	- Unabsorbed depreciation	1019.78	1972.94	2,088.78
	- Long term capital loss	13.06	14.63	14.63

Annexure-51

1. Balances of the sundry debtors, sundry creditors, loans and advances etc. are subject to confirmation and reconciliation.
2. In the opinion of the Board, the value of realization of loans, advances and current assets in the ordinary course of business will not be less than the amount at which they are stated in the balance sheet.
3. A fire incident was happened in Tilda (Unit III) during the last year. Due to which some of the fixed assets has been burnt (Refer Annexure 7), for which insurance claim has been lodged and the same is yet to be settled.
4. Inventories and consumption of stores materials have been taken as valued and certified by the management.

5. Amounts have been rounded off to the nearest rupees million and previous year's figures have been regrouped, rearranged and reclassified wherever considered necessary to confirm to the current presentation.

For S S S D & CO **Chartered Accountants** **Firm Registration Number: 020203C**	**For and behalf of** **Shri Bajrang Power and Ispat Limited**	
	Pawan Goel **Chief Financial Officer**	**Suresh Goel** **Chairman**
Vidhan Chandra Srivastava **Partner** **Membership Number: 073712**		**DIN: 00115834**
Place: Raipur **Date : September 2, 2018**	**Parul Verma** **Company Secretary**	**Narendra Goel** **Managing Director** **DIN : 00115883**

Auditors' Report on the Restated Consolidated Accounting Principles Generally Accepted in India ("IGAAP") Financial Information of Shri Bajrang Power and Ispat Limited

To,
The Board of Directors
Shri Bajrang Power and Ispat Limited
Village Borjhara , Urla Industries Area,
Raipur (C.G) -493221

Independent Auditors' Report on the Restated Consolidated IGAAP Financial Information prepared in connection with the proposed initial public offering (the "IPO") by Shri Bajrang Power and Ispat Limited.

Dear Sirs,

1. We have examined the attached Restated Consolidated IGAAP Financial Information of Shri Bajrang Power and Ispat Limited (the "**Company**") and its subsidiaries i.e. Shri Bajrang Energy Private Limited, S B Power and its Joint Ventures i.e. Chhattisgarh Captive Coal Mining Limited (together referred to as the "**Group**", which comprises of the Restated Consolidated IGAAP Summary Statement of Assets and Liabilities as at March 31, 2015 and March 31, 2014, the Restated Consolidated IGAAP Summary Statement of Profit and Loss and the Restated Consolidated IGAAP Summary Statement of Cash Flows for each of the years ended March 31, 2015 and March 31, 2014 and the Significant Accounting Policies and Other Information – including schedules, notes and annexures thereto for the reporting period (collectively referred to as the "**Restated Consolidated IGAAP Financial Information**"), for the purpose of inclusion in the Draft Red Herring Prospectus ("**Offer Documents**") to be prepared by the Company in connection with its proposed IPO of equity shares of face value of ₹ 10 each as approved by the Board of Directors of the Company, prepared in terms of the requirements of the relevant provisions of the:

   a. Section 26 of Part I of Chapter III of the Companies Act, 2013 (the "**Act**") and

   b. the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 as amended from time to time in pursuance of provisions of Securities and Exchange Board of India Act, 1992 ("**SEBI ICDR Regulations**").

The preparation of the Restated Consolidated IGAAP Financial Information, is the responsibility of the management of the Company. The management's responsibility includes designing, implementing and maintaining adequate internal control relevant to the preparation and presentation of the Restated Consolidated IGAAP Financial Information. The management is also responsible for identifying and ensuring that the Company complies with the Act and SEBI ICDR Regulations.

2. We have examined such Restated Consolidated IGAAP Financial Information taking into consideration:

   a. the terms of reference and terms of our engagement agreed with you vide our engagement letter dated August 14, 2018 , requesting us to carry out the assignment, in connection with the proposed IPO of the Company;

   b. Guidance Note on Reports in Company Prospectus (Revised 2016) issued by the Institute of Chartered Accountants of India ("**ICAI**") as amended from time to time (the "**Guidance Note**") which include the concepts of test checks and materiality. This Guidance Note requires us to obtain reasonable assurance based on verification of evidence supporting the Restated Consolidated IGAAP Financial Information. This Guidance Note also requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

3. The Restated Consolidated IGAAP Financial Information have been compiled by the management of the Company from:

   a. the audited consolidated financial statements of the Company as at and for the year ended March 31, 2015 and March 31, 2014, which were prepared in accordance with the accounting principles generally accepted in India ("**IGAAP**") at the relevant time which have been approved by the Board of Directors at their meetings held on July 14, 2015 and August 24, 2014 respectively;

   b. The financial information in relation to the Company's subsidiaries as listed below, which are audited by the other auditors and included in the Restated Consolidated IGAAP Financial Information:

Name of the entity	Name of the audit firm	Relationship of entity with the company	Period
Shri Bajrang Energy Private Limited	R.K. Singhania & Associates	Subsidiary	2013-14 & 2014-15
S. B. Power	PSA Jain and Co.	Subsidiary	2013-14 & 2014-15
Chhattisgarh Captive Coal Mining Limited	R.K. Singhania & Associates	Joint Venture	2013-14 & 2014-15

c. Audit for the financial year ended March 31, 2015 and March 31, 2014 was conducted by the previous auditors, R.K. Singhania & Associates , Chartered Accountants, Raipur , and accordingly reliance has been placed on the consolidated financial information examined by them for the said years. The financial report included for these years i.e. March 31, 2015 and March 31, 2014 are based solely on the report submitted by R.K. Singhania & Associates , Chartered Accountants Raipur and the Company have also confirmed the Restated Consolidated IGAAP Financial Information:

These financial statements have been audited by other auditors as mentioned above, whose reports have been furnished to us and our opinion in so far as it relates to the amounts included in these Restated Consolidated IGAAP Financial Information are based solely on the report of other auditor.

The previous auditor, as mentioned, and the company have confirmed that the restated consolidated financial information:

- have been made after incorporating adjustments for the changes in accounting policies retrospectively in respective financial years to reflect the same accounting treatment as per changed accounting policy for the reporting periods;
- have been made after incorporating adjustments for the material amounts in the respective financial years to which they relate; and
- as per requirements of IGAAP, do not contain any extra-ordinary items that need to be disclosed separately in the Restated Consolidated IGAAP Financial Information;
- There were qualifications in the auditors' reports on the audited consolidated financial statements of the Company as at March 31, 2015 and March 31, 2014 and for which adjustment have been done to the Restated Consolidated IGAAP Financial Information. (Refer Annexure 5 for the details)

4. In accordance with the requirements of Section 26 of Part I of Chapter III of the Act, the SEBI ICDR Regulations and the Guidance Note, we have examined the following financial statements of the Group contained in the Restated Consolidated IGAAP Financial Information as at March 31, 2015 and March 31, 2014 examined and reported by R.K. Singhania & Associates , Chartered Accountants Raipur , on which reliance has been placed by us, have been arrived after making adjustments and regrouping/ reclassifications as in our opinion were appropriate below and have been fully described in Annexure 5: Notes on Material Adjustments to the Restated Consolidated IGAAP Summary Statements and based on our examination, we report that:

    a. The Restated Consolidated IGAAP Consolidated Summary Statement of Assets and Liabilities of the Group as at March 31, 2015 and March 31, 2014, as set out in Annexure 1 to this report;
    b. The Restated Consolidated IGAAP Consolidated Summary Statement of Profit and Losses of the Group for each of the years ended March 31, 2015 and March 31, 2014, as set out in Annexure 2 to this report;
    c. The Restated IGAAP Consolidated Summary Statement of Cash Flows of the Group for each of the years ended March 31, 2015 and March 31, 2014, as set out in Annexure 3 to this report;

    Based on the above and according to the information and explanations given to us and reliance placed on the reports submitted by the previous auditor R.K. Singhania & Associates , Chartered Accountants Raipur, we further report that the Restated Consolidated IGAAP Financial Information of the Group : as attached to this report and as mentioned above, read with basis of preparation and respective significant accounting policies given in Annexure 4 as described in paragraph 1 have been prepared in accordance with the Act and SEBI ICDR Regulations and these Restated Consolidated IGAAP Financial Information:

    a. have been made after incorporating adjustments for the changes in accounting policies retrospectively in respective financial years to reflect the same accounting treatment as per changed accounting policy for the reporting periods;
    b. have been made after incorporating adjustments and regroupings for the material amounts in the respective financial year to which they relate;
    c. as per requirements of IGAAP, do not contain any extra-ordinary items that need to be disclosed separately in the Restated Consolidated IGAAP Financial Information;
    d. There were qualifications in the auditors' reports on the audited consolidated financial statements of the Company as at March 31, 2015 and March 31, 2014 and for which adjustments have been done to the Restated Consolidated IGAAP Financial Information. (Refer Annexure 5 for the details)
    e. Other audit qualifications included in the Annexure to the auditors' report issued under Companies (Auditor's Report) Order 2003, as applicable, on the consolidated financial statements for the years ended March 31, 2015, which do not require any corrective adjustment in the Restated IGAAP Consolidated Summary Statements, are as follows:

A. As at and for the year ended March 31, 2015

Clause I (a)- Fixed Assets

According to the information and explanations given to us the Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets except componentization of fixed assets during the year.

Clause VII (b)- Disputed liabilities pending before appropriate authorities

S.No	Name of the Statute	Nature of the duties	"₹" in Millions	Period to which the amount relates	Forum where dispute is pending
1.	Income Tax Act ,1961	Income Tax	24.49	FY 2004-05	High Court of Chhattisgarh
2.		Income Tax	48.81	FY 2010-11	ITAT Chhattisgarh
3.		Income Tax	34.12	FY 2009-10	ITAT Chhattisgarh
4.	Central Excise Act 1944.	Custom duty	2.20	FY 2007-08	CESTAT,Mumbai
5.	Central Excise Act 1944.	Custom duty	2.21	FY 2012-13	The Additional Commissioner of Custom. Vizag.
6.	Central Excise Act 1944.	Excise duty	22.83	FY 2005-09	CESTAT, Dehli
7.	Central Excise Act 1944.	Service Tax	6.49	FY 2011-12	Commission of Excise , Raipur
8.	Central Excise Act 1944.	Excise duty	1.59	FY 2005-06	DGECL , Raipur.
9.	Central Excise Act 1944.	Excise duty	0.32	FY 2006-07	Commission of Excise , Raipur.
10.	Central Excise Act 1944.	Excise duty	0.25	FY 2005-06 & 2007-08	Commission of Excise , Raipur
11.	Central Excise Act 1944.	Excise & Service Tax	1.48	FY 2010-11	Commission of Excise , Raipur
12.	Central Excise Act 1944.	Excise & Service Tax	5.65	FY 2012-13	Commission of Excise , Raipur
13.	Central Excise Act 1944.	Excise & Service Tax	0.57	FY 2014-15	Commission of Excise , Raipur
14.	Central Excise Act 1944.	Excise & Service Tax	6.90	FY 2012-13	CESTAT ,New Dehli
15.	Central Sales tax & CG VAT Act	Sales Tax	5.22	FY 2005-06	Additional Commissioner of Commercial Tax (Appeal) Raipur.
	Total		**159.18**		

5. We have also examined the following Restated Consolidated IGAAP Financial Information set out in Annexures prepared by the management and approved by the Board of Directors of the Company and annexed to this report relating to the Group as at and for each of the years ended March 31, 2015 and 2014:

1. Restated Consolidated IGAAP Summary Statement of Assets and Liabilities in **Annexure 1**;
2. Restated Consolidated IGAAP Summary Statement of Profit and Loss in **Annexure 2**;
3. Restated Consolidated IGAAP Summary Statement of Cash Flows in **Annexure 3**;
4. Notes to the Restated Consolidated IGAAP Financial Information - Significant Accounting Policies in **Annexure 4**;
5. Statement of Restatement Adjustment to Audited IGAAP Consolidated Financial Statements in **Annexure 5**;
6. Restated Consolidated Statement of Share Capital, enclosed as **Annexure 6**;
7. Restated Consolidated Statement of Reserves, enclosed as **Annexure 7**;
8. Restated Consolidated Statement of Long-term Borrowings, enclosed as **Annexure 8**;
9. Restated Consolidated Statement of Deferred Tax liability (Net), enclosed as **Annexure 9**;
10. Restated Consolidated Statement of Long-termProvisions, enclosed as **Annexure 10**;
11. Restated Consolidated Statement of Short-term Borrowings, enclosed as **Annexure 11**;
12. Restated Consolidated Statement of Other Current Liabilities, enclosed as **Annexure 12**;

13. Restated Consolidated Statement of Short TermProvisions, enclosed as **Annexure 13**;
14. Restated Consolidated Statement of Fixed Assets, enclosed as **Annexure 14**;
15. Restated Consolidated Statement of Non-Current investments, enclosed as **Annexure 15**;
16. Restated Consolidated Statement of Long term Loans and Advances, enclosed as **Annexure 16**;
17. Restated Consolidated Statement of Inventories, enclosed as **Annexure 17**;
18. Restated Consolidated Statement of Trade Receivables, enclosed as **Annexure 18**;
19. Restated Consolidated Statement of Cash and Bank Balances, enclosed as **Annexure 19**;
20. Restated Consolidated Statement of Short term Loans and Advances, enclosed as **Annexure 20**;
21. Restated Consolidated Statement of Other Current Assets, enclosed as **Annexure 21**;
22. Restated Consolidated Statement of Other Non Current Assets, enclosed as **Annexure 22**;
23. Restated Consolidated Statement of Revenue from operations, enclosed as **Annexure 23**;
24. Restated Consolidated Statement of Other Income, enclosed as **Annexure 24**;
25. Restated Consolidated Statement of Cost of Material consumed, enclosed as **Annexure 25**;
26. Restated Consolidated Statement of Increased/decreased in stock in trade, enclosed as **Annexure 26**;
27. Restated Consolidated Statement of Employee Benefit Expense, enclosed as **Annexure 27**;
28. Restated Consolidated Statement of Finance Costs, enclosed as **Annexure 28**;
29. Restated Consolidated Statement of Other Expenses enclosed as **Annexure 29**;
30. Notes to the Restated Consolidated of Current tax, enclosed as **Annexure 30**;
31. Notes to the Restated Consolidated of Earning per equity shares, enclosed as **Annexure 31;**
32. Restated Consolidated Statement of Accounting Ratios, enclosed as **Annexure 32**;
33. Restated Consolidated Statement of Tax Shelter, enclosed as **Annexure 33**;
34. Restated Consolidated Statement of Segment Reporting, enclosed as **Annexure 34**;
35. Notes to the Restated Consolidated Summary Statement, enclosed as **Annexure 35**;

According to the information and explanations given to us and also as per the reliance placed on the statutory audit reports of the previous auditors furnished to us and representations made by the Company's management, in our opinion, the Restated Consolidated IGAAP Financial Information and the abovementioned restated IGAAP financial information contained in Annexures 1to35 accompanying this report, read with Summary of Significant Accounting Policies disclosed in Annexure 4, are prepared after making adjustments and regroupings as considered appropriate and disclosed in Annexure 5and have been prepared in accordance with Section 26 of Part I of Chapter III of the Act, the SEBI ICDR Regulations and the Guidance Note.

6. This report should not in any way be construed as a re-issuance or re-dating of any of the previous audit reports issued by the previous auditors of the Company or by us nor should it be construed as a new opinion on any of the financial statements referred to therein.

7. We have no responsibility to update our report for events and circumstances occurring after the date of the report.

8. Our report is intended solely for use of the management for inclusion in the offer documents to be filed with Security Exchange Board of India, National Stock Exchange of India Limited and BSE Limited and Registrar of Company, Bilaspur (C.G) in connection with the proposed IPO of the Company. Our report should not be used, referred to or distributed for any other purpose except with our prior consent in writing.

For S S S D & CO.
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur

Date: September 2, 2018

Annexure 1

Restated Consolidated IGAAP Summary Statement of Assets and Liabilities **(₹ In Million)**

Particulars	Annexure	As at 31.03.2015	As at 31.03.2014
I. EQUITY AND LIABILITIES			
(1) Shareholders' Fund			
(a) Share Capital	6	130.71	129.93
(b) Reserve & Surplus	7	4208.74	4124.65
(2) Share application money pending allotment		-	25.00
(3) Minority Interest		20.46	20.46
(4) Non-Current Liabilities			
(a) Long-Term Borrowings	8	4,686.56	4,212.14
(b) Deferred Tax Liabilities (Net)	9	(16.90)	(9.60)
(c) Long-Term Provisions	10	82.71	63.12
(5) Current Liabilities			
(a) Short-Term Borrowings	11	3,146.15	3,100.43
(b) Trade Payables		1,257.68	1,299.19
(c) Other Current Liabilities	12	1,420.41	1,303.00
(d) Short-Term provisions	13	40.70	35.31
	Total	**14,977.21**	**14,303.62**
II. ASSETS			
(1) Non-current Assets			
(a) Fixed Assets			
(i) Tangible Assets	14	8,451.01	7,849.90
(ii) Intangible Assets (Goodwill)		100.29	100.29
(iii) Capital work-in-progress	14	518.33	1037.66
(b) Non-current investments	15	9.24	9.24
(c) Long-term loans and advances	16	169.56	214.39
(d) Other Non-Current Assets	22	1.14	1.14
(2) Current Assets			
(a) Inventories	17	2,109.90	2,070.38
(b) Trade Receivables	18	832.17	528.27
(c) Cash and cash equivalents	19	428.47	231.99
(d) Short-Term loans and advances	20	1,986.28	1,908.50
(e) Other current assets	21	370.82	351.86
	Total	**14,977.21**	**14,303.62**

Note: The above should be read with Notes to Statement of Restatement Adjustment to Audited IGAAP Consolidated Financial Statements appearing in Annexure 5and Significant Accounting Policies and Notes forming part of the Restated Consolidated IGAAP Financial Information.

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2, 2018

For and behalf of
Shri Bajrang Power and Ispat Limited

Pawan Goel
Chief Financial Officer

Suresh Goel
Chairman
DIN: 00115834

Parul Verma
Company Secretary

Narendra Goel
Managing Director
DIN : 00115883

Annexure 2

Restated Consolidated IGAAP Summary Statement of Profit and Loss (₹. in Million)

	Particulars	Annexure	For the Year Ended 31.03.2015	For the Year Ended 31.03.2014
I.	Revenue from Operations	23	18,778.45	11,640.17
II.	Other Income	24	55.23	32.64
III.	**Total Revenue (I+II)**		**18,833.68**	**11,672.81**
IV.	**Expenses**			
	Cost of Materials Consumed	25	11,290.16	8,535.44
	Purchase of Stock in Trade		4,329.40	477.73
	(Increase) / Decrease in Stock in Trade	26	(194.87)	313.47
	Employees benefit Expenses	27	371.28	274.22
	Financial Costs	28	1,087.93	866.74
	Depreciation	14	622.35	668.27
	Other Manufacturing Expenses	29	1,024.99	583.11
	Other Administrative Expenses	29	107.61	71.29
	Other Selling & Distribution Expenses	29	116.31	78.19
		Total	**18,755.15**	**11,868.46**
V.	**Profit Before Exceptional and Extraordinary Items and Tax (III-IV)**		**78.53**	**(195.65)**
VI.	Exceptional items		10.88	-
VII.	**Profit Before Extraordinary Items and Tax (V-VI)**		**67.65**	**(195.65)**
VIII.	Extraordinary Items		-	-
IX.	**Profit Before Tax (VII- VIII)**		**67.65**	**(195.65)**
X.	**Tax expenses:**			
	Net current Tax		16.31	(192.44)
	Deferred Tax		(7.30)	(167.40)
XI	**Profit (Loss) for the period from Continuing operations (IX-X)**		**58.63**	**164.20**
XII	**Profit/(loss) from discontinuing operations**		**-**	**-**
XIII	**Tax expense of discontinuing operations**		**-**	**-**
XIV	**Profit/(loss) from Discontinuing operations (after tax) (XII-XIII)**		**-**	**-**
XV	**Profit (Loss) for the period (XI + XIV)**		**58.63**	**164.20**
XVI	**Basic / Diluted Earnings per Equity Share(in Rs.)**		**4.49**	**12.71**

Note: The above should be read with Notes to Statement of Restatement Adjustment to Audited IGAAP Consolidated Financial Statements appearing in Annexure 5and Significant Accounting Policies and Notes forming part of the Restated Consolidated IGAAP Financial Information.

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

For and behalf of
Shri Bajrang Power and Ispat Limited

Pawan Goel
Chief Financial Officer

Suresh Goel
Chairman
DIN: 00115834

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2, 2018

Parul Verma
Company Secretary

Narendra Goel
Managing Director
DIN: 00115883

Annexure 3
Restated Consolidated IGAAP Summary Statement of Cash Flows **(₹. in Million)**

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
A CASH FLOW FROM OPERATING ACTIVITIES		
Net Profit before Tax	67.65	(195.65)
ADJUSTMENTS FOR:		
Depreciation	622.35	668.27
Financial Costs	1,087.93	866.74
Interest Income	(55.68)	(29.43)
Dividend Income	(0.00)	(0.00)
Impact of Restatement of Financial Statement	1.39	0.99
Net Gain on Sale of Fixed Asset	17.66	0.95
OPERATING PROFIT BEFORE WORKING CAPITAL CHANGES	**1,741.29**	**1,311.86**
ADJUSTMENTS FOR CHANGE IN CURRENT ASSETS& LIABILITIES:		
(Increase)/Decrease in Inventories	(39.52)	(277.27)
(Increase)/Decrease in Trade Receivables	(303.91)	(124.09)
(Increase)/Decrease in Other Current Assets	28.04	(188.94)
Increase/(Decrease) in Current Liabilities & Provisions	100.87	1,047.92
CASH GENERATED FROM OPERATIONS	**1,526.78**	**1,769.48**
Direct Taxes Paid/Deducted at Source	16.31	-
NET CASH FROM OPERATING ACTIVITIES	**1,510.46**	**1,769.48**
B CASH FLOW FROM INVESTING ACTIVITIES		
Deletion/(Addition) to Tangible Assets	(747.91)	(1418.45)
Increase/(Decrease) in Long-Term Loans & Advances	44.72	208.38
Sale of Tangible Asset	25.97	23.43
Dividend Income	0.00	0.00
Interest Income	55.68	29.43
(Purchase)/Sale of Non-current Investments	-	(2.46)
NET CASH USED IN INVESTING ACTIVITIES	**(621.54)**	**(1,159.67)**
C CASH FLOW FROM FINANCING ACTIVITIES		
Proceeds from Long-Term Borrowings (Net)	474.42	(377.49)
Proceeds from issued of Share Capital		
(incl. Application money and premium)	-	3.14
Increase/(Decrease) in Short-Term Borrowings	(78.94)	782.47
Financial Costs	(1,087.93)	(866.74)
NET CASH USED IN FINANCING ACTIVITIES	**(692.44)**	**(458.62)**
NET INCREASE / (DECREASE) IN CASH &		
CASH EQUIVALENTS (A+B+C)	**196.48**	**151.19**
Cash and Cash Equivalents at the beginning of the year	**231.99**	**80.80**
Cash and Cash Equivalents at the end of the year	**428.47**	**231.99**

Components of cash and cash equivalents as at		
Cash in hand	22.44	25.70
With bank	406.03	206.29
	428.47	**231.99**

For S S S D & CO **Chartered Accountants** **Firm Registration Number: 020203C**	**For and behalf of** **Shri Bajrang Power and Ispat Limited**	
	Pawan Goel **Chief Financial Officer**	**Suresh Goel** **Chairman** **DIN: 00115834**
Vidhan Chandra Srivastava **Partner** **Membership Number: 073712** **Place: Raipur** **Date: September 2, 2018**	**Parul Verma** **Company Secretary**	**Narendra Goel** **Managing Director** **DIN: 00115883**

Annexure 4

Notes to the Restated Consolidated IGAAP Financial Information - Significant Accounting Policies of the Restated Consolidated Financial Statement

Group's Information :

The consolidated financial statement of the group (Shri Bajrang Power & Ispat limited (**"Company"**) and its subsidiary Shri Bajrang Energy private limited, S. B. Power ("Group") are included in consolidation for the year. The other Joint Ventures Chhattisgarh Captive Coal Mining Limited have also been included in the consolidation.

Shri Bajrang Power & Ispat Limited (Borjhara Division, TMT Division & Tilda Division) is engaged in the manufacturing & Trading of Sponge Iron, Billets, Pellets, TMT Bars, Wire rod, Filter Cake, Ferro Alloys and generation of electricity.

<u>Significant Accounting Policies</u>

1.01 Basis of Preparation of Financial Statements:

i. The consolidated financial statements have been prepared on Historical Cost convention in accordance with the generally accepted accounting principles ("IGAAP") and to comply with the Accounting Standards specified under Section 133 of the Companies Act, 2013, read with Rule 7 of the Companies (Accounts) Rules.2014 and the relevant provisions of the Companies Act, 2013 ("the 2013 Act"). The consolidated financial statements have been prepared on accrual basis under the historical cost convention. The accounting policies adopted in the preparation of the consolidated financial statements are consistent with those followed in the previous year.The financial statements of the Company and its subsidiaries are combined on a line-by-line basis by adding together like items of assets, liabilities, income and expenses in accordance with Accounting Standard 21 "Consolidated Financial Statements" after eliminating intra group balances, intra group transactions and resulting unrealized profits or losses, unless cost cannot be recovered. Interest of the minority shareholders in the subsidiaries' profits or losses and net worth is displayed separately in the consolidated financial statements. The excess of cost to the Group of its investment in the subsidiary companies over its share of equity or net assets is recognized as Goodwill. On the other hand, where share in equity or net assets as on the date of investment in subsidiary companies as on the date of investment is in excess of cost of investment of the Group, it is recognized as Capital reserve in the Consolidated financial statements under Reserves and surplus.

ii. The Accounting policies have been consistently applied by the company with those used in previous year.

iii. The Restated Consolidated Financial Statement of Assets and Liabilities of the Company as at March 31, 2015 and March 31, 2014 and related Restated Consolidated Statement of Profit and Loss and Restated Consolidated Statement of Cash Flows for the period ended March 31, 2015 and March 31, 2014 and other restated financial information (herein collectively referred to as "**Restated Consolidated Financial Statements**") have been complied by the management from the audited financial statements of the Company and its subsidiary for respective corresponding periods and making consolidation adjustments.

iv. The Company has prepared the Restated Consolidated Financial Statements to comply in all material aspects with the Accounting Standards notified under Section 133 of the Companies Act, 2013 ('the Act'), read together with paragraph 7 of the Companies (Accounts) Rules, 2014 and Companies (Accounting Standards) Amendment Rules, 2006, as amended from time to time

v. The Restated Consolidated Financial Statements have been prepared by management for inclusion in the offer document to be filed by the Company with Securities and Exchange Board of India in connection with the proposed initial public offering of its equity shares, in accordance with the requirement of Section 26 of Part 1 Chapter III of the Act; Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009, as amended from time to time (the "Regulations") issued by the Securities and Exchange Board of India ('SEBI') on 26 August 2009, in pursuance of the Securities and Exchange Board of India Act, 1992 read along with SEBI Circular No. SEBI/HO/CFD/DIL/CIR/P/2016/47 dated 31st March, 2016; and Guidance note on the reports in company prospectus (2016)

vi. The Restated Consolidated Financial Statements have been prepared after incorporating adjustments for the changes in accounting policies retrospectively in financial year ended March 31, 2014 to reflect the same accounting treatment as per accounting policies as at and for the year ended March 31, 2015.

1.02 Use of Estimates:

The preparation of financial statements requires estimates and assumptions to be made that affect the reported amount of assets and liabilities on the date of the financial statements and the reported amount of revenues & expenses during the reported period. Difference between the actual results and the estimates are recognized in the period in which the results are known / materialized.

1.03 Tangible Assets

i. Fixed Assets are stated at acquisition cost less depreciation. Cost includes related taxes, duties, freight, insurance etc, attributable to acquisition and installation of assets and borrowing cost incurred up to the date of commencing operations, but excludes duties and taxes that are recoverable subsequently from the taxing authorities.

ii. The various expenditure incurred during the construction stage and up to the date of commercial production for setting-up the relevant project are grouped under the head "Pre-operative Expenditure" and allocated to related assets on pro-rata basis.

iii. Asset Under Construction as at the Balance sheet date are shown as Capital Work in Progress.

iv. If any Fixed Asset disposed/ sold its Losses or Gain is Recognize in Profit and Loss Account.

v. The Tangible Assets purchased from other units of the company are stated at prevailing market price.

1.04 Depreciation / Amortization

i. Depreciable amount for assets is the cost of an asset, or other amount substituted for cost, less its estimated residual value.

ii. Depreciation on tangible fixed assets has been provided on the straight-line method as per the useful life prescribed in Schedule II to the Companies Act, 2013 except Rolls (Rolling Mill Division), where life of the assets has been assessed (as one year) as under based on technical advice, taking into account the nature of the asset, the estimated usage of the asset, the operating conditions of the asset, past history of replacement, anticipated technological changes etc.. Leasehold land and mines are amortized over the period of the lease.

iii. Free-hold land are not depreciated/amortized.

iv. Expenditure of amount below `₹ 5000/- had been written of in full.

1.05 Investments

i. Long Term Investments are stated at cost including directly attributable cost. A provision for diminution in the value of long term investments is made only if such is other than temporary, in the opinion of Management.

ii. Current Investments are stated at lower of cost and fair value.

1.06 Inventories

i. Inventories are valued at lower of cost and net realizable value after providing cost of obsolescence if any.

ii. Cost of Raw Materials and stores & spares are computed on FIFO basis and cost of Finished Goods are computed on Weighted average basis.

iii. Cost of Finished Goods includes direct materials, labour, conversion and proportion of manufacturing overheads incurred in bringing the inventories to their present location and condition.

iv. Inventory of Carbon Credit is recognized on the basis of certificate to be received of CERs from CDM board and valued at net Realizable value.

1.07 Excise Duty

i. The Excise Duty in respect of closing inventory of finished goods is provided in books of account and included as part of inventory.

ii. CENVAT Credit relating to raw materials/components are debited under short term loans and advances for availing credit against CENVAT and credited to respective materials/component account.

1.08 Revenue recognition

Revenue is recognized to the extent that it is probable that the economic benefits will flow to the company and the revenue can be reliably measured.

i. Sale of Finished Products

Revenue is recognized when the significant risks and rewards of ownership of the goods have passed to the buyer. Sales and Operational income is inclusive of Excise duty, Sales Tax, Job Work Charges but net of Returns, Rebate & discount.

Disclosure of Turnover is made in accordance with AS 14 on 'Disclosure of Revenue from Sales Transactions' issued by Institute of Chartered Accountants of India, with reference to Accounting standard - 9 that means Excise Duty deducted from turnover (gross) is the amount that is included in the amount of turnover (gross) and not the entire amount of liability arised during the year.

Proceeds in respect of sales/disposal of raw materials is credited to the raw material purchase account.

ii. **Sale of Electricity**

Revenue from Power Supply is accounted for on the basis of billing to consumers and generally all consumers are billed on the basis of recording of consumption of energy by installed meters. Shortfall of Power Unit supplied and Actual Received is recorded as Power Sale Discount and its charges recorded in Profit and Loss Account.

iii. **Interest**

Revenue is recognised on accrual basis taking into account the amount outstanding and the rate applicable.

iv. **Income on Investment**

Income from investment is recognised based on the terms of investments. Profit on sale of Investment is accounted on sale of such investment. Income from Mutual fund scheme having fixed maturity Plans is accounted on declaration of dividend or on maturity of such investment.

v. **Carbon Credit (Certified Emission Reduction)**

Revenue is recognized in accordance with Approved Consolidated Monitoring Methodology issued by United Nation Framework Convention of Climate Change (UNFCCC) on accrual basis of accounting, assuming the CER will be certified & received in future from CDM board.

vi. **Renewable Energy Certificates**

Revenue is recognised when the Company received certification of quantity of Renewable Energy Certificates and on the basis of eligible claims made by the Company.

1.09 Borrowing Cost

Interest and other costs in connection with the borrowing of the funds to the extent related/attributed to the acquisition/construction of fixed assets are capitalized only with respect to qualifying fixed assets i.e. those which take substantial period of time to get ready for its intended use. All other Borrowing cost is charged to Profit and Loss Account.

1.10 Contingent Liabilities

Liabilities which are material and whose future outcome cannot be reasonably ascertained are treated as contingent and not provided for and disclosed by way of notes to the accounts.

1.11 Taxes on Income

i. Provision for current tax is made after taking into consideration benefits admissible under the provisions of the Income Tax Act, 1961. Deferred tax resulting from "timing difference" between book profit and taxable profit is accounted for using the tax rate and laws that have been enacted or substantially enacted as on the balance sheet date. The deferred tax asset is recognised and carried forward only to the extent that there is reasonable certainty that the asset will be realised in future.

ii. The Company recognises MAT credit available as an asset only to the extent that there is convincing evidence that the company will pay normal income tax during the specified period, i.e., the period for which MAT credit is allowed to be carried forward. In the year in which the company recognises MAT credit as an asset in accordance with the Guidance Note on Accounting for Credit Available in respect of Minimum Alternative Tax under the Income-tax Act, 1961, the said asset is created by way of credit to the statement of profit and loss and shown as "MAT Credit Entitlement." The company reviews the "MAT credit entitlement "asset at each reporting date and writes down the asset to the extent the company does not have convincing evidence that it will pay normal tax during the specified period.

1.12 Forward Currency Transactions

i. Foreign currency transactions are recorded in the reporting currency, by applying to the foreign currency amount the exchange rate between the reporting currency and the foreign currency at the date of transaction.

ii. Foreign currency monetary items are reported using closing rate. Non-monetary items which are carried in terms of historical cost denominating in a foreign currency are reported using the exchange rate at the date of transaction and non-monetary items which are carried at fair value or other similar valuation denominated in a foreign currency are reported using the exchange rates that existed when the values are determined.

iii. Exchange differences arising on the settlement of monetary items or on reporting company's monetary items at the rates different from those at which they were initially recorded during the year, or reported in previous financial statements, are recognized as income or as expense in the year in which they arise. Exchange differences arising in respect of fixed assets acquired from outside India are capitalized as a part of fixed assets.

iv. All loans and deferred credits repayable in foreign currency and outstanding at the close of the year are expressed in Indian currency at the appropriate rates of exchange prevailing as on the date of the balance sheet.

v. In respect of transactions covered by Forward Foreign Exchange Contracts, the difference between the forward rate and exchange rate at the inception of contract is recognized as income or expenses over the life of the contract except for contracts relating to liabilities incurred for purchase of Fixed Assets, the difference thereof is adjusted in the carrying amount of respective Fixed Assets.

vi. The loss/gain in respect of currency hedge transactions, where the certainties of liability/gain is not ascertainable as on the date of balance sheet, are recognized and accounted for on the actual date of final settlement of such transactions and where the amount of such gain/loss to the extent ascertainable on the date of balance are recognized on accrual basis.

1.13 Employee Benefits

i. **Defined Contribution plan**

Company's contribution to Provident Fund and Employees' state Insurance is charged to Profit and Loss Account. The Company makes monthly contributions and has no other obligation other than the contribution Payable to respective authorities.

ii. **Defined Benefit plan**

Company's Liabilities towards gratuity are recognised as an expense in the Profit and Loss account for the year in which the employee has rendered services. The expense is determined using actuarial valuation techniques & assumptions. Actuarial gains/losses are immediately taken to statement of profit and loss and are not deferred

Value of encashable leave are encashed during the year is equivalent to one month salary and charged to Profit & Loss Account.

1.14 Provisions

Provisions are recognized, where the company has any legal or constructive obligation or where reliable estimate can be made for the amount of the obligation and as a result of past events, for which it is probable that an outflow of economic benefits will be required to settle the obligation at the balance sheet date. These are reviewed at each balance sheet date and adjusted to reflect the current best estimates.

1.15 Impairment of Assets

The Company assesses at each balance sheet date whether there is any indication that any asset may be impaired. If any such indication exists, the carrying value of such assets is reduced to its estimated recoverable amount and the amount of such impairment loss is charged to profit & loss account. If at the balance sheet date there is an indication that previously assessed impairment loss no longer exists, then such loss is reversed and the asset is restated to that effect.

1.16 Cash and Cash equivalents

Cash and Cash equivalents in the balance sheet comprise cash in hand, cash at banks and Margin money with banks.

1.17 Segment Reporting Policies

Identification of Segment

The company's operating businesses are organized and managed separately according to the nature of product and services provided, with each segment representing a strategic business unit that offers different products and serves different markets. the analysis of geographical segments is based on the areas in which major operating divisions of the company operate.

Inter Segment Transfer

The company generally accounts for inter segment sales and transfers as if the sales or transfers were to third Parties at current market Prices.

Allocation of common Costs

Common allocable cost are allocated to each segment according to the reasonable basis of each segment to the common costs.

Unallocated Items

The corporate and other segment includes general corporate income and expense items which are not allocated to any business segment.

1.18 Earnings Per Share

Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders by weighted average number of equity shares outstanding during the period.

For the Purpose of calculating Diluted Earning Per Share the net profit or loss for the period attributable to equity shareholders by weighted average number of equity shares outstanding during the year are adjusted for the effect of all dilutive potential Equity share.

1.19 Preliminary Expenses
As per the provision of Accounting Standard- 26 issued by Institute of Chartered Accountants of India , preliminary expenses have been written off in full in the year in which incurred.

1.20 Government Grant

Government Grant is recognised only when there is reasonable certainty of its collection. Infrastructure capital subsidy received is treated as Capital Reserve being "Subsidy in the nature of Promoter's Contribution" .

Annexure-5

Statement of Restatement Adjustments to Audited IGAAP Consolidated Financial Statements

The summary of results of restatement made in the audited previous IGAAP consolidated financial statements for the respective years and its impact on the profit of the Company is as follows:

(₹. in Million)

Particulars	**As at 31.03.2015**	**As at 31.03.2014**
Net Profit/(loss) as per audited financial statement	**102.65**	**315.79**
Restated Adjustment:		
A) Audit Qualification		
'---Recognition of Uncertified unit of CER	22.50	35.30
'Sub total (A)	22.50	35.30
B)Other Material Adjustment		
'---Sundry Balances Written off/back	2.95	0.65
'---Prior Period Tax	(1.87)	0.83
'---Service Tax, Excise Duty etc. paid	0.05	(0.94)
'---Employee Related Expense	-	0.30
'---Expenses of earlier year(Interest, legal & Professional, registration charges, Fines & Penalty and Rent, Rates & Taxes)	(10.68)	11.08
'---Change in Tax	(40.01)	(89.02)
'---Impact due to Change in Consolidation Policy	10.18	-
'Sub total (B)	(39.37)	(77.10)
C)Change in Accounting Policy		
-----Change in Revenue Recognition (CER)	60.89	193.40
Sub total (C)	**60.89**	**193.40**
Total (A+B+C)	**44.02**	**151.60**
Net Profit/(loss) as per Restated financial statement	**58.63**	**164.20**

A) Adjustments

1. **Adjustments for Audit Qualifications:** The Company had recognized the uncertified unit of Certified Emission Reduction (CER) in closing stock as per the company's policy, which was not certified by the CDM Board due to which the profit of company has been enhanced. Thus the rectification/adjustment has been made in respective year i.e. for March 31, 2015 and March 31, 2014.

2. **Other Material Adjustments**

    1. In the audited financial statements of the company for the years ended March 31, 2015 , March 31, 2014 certain amounts have been written off for which advances have been given to vendors which are considered bad & doubtful hence are appropriately adjusted in the respective years to which they relate.
    In the audited financial statements of the Company for the years ended March 31, 2015, March 31, 2014, certain provisions/ liabilities created in earlier years were written back. For the purpose of this statement, the said provisions/ liabilities have been appropriately adjusted in the respective years in which they were originally created.

    2. In the audited financial statements of the company for the years ended March 31, 2015, March 31, 2014, certain amounts of tax adjustment for prior period were appropriately adjusted in the respective year to which they relate.

3. In the audited financial statements of the company for the years ended March 31, 2015, March 31, 2014, certain amounts of expenses were appropriately adjusted in the respective year to which they relate.

4. The Tax rate applicable for the respective year has been used to calculate the deferred tax impact on other material adjustments.

3. Change in Accounting Policy

Carbon Credit (Certified Emission Reduction)

Revenue is recognised in accordance which approved consolidated monitoring methodology issed by United Nation Framework Convention of Climate Change (UNFCCC) on receipt basis, earlier which was on accrual basis of accounting assuming the CER will be certified & received in future from CDM Board. Thus the impact for change in accounting policy has been made in respective year i.e. for March 31, 2015 and March 31, 2014.

4. Opening Reserve Reconciliation **(₹. in Million)**

Surplus in the statement of Profit & Loss, as per audited balance sheet as at 1st April 2013	2,226.25
Adjustment on account of Restatement	
Other Material Adjustment	
----Sundry Balances Written off/back	(21.38)
----Prior Period Tax	(1.28)
----Service Tax, Excise Duty etc. paid	(0.89)
----Expenses of earlier year(Interest, legal & Professional, registration charges, Fines & Penalty and Rent, Rates & Taxes)	(4.61)
Balance as per Restated Consolidated Financial Information as at 1st April 2013	2,198.09

Annexure 6
Restated Consolidated Statement of Share Capital

(₹. in Million)

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
(A) Authorised Share Capital		
6,00,00,000 Equity Share of ₹.10/- each	600.00	600.00
(Previous Year 6,00,00,000 Equity Share of ₹.10/- each)		
Issued, Subscribed & Fully Paid-up Share Capital		
1,30,71,155 Equity Share of ₹.10/- each fully paid up	130.71	129.93
(Previous Year 1,29,93,030 Equity Share of ₹.10/- each)		

(B) Reconciliation of number of equity shares outstanding at the beginning and at the end of the year

Particulars	**31.03.2015**	**31.03.2014**
No of shares outstanding as at the beginning of the year	12,993,030	12,913,730
Add : Number Of Shares Allotted During The Year As Fully Paid-Up	78,125	79,300
Number of shares outstanding as at the end of the year	**13,071,155**	**12,993,030**

(C.) Shares in the company held by each shareholder holding more than 5% shares

Name of the shareholder	31.03.2015		31.03.2014	
	No. of shares held in the Company	% of Shares held	No. of share held in the Company	% of Shares held
Atlanta Securities Private Limited	2,039,500	15.60	2,039,500	15.70
Banka Finance & Securities Pvt. Ltd.	2,078,381	15.90	2,078,381	16.00
Bonus Dealcom Pvt Ltd.	717,300	5.49	717,300	5.52

(D) The Company has only one class of shares referred to as equity shares having a par value of ₹ 10/-. Each holder of equity shares is entitled to one vote per share.

Annexure 7
Restated Consolidated Statement of Reserves

(₹. in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
Securities Premium Account		
Balance as per last financial statements	1,510.57	1,485.99
Add: Addition during the year	24.22	24.58
Closing Balance	**1,534.79**	**1,510.57**
Surplus/ (deficit) in the statement of profit and loss		
Balance as per last financial statements	2,391.43	2,198.09
Adjustment due to Depreciation (As per Sch-II of the Act)	(0.14)	-
Add: Current year Surplus	58.63	164.20
Less: Impact of Restatement of Financial Statement	(1.39)	(29.15)
Net Carried Forward Surplus	**2,451.31**	**2,391.43**
Capital Subsidy		
Balance as per last financial statements	110.74	110.74
Add: Addition during the year	-	-
Closing Balance	**110.74**	**110.74**
Amalgamation Reserve		
Balance as per last financial statements	111.90	111.90
Add: Addition on Account of Merger	-	-
Closing Balance	**111.90**	**111.90**
Total	**4,208.74**	**4,124.65**

Annexure 8

Restated Consolidated Statement of Long-term and Short-term Borrowings

(₹. in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
(a) Term Loans From Banks *		
Secured Loan		
Term Loans from State Bank of India	1,414.92	1,115.28
(Repayable in Quarterly 26 installments starting from December 2013		
and last installment falling due on March 2020 and 60 monthly installment		
starting from February 2014 and last installments falling due on Jan 2020		
and 60 Installment Starting from April 2016 to March 2021).		
Term Loans from Bank of India	560.00	674.00
(Repayable in 78 Monthly installments starting from October 2013 and		
last installment falling due on March 2020).		
Term Loans from Bank of Baroda	1,724.70	1,473.22
(Repayable in 78 Monthly installments starting from October 2013 and		
last installment falling due on March 2020 and 60 Installment Starting		
from April 2016 to March 2021).		
Term Loans from Karnataka Bank	279.64	337.41
(Repayable in 78 Monthly installments starting from October 2013 and		
last installment falling due on March 2020).		
Term Loans from Karnataka bank	73.89	116.67
(Repayable in 36 installments starting from November 2014 and last		
installment falling due on October 2017).		
(b) Term Loans From Others**		
Secured Loan		
L & T Infrastructure Finance Company Limited	43.33	59.59
(Repayable in 72 installments starting from December 2012 and last		
installment falling due on November 2018).		
L&T Fincorp Limited	245.55	337.65
(Repayable in 65 installments starting from July 2013 and last		
installment falling due on November 2018).		
(c) Long Term Maturities' of Finance Lease Obligations ***		
Secured Loan	100.10	55.01
(Hypothecated by Asset Acquired under Finance Lease)		
(c) Loans And Advances From Related Parties		
Unsecured :		
a) From Director & its Relative	-	-
b) From Corporate Body	244.44	43.32
Total	**4,686.56**	**4,212.14**

Note: There is no default, continuing or otherwise, as at the balance sheet date, in repayment of any of the above loans

Note: There was no prepayment of loans in the respective years.

Note: No penal interest had been charged.

Note: Current Maturities of Long term debts disclosed under the head "other current liabilities"

Security and terms & conditions for above loans from Banks : *

The Term Loan granted under consortium finance from State Bank of India, Commercial Branch, Bhilai working as a lead banker, Bank of Baroda, Mid-corporate banking Branch, Bank of India and Karnataka Bank, Raipur are secured by:

(a) Hypothecation of plant and machinery and other movable assets and EM of Leasehold (from CSIDC) factory land at village: Borjhara, Urla Industrial Estate, Raipur (C.G.), Area of land 21.25 acres on pari-passu basis with other participating term lenders. EM of 39.15 acres of free hold factory land at village: Borjhara, Urla Industrial Estate, Raipur (C.G.) on first parri-passu basis.

(b) First parri-passu charge with other participating lenders on the entire Fixed assets of Gondwara Divisions, along with EM of the land situated at khasara No. 2/1, 22, 23/2, 25, 26, 27/2, 30/1, 30/2, 32, 33 admeasuring 4.039 Hectare situated at Vill : Gondwara, Industrial Estate, Urla, Raipur(C.G.)

(c) First mortgage charge on the company's present and future movable Immovable assets on parri passu basis with other participating lenders. Assignments of all projects contract (including insurance policies right Titles to SBI/other lenders).

(d) First charge on all the bank accounts of the borrower related to the project Through which the disbursement of term loan is being made.

(e) Equitable Mortgage on pari passu basis in favour of lenders on 312.60 acres Land (excluding the 37.4 acres of the land for green belt which cannot be diverted) at Dharsiwa, Tilda, Raipur (C.G.).

(f) Pari-passu charge on all the project's bank account including but not limited to the trust & retention account (TRA) opened at CB, Bhilai where all cash inflows from the project are deposited and all the proceeds shall be utilized in a manner and priority to be decided by the Lenders.

<u>Personal Guarantee of director :</u>
Shri Suresh Goel S/o. Late Hari Ram Goel
Shri Rajendra Goel S/o. Late Hari Ram Goel
Shri Narendra Goel S/o. Late Hari Ram Goel

<u>Guarantee of Relative of Directors :</u>
Shri Anand Goel S/o. Late Hari Ram Goel
Shri Sandeep Goel S/o. Shri Suresh Goel
Shri Dinesh Goel S/o. Shri Suresh Goel
Smt. Suman Goel W/o. Shri Dinesh Goel

<u>Corporate Guarantee :</u>
M/s. Shri Bajrang Alloys Limited
M/s. Swastik Mercantile Limited
M/s. Shimmer Investment Pvt. Limited

* Security and terms & conditions for above loans from Karnataka Bank :
Hypothecation of all the movable assets in respect of Hot rolling mill plant to be installed at Unit I of the company in the above property (including movable plant and machinery, machinery spares, tools and accessories).

** Security and terms & conditions for above loans from Others :
The Term Loan from L & T Infrastructure Finance company Limited & L&T Fincorp Limited (Non Banking financial Institution) are secured by "second pari pasu" charged by all movable assets including all current assets of the Company. The above loans are additionally secured by pledge of 26% shares (as on the date of pledge of shares) of the company in the name of corporate shareholders and also pledge of 40% share (as on the date of pledge of shares) of the Shri Bajrang Energy Private Limited in the name of director & relatives alongwith Demand Promissory Note.

*** In respect of Fixed Assets acquired on finance lease as per Accounting Standard on Leases (AS-19), the minimum lease rentals outstanding as on 31st March, 2015 are as follows:

(₹. in Million)

Due	Total Minimum Lease Payments Outstanding as at		Interest not due		Present Value of the minimum lease payments as at	
	31.03.15	31.03.14	31.03.15	31.03.14	31.03.15	31.03.14
Not later than one year	106.05	63.15	17.52	9.28	88.53	53.87
Later than one year and not later than five years	119.92	63.42	19.83	8.41	100.10	55.01

Annexure 9
Restated Consolidated Statement of Deferred Tax Liabilities (Net)

(₹. in Million)

Particulars		As at 31.03.2015	As at 31.03.2014
Deferred Tax Liabilities			
On Account of Depreciation – Opening		496.97	332.01
Add : Charge during the year		127.68	164.97
Closing		624.65	496.97
Less : Deferred Tax Assets			
On Account of Bonus, Leave Encashment & Gratuity – Opening		(11.87)	(6.18)
Add : Charge during the year		(2.38)	(5.70)
Closing		(14.25)	(11.87)
On Account of MAT & Carried forward Losses – Opening		(494.70)	(168.04)
Add : Charge during the year		(132.60)	(326.67)
Closing		(627.30)	(494.70)
Deferred Tax Liabilities (Net)	**Total**	**(16.90)**	**(9.60)**

"In accordance with "Accounting Standard – 22" issued by the "Institute of Chartered Accountants of India", the Company has recognized net of deferred tax assets and deferred tax liability amounting to ₹. (16.90) million as on 31/03/2015 under a separate head "Deferred Tax Liabilities". Net of deferred tax liability and asset for the year amounting to ₹. (7.3) million has been recognized in the Profit & Loss Account."

Annexure 10
Restated Consolidated Statement of Long Term Provisions

(₹. in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
Long Term Provisions		
Provision for employee benefits		
Gratuity Payable	21.44	16.37
Salary Payable	0.47	1.07
Other Provisions		
Cross Subsidy Payable A/c	60.80	45.68
Total	**82.71**	**63.12**

Annexure 11

Restated Consolidated Statement of Long-term and Short-term Borrowings

(₹. in Million)

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
Loans Repayable on Demand		
Secured :		
Cash Credit Limit (State Bank of India)	1,093.75	1,014.56
Cash Credit Limit (Bank of Baroda)	1,472.52	1,504.55
Cash Credit Limit (Bank of Maharashtra)	579.88	581.32
Total	**3,146.15**	**3,100.43**

Note: There is no default, as at the balance sheet date, in service of interest of above Loans

Note: There was no prepayment of loans in the respective years.

Note: No penal interest had been charged.

Security and terms & conditions for above loans from Banks: *

Working Capital Facilities, granted under a consortium finance from State Bank of India, Commercial Branch, Raipur working as a lead banker are secured by hypothecation of entire stocks of raw material, finished goods, stocks in trade, Stores and spares, packing material, and other current assets of the company at their factory premises or at some other as approved by bank including goods in transit, outstanding moneys, books in debt, receivable etc. on first pari-passu basis with other consortium member viz. Bank of Baroda, Mid-corporate banking Branch Raipur, and Bank of Maharashtra, Main Branch Raipur.

Annexure 12

Restated Consolidated Statement of Other Current Liabilities

(₹. in Million)

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
Current Maturities of Long term Borrowings from Bank		
Secured :		
Term Loans from Syndicate Bank	-	90.03
Term Loans from State Bank of India	247.60	126.88
Term Loans from Bank of India	128.67	99.48
Term Loans from Bank of Baroda	248.52	184.44
Term Loans from Karnataka Bank	63.81	41.82
Term Loans from Karnataka Bank	47.93	23.34
L & T Infrastructure Finance Company Limited	18.37	16.25
L&T Fincorp Limited	104.06	92.08
Current Maturities of Finance Lease Obligations		
Secured :	88.53	53.85
Other Payables		
Creditors for Capital goods *	180.08	360.14
Advances from Customers **	159.28	112.22
Excise Duty Payable on Closing Stock	90.61	67.53
Sales Tax & Entry Tax Payable	9.43	3.83
Service Tax payable	0.86	1.55
TDS Payable	7.98	8.79
Other Expenses payables	24.70	20.77
Total	**1,420.41**	**1303.00**

Note: There was no prepayment of loans in the respective years.
Note: No penal interest had been charged.

Debts due by Company / Firm in which director is a member / Partner

* Creditors for Capital Goods stated above	105.19	77.37
** Advances from Customers stated above	96.05	34.49

Annexure 13

Restated Consolidated Statement of Short Term Provisions

(₹. in Million)

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
Provision for employee benefits	40.70	35.31
Total	**40.70**	**35.31**

Annexure 14 Restated Consolidated Statement Of Fixed Assets

(Rs. In Million)

PARTICULARS	Gross Block					DEPRECIATION					Net block	
	Balance as at 01/04/2014	Addition	Deductions	Transfer **	Cost as on 31.03.2015	Upto 01/04/2014	Provided/ for the year	Adjustment Due to Schedule II*	On disposals	Total upto 31.03.2015	Balance as at 31.03.2015	Balance as at 31.03.2014
Land & Site Development	456.39	34.57	-	-	490.96	-	23.07	20.59	-	43.66	447.30	456.39
Leasehold Land	19.80	-	-	-	19.80	0.82	0.23	-	-	1.06	18.75	18.98
Lease hold Land (Mines	-	158.22	-	-	158.22	-	0.74	-	-	0.74	157.49	-
Factory Building	981.30	21.67	-	-	1,002.97	65.32	89.01	31.55	-	185.88	817.09	915.98
Factory Building (Power Plant)	132.13	-	-	-	132.13	19.10	4.17	1.95	-	25.23	106.90	113.03
Office Building	110.19	7.76	-	-	117.95	7.98	3.78	-	-	11.76	106.20	102.21
Residential Building (Flat)	30.75	55.63	-	-	86.38	1.85	0.93	-	-	2.78	83.59	28.89
Plant & Machinery	6,184.49	849.86	-	-	7.034.35	1,279.39	356.23	7.32	-	1,642.94	5,391.41	4,905.10
Plant & Machinery(Power Plant)	1,856.28	2.20	76.46	-	1,782.02	753.37	32.56	-	36.00	749.94	1,032.08	1,102.91
Office Equipment	16.99	2.23	0.14	-	19.08	3.35	3.97	2.12	-	9.43	9.65	13.64
Computer	22.18	5.72	0.06	-	27.84	14.11	4.14	1.29	0.05	19.49	8.35	8.07
Furniture & Fixtures	23.75	3.96	-	-	27.71	7.04	3.48	0.04	-	10.56	17.14	16.70
Vehicle	231.27	127.11	9.08	-	349.30	68.24	30.62	1.25	5.88	94.23	255.07	163.03
Rolls	48.48	-	-	-	48.48	43.51	4.97	-	-	48.48	-	4.97
TOTAL	**10,113.99**	**1,268.93**	**85.74**	-	**11,297.19**	**2,264.10**	**557.90**	**66.11**	**41.93**	**2,846.17**	**8,451.01**	**7,849.90**
Previous Year	**8,028.17**	**2,113.29**	**27.47**	-	**10,113.99**	**1,596.96**	**670.22**	**-**	**3.09**	**2,264.10**	**7,850.00**	**6,431.21**

b) Capital work in progress

During the Year	1,037.66	463.66	982.99	-	518.33	-	-	-	-	-	518.33	1,037.66
TOTAL	**1,037.66**	**463.66**	**982.99**	**-**	**518.33**	**-**	**-**	**-**	**-**	**-**	**518.33**	**1,037.66**
Previous Year	**1,730.54**	**1,150.85**	**1,843.74**	**-**	**1,037.66**	**-**	**-**	**-**	**-**	**-**	**1,037.66**	**1,730.54**

Note:-

Pursuant to the enactment of Companies Act 2013, the company has applied the estimated useful lives as specified in Schedule II, except in respect of certain assets as disclosed in Accounting Policy in Depreciation, Amortization and Depletion. Accordingly the unamortized carrying value is being depreciated / amortized over the revised/remaining useful lives.

* The written down value of Fixed Assets whose lives have expired (due to Transitional Provision of Schedule II of the Companies Act, 2013) as at 1st April 2014 have been charged to Statement of Profit & Loss Account amounting to ₹. 66.11 Million.

The Depreciation for the year includes ₹. 1.67 Million (P.Y. ₹ 1.95 Million) of Partnership Firm S B Power which has been capitalized as Project Development Expenses hence not charged to Profit & Loss Account.

Annexure 15

Restated Consolidated Statement of Non-Current investments

(₹. in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
In Fixed Capital of Partnership Firm		
I A Energy	0.49	0.49
Investment in Mutual Fund - Quoted, Fully Paid up		
SBI Infrastructure Fund -1- Growth	0.50	0.50
Investment in Debenture - Unquoted, Fully Paid up		
9.5% Non-Convertible Debenture of		
Yes Bank Limited	1.00	1.00
(1 unit of ₹. 10,00,000/- each, fully paid-up)		
Investment in Shares - Quoted, Fully Paid up		
Bhushan Steel Limited	0.01	0.01
(250 equity shares of ₹. 10/- each, fully paid-up, Market Price ₹. 65.90 per share)		
Essar Steels Limited	0.00	0.00
(100 equity shares of ₹. 10/- each, fully paid-up, Market Price ₹. 51.80 per share)		
JSW Steels Limited	0.01	0.01
(50 equity shares of ₹. 10/- each, fully paid-up, Market Price ₹. 907.65 per share)		
Prakash Industries	0.00	0.00
(100 equity shares of ₹. 10/- each, fully paid-up, Market Price ₹. 35.50 per share)		
Steel Authority of India Limited	0.01	0.01
(100 equity shares of ₹. 10/- each, fully paid-up, Market Price ₹. 68.35 per share)		
Tata Steel Limited	0.02	0.02
(50 equity shares of ₹. 10/- each, fully paid-up, Market Price ₹. 316.85 per share)		
Investment in Shares - Unquoted, Fully Paid up		
Shri Bajrang Hydro Energy Limited	0.01	0.01
[5,100 (P.Y. 5,100 - Subsidiary) equity shares of ₹. 10/- each, fully paid-up]		
Madanpur (N) Coal Company Pvt. Ltd.	1.66	1.66
864420 (864420) Equity Shares of ₹. 10/- each fully paid up		
Madanpur(S) Coal Company Ltd.	5.14	5.14
191770 (191770) Equity Shares of ₹. 10/- each fully paid up		
Share Application Money Pending Allotement	0.08	0.08
- Madanpur (N) Coal Company Pvt. Ltd.		
Investment in Gold Coin		
[10 numbers (P.Y. 10 numbers) of 10 gm. each]	0.31	0.31
Total	**9.24**	**9.24**

The company has entered into Partnership with

M/s I A Energy, Shimla having Profit Sharing Ratio of 9%

Name of the Partners	% Share	Fixed Capital Employed	Profit for the year
Indo Arya central Transport Ltd.	51%	0.51	N.A.
Shri Bajrang Power & Ispat Ltd.	40%	040	N.A.
Shri Bajrang Energy Private Ltd.	9%	0.09	N.A.
	100%	1.00	

M/s S B Power, Shimla having Profit Sharing Ratio of 51%

Name of the Partners	%	Fixed Capital	Profit for
	Share	Employed	the year
Shri Bajrang Power & Ispat Ltd.	51%	0.51	N.A.
Shri Bajrang Energy Private Ltd.	49%	0.49	N.A.
	100%	1.00	

Annexure 16

Restated Consolidated Statement of Long term Loans and Advances

(₹. in Million)

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
(a) Capital Advances *		
Unsecured, considered good	53.24	78.93
(b) Security Deposits		
Unsecured, considered good		
Deposit with Governments Authorities and others	116.31	135.46
Total	**169.55**	**214.39**

* Capital Advance stated above include advance given :		
Company in which director is a member	-	4.82

Annexure 17

Restated Consolidated Statement of Inventories

(₹. in Million)

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
(As valued, verified and certified by the management)		
(All Stock are Valued at cost or Net realizable value whichever is Lower)		
(a) Raw Materials and components	856.68	1088.71
(b) Finished goods	823.88	601.47
(c) Stores and spares	399.81	334.44
(d) Trading Goods	19.29	23.74
(e) Others		
- Furnace Oil	1.12	0.91
- Coal	9.12	21.10
Total	**2109.90**	**2070.38**

Annexure 18

Restated Consolidated Statement of Trade Receivables

(₹. in Million)

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
(a) Trade receivables outstanding for a		
period less than six months		
Unsecured, considered good *	812.90	516.45
(b) Trade receivables outstanding for		
more than six months		
Unsecured, considered good	19.27	11.81
Total	**832.17**	**528.27**

*** Trade Receivable stated above include debts due by:**		
Private Company / Firm in which director is a member / Partner	60.00	2.33

Annexure 19

Restated Consolidated Statement of Cash and Bank Balances

(₹. in Million)

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
(a) Balances with banks	273.58	73.53
(b) Cash on hand	22.44	25.70
(c) Margin Money with banks	131.80	120.21
(d) In Fixed Deposit with Banks	0.65	12.55
Total	**428.47**	**231.99**

Annexure 20

Restated Consolidated Statement of Short term Loans and Advances

(₹. in Million)

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
(a) Others		
Unsecured, considered good		
Advance Recoverable in Cash or in kind or Value to be received*	848.01	691.40
Advance to Supplier	1049.33	1009.35
Balance with Central Excise & Sales Tax Department	88.94	207.75
Total	**1986.28**	**1908.50**

Advance Recoverable in Cash or in kind or Value to be received above includes loan given to :-		
* Partnership Firm in which company is a Partner.	842.82	686.42

Annexure 21

Restated Consolidated Statement of Other Current Assets

(₹. in Million)

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
Prepaid Expenses	7.68	6.48
Interest Receivable	1.45	2.28
TDS Receivable & Advance Tax	1.66	2.62
MAT Credit Entitlement Account	296.28	296.28
Royalty Receivable	1.65	-
Total	**308.71**	**307.65**

Annexure 22

Restated Consolidated Statement of Other Non - Current Assets

(₹. in Million)

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
Unamortized Preliminary Expenses	1.11	1.11
Fringe Benefit Tax	0.03	0.03
Total	**1.14**	**1.14**

Annexure 23

Restated Consolidated Statement of Revenue from operations

(₹. in Million)

Particulars		FY Ended 31.03.2015	FY Ended 31.03.2014
Sale of Products		15,875.24	12,560.54
Sale of Trading Goods		4,535.70	272.01
Sale of Electricity		106.64	168.54
Less: Excise Duty paid		1739.14	1360.91
	Total	**18,778.45**	**11,640.17**

Annexure 24
Restated Consolidated Statement of Other Income

(₹. in Million)

Particulars		FY Ended 31.03.2015	FY Ended 31.03.2014
Recurring Income:			
Interest on Margin Money		10.95	5.93
Other Interest Income		44.73	23.50
Rental Income		0.36	0.33
Non-Recurring Income:			
Profit on Sale Of Investment/Fixed Assets		0.29	0.06
Gain from Exchange Difference		0.07	-
Income from Job Work		0.62	-
Dividend from Non-Current Investments		0.00	0.00
Insurance Claim Received		0.02	0.29
Foreign Exchange Gain		0.02	-
Miscellaneous Income		(1.83)	2.52
	Total	**55.23**	**32.64**

Annexure 25
Restated Consolidated Statement of Cost of Material Consumed

(₹. in Million)

Particulars		FY Ended 31.03.2015	FY Ended 31.03.2014
Opening Stock		1,088.71	587.73
Add: Transfer on Amalgamation		-	-
Add: Purchases		11,479.91	9,246.26
		12,568.62	**9,833.99**
Less: Sale / Disposal		421.78	209.83
Less: Closing Stock		856.68	1,088.71
Raw Material Consumed	**Total**	**11,290.16**	**8,535.44**
Breakup of Raw Material Consumed			
Imported		-	-
Percentage %		-	-
Indigenous		11,290.16	8,535.44
Percentage %		1.00	1.00
Value of Imports on C.I.F. Basis (In ₹.)		-	-

Annexure 26
Restated Consolidated Statement of Increase/Decrease in Stock in trade

(₹. in Million)

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Closing Stock of Finished Goods	823.88	601.47
Closing Stock of Traded Goods	19.29	23.74
	843.16	**625.22**
Less: Opening Stock of Finished Goods	601.47	918.68
Less: Opening Stock of Traded goods	23.74	36.85
	625.22	**955.53**
(Increase)/ Decrease in stock of finished goods	(217.95)	330.31
(Increase) / Decrease in Excise on Closing Stock	23.08	(16.84)
Net Increase (Decrease) in stock of finished goods **Total**	**(194.87)**	**313.47**

Annexure 27
Restated Consolidated Statement of Employee Benefit Expense

(₹. in Million)

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Salaries, Wages & Other Benefits	346.42	255.90
Contribution to Provident and Other Funds	19.77	12.92
Staff & Workers Welfare Expenses	5.09	5.40
Total	**371.28**	**274.22**

Annexure 28
Restated Consolidated Statement of Finance Costs

(₹. in Million)

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Other Borrowing Cost	47.06	46.85
Interest Expenses	1,049.12	1,014.12
Less: Amount included in Capital Work-in- Progress	8.26	194.23
Total	**1,087.93**	**866.74**

Annexure 29
Restated Consolidated Statement of Other Expenses

(₹. in Million)

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Manufacturing Expenses		
Power & Fuel	272.43	166.04
Manufacturing Wages	114.07	78.73
Consumption of Stores & Spares	480.92	218.92
Repair & Maintenance		
- Factory Building	15.35	6.31
- Plant & Machinery	77.37	48.43
Insurance Charges	5.48	4.79
Water Cess Expenses	15.03	11.65

Materials Handling & Processing	43.30	45.89
Entry Tax	0.95	1.53
Wind Mill Running Expenses	0.08	0.84
Administration Expenses:		
Auditor's Remuneration:		
For Statutory Audit	0.91	0.75
For Tax Audit	0.30	0.25
For Certification & Other Consultancy	0.01	0.06
Internal Auditor Remuneration	0.66	0.68
Director's Remuneration	2.10	2.10
Director's Sitting Fees	0.18	0.15
Corporate Social Responsibility	4.31	0.98
Insurance Expenses	4.57	1.42
Subscription to Association & Membership Fees	1.50	0.70
Loss on Sale of Fixed Assets	17.95	0.74
Legal & Professional Charges	10.60	6.92
Office & General Expenses	6.71	5.36
Rent, Rates and Taxes	4.34	5.21
Printing & Stationary Expenses	2.78	2.35
Registration & Renewal Fees	7.40	5.91
Environmental Expenses	1.83	1.29
Repair & Maintenance (Others)	5.81	5.47
Director's Traveling Expenses	3.58	3.29
Traveling Expenses (Other)	9.32	9.32
Testing & Inspection Charges	1.19	0.40
Communication Expenses	4.85	3.69
Canteen Expenses	5.31	4.95
Conveyance Expenses	10.83	7.83
Penalty & Fines	0.34	0.45
Earlier Years Taxes	0.25	1.02
Other Selling & Distribution Expenses:		
Advertisement & Publicity	33.40	25.21
Carriage Outward	4.79	1.13
Sales Commission	41.12	29.29
Finished Goods Handling Charges	10.26	3.09
Sales Tax, Service Tax & Custom Duty	3.64	0.82
Power Distribution Charges & Discount	8.06	7.35
Rebate & Rate Difference	0.02	0.63
Sales Promotion & Planning	15.03	10.69
Total	**1,248.91**	**732.59**

Breakup of Stores Consumed		
Imported	4.24	1.42
Percentage %	0.88	0.65
Indigenous	476.68	217.49
Percentage %	99.12	99.35
Value of Imports on C.I.F. Basis (In ₹.)	4.24	1.42

Annexure 30
Restated Consolidated Statement of Net Current tax

(₹. in Million)

Particulars		As at 31.03.2015	As at 31.03.2014
Current Tax (MAT)		16.31	-
Less : MAT Credit Entitlement		-	192.44
	Total	**16.31**	**(192.44)**

Provision for Income Tax has been made in terms of the provisions of Sec. 115JB of the Income Tax Act, 1961.

Annexure 31
Restated Consolidated Statement of Earning Per Equity Shares

(₹. in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
Profit / (Loss) after Taxation as per Profit & Loss Account	58.63	164.20
Weighted Avg. No. of Equity Share Outstanding	13.06	12.92
Basic / Diluted Earning / (Loss) per Share of ₹. 10/-	4.49	12.71

Annexure 32
Restated Consolidated Statement of Accounting Ratio (₹. in Million)

SI NO	PARTICULARS		As at 31.03.2015	As at 31.03.2014
	Basic earnings per share (₹.) (refer note 3(a) below)	A/C	4.49	12.71
	Diluted earnings per share (₹.) (refer note 3(b) below)	B/D	4.49	12.71
	Return on Net Worth (%) (refer note 3(c) below)	A/E	1.35%	3.86%
	Net asset value per equity share (₹.) (refer note 3(d) below)	E/F	332.21	329.32
1	Restated Profit / loss after tax, attributable to equity shareholders	A	58.63	164.20
	Add: Adjustment for loss on fair valuation of convertible preference shares		-	-
	Net loss available for calculation of DEPS	B	58.63	164.20
2	Weighted average number of equity shares considered for calculating basic earnings per share	C	13.06	12.92
	Effect of dilution:			
	Stock option under ESOP		-	-
	Compulsory convertible preference shares		-	-
	Weighted average number of equity shares considered for calculating diluted earnings per	D	13.06	12.92

	share (Note 7)			
3	Restated net worth at the end of the year (refer note 5 below)	E	4,339.46	4,254.58
	Face value per share		10.00	10.00
	Total number of equity shares outstanding at the end of the year	F	13.06	12.92
	Weighted average number of equity shares outstanding during the year, after giving the impact of bonus shares, used for diluted earning per share	H	13.06	12.92

Notes

1 The figures disclosed above are based on the Restated Consolidated IGAAP Financial Information of the Company.

2 The above statement should be read with the Notes to the Restated Consolidated IGAAP Financial Information - Accounting Policies - Annexure V and Statement of Restatement

3 The Ratios have been computed as below:

a) Basic Earnings per share (Rs.) = $\dfrac{\text{Restated Profit / loss after tax, attributable to equity shareholders}}{\text{Weighted average number of equity shares considered for calculating basic earnings per share}}$

b) Diluted Earnings per share (Rs.) = $\dfrac{\text{Net Profit / loss available for calculation of DEPS}}{\text{Weighted average number of diluted equity shares}}$

c) Return on net worth (%) = $\dfrac{\text{Restated Profit / loss after tax, attributable to equity shareholders}}{\text{Restated Net worth at the end of the year}}$

d) Net asset value per share (Rs.) = $\dfrac{\text{Restated net worth at the end of the year}}{\text{No of Equity Shares Outstanding at the end of the Year}}$

4 Weighted average number of equity shares is the number of equity shares outstanding at the beginning of the year adjusted by the number of equity shares issued during year multiplied by the time weighting factor. The time weighting factor is the number of days for which the specific shares are outstanding as a proportion of total number of days during the year.

5 Net worth includes Equity share capital + Other equity (including Share Premium, General Reserve, Employee share based payment reserve and Retained earnings).

6 Earnings per share calculations are in accordance with Accounting Standard 20 (Earnings per Share).

7 The Company has allotted bonus shares to the existing equity shareholders on September 4, 2018 in the ratio of 1:3 as approved by the shareholders at the general meeting held on September 3, 2018. Consequently, the number of shares have increased from 13,071,155 equity shares to 52,284,620 equity shares.

Annexure 33
Restated Consolidated Statement of Tax Shelter **(₹. in Million)**

Si no	PARTICULARS	As at 31.03.2015	As at 31.03.2014
A	Restated Loss Before Tax	67.65	-195.65
B	Tax Rate	32.45%	30.09%
C	Tax Thereon on Above Rate (A x B)	21.95	-60.45
D	**Adjustment for Permanent Difference**		
1	**Expenses disallowed under Income Tax Act**		
	Loss on Sale of Fixed Assest & Investment	17.90	0.74
	Profit on Sale of Fixed Assest	(0.29)	(0.06)
	Earlier Year Taxes	2.12	0.00
	Interest on TDS	0.09	0.05
	Penalty & Fine	0.44	0.00
	Donation	0.42	0.12
	Corporate Social Responsibility	4.31	0.00
	Dividend Exempt Under IT ACT	0.00	0.00
	Deduction u/s 32AC	(126.60)	(265.28)
	TOTAL (D)	(101.62)	(264.44)
E	**Adjustments for Timing Differences**		
	Difference in book depreciation and Depreciation under Income Tax Act 1961	(382.50)	(540.49)
	Expenses allowable on payment basis	(19.86)	(8.63)
	Provision for gratuity	6.94	6.08
	Provision for leave encashment	4.73	4.36
	Provision for Bonus	15.35	15.34
	Deduction allowed as per Sec. 35(2) & 35(2AB)	0.00	0.00
	TOTAL (E)	(375.34)	(523.33)
	Net Adjustments (D+E)	(476.96)	(787.77)
	Taxable income/(loss) before set off of losses		
	Taxable Income for the year	(409.31)	(983.42)
	Brought forward Losses		
	Business Losses	0.00	0.00
	Unabsorbed depreciation	1766.65	1367.47
	Long term capital loss	0.00	0.00

Annexure 34
Restated Consolidated Statement of Segment Reporting

Basis of preparation :

The Company's operations predominantly relate to manufacturing, trading, generation and sale of sponge iron, billets, ferro alloys and power. The risks and rewards associated with these three businesses are significantly different. Therefore, the primary segment consists of "Iron & Steel" and "Power".

The geographic segments identified as secondary segments are "Domestic Market" and "Export Market". Since there is no significant export market revenue, the same has not been disclosed. The entire capital employed is within India.

Information about business segments - Primary

(₹. in Million)

Business Segment	**Iron & Steel**		**Power**		**Trading**		**Total**	
	2014-15	2013-14	2014-15	2013-14	2014-15	2013-14	2014-15	2013-14
Revenue								
External Turnover								

(Gross)	15875.24	12832.55	106.64	168.54	4535.70	-	20517.58	13001.08
Inter-segment								
Transfer	-	-	1471.58	1272.65	-	-	1471.58	1272.65
Eliminations	-	-	(1471.58)	(1272.65)	-	-	(1471.58)	(1272.65)
Total Revenue	15875.24	12832.55	106.64	168.54	4535.70	-	20517.58	13001.08
Result								
Segment Result	(889.41)	(844.87)	755.19	649.23	201.87	-	67.65	(195.65)
Unallocated Corp.								
Expense/Income	-	-	-	-	-	-	-	-
Operating Profit	-	-	-	-	-	-	30.32	(227.54)
(+) Interest Income	-	-	-	-	-	-	54.49	29.43
(+) Profit on Sale of								
F. Assets	-	-	-	-	-	-	(17.61)	(0.68)
(+) Other Income	-	-	-	-	-	-	0.45	3.14
(-) Income Taxes	-	-	-	-	-	-	16.31	(192.44)
(-) Earlier Year								
Taxes	-	-	-	-	-	-		
(-) Deferred Taxes	-	-	-	-	-	-	(7.30)	(167.40)
Net Profit	(889.41)	(844.87)	755.19	649.23	201.87	-	58.63	164.20
Other Information								
Segment Assets	7289.84	6609.78	1296.41	1352.81	-	-	8586.25	7962.59
Unallocated								
Corporate Assets	-	-	-	-	-	-	6390.96	6341.02
Total Assets	7289.84	6609.78	1296.41	1352.81	-	-	14977.21	14314.30
Segment								
Liabilities	5464.60	4990.28	768.84	866.73	-	-	6233.43	5857.01
Unallocated								
Corporate								
Liabilities	-	-	-	-	-		4404.32	4167.02
Total Liabilities	5464.60	4990.28	768.84	866.73	-	-	10637.75	10024.04
Depreciation	564.82	509.43	36.74	155.16	-	-	601.63	664.61
Unallocated								
Depreciation	-	-	-	-	-	-	7.32	3.66
Non cash Exp.								
other than Dep.	-	-	-	-	-	-	-	-

Annexure 35
Notes to the Restated Consolidated Summary Statement

I. EMPLOYEE BENEFITS

a) Gratuity

As per Accounting Standard 15 “Employee benefits”, the disclosures as defined in the Accounting Standard are given below: **(₹. in Million)**

	31.03.2015	31.03.2014
Employer’s Contribution to Provident Fund	12.07	6.12
Employer’s Contribution to Employee State Insurance	7.64	6.55

Defined Benefit Plan :-

Gratuity

The Company has a defined benefit gratuity plan. Every employee who has completed five years or more of service gets a gratuity on departure at 15 days salary (last drawn salary) for each completed year of service or part thereof in excess of 6 month and its payable on retirement / termination/ resignation. The benefit vests on the employees after completion of 5 Year of service. The gratuity liability has not been externally funded.

The present value of obligation is determined based on actuarial valuation using the Projected Unit Credit Method, which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation.

	Gratuity (Non Funded) ₹. In Million	
I) Reconciliation of opening & closing balances	**As at**	**As at**
of defined benefit obligation	**31.03.2015**	**31.03.2014**
Defined Benefit obligation at beginning of year	18.37	12.64
Current Service Cost	5.67	4.04
Interest Cost	1.72	1.40
Actuarial (gain) / loss	(0.71)	0.62
Benefits paid	(0.30)	(0.33)
Defined Benefit obligation at year end	**24.76**	**18.37**
II) Reconciliation of fair value of assets and obligations		
Defined Benefit obligation	24.76	16.24
Fair value of Plan assets	-	-
	24.76	16.24
Less : Unrecognized Past Service Cost	-	-
Amount recognized in Balance Sheet	**24.76**	**16.24**

Since the entire amount of plan obligation is unfunded, therefore change in the fair value of plan assets are not given. Further the entire amount of plan obligation is unfunded, therefore categories of plan asset as a percentage of the fair value of total plan assets and company's expected contribution to the plan assets in the next year is not given.

III) Expenses recognised during the year		
		(₹. in Million)
Current Service Cost	5.67	4.04
Interest Cost	1.72	1.40
Expected return on Plan assets	-	-
Actuarial (gain) / loss	(0.71)	0.62
Net Cost	6.69	6.06
IV) Investment Details :		
V) Actuarial assumptions		
Mortality Table (LIC) Ultimate	1994-96	1994-96
Discount rate (per annum)	8.00%	8.25%
Expected rate of return on plan assets (per annum)	0	0
Rate of escalation in salary (per annum)	5.00%	5.00%
Expected Average remaining working lives of employees Years)	21.79	22.29
Principal Plan is under Payment of Gratuity Act 1972 (as amended up to date).		

The estimates of rate of escalation in salary considered in actuarial valuation, take into account inflation, seniority, promotion and other relevant factors including supply and demand in the employment market. The above information is certified by the actuary.

The expected rate of return on plan assets is determined considering several applicable factors, mainly the composition of Plan assets held, assessed risks, historical results of return on plan assets and the Company's policy for plan assets management.

(ii) Leave Encashment

The obligation for leave encashment is recognized during the year of ₹. 18.93 million (P.Y. ₹. 14.86 million), is equivalent to one month salary and charged to Profit & Loss Account."

II) CONTINGENT LIABILITIES

Contingent Liabilities and Capital Commitments are not provided for in respect of :-

(₹. in Million)

Description	31.03.2015		31.03.2014	
	Value of Liability	**Margin Money**	**Value of Liability**	**Margin Money**
i)Estimated amount of contracts				
remaining to be executed on	-	-	-	-
capital accounts				
ii)Claims against the Co. / disputed	159.18	-	158.61	-
tax liabilities not acknowledged				
as debt				
iii)Bank Guarantees outstanding	11.01	1.51	55.42	8.08
iv)Letter of Credit & Guarantee	147.45	12.32	341.11	19.68
issued by bank				
v)Jointly and severely corporate				
guarantee to the bank on behalf	-	-	417.50	-
of Joint venture company				
vi)Jointly and severely corporate				
guarantee to the bank on behalf	3311.00	-	2305.50	-
of Partnership Firm				

(III) Balances of the sundry debtors, sundry creditors, loans and advances etc. are subject to confirmation and reconciliation.

(IV)The company has not received any information from any of the suppliers of their being a Small Scale Industrial Unit. Hence the amounts due to Small Scale Industrial Unit as on 31st March 2015 are not ascertainable.

(V) In the opinion of the Board, the value of realization of loans, advances and current assets in the ordinary course of business will not be less than the amount at which they are stated in the balance sheet.

(VI) Information on Related Party as required by Accounting Standard-18, "Related Party Disclosures" issued by The Institute of Chartered Accountants of India, are given below:

Related Parties

a) Subsidiary (Control Exists)

-- Shri Bajrang Energy Private Limited w.e.f. 31.03.2012

b) Joint Venture

-- Chhattisgarh Captive Coal Mining Ltd. W.e.f. 01.04.2007

c) Associate

-- Shri Bajrang Alloys Limited
-- S. B. Multimedia (P) Limited
-- Shri Bajrang Ispat & Plywood Limited
-- Shimmer Investment Private Limited
-- Swastik Mercantiles Limited
-- Shri Bajrang Steel & Power Limited
-- I A Energy Private Limited
-- J.J. Re-Rollers

-- Bajrang Rice Mills
-- Jainarayan Hariram Goel Charitable Trust
-- I A Energy (Partnership Firm)
-- S B Power (Partnership Firm)
-- Shri Bajrang Hydro Energy Private Limited

d) Key Management Personnel

-- Shri Suresh Goel
-- Shri Narendra Goel
-- Shri Rajendra Goel
-- Shri Pawan Goel

e) Relative of Key Management Personnel

-- Shri Anand Goel
-- Smt. Sarla Goel
-- Smt. Neeta Goel
-- Smt. Aruna Goel
-- Smt. Kiran Goel
-- Shri Dinesh Goel
-- Shri Sandeep Goel
-- Shri Bajrang Goel
-- Shri Ashutosh Goel
-- Shri Archit Goel
-- Smt. Suman Goel
-- Smt. Rashmi Goel
-- Smt. Esha Goel
-- Smt. Ankita Goel
-- Shri Shimmer Goel

Transaction with Related Parties in the ordinary course of business (₹. in Million)

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
Associates		
Purchase of Materials	22.02	32.17
Purchase of Fixed Assets	1.45	18.81
Sale of Materials	184.43	295.14
Service Received	-	0.23
Interest Expenditure	-	1.13
Rent received	0.06	0.06
Outstandings:		
Investment, Loans & Advance Payable / (Receivable)	14.40	0.01
Payables	217.38	77.37
Receivables	3.26	-
Joint Venture		
Investments	48.10	48.10
Outstandings:		
Payables	13.37	-
Partnership		
Sale of Materials	52.17	25.58
Investments	0.60	0.60
Advances given	972.75	786.35
Outstandings:		
Receivables	60.00	-

Key Management		
Remuneration Paid	3.46	3.20
Interest Paid	-	0.37
Purchase of Material	0.28	0.31
Receivables	3.09	1.32

The following tables provides the total amount of transactions that have been entered into with related parties for the relevant financial year:-

(₹. in Million)

Particulars	**31.03.2015**	**31.03.2014**
Purchase of Materials:		
Shri Bajrang Alloys Limited	22.02	32.17
Shri Narendra Goel	0.28	0.31
Purchase of Fixed Assets:		
Shri Bajrang Alloys Limited	1.45	18.81
Sale of Materials:		
Shri Bajrang Alloys Limited	179.09	288.70
Shri Jainarayan Hariram Goel Charitable Trust	4.88	1.26
Shimmer Investments Pvt. Ltd.	0.45	5.18
Suresh Goel & Brothers	-	0.00
I A Energy (Partnership Firm)	52.17	25.58
Service Received:		
SB Multimedia Pvt. Ltd.	-	0.23
Service Rendered:		
Shri Bajrang Alloys Limited	0.06	0.06
Remuneration Paid:		
Shri Narendra Goel	1.20	1.20
Shri Rajendra Goel	0.90	0.90
Shri Shravan Kumar Goyal	1.36	1.10
Interest Paid:		
Shri Rajendra Goel	-	0.37
Shri Jai Narayan Hariram Goel Charitable Trust	-	1.13

(VII) Details of Interest of the Company in Joint Venture:

i) Name of the Joint Venture entity : Chhattisgarh Captive Coal Mining Ltd.
ii) Country of Incorporation : India
iii) Principal Activities : Extraction of Coal
iv) Ownership Interest : 19.753%

The Company's interests in these joint ventures are reported as Non-current Investment (Annexure 15) and stated at cost. However, the company's share of each of the assets, liabilities, income & expenses etc. are :

(₹. in Million)

Particulars	**31.03.2015**	**31.03.2014**
Fixed Assets (including Capital WIP & Pre-operative expenses)	15.70	27.23
Investments	7.08	7.08
Cash, Bank & Loans and Advances	21.78	13.86
Loan Fund	-	-
Current Liabilities	0.01	0.07
Revenue	-	-
Expenses	-	-
Contingent Liabilities	97.28	102.77

(VIII) The effect of acquisition of subsidiaries on the financial position and the results as included in consolidated financial statements for the year ended on 31 March 2015 are given below:

(₹. in Million)

Particulars	Current Year
EQUITY AND LIABILITIES	
Shareholders' funds	101.44
Non-current liabilities	30.05
Current liabilities	0.01
Total	**131.51**
ASSETS	
Non-current assets	2.29
Current assets	129.21
Total	**131.51**

(IX) A Legal case pending with the Honorable First Class Judicial Magistrate, Raipur against Advance to supplier for ₹. 9.31 million.

(X) REMITTANCE IN FOREIGN CURRENCY

Value of import on CIF basis

Particulars	Currency	31.03.2015		31.03.2014	
		INR in Million		INR in Million	
- Raw Materials	USD	-	-	-	-
- Stores & Spares	USD	68306	4.24	27447	1.42
- Trading Goods	USD	367320	24.43	-	-
- Capital Goods	USD	78000	4.80	38488	2.32
	EUR	-	-	42860	3.07
	SEK	1057000	9.49	-	-
Expenditure in Foreign Currency					
	USD	4472	0.22	65917	5.05
Earning in Foreign Exchange on					
Sale of Finished Goods					
Carbon Credits	EURO	98314	7.82	89191	6.84
Wire-rod Coil	USD	-	-	-	-
TMT	USD	259167	13.41	129370.05	7.82

(XI) BORROWING COST

During the year under review the Company has capitalized a sum of ₹. 8.26 million (Previous Year ₹. 194.23 million) in respect of cost of borrowings and added to the cost of related assets.

(XII)Inventories and consumption of stores materials have been taken as valued and certified by the management.

(XIII)Amounts have been rounded off to the nearest rupees and previous year's figures have been regrouped, rearranged and reclassified wherever considered necessary to confirm to the current presentation.

For S S S D & CO **Chartered Accountants** **Firm Registration Number: 020203C**	**For and behalf of** **Shri Bajrang Power and Ispat Limited**	
	Pawan Goel **Chief Financial Officer**	**Suresh Goel** **Chairman** **DIN: 00115834**
Vidhan Chandra Srivastava **Partner** **Membership Number: 073712** **Place: Raipur** **Date: September 2, 2018**	**Parul Verma** **Company Secretary**	**Narendra Goel** **Managing Director** **DIN: 00115883**

Auditors' Report on the Restated Standalone under Indian Accounting Standards("IND AS") Financial Information of Shri Bajrang Power and Ispat Limited

To,
The Board of Directors
Shri Bajrang Power and Ispat Limited
Village Borjhara , Urla Industries Area,
Raipur (C.G) -493221

Independent Auditors' Report on the Restated Standalone Ind AS Financial Information prepared in connection with the proposed initial public offering (the "IPO") by Shri Bajrang Power and Ispat Limited.

Dear Sirs,

1. We have examined the attached Restated Standalone Ind AS Financial Information of Shri Bajrang Power and Ispat Limited (the "**Company**"), which comprises of the Restated Standalone Ind AS Summary Statement of Assets and Liabilities as at March 31, 2018, March 31, 2017 and March 31,2016, the Restated Standalone Ind AS Summary Statement of Profit and Loss (including other comprehensive income), the Restated Standalone Ind AS Statement of Changes in Equity and the Restated Standalone Ind AS Summary Statement of Cash Flows for each of the years ended March 31, 2018, March 31, 2017 and March 31, 2016 and the Significant Accounting Policies and Other Information – including schedules, notes and annexures thereto (collectively referred to as the "**Restated Standalone Ind AS Financial Information**"), as approved by the Board of Directors of the Company , prepared in terms of the requirements of the relevant provisions of the:

   a. Section 26 of Part I of Chapter III of the Companies Act, 2013 (the "**Act**");
   b. the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 as amended from time to time in pursuance of provisions of Securities and Exchange Board of India Act, 1992 ("**SEBI ICDR Regulations**").

   The preparation of the Restated Standalone Ind AS Financial Information is the responsibility of the management of the Company. The management's responsibility includes designing, implementing and maintaining adequate internal control relevant to the preparation and presentation of the Restated Standalone Ind AS Financial Information. The management is also responsible for identifying and ensuring that the Company complies with the SEBI ICDR Regulations.

2. We have examined such Restated Standalone Ind AS Financial Information taking into consideration:

   a. the terms of reference and terms of our engagement agreed with you vide our engagement letter dated August 14, 2018, requesting us to carry out the assignment, in connection with the proposed initial public offering of the Company;

   b. Guidance Note on Reports in Company Prospectus (Revised 2016) issued by the Institute of Chartered Accountants of India ("**ICAI**") as amended from time to time (the "**Guidance Note**"), which include the concept of test checks and materiality. This Guidance note requires us to obtain reasonable assurance based on verification of evidence supporting the Restated Standalone Ind AS Financial Information. The Guidance Note also required that we comply with the ethical requirements of the code of Ethics issued by the Institute of Chartered Accountants of India.

3. The Restated Standalone Ind AS Financial Information have been compiled by the management of the Company from:

   a. the audited standalone financial statements of the Company as at March 31, 2018, have been prepared in accordance with Indian Accounting Standards ("**Ind AS**") notified under the Companies (Indian Accounting Standards) Rules, 2015 read with Section 133 of the Act and which have been approved by the Board of Directors at their meetings held on July 24, 2018; and

   b. the audited standalone financial statements of the Company as at March 31, 2017 and 2016 prepared in accordance with accounting principles generally accepted in India ("**IGAAP**") at the relevant time which have been approved by the Board of Directors at their meetings held on July 25, 2017 and August 23, 2016, respectively; and

   c. Audit for the financial year ended March 31, 2017 and March 31, 2016 was conducted by the previous auditors , R. K. Singhania & Associates , Chartered Accountants, Raipur, and accordingly reliance has been placed on the financial information examined by them for the said years .The financial report included for these financial years i.e. 2016-17 and 2015-16 are based solely on the report submitted by R. K. Singhania & Associates , Chartered Accountants Raipur & the company have also confirmed that the Restated Standalone Ind AS Financial Information :

- have been made after incorporating adjustments for the changes in accounting policies retrospectively in respective financial years to reflect the same accounting treatment as per changed accounting policy for the reporting periods;
- have been made after incorporating adjustments for the material amounts in the respective financial years to which they relate
- as per requirements of Ind AS, do not contain any extra-ordinary items that need to be disclosed separately in the Restated Standalone Ind AS Financial Information
- There were qualifications in the auditors' reports on the audited standalone financial statements of the Company as at March 31, 2017 and March 31, 2016 and for which adjustment have been done to the Restated Standalone Ind AS Financial Information. (Refer Annexure 6 for details)

d. Auditors' Report issued by R.K .Singhania & Associates , Chartered Accountants Raipur dated July 25, 2017 and 23 August, 2016, respectively on the standalone financial statements of the Company as at and for each of the years ended March 31, 2017 and 2016, respectively; as referred above; and as adjusted for changes on account of Ind AS.

4. In accordance with the requirements of Section 26 of Part I of Chapter III of the Act the SEBI ICDR Regulations and the Guidance Note we report that: the Restated Standalone Ind AS Financial Information as at March 31, 2017 & March 31,2016 examined and reported upon by R.K .Singhania & Associates , Chartered Accountants Raipur ,on which reliance has been placed by us and March 2018 examined by us, as set out in Annexure to this report , have been arrived after making adjustments and regrouping/ reclassifications as in our opinion were appropriate below and have been fully described in Annexure 6 : Statement of Restatement Adjustments to Audited Ind AS Standalone Financial Statements and based on our examination, we report that:

a. The Restated Standalone Ind AS Summary Statement of Assets and Liabilities of the Company as at March 31, 2018, 2017 and 2016, as set out in Annexure 1 to this report;
b. The Restated Standalone Ind AS Summary Statement of Profit and Losses of the Company for each of the years ended March 31, 2018, 2017 and 2016, as set out in Annexure 2 to this report;
c. The Restated Ind AS Standalone Summary Statement of Cash Flows of the Company for each of the years ended March 31, 2018, 2017 and 2016, as set out in Annexure 3 to this report;
d. The Restated Ind AS Standalone Summary Statement of Changes in Equity of the Company for each of the years ended March 31, 2018, 2017 and 2016, as set out in Annexure 4 to this report;

Based on the above and according to the information and explanations given to us, and reliance placed on the reports submitted by the previous auditor R.K .Singhania & Associates , Chartered Accountants Raipur , we further report that the Restated Standalone Ind AS Financial Information of the Company (as attached to this report) and as mentioned above, read with basis of preparation and respective significant accounting policies given in Annexure 6 as described in paragraph 1 have been prepared in accordance with the SEBI ICDR Regulations and these Restated Standalone Ind AS Financial Information:

a. have been made after incorporating adjustments for the changes in accounting policies retrospectively in respective financial years to reflect the same accounting treatment as per changed accounting policy for the reporting periods;
b. have been made after incorporating adjustments and regroupings for the material amounts in the respective financial year to which they relate;
c. as per requirements of Ind AS, do not contain any extra-ordinary items that need to be disclosed separately in the Restated Standalone Ind AS Financial Information;
d. There were qualifications in the auditors' reports on the audited standalone financial statements of the Company as at 2017 and 2016 and for which adjustment have been made to the Restated Standalone Ind AS Financial Information :

(e): -

i. Emphasis of Matter included in the auditor's report on the standalone financial statement as at and for the year ended March 31, 2018, which do not require any corrective adjustment in the Restated Standalone Ind AS Financial Information, are as follows:

Attention drawn to (Note- 5 of the Standalone financials statement) where the Company has invested in equity shares amounting to ` 2,200 million in its subsidiary company (IA Hydro Energy Private Limited) during the year resulting into utilization of short term fund for long term purposes.

Our opinion is not modified in this matter.

ii. Emphasis of Matter included in the auditor's report on the standalone financial statement as at and for the year ended March 31, 2016, which do not require any corrective adjustment in the Restated Standalone Ind AS Financial Information, are as follows:

We draw attention to the following matter in the notes to the financial statement :
Annexure 8 of the financial statement, where the company has not made any provision against the expected diminution of its joint venture investment due to coal block cancellation , the management has opined that the expected realizable value of the

assets of the JV will be more as compared to its book value ; in the absence of corroborative evidence of permanent decline ,the impact could not be ascertained at this juncture.

Our opinion is not modified in this matter.

(f) Other audit qualifications included in the Annexure to the auditors' report issued under Companies (Auditor's Report) Order 2016, as applicable, on the standalone financial statements for each of the years ended March 31, 2018 ,2017and 2016, which do not require any corrective adjustment in the Restated IND AS Standalone Summary Statements, are as follows:

A. As at and for the year ended March 31, 2018
Clause (vii) (b)

S.No	Name of the Statute	Nature of the duties	"₹" in Millions	Period to which the amount relates (FY)	Forum where dispute is pending
1	Income Tax Act ,1961	Income Tax	24.50	2004-05	Settlement Commission. Kolkata.
2		Income Tax	94.95	2007-08	High Court of Chhattisgarh
3		Income Tax	0.69	2007-08	Commission of Income Tax (Appeal), Raipur.
4		Income Tax	52.94	2008-09	High Court of Chhattisgarh
5		Income Tax	34.13	2009-10	Income Tax Appellate Tribunal, Raipur.
6		Income Tax	44.81	2010-11	Commission of Income Tax (Appeal), Raipur.
7		Income Tax	60.99	2011-12	Commission of Income Tax (Appeal), Raipur.
8		Income Tax	1.19	2012-13	Commission of Income Tax (Appeal), Raipur.
9		Income Tax	6.19	2013-14	Commission of Income Tax (Appeal), Raipur.
10		Income Tax	3.25	2015-16	Commission of Income Tax (Appeal), Hyderabad, Telangana
11	Central Excise Act, 1944	Excise Duty	1.59	2005-06	High Court of Chhattisgarh
12		Excise Duty	0.32	2006-07	Commission of Excise , Raipur.
13		Excise Duty	0.25	2005-06 to 2007-08	Commission of Excise , Raipur.
14		Service Tax	6.49	2011-12	Commission of Excise , Raipur.
15		Service Tax	5.65	2012-13	Commission of Excise , Raipur.
16		Excise Duty	0.26	2014-15 to 2015-16	Commission of Excise , Raipur.
17		Service Tax	0.03	2011-12 to 2015-16	Commission of Excise , Raipur.
18		Excise Duty	7.35	2014-15	Commission of Excise , Raipur.
19		Excise Duty	5.37	2014-15	Commission of Excise , Raipur.
20	Custom Act, 1962	Custom Duty	2.22	2012-13	The Additional Commissioner of Custom. Vizag.
21	Central Sales tax & CG VAT Act	Sales Tax	110.74	2005-06 to 2011-12	High court of Chhattisgarh
22		Sales Tax	5.22	2005-06	Additional Commissioner of Commercial Tax (Appeal) Raipur.
			469.16		

According to the information and explanations given to us, the disputed amounts payable in respect of provident fund, income tax, sales tax, wealth tax, service tax, duty of customs, value added tax, cess and other material statutory dues aggregating to ` 4,69.16 Millions, that have not been deposited on account of matters pending before the appropriate authorities are as above;

Clause (viii)
According to the information and explanations given to us and based on the documents and records produced to us, the Company have made defaults up to 30 days for monthly repayments of term loans in aggregate amounting to ` 303.12 million and `299.26 million for principal repayment and Interest respectively. However, the default was remedied before the financial statements were approved for issue.

Clause (ix)

The company has not raised any money by way of initial public offer or further public offer (including debt instruments) during the year. The company has obtained fresh term loan during the year and the same has been mainly applied for the purpose for which these are obtained. Term loan from LIC Housing Finance Limited has been utilized for business purposes

B. As at and for the year ended March 31, 2017

Clause (vii) (b)

S.No	Name of the Statute	Nature of the duties	"₹" in Millions	Period to which the amount relates (FY)	Forum where dispute is pending
1	Income Tax Act ,1961	Income Tax	24.50	2004-05	High Court of Chhattisgarh
2		Income Tax	44.81	2010-11	ITAT, Raipur.
3		Income Tax	34.13	2011-12	ITAT, Raipur.
4		Income Tax	3.25	2015-16	Commission of Income Tax (Appeal), Hyderabad, Telangana
5	Central Excise Act, 1944	Custom duty	2.22	2013-13	The Additional Commissioner of Custom. Vizag.
6		Service Tax	6.49	2011-12	Commission of Excise , Raipur.
7		Excise duty	1.59	2005-06	DGECL , Raipur.
8		Excise duty	0.32	2006.07	Commission of Excise , Raipur.
9		Excise duty	0.25	2005-06 to 2007-08	Commission of Excise , Raipur.
10		Excise & Service Tax	1.48	2010-11	Commission of Excise , Raipur.
11		Excise & Service Tax	5.65	2012-13	Commission of Excise , Raipur.
12		Excise & Service Tax	0.80	2011-12 to 2015-16	Commission of Excise , Raipur.
13		Excise & Service Tax	1.79	2016-17	Commission of Excise , Raipur.
14	Central Sales tax & CG VAT Act	Sales Tax	5.23	2005-06	Additional Commissioner of Commercial Tax (Appeal) Raipur.
			132.52		

5. We have also examined the following Restated Standalone Ind AS Financial Information set out in Annexures prepared by the management and approved by the Board of Directors of the Company and annexed to this report relating to the Company as at and for each of the years ended March 31, 2018, 2017 and 2016:

1. Restated Standalone Ind AS Summary Statement of Assets and Liabilities in **Annexure 1**;
2. Restated Standalone Ind AS Summary Statement of Profit and Loss in **Annexure 2**;
3. Restated Standalone Ind AS Statement of in Statement of Cash Flows **Annexure 3**;
4. Restated Standalone Ind AS Summary Changes In Equity in **Annexure 4**;
5. Notes to the Standalone Ind AS Financial Information - Significant Accounting Policies in **Annexure 5**;
6. Statement of Restatement Adjustments to Audited Ind AS Standalone Financial Statements in **Annexure 6;**
7. Restated Standalone Ind AS Statement of Property, Plant and Equipment included in **Annexure 7**;
8. Restated Standalone Ind AS Statement of Intangible Assets included in **Annexure 7**;
9. Restated Standalone Ind AS Statement of Non-Current Investments included in **Annexure 8**;
10. Restated Standalone Ind AS Statement of Other Non-Current Financial Assets included in **Annexure 9**;
11. Restated Standalone Ind AS Statement of Other Non-Current Assets included in **Annexure 10**;
12. Restated Standalone Ind AS Statement of Inventories included in **Annexure 11**;
13. Restated Standalone Ind AS Statement of Trade Receivables included in **Annexure 12**;
14. Restated Standalone Ind AS Statement of Cash and Bank Balances included in **Annexure 13**;
15. Restated Standalone Ind AS Statement of Current Loans included in **Annexure 14**;
16. Restated Standalone Ind AS Statement of Other Current Financial Assets included in **Annexure 15**;
17. Restated Standalone Ind AS Statement of Other Current Assets included in **Annexure 16**;
18. Restated Standalone Ind AS Statement of Equity Share Capital included in **Annexure 17**;
19. Restated Standalone Ind AS Statement of Other Equity included in **Annexure 18**;
20. Restated Standalone Ind AS Statement of Borrowings included in **Annexure 19**;
21. Restated Standalone Ind AS Statement of Long Term Provisions included in **Annexure 20**;
22. Restated Standalone Ind AS Statement of Deferred Tax Liabilities (Net) included in **Annexure 21**;
23. Restated Standalone Ind AS Statement of Other Long Term Liability included in **Annexure 22**;
24. Restated Standalone Ind AS Statement of Short Term Borrowing included in **Annexure 23**;
25. Restated Standalone Ind AS Statement of Trade Payable included in **Annexure 24**;
26. Restated Standalone Ind AS Statement of Other Current Financial Liabilities included in **Annexure 25;**

27. Restated Standalone Ind AS Statement of Other Current Liabilities included in **Annexure 26;**
28. Restated Standalone Ind AS Statement of Short Term Provisions included in **Annexure 27;**
29. Restated Standalone Ind AS Statement of Revenue from Operations included in **Annexure 28**;
30. Restated Standalone Ind AS Statement of Other Income included in **Annexure 29**;
31. Restated Standalone Ind AS Statement of Cost of Material Consumed included in **Annexure 30**;
32. Restated Standalone Ind AS Statement of Increase/Decrease in Stock included in **Annexure 31;**
33. Restated Standalone Ind AS Statement of Employee Benefit Expenses included in **Annexure 32**;
34. Restated Standalone Ind AS Statement of Finance Cost included in of **Annexure 33**;
35. Restated Standalone Ind AS Statement of Other Expenses included in **Annexure 34**;
36. Restated Standalone Ind AS Statement of Current Tax included in **Annexure 35**;
37. Restated Standalone Ind AS Statement of Earning Per Share included in **Annexure 36**;
38. Restated Standalone Ind AS Statement of First time adoption of Ind AS included in **Annexure 37**;
39. Restated Standalone Ind AS Statement of Gratuity disclosure included in **Annexure 38**;
40. Restated Standalone Ind AS Statement of Financial Risk Management Policies & Objectives included in **Annexure 39**;
41. Restated Standalone Ind AS Statement of Capital Management included in **Annexure 40**;
42. Restated Standalone Ind AS Statement of Financial Instruments included in **Annexure 41**;
43. Restated Standalone Ind AS Statement of Payment to Auditors included in **Annexure 42**;
44. Restated Standalone Ind AS Statement of Related Parties included in **Annexure 43**;
45. Restated Standalone Ind AS Statement of Contingent Liabilities included in **Annexure 44**;
46. Restated Standalone Ind AS Statement of Segment Reporting included in **Annexure 45;**
47. Restated Standalone Ind AS Statement of Capitalization included in **Annexure 46**;
48. Restated Standalone Ind AS Statement of Tax Shelter included in **Annexure 47;**
49. Restated Standalone Ind AS Statement of Accounting Ratios included in **Annexure 48;**
50. Restated Standalone Ind AS Statement of Other Notes included in **Annexure 49;**

6. According to the information and explanations given to us and also as per the reliance placed on the statutory audit reports of the previous auditors furnished to us and representations made by the Company's management, in our opinion, the Restated Standalone Ind AS Financial Information and the abovementioned restated Ind AS financial information contained in Annexures 1 to 49 accompanying this report, read with Summary of Significant Accounting Policies disclosed in **Annexure 5**, are prepared after making adjustments and regroupings as considered appropriate and disclosed in **Annexure 6** and have been prepared in accordance with Section 26 of Part I of Chapter III of the Act, the SEBI ICDR Regulations and the Guidance Note and in all material respect, give a true and fair view in conformity with Ind AS, of the state of affairs of the company as at March 31, 2018, 2017 and 2016 and its profit, total comprehensive income, the changes in equity and its cash flows for the year ended March 31, 2018, 2017 and 2016.

7. This report should not in any way be construed as a re-issuance or re-dating of any of the previous audit reports issued by the previous auditors of the Company or by us nor should it be construed as a new opinion on any of the financial statements referred to therein.

8. We have no responsibility to update our report for events and circumstances occurring after the date of the report.

9. Our report is intended solely for use of the management for inclusion in the offer document to be filed with SEBI, National Stock Exchange of India Limited and BSE Limited in connection with the proposed IPO of the Company. Our report should not be used, referred to or distributed for any other purpose except with our prior consent in writing.

For S S S D & CO.
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2, 2018

Annexure 1
Restated Standalone Ind AS Summary Statement of Assets and Liabilities

(₹ in Million)

Particulars	Annexure	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
I. ASSETS				
(1) Non-current Assets				
(a) Property, Plant & Equipment	7	8,622.48	8,904.03	8,985.86
(b) Capital work-in-progress	7	167.85	91.18	235.54
(c) Investment Property	7	189.83	193.01	196.19
(d) Intangible Assets	7	142.21	147.21	152.21
(e) Financial Assets				
(i) Investments	8	2,407.98	208.70	134.15
(ii) Others	9	47.45	48.25	43.92
(f) Deferred Tax Assets (Net)		-	35.89	83.89
(g) Other Non-current assets	10	162.94	34.49	50.15
Total Non-Current Assets		**11,740.74**	**9,662.77**	**9,881.92**
(2) Current Assets				
(a) Inventories	11	2,418.74	2,099.08	2,433.84
(b) Financial Assets				
(i) Trade Receivables	12	710.97	517.26	479.56
(ii) Cash and cash equivalents	13	15.82	13.06	17.56
(iii) Bank Balance other than	13	144.97	175.14	158.35
Cash & Cash Equivalent				
(iv) Loans	14	269.32	2,477.93	1,455.09
(v) Other Financial Assets	15	24.34	38.65	66.61
(c) Current Tax Assets (Net)		-	68.03	100.21
(d) Other current assets	16	871.67	1,012.19	1,077.53
Total Current Assets		**4,455.82**	**6,401.33**	**5,788.75**
	Total	**16,196.57**	**16,064.10**	**15,670.67**
II. EQUITY AND LIABILITIES				
(1) Equity				
(a) Equity Share Capital	17	130.71	130.71	130.71
(b) Other Equity	18	5,845.68	5,081.95	4,758.50
Total Equity		**5,976.39**	**5,212.66**	**4,889.21**
(2) Non-Current Liabilities				
(a) Financial Liabilities				
(i) Borrowings	19	4,136.05	4,369.05	4,749.95
(b) Provisions	20	55.57	44.57	32.72
(c) Deferred Tax Liabilities (Net)	21	158.52	-	-
(d) Other Long-Term Liabilitie	22	60.80	60.80	60.80
Total Non-Current Liabilities		**4,410.95**	**4,474.42**	**4,843.47**

(3) Current Liabilities				
(a) Financial Liabilities				
(i) Borrowings	23	2,843.64	3,393.64	3,494.91
(ii) Trade Payable	24	2,009.98	1,915.60	1,568.85
(ii) Other Financial Liabilities	25	608.60	752.42	643.91
(c) Other Current Liabilities	26	196.29	286.01	205.88
(d) Provisions	27	30.76	29.35	24.45
(e) Current Tax Liabilities (net)		119.95	-	-
Total Current Liabilities		**5,809.23**	**6,377.02**	**5,938.00**
Total		**16,196.57**	**16,064.10**	**15,670.67**

The above should be read with Restatement Adjustments to Audited Ind AS Standalone Financial Statements appearing in Annexure 6 and Significant Accounting Policies and Notes forming part of the Restated Standalone Financial Statements.

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2, 2018

For and behalf of
Shri Bajrang Power and Ispat Limited

Pawan Goel
Chief Financial Officer

Suresh Goel
Chairman
DIN: 00115834

Parul Verma
Company Secretary

Narendra Goel
Managing Director
DIN : 00115883

Annexure 2

Restated Standalone Ind AS Summary Statement of Profit and Loss

(₹ in Million)

Particulars	Annexure	For the Year Ended 31.03.2018	For the Year Ended 31.03.2017	For the Year Ended 31.03.2016 (Proforma)
I. Revenue from Operations	28	18,299.32	15,604.80	14,106.44
II. Other Income	29	142.67	46.89	47.24
III. Total Revenue (I+II)		**18,441.99**	**15,651.69**	**14,153.68**
IV. Expenses				
Cost of Materials Consumed	30	12,745.79	9,455.66	9,570.27
Purchase of Stock in Trade		201.75	34.66	153.15
(Increase) / Decrease in Stock in Trade	31	(485.18)	508.09	(239.16)
Excise Duty on Sales		523.22	1,681.64	1,519.89
Employees benefit Expenses	32	536.97	445.37	417.36
Financial Costs	33	1,044.01	1,170.83	979.91
Depreciation	7	538.65	539.31	547.24
Other Expenses	34	2,049.18	1,343.90	1,154.69
	Total	**17,154.38**	**15,179.47**	**14,103.36**
V. Profit Before Exceptional and Tax (III-IV)		**1,287.60**	**472.22**	**50.32**
VI. Exceptional items		-	-	6.67
VII. Profit Before Tax (VII- VIII)		**1,287.60**	**472.22**	**43.65**
VIII. Tax expenses:				
Net current Tax		294.35	113.05	8.66
Deferred Tax		194.38	47.95	229.26
IX. Profit (Loss) for the period (VII-VIII)		**798.87**	**311.22**	**(194.28)**
X. Other Comprehensive Income:				
(i) Items that will not be reclassified to profit or loss				
a) Re-measurements of the defined benefit plans		**(2.56)**	**(1.40)**	**-**
b) Equity instruments through other comprehensive income		0.10	0.13	0.06
c) Income tax relating to items that will not be reclassified to profit or loss		(0.03)	(0.05)	(0.02)
		(2.49)	**(1.31)**	**0.04**
(ii) Items that will be reclassified to profit or loss		**-**	**-**	**-**
XI. Total Comprehensive Income for the year		**796.38**	**309.90**	**(194.24)**
XII. Basic / Diluted Earnings per Equity Share		**60.93**	**23.71**	**(14.86)**

The above should be read with Restatement Adjustments to Audited Ind AS Standalone Financial Statements appearing in Annexure 6 and Significant Accounting Policies and Notes forming part of the Restated Standalone Financial Statements.

For S S S D & CO **Chartered Accountants** **Firm Registration Number: 020203C**	**For and behalf of** **Shri Bajrang Power and Ispat Limited**	
	Pawan Goel **Chief Financial Officer**	**Suresh Goel** **Chairman** **DIN: 00115834**
Vidhan Chandra Srivastava **Partner** **Membership Number: 073712** **Place: Raipur** **Date: September 2, 2018**	**Parul Verma** **Company Secretary**	**Narendra Goel** **Managing Director** **DIN : 00115883**

Annexure 3

Restated Standalone Ind AS Summary Statement of Cash Flows

(₹ in Million)

	As at	**As at**	**As at**
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
A CASH FLOW FROM OPERATING ACTIVITIES			
Net Profit before Tax	1,287.60	472.22	43.65
ADJUSTMENTS FOR:			
Depreciation	538.65	539.31	547.24
Financial Costs	1,044.01	1,170.83	979.91
Interest Income	(79.05)	(42.94)	(32.09)
Provision for Bad & Doubtful Debt	1.94	0.38	4.84
Bad Debts Written Off	(1.39)	-	-
Equity instruments through Other comprehensive income	0.10	0.13	0.06
Re-measurements of the defined benefit plans	(2.56)	(1.40)	-
Other Adjustment due to Restatement	(32.65)	2.55	(0.44)
Income Disclosed Under IDS (Net of Tax)	-	11.00	-
Dividend Income	(0.00)	(0.00)	(0.00)
Profit/(Loss) on Sale of Investment	-	-	8.06
Profit/(Loss) on Sale of Fixed Asset	9.50	0.31	7.10
OPERATING PROFIT BEFORE WORKING CAPITAL CHANGES	**2,766.15**	**2,152.40**	**1,558.34**
ADJUSTMENTS FOR CHANGE IN CURRENT ASSETS& LIABILITIES:			
(Increase)/Decrease in Inventories	(319.65)	334.75	(323.94)
(Increase)/Decrease in Trade Receivables	(194.26)	(38.08)	347.77
(Increase)/Decrease in Other Current Assets	2,472.29	(897.35)	(632.35)
Increase/(Decrease) in Current Liabilities & Provisions	(58.62)	540.29	(275.72)
Increase/(Decrease) in Non Current Provisions	11.00	11.85	11.29
CASH GENERATED FROM OPERATIONS	**4,676.91**	**2,103.86**	**685.38**
Direct Taxes Paid/Deducted at Source	294.35	113.05	8.66
NET CASH FROM OPERATING ACTIVITIES	**4,382.56**	**1,990.81**	**676.72**
B CASH FLOW FROM INVESTING ACTIVITIES			
Deletion/(Addition) to Tangible Assets	(391.65)	(331.28)	(580.17)
Increase/(Decrease) in Long-Term Loans & Advances	(127.65)	11.33	69.67
Sale of Tangible Asset	56.57	26.02	79.76
Dividend Income	0.00	0.00	0.00
Interest Income	79.05	42.94	32.09
(Increase) / Decrease in Bank Balance other than Cash & Cash Equivalent	30.16	(16.79)	(26.55)
(Purchase)/Sale of Non-current Investments	(2,199.29)	(74.54)	9.29
NET CASH USED IN INVESTING ACTIVITIES	**(2,552.79)**	**(342.31)**	**(415.92)**
C CASH FLOW FROM FINANCING ACTIVITIES			
Proceeds from Long-Term Borrowings (Net)	(233.00)	(380.90)	93.44
Increase/(Decrease) in Short-Term Borrowings	(550.00)	(101.27)	348.76
Financial Costs	(1,044.01)	(1,170.83)	(979.91)
NET CASH USED IN FINANCING ACTIVITIES	**(1,827.00)**	**(1,653.00)**	**(537.72)**
NET INCREASE / (DECREASE) IN CASH &			
CASH EQUIVALENTS (A+B+C)	**2.77**	**(4.51)**	**(276.91)**
Cash and Cash Equivalents at the beginning of the year	**13.06**	**17.56**	**294.47**
Cash and Cash Equivalents at the end of the year	**15.82**	**13.06**	**17.56**

Components of cash and cash equivalents as at			
Cash in hand	3.29	4.05	8.80
With bank: On Current Account	12.53	9.01	8.76
	15.82	**13.06**	**17.56**

Notes to cash flow statement

1. Figures for the previous year have been regrouped/ rearranged wherever found necessary.
2. The Cash Flow Statement has been prepared under the "Indirect Method" as set out in IND AS - 7 on Cash Flow Statement issued by the Institute of Chartered Accountants of India.

The above should be read with Restatement Adjustments to Audited Ind AS Standalone Financial Statements appearing in Annexure 6 and Significant Accounting Policies and Notes forming part of the Restated Standalone Financial Statements.

For S S S D & CO **Chartered Accountants** **Firm Registration Number: 020203C**	**For and behalf of** **Shri Bajrang Power and Ispat Limited**	
	Pawan Goel **Chief Financial Officer**	**Suresh Goel** **Chairman** **DIN: 00115834**
Vidhan Chandra Srivastava **Partner** **Membership Number: 073712**		
Place: Raipur **Date: September 2, 2018**	**Parul Verma** **Company Secretary**	**Narendra Goel** **Managing Director** **DIN : 00115883**

Annexure 4
Restated Standalone Ind AS Statement of Changes in Equity

A. Equity Share Capital

(₹ in Million)

Particulars	**Balance as on**	**Movement**	**Balance as on**	**Movement**	**Balance as on**
	01/04/2016	**during the year**	**31/03/2017**	**during the year**	**31/03/2018**
Equity Share Capital	130.71	-	130.71	-	130.71

B. Other Equity

(₹ in Million)

	Reserve & Surplus					**Other**	**Total Equity**
Particulars	**Retained Earnings**	**Securities Premium Reserve**	**Amalgamation Reserve**	**Capital Redemption Reserve**	**Revaluation Reserve**	**Comprehensive Income**	**Attributable to Equity Holder of the Company**
Balance as on April 1, 2015	**2,461.64**	**1,455.83**	**110.74**	**111.90**	**-**	**-**	**4,140.11**
Impact of Restatement of Financial Statement	(0.44)	-	-	-	-	-	**(0.44)**
Profit/(loss) for the period	(194.28)	-	-	-	813.07	-	**618.79**
Other comprehensive income For the Year	(0.02)	-	-	-	-	0.06	**(0.04)**
Balance as on March 31, 2016	**2,266.90**	**1,455.83**	**110.74**	**111.90**	**813.07**	**0.06**	**4,758.50**
Impact of Restatement of Financial Statement	2.55	-	-	-	-	-	**2.55**
Profit/(loss) for the period	311.22	-	-	-	-	-	**311.22**
Income Disclosed under IDS (Net of Tax)	11.00	-	-	-	-	-	**11.00**
Other comprehensive income For the Year	-	-	-	-	-	(1.31)	**(1.31)**
Balance as of March 31, 2017	**2,591.67**	**1,455.83**	**110.74**	**111.90**	**813.07**	**(1.26)**	**5,081.95**
Impact of Restatement of Financial Statement	(32.65)	-	-	-	-	-	**(32.65)**
Profit/(loss) for the period	798.87	-	-	-	-	-	**798.87**

Other comprehensive income For the Year	-	-	-	-	-	(2.49)	**(2.49)**
Balance as of March 31, 2018	**3,357.89**	**1,455.83**	**110.74**	**111.90**	**813.07**	**(3.75)**	**5,845.68**

Annexure 5
Notes to the Restated Standalone IGAAP Financial Information - Significant Accounting Policies

1. **CORPORATE INFORMATION**
Shri Bajrang Power & Ispat Limited is a public limited company(CIN : U27106CT2002PLC015184) ("**Company**") having its registered office at Village Borjhara, Urla Industrial Area, Borjhara, Raipur (Chhattisgarh) and its places of business are UNIT-I at Borjhara, UNIT-II (TMT) at Gondwara, & UNIT-III at Tilda. The company is engaged in manufacturing of Sponge Iron, Billets, Pellets, TMT Bars, Wire rod, Ferro Alloys, Fly Ash Bricks and generation of electricity. The Company is having its major operation in steel, power & other incidental & ancillary operations related to steels & mining. During the year research & development activities have been started in UNIT - I (Borjhara).

2. **SIGNIFICANT ACCOUNTING POLICIES**
2.1 BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES

i. The financial statements are prepared in accordance with Indian Accounting Standards (Ind AS) notified under the Companies (Indian Accounting Standards) Rules, 2015
ii. For all periods upto and including the year ended March 31, 2017, the company prepared its financial statements in accordance with accounting standards notified as Companies (Accounting Standards) Rules, 2006 and considered as "Previous GAAP".
iii. These financial statements for the year ended March 31, 2018 are the Company's first Ind AS standalone financial statements.
iv. The standalone financial statements have been prepared on a historical cost basis, except for the following assets and liabilities which have been measured at fair value:
- Certain financial assets and liabilities (including derivative instruments) and -
Defined benefit plans - plan assets

v. The Company's financial statements are presented in Indian Rupees (₹), which is also its functional currency.

2.2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

a. Property, Plant and Equipment (PPE)

i. Property, plant and equipment are stated at cost, net of recoverable taxes, trade discount and rebates less accumulated depreciation and impairment losses, if any. Such cost includes purchase price, borrowing cost and any cost directly attributable to bringing the assets to its working condition for its intended use, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the assets.

ii. 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 entity and the cost can be measured reliably. In the carrying amount of an item of PPE, the cost of replacing the part of such an item is recognized when that cost is incurred if the recognition criteria are met. The carrying amount of those parts that are replaced is derecognized in accordance with the de-recognition principles.

iii. Expenses incurred relating to project, net of income earned during the project development stage prior to its intended use, are considered as pre - operative expenses and disclosed under Capital Work - in - Progress.

iv. Depreciation on property, plant and equipment is provided using straight line method. Depreciation is provided based on useful life of the assets as prescribed in Schedule II to the Companies Act, 2013 except, in respect of Rolls (Rolling Mill Division), where useful life taken for one year only as per the technical advice. Each part of an item of Property, Plant & Equipment with a cost that is significant in relation to total cost of the Machine is depreciated separately, if its useful life is different than the life of the Machine.

v. The residual values, useful lives and methods of depreciation of property, plant and equipment are reviewed at each financial year end and adjusted prospectively, if appropriate.

vi. Gains or losses arising from derecognition of a property, plant and equipment are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognized in the Statement of Profit and Loss when the asset is derecognised.

vii. Spare parts procured along with the Plant & Machinery or subsequently which meet the recognition criteria are capitalized and added in the carrying amount of such item. The carrying amount of those spare parts that are replaced is derecognized when no future economic benefits are expected from their use or upon disposal. Other machinery spares are treated as "stores & spares" forming part of the inventory.

viii. The Company has adopted a revaluation model for Freehold Land, wherein the assets which have been revalued shall be reviewed on an periodical basis and any accretion or decretion in value arising out of such revaluation shall be credited / debited to the revaluation reserve.

b. Leases

i. Leases are classified as finance leases whenever the terms of the lease, transfers substantially all the risks and rewards of ownership to the lessee. All other leases are classified as operating leases.

ii. Leased assets: Assets held under finance leases are initially recognized as assets of the Company at their fair value at the inception of the lease or, if lower, at the present value of the minimum lease payments. The corresponding liability to the lessor is included in the balance sheet as a finance lease obligation.

iii. Lease payments are apportioned between finance expenses and reduction of the lease obligation so as to achieve a constant rate of interest on the remaining balance of the liability. Finance expenses are recognized immediately in Statement of Profit and Loss, unless they are directly attributable to qualifying assets, in which case they are capitalized. Contingent rentals are recognized as expenses in the periods in which they are incurred.

iv. 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.

v. Operating lease payments are recognized as an expense in the Statement of Profit and Loss on a straight-line basis over the lease term except where another systematic basis is more representative of time pattern in which economic benefits from the leased assets are consumed.

c. Intangible assets

i. Intangible Assets are stated at cost of acquisition net of recoverable taxes, trade discount and rebates less accumulated amortization /depletion and impairment loss, if any. Such cost includes purchase price, borrowing costs, and any cost directly attributable to bringing the asset to its working condition for the intended use, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the intangible assets.

ii. 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 entity and the cost can be measured reliably.

iii. 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 recognized in the Statement of Profit and Loss when the asset is derecognised

d. Capital Work in Progress

i. Expenditure incurred on assets under construction (including a project) is carried at cost under Capital Work in Progress. Such costs comprises purchase price of asset including import duties and non-refundable taxes after deducting trade discounts and rebates and costs that are directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

ii. Cost directly attributable to projects under construction include costs of employee benefits, expenditure in relation to survey and investigation activities of the projects, cost of site preparation, initial delivery and handling charges, installation and assembly costs, professional fees, expenditure on maintenance and up-gradation etc. of common public facilities, depreciation on assets used in construction of project, interest during construction and other costs if attributable to construction of projects. Such costs are accumulated under "Capital works in progress" and subsequently allocated on systematic basis over major assets, other than land and infrastructure facilities, on commissioning of projects.

iii. Capital Expenditure incurred for creation of facilities, over which the Company does not have control but the creation of which is essential principally for construction of the project is capitalized and carried under "Capital work in progress" and subsequently allocated on systematic basis over major assets, other than land and infrastructure facilities, on commissioning of projects, keeping in view the "attributability" and the "Unit of Measure" concepts in Ind AS 16- "Property, Plant & Equipment". Expenditure of such nature incurred after completion of the project, is charged to Statement of Profit and Loss.

e. Research and Development Expenditure

Revenue expenditure pertaining to research is charged to the Statement of Profit and Loss. Development costs of products are charged to the Statement of Profit and Loss unless a product's technological and commercial feasibility has been established, in which case such expenditure is capitalised.

f. Finance Cost

i. Borrowing costs include exchange differences arising from foreign currency borrowings to the extent they are regarded as an adjustment to the interest cost. 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. A qualifying asset is one that necessarily takes substantial period of time to get ready for its intended use.

ii. Interest income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalisation.

iii. All other borrowing costs are expensed in the period in which they occur.

g. Inventories

i. Items of inventories are measured at lower of cost and net realisable value after providing for obsolescence, if any, except in case of by-products which are valued at net realisable value. Cost of inventories comprises of cost of purchase, cost of conversion and other costs including manufacturing overheads net of recoverable taxes incurred in bringing them to their respective present location and condition.

ii. Cost of raw materials, stores and spares, packing materials, trading and other products are determined at Cost, with moving average price on FIFO basis

iii. Cost of Finished Goods includes direct materials, labours, conversion and proportion of manufacturing overheads incurred in bringing the inventories to their present location and condition.

h. Impairment of non-financial assets - property, plant and equipment and intangible assets

i. The Company assesses at each reporting date as to whether there is any indication that any property, plant and equipment and intangible assets or group of assets, called Cash Generating Units (CGU) may be impaired. If any such indication exists the recoverable amount of an asset or CGU is estimated to determine the extent of impairment, if any. When it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the CGU to which the asset belongs.

ii. An impairment loss is recognized in the Statement of Profit and Loss to the extent, asset's carrying amount exceeds its recoverable amount. The recoverable amount is higher of an asset's fair value less cost of disposal and value in use. Value in use is based on the estimated future cash flows, discounted to their present value using pre-tax discount rate that reflects current market assessments of the time value of money and risk specific to the assets.

iii. The impairment loss recognized in prior accounting period is reversed if there has been a change in the estimate of recoverable amount.

i. Provisions, Contingent Liabilities and Contingent Assets and Commitments

i. Provisions are recognized when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. Such provisions are determined based on management estimate of the amount required to settle the obligation at the balance sheet date. When the Company expects some or all of a provision to be reimbursed, the reimbursement is recognized as a standalone asset only when the reimbursement is virtually certain.

ii. 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.

iii. Contingent liabilities are disclosed on the basis of judgment of management. These are reviewed at each balance sheet date are adjusted to reflect the current management estimate.

iv. Contingent assets are not recognized but are disclosed in the financial statements when inflow of economic benefits is probable.

j. Income Taxes

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

i. Current tax

Current tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities, based on tax rates and laws that are enacted or substantively enacted at the Balance sheet date.

ii. Deferred tax

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realized, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period. The carrying amount of deferred tax liabilities and assets are reviewed at the end of each reporting period.

k. Foreign Currency Transactions

v. Transactions in foreign currencies are initially recorded at the exchange rate prevailing on the date of transaction. Monetary assets and liabilities denominated in foreign currencies are translated at the functional currency closing rates of exchange at the reporting date.

vi. Exchange differences arising on settlement or translation of monetary items are recognized in Statement of Profit and Loss except to the extent of exchange differences which are regarded as an adjustment to interest costs on foreign currency borrowings that are directly attributable to the acquisition or construction of qualifying assets, are capitalized as cost of assets.

vii. Non-monetary items that are measured in terms of historical cost in a foreign currency are recorded using the exchange rates at the date of the transaction. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was measured. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e., translation differences on items whose fair value gain or loss is recognized in OCI or Statement of Profit and Loss are also recognized in OCI or Statement of Profit and Loss, respectively).

l. Employee Benefits Expense

Short Term Employee Benefits
The undiscounted amount of short term employee benefits expected to be paid in exchange for the services rendered by employees are recognized as an expense during the period when the employees render the services.

Post-Employment Benefits
Defined Contribution Plans
A defined contribution plan is a post-employment benefit plan under which the Company pays specified contributions to a separate entity. The Company makes specified monthly contributions towards Provident Fund, Superannuation Fund and Pension Scheme. The Company's contribution is recognized as an expense in the Statement of Profit and Loss during the period in which the employee renders the related service.

Defined Benefits Plans
"The cost of the defined benefit plan and other post-employment benefits and the present value of such obligation are determined using actuarial valuations. An actuarial valuation involves making various assumptions that may differ from actual developments in the future. These include the determination of the discount rate, future salary increases, mortality rates and future pension increases. Due to the complexities involved in the valuation and its long-term nature, a defined benefit obligation is highly sensitive to changes in these assumptions. All assumptions are reviewed at each reporting date.
The liability in respect of gratuity and other post-employment benefits is calculated using the Projected Unit Credit Method and spread over the period during which the benefit is expected to be derived from employees' services.
Re-measurement of defined benefit plans in respect of post- employment are charged to the Other Comprehensive Income.

Value of encashable leave are encashed during the year is equivalent to one month salary and charged to Profit & Loss Account.

m. Mining Assets

i. Exploration and Evaluation Assets

Upon obtaining the legal rights to explore a specific area but before the technical feasibility and commercial viability of extracting a mineral resource are demonstrable, the expenditure incurred on finding specific mineral resources are capitalized as Exploration and Evaluation Assets. These expenditure include expenses on acquisition of rights to explore; topographical, geological, geochemical and geophysical studies; exploratory drilling; trenching; sampling; activities in relation to evaluating the technical feasibility and commercial viability of extracting a mineral resource and such other related expenses. When the technical feasibility and commercial viability of extracting a mineral resource are demonstrated, the Exploration and Evaluation Assets are reclassified as part of the right to mine.
At the initial recognition the Exploration and Evaluation Assets are measured at cost. After recognition, the company continues to use the cost model.

Exploration and Evaluation Assets are assessed for impairment when facts and circumstances suggest that the carrying amount of such assets may exceed its recoverable amount.

After the reclassification of the Exploration and Evaluation Assets as part of the Right to Mine, the cost is then amortized over the remaining useful life of the mining rights.

ii. Stripping Activity

During the development phase of the mine (before production begins), stripping costs are capitalized as part of the cost of right to mine.

During the production phase, two benefits accrue from the stripping activity: usable ore that can be used to produce inventory and improved access to further quantities of material that will be mined in future periods.

To the extent that the benefit from the stripping activity is realized in the form of inventory produced, the costs of that stripping overburden removal activity is accounted for in accordance with the principles of Ind AS 2, Inventories.

To the extent the benefit is improved access to ore, these costs are recognized as Stripping Activity Asset, if the following criteria are met:-

- it is probable that the future economic benefit (improved access to the ore body) associated with the stripping activity will flow;
- the component of the ore body for which access has been improved can be identified; and
- the costs relating to the stripping activity associated with that component can be measured reliably.

The Stripping Cost capitalized during the development phase or during the production phase is amortized using the units or production method.

In accordance with Ind AS 101 First Time Adoption of Ind AS, the previously recognized asset balance that resulted from stripping activity undertaken during the production phase ('predecessor stripping asset' classified as Iron Ore Mines under Intangible Assets) is reclassified as a part of an existing asset i.e. Right to Mine to which the stripping activity relates, to the extent that there remains an identifiable component of the ore body with which the predecessor stripping asset can be associated. Such balances will be amortised over the remaining expected useful life of the Right to Mine.

n. Revenue recognition

Revenue from sale of goods is recognized when the significant risks and rewards of ownership have been transferred to the buyer, recovery of the consideration is probable, the associated cost can be estimated reliably, there is no continuing effective control or managerial involvement with the goods, and the amount of revenue can be measured reliably.

Revenue from rendering of services is recognized when the performance of agreed contractual task has been completed.
Revenue from sale of goods is measured at the fair value of the consideration received or receivable, taking into account contractually defined terms of payment and excluding taxes or duties collected on behalf of the government.

Revenue from operations includes sale of goods, services, service tax, excise duty and adjusted for discounts (net), and gain/ loss on corresponding hedge contracts.

Revenue from Power Supply is accounted for on the basis of billing to consumers and generally all consumers are billed on the basis of recording of consumption of energy by installed meters. Shortfall of Power Unit supplied and Actual Received is recorded as Power Sale Discount and its charges recorded in Profit and Loss Account."

o. Interest income
Interest income from a financial asset is recognized using effective interest rate (EIR) method.

p. Dividends
Revenue is recognized when the Company's right to receive the payment has been established, which is generally when shareholders approve the dividend.

q. Carbon Credit (Certified Emission Reduction)
Revenue is recognized in accordance with Approved Consolidated Monitoring Methodology issued by United Nation Framework Convention of Climate Change (UNFCCC) on receipt basis.

r. Renewable Energy Certificates
Revenue is recognized when the Company Sold certification of quantity of Renewable Energy Certificates.

s. Insurance Claims
Insurance claims are accounted for on the basis of claims admitted/ expected to be admitted to the extent that there is no uncertainty in receiving the claims.

t. Financial Instruments

i. Financial Assets

A. Initial recognition and measurement

All financial assets and liabilities are initially recognized at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities, which are not at fair value through profit or loss, are adjusted to the fair value on initial recognition. Purchase and sale of financial assets are recognized using trade date accounting.

B. Subsequent measurement

Financial assets carried at amortized cost

A financial asset is measured at amortized cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Financial assets at fair value through other comprehensive income (FVTOCI)

A financial asset is measured at FVTOCI 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.

Financial assets at fair value through profit or loss (FVTPL)

A financial asset not classified as either amortized cost or FVOCI, is classified as FVTPL.

C. Investment in subsidiaries, Associates and Joint Ventures

The Company has elected to measure investment in subsidiaries, joint venture and associate at cost. On the date of transition, the fair value has been considered as deemed cost.
Investment in Equity shares & Mutual Funds etc., are classified at fair value through the profit and loss account."

D. Other Equity Investments

All other equity investments are measured at fair value, with value changes recognized in Statement of Profit and Loss, except for those equity investments for which the Company has elected to present the value changes in 'Other Comprehensive Income'.

E. Impairment of financial assets

In accordance with Ind AS 109, the Company uses 'Expected Credit Loss' (ECL) model, for evaluating impairment of financial assets other than those measured at fair value through profit and loss (FVTPL).

Expected credit losses are measured through a loss allowance at an amount equal to:

- The 12-months expected credit losses (expected credit losses that result from those default events on the financial instrument that are possible within 12 months after the reporting date); or
- Full lifetime expected credit losses (expected credit losses that result from all possible default events over the life of the financial instrument)

For trade receivables Company applies 'simplified approach' which requires expected lifetime losses to be recognized from initial recognition of the receivables. The Company uses historical default rates to determine impairment loss on the portfolio of trade receivables. At every reporting date these historical default rates are reviewed and changes in the forward looking estimates are analyzed.

For other assets, the Company uses 12 month ECL to provide for impairment loss where there is no significant increase in credit risk. If there is significant increase in credit risk full lifetime ECL is used.

ii. Financial Liabilities

A. Initial recognition and measurement

All financial liabilities are recognized at fair value and in case of loans, net of directly attributable cost. Fees of recurring nature are directly recognized in the Statement of Profit and Loss as finance cost.

B. Subsequent measurement

Financial liabilities are carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

Derivative financial instruments and Hedge Accounting

The Company uses various derivative financial instruments such as interest rate swaps, currency swaps, forwards & options and commodity contracts to mitigate the risk of changes in interest rates, exchange rates and commodity prices. Such derivative financial instruments are initially recognized at fair value on the date on which a derivative contract is entered into and are also subsequently measured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative.
Any gains or losses arising from changes in the fair value of derivatives are taken directly to Statement of Profit and Loss, except for the effective portion of cash flow hedges which is recognized in Other Comprehensive Income and later to Statement of Profit and Loss when the hedged item affects profit or loss or treated as basis adjustment if a hedged forecast

transaction subsequently results in the recognition of a non-financial assets or non-financial liability.

Hedges that meet the criteria for hedge accounting are accounted for as follows:

a. Cash flow hedge

The Company designates derivative contracts or non derivative financial assets / liabilities as hedging instruments to mitigate the risk of movement in interest rates and foreign exchange rates for foreign exchange exposure on highly probable future cash flows attributable to a recognized asset or liability or forecast cash transactions. When a derivative is designated as a cash flow hedging instrument, the effective portion of changes in the fair value of the derivative is recognized in the cash flow hedging reserve being part of other comprehensive income. Any ineffective portion of changes in the fair value of the derivative is recognized immediately in the Statement of Profit and Loss. If the hedging relationship no longer meets the criteria for hedge accounting, then hedge accounting is discontinued prospectively. If the hedging instrument expires or is sold, terminated or exercised, the cumulative gain or loss on the hedging instrument recognized in cash flow hedging reserve till the period the hedge was effective remains in cash flow hedging reserve until the underlying transaction occurs. The cumulative gain or loss previously recognized in the cash flow hedging reserve is transferred to the Statement of Profit and Loss upon the occurrence of the underlying transaction. If the forecasted transaction is no longer expected to occur, then the amount accumulated in cash flow hedging reserve is reclassified in the Statement of Profit and Loss.

b. Value "Fair Hedge

The Company designates derivative contracts or non derivative financial assets / liabilities as hedging instruments to mitigate the risk of change in fair value of hedged item due to movement in interest rates, foreign exchange rates and commodity prices.

Changes in the fair value of hedging instruments and hedged items that are designated and qualify as fair value hedges are recorded in the Statement of Profit and Loss. If the hedging relationship no longer meets the criteria for hedge accounting, the adjustment to the carrying amount of a hedged item for which the effective interest method is used is amortized to Statement of Profit and Loss over the period of maturity.

De-recognition of financial instruments

The Company derecognizes a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the financial asset and the transfer qualifies for derecognition under Ind AS 109. A financial liability (or a part of a financial liability) is derecognized from the Company's Balance Sheet when the obligation specified in the contract is discharged or cancelled or expires.

u. Operating Cycle

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

An asset is treated as current when it is:

a. Expected to be realized or intended to be sold or consumed in normal operating cycle;
b. Held primarily for the purpose of trading;
c. Expected to be realized within twelve months after the reporting period, or
d. Cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period All other assets are classified as non-current.

A liability is current when:

a. It is expected to be settled in normal operating cycle;
b. It is held primarily for the purpose of trading;
c. It is due to be settled within twelve months after the reporting period, or
d. There is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period

All other liabilities are classified as non-current.

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

The Company has identified twelve months as its operating cycle.

v. Earnings per Share

Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders by weighted average number of equity shares outstanding during the period. The weighted average number of equity shares outstanding during the period are adjusted for events of bonus issue; bonus element in a right issue to existing shareholders.

For the purpose of calculating diluted earnings per share, the net profit or loss for the year attributable to equity shareholders and the weighted average number of shares outstanding during the year are adjusted for the effects of all dilutive potential equity shares.

w. Borrowing Cost

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 capitalized 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 the company 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.

x. Segment Reporting Policies

Identification of segments: 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 and loss and is measured consistently with profit and loss in the financial statements. The Operating segments have been identified on the basis of the nature of products.

Inter segment Transfers :The Company generally accounts for intersegment sales and transfers as if the sales or transfers were to third parties at current market prices.

Allocation of common costs: Common allocable costs are allocated to each segment according to the relative contribution of each segment to the total common costs.

Unallocated items: The Corporate and Other segment includes general corporate income and expense items which are not allocated to any business segment.

y. Government Grant

Grant from the government are recognized at the fair value where there is a reasonable assurance that the grant will be received and the company will comply with the attached conditions.

z. Dividend Distribution

Dividend distribution to the shareholders is recognized as a liability in the company's financial statements in the period in which the dividends are approved by the company's shareholders.

aa. Statement of Cash Flows

i. Cash and Cash equivalents

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

ii. Statement of Cash Flows is prepared in accordance with the Indirect Method prescribed in the relevant Accounting Standard.

2.3 CRITICAL ACCOUNTING JUDGMENTS AND KEY SOURCES OF ESTIMATION UNCERTAINTY

The preparation of the financial statements in conformity with the Ind AS requires management to make judgments, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities and disclosures as at date of the financial statements and the reported amounts of the revenues and expenses for the years presented. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates under different assumptions and conditions. The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised if the revision affects only that period or in the period of the revision and future periods if the revision affects both current and future periods.

a. Depreciation / amortization and useful lives of property plant and equipment / intangible assets

Property, plant and equipment / intangible assets are depreciated / amortized over their estimated useful lives, after taking into account estimated residual value. Management reviews the estimated useful lives and residual values of the assets annually in order to determine the amount of depreciation / amortization to be recorded during any reporting period. The useful lives and residual values are based on the Company's historical experience with similar assets and take into account anticipated technological changes. The depreciation / amortization for future periods is revised if there are significant changes from previous estimates.

b. Recoverability of trade receivable

Judgments are required in assessing the recoverability of overdue trade receivables and determining whether a provision against those receivables is required. Factors considered include the credit rating of the counterparty, the amount and timing of anticipated future payments and any possible actions that can be taken to mitigate the risk of non-payment.

c. Provisions

Provisions and liabilities are recognized in the period when it becomes probable that there will be a future outflow of funds resulting from past operations or events and the amount of cash outflow can be reliably estimated. The timing of recognition and quantification of the liability requires the application of judgment to existing facts and circumstances, which can be subject to change. The carrying amounts of provisions and liabilities are reviewed regularly and revised to take account of changing facts and circumstances.

d. Impairment of non-financial assets

The Company assesses at each reporting date whether there is an indication that an asset may be impaired. If any indication exists, the Company estimates the asset's recoverable amount. An asset's recoverable amount is the higher of an asset's or Cash Generating Units (CGU's) fair value less costs of disposal and its value in use. It is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or a groups of assets. Where the carrying amount of an asset or CGU exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount.

In assessing value in use, the estimated future cash flows are discounted to their present value using pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. In determining fair value less costs of disposal, recent market transactions are taken into account, if no such transactions can be identified, an appropriate valuation model is used.

e. Impairment of financial assets

The impairment provisions for financial assets are based on assumptions about risk of default and expected cash loss rates. The Company uses judgment in making these assumptions and selecting the inputs to the impairment calculation, based on Company's past history, existing market conditions as well as forward looking estimates at the end of each reporting period.

f. Measurement of defined benefit obligations

The measurement of defined benefit and other post-employment benefits obligations are determined using actuarial valuations. An actuarial valuation involves making various assumptions that may differ from actual developments in the future. These include the determination of the discount rate, future salary increases, mortality rates and future pension increases. Due to the complexities involved in the valuation and its long-term nature, a defined benefit obligation is highly sensitive to changes in these assumptions. All assumptions are reviewed at each reporting date.

2.4 First Time adoption of Ind AS

The Company has adopted Ind AS with effect from 1st April 2017 with comparatives being restated. Accordingly the impact of transition has been provided in the Opening Reserves as at 1st April 2016. The figures for the previous period have been restated, regrouped and reclassified wherever required to comply with the requirement of Ind AS and Schedule III.

a. Exemptions from retrospective application

i. Business combination exemption

The Company has applied the exemption as provided in Ind AS 101 on non-application of Ind AS 103, "Business Combinations" to business combinations consummated prior to April 1, 2016 (the "Transition Date"), pursuant to which goodwill/capital reserve arising from a business combination has been stated at the carrying amount prior to the date of transition under Indian GAAP. The Company has also applied the exemption for past business combinations to acquisitions of investments in subsidiaries / associates / joint ventures consummated prior to the Transition Date

ii. Fair value as deemed cost exemption

The Company has elected to measure items of property, plant and equipment and intangible assets at its carrying value at the transition date.

iii. Cumulative translation differences

The Company has elected to apply Ind AS 21 - The Effects of changes in Foreign Exchange Rate prospectively. Accordingly all cumulative gains and losses recognized are reset to zero by transferring it to retained earnings.

iv. Investments in subsidiaries, joint ventures and associates

The Company has elected to measure investment in subsidiaries, joint venture and associate at fair value.

Annexure 6
Statement of Restatement Adjustments to Audited Ind AS Standalone Financial Information

The summary of results of restatement made in the audited previous Ind AS standalone financial statements for the respective years and its impact on the profit of the Company is as follows:

(₹ in Million)

	FY Ended	FY Ended	FY Ended
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Net Profit/(loss) as per audited financial statement	**773.56**	**408.34**	**(194.71)**
Restated Adjustment:			
A) Audit Qualification			
---Recognition of Uncertified unit of CER	-	-	-
Sub total (A)	**-**	**-**	**-**
B) Other Material Adjustment			
---Sundry Balances Written off/back	(28.18)	2.83	0.38
---Insurance Claim Received	-	0.20	(0.20)
---Prior Period Tax	-	0.26	(0.51)
---Service Tax, Excise Duty etc. paid	(0.64)	0.64	-
---Employee Related Expense	(0.30)	-	-
---Expenses of earlier year (Interest, legal & Professional,			
registration charges, Fines & Penalty and Rent, Rates & Taxes,	(3.52)	(1.38)	(0.11)
---Change in Tax	9.83	95.89	(0.03)
Sub-total (B)	**(22.82)**	**98.44**	**(0.47)**
C) Change in Accounting Policy			
---Change in Revenue Recognition (CER)	-	-	-
Sub-total (C)	**-**	**-**	**-**
Total (A+B+C)	**(22.82)**	**98.44**	**(0.47)**
Net Profit/(loss) as per Restated financial statement	**796.38**	**309.90**	**(194.24)**

Adjustments

Adjustments for Audit Qualifications:

The Company had recognized the uncertified unit of Certified Emission Reduction (CER) in closing stock as per the company's policy, which was not certified by the CDM Board due to which the profit of company has been enhanced. The rectification/adjustment for the year March 31, 2017 and March 31, 2016 has been done in the respective financial year of company's first Ind As Financial Statement of Mrach'18.

Other Material Adjustments

1. In the audited financial statements of the company for the years ended March 31, 2018, March 31, 2017 & March 31, 2016 , certain amounts have been written off for which advances have been given to vendors which are considered bad & doubtful hence are appropriately adjusted in the respective years to which they relate.

2. In the audited financial statements of the Company for the years ended March 31,2018, March 31, 2017& March 31, 2016, certain Provisions/ liabilities created in earlier years were written back. For the purpose of this statement, the said provisions/ liabilities have been appropriately adjusted in the respective years in which they were originally created.

3. In the audited financial statements of the company for the years ended March 31,2018, March 31, 2017 & March 31, 2016 , certain amounts has been received for insurance claim were appropriately adjusted in the respective year to which they relate.

4. In the audited financial statements of the company for the years ended March 31,2018, March 31, 2017 & March 31, 2016 , certain amounts of tax adjustment for prior period were appropriately adjusted in the respective year to which they relate.

5. In the audited financial statements of the company for the years ended March 31,2018, March 31, 2017 & March 31, 2016 , certain amounts of expenses were appropriately adjusted in the respective year to which they relate.

6. The Tax rate applicable for the respective year has been used to calculate the deferred tax impact on other material adjustments.

Change in Accounting Policy

Carbon Credit (Certified Emission Reduction)

Revenue was recognized in accordance with approved consolidated monitoring methodology issued by United Nation Framework Convention of Climate Change (UNFCCC) on receipt basis, earlier which was on accrual basis of accounting, assuming the CER will be certified & received in future from CDM Board. The impact for change in accounting policy for the years March 31, 2017 and March 31, 2016 has been done in the respective financial year of company's first Ind As Financial Statement of Mrach'18.

Annexure 7

PROPERTY, PLANT & EQUIPMENT (“₹” in Million)

PARTICULARS	Land & Site Development	Leasehold Land	Factory Building	Plant & Machinery	Office Equipment	Computer	Furniture & Fixtures	Vehicles	TOTAL	Investment Property	Intangible Assets (Right to Mines	GRAND TOTAL
GROSS BLOCK CARRYING VALUE												
At 01/04/2016 (Proforma)	1294.18	18.52	1033.37	6406.29	6.91	6.30	19.95	200.34	**8985.86**	196.19	152.21	**9334.27**
Additions	11.06	0.00	41.92	365.88	0.61	1.59	0.50	54.07	**475.63**			**475.63**
Disposals*	0.00	0.00	0.00	24.58	0.00	0.00	0.00	10.75	**35.33**			**35.33**
Other Adjustments**	**1305.24**	**18.52**	**1075.29**	**6747.59**	**7.52**	**7.90**	**20.45**	**243.66**	**9426.17**	**196.19**	**152.21**	**9774.57**
At 31/03/2017	2.47	0.00	60.39	138.24	2.25	2.06	0.52	74.17	**280.10**			**280.10**
Additions	5.51	0.00	0.00	1.35	0.00	0.00	0.00	41.69	**48.55**			**48.55**
Disposals	**1302.21**	**18.52**	**1135.68**	**6884.48**	**9.77**	**9.95**	**20.97**	**276.13**	**9657.72**	**196.19**	**152.21**	**10006.12**
Other Adjustments	1294.18	18.52	1033.37	6406.29	6.91	6.30	19.95	200.34	**8985.86**	196.19	152.21	**9334.27**
At 31/03/2018	11.06	0.00	41.92	365.88	0.61	1.59	0.50	54.07	**475.63**			**475.63**
DEPRECIATION												
At 01/04/2016	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**			**0.00**
Charge for the year	4.19	0.23	99.99	382.72	2.47	3.21	2.93	35.38	**531.13**	3.18	5.00	**539.31**
(Disposal)/Adjustment	0.00	0.00	0.00	-0.84	0.00	0.00	0.00	-8.15	**-9.00**			**-9.00**
At 31/03/2007	**4.19**	**0.23**	**99.99**	**381.87**	**2.47**	**3.21**	**2.93**	**27.23**	**522.13**	**3.18**	**5.00**	**530.31**
Charge for the year	9.77	2.14	97.51	371.29	2.18	2.48	2.93	42.16	**530.47**	3.18	5.00	**538.65**
(Disposal)/Adjustment	0.00	0.00	0.00	-0.15	0.00	0.00	0.00	-17.21	**-17.37**			**-17.37**
At 31/03/2018	**13.97**	**2.38**	**197.50**	**753.02**	**4.65**	**5.69**	**5.86**	**52.18**	**1035.24**	**6.37**	**10.00**	**1051.60**
NETT BLOCK												
At 01/04/2016	**1294.18**	**18.52**	**1033.37**	**6406.29**	**6.91**	**6.30**	**19.95**	**200.34**	**8985.86**	**196.19**	**152.21**	**9334.27**
At 31/03/2017	**1301.05**	**18.29**	**975.31**	**6365.72**	**5.05**	**4.68**	**17.51**	**216.43**	**8904.03**	**193.01**	**147.21**	**9244.26**
At 31/03/2018	**1288.24**	**16.14**	**938.18**	**6131.46**	**5.13**	**4.26**	**15.11**	**223.96**	**8622.48**	**189.83**	**142.21**	**8954.52**
CAPITAL WORK IN PROGRESS												
At 01/04/2016	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**235.54**	**0.00**	**0.00**	**235.54**
At 31/04/2017	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**91.18**	**0.00**	**0.00**	**91.18**
At 31/03/2018	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**167.85**	**0.00**	**0.00**	**167.85**

Note:-

i. Pursuant to the enactment of Companies Act 2013, the company has applied the estimated useful lives as specified in Schedule II, except in respect of certain assets as disclosed in Accounting Policy in Depreciation, Amortization and Depletion. Accordingly the unamortized carrying value is being depreciated / amortized over the revised/remaining useful lives.

ii. The amount shown under Lease hold asset was the cost incurred for the Lease by the lessee for the agreed period. The company being the lessee is the beneficial owner of these assets for the above period.

iii. *Deduction of Gross Block includes loss of fixed assets (Annexure 49 (iv)) in the incident at UNIT-III (TILDA DIVISION).

iv. ** Other adjustments include assets transfer from partnership firm on account of conversion from Partnership firm to Company.

v. Company has made following addition in Fixed assets relating to “Research & Development” during the year as mentioned below:

	(₹ In Million)
Building	4.12
Plant & Machinery	26.02
Other Equipment	1.00

Annexure 8
Restated Standalone Ind AS Statement of Non-Current Investments

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Trade Investments (Unqouted)			
In Subsidiary Company (At Cost)			
Shri Bajrang Energy Pvt. Ltd.	100.93	100.93	100.93
[2,01,860 (P.Y. 2,01,860) equity shares of ₹ 10/- each, fully paid-up]			
IA Hydro Energy Private Limited*	2,274.00	74.00	-
[2,94,00,000 (P.Y 7,40,000) equity shares of ₹ 10/- each, fully paid-up]			
In Joint Venture (At Cost)			
Chhattisgarh Captive Coal Mining Limited	30.69	30.69	30.69
[3,38,241 (P.Y. 3,38,241) equity shares of ₹ 10/- each, fully paid-up]			
In Partnership Firm (At Cost)			
I A Energy	-	-	0.09
S B Power	0.51	0.51	0.51
Investment in Shares - Unquoted, Fully Paid up (At Cost)			
Shri Bajrang Hydro Energy Limited	0.01	0.01	0.01
[5,100 (P.Y. 5,100 - Subsidiary) equity shares of ₹ 10/- each, fully paid-up]			
Investment in Shares - Quoted, Fully Paid up (At Fair Value through OCI)			
Bhushan Steel Limited	0.01	0.01	0.01
(250 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 40.45 per share)			
Essar Steels Limited	0.00	0.00	0.01
(100 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 12.80 per share)			
JSW Steels Limited	0.01	0.01	0.04
(50 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 288.15 per share)			
Prakash Industries	0.02	0.01	0.00
(100 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 169.20 per share)			
Steel Authority of India Limited	0.01	0.01	0.00
(100 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 70.20 per share)			
Tata Steel Limited	0.03	0.02	0.02
(50 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 571.05 per share)			
Investment in Debenture - Unquoted, Fully Paid up			
9.5% Non-Convertible Debenture of			
Yes Bank Limited	1.00	1.00	1.00
(1 unit of ₹ 10,00,000/- each, fully paid-up)			
Investment in Gold Coin			
[10 numbers (P.Y. 10 numbers) of 10 gm. each]	-	0.31	0.31
Investment in Mutual Fund (At Fair Value through OCI)			
Baroda pioneer Mutual Fund	-	0.50	-
SBI Infrastructure Fund -1- Growth	0.76	0.68	0.53
Total	**2,407.98**	**208.70**	**134.15**
Aggregate Amount of Quoted Investments	**0.08**	**0.06**	**0.08**
Aggregate Amount of Unquoted Investments	**2,407.90**	**208.63**	**134.07**

*The company was a partner in "IA energy" w.e.f. 18.06.10 which was later on converted into private limited company on 23.03.2017. The company is having stake of 90.46% Shareholding in newly formed company named "IA HYDRO ENERGY PRIVATE LIMITED".
**The company is a Partner in M/s S B Power, Shimla having Profit Sharing Ratio of 51%

Name of the Partners	%	Fixed Capital	Profit for
	Share	Employed	the year
Shri Bajrang Power & Ispat Ltd.	51%	0.51	N.A.
Shri Bajrang Energy Private Ltd.	49%	0.49	N.A.
	100%	1.00	

Annexure 9
Restated Standalone Ind AS Statement of Other Non-Current Financial Assets

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Unsecured, considered good			
Security Deposits			
Deposit	47.45	48.25	43.92
Total	**47.45**	**48.25**	**43.92**

Annexure 10
Restated Standalone Ind AS Statement of Other Non-Current Assets

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Unsecured, considered good			
(a) Capital Advances *	152.86	19.06	34.41
(b) Security Deposits			
Deposit with Governments Authorities and others	10.07	15.43	15.74
Total	**162.94**	**34.49**	**50.15**

Debts due by Private Company / Firm in which director is a member / Partner			
*Advance to Creditors for Capital Goods stated above	60.61	-	-

Annexure 11
Restated Standalone Ind AS Statement of Inventories

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
(As valued, verified and certified by the management)			
(All Stock are Valued at cost or Net realizable value whichever is Lower)			
(a) Raw Materials and components	910.85	1,062.72	897.52
(b) Finished goods	968.81	528.79	1,094.67
(c) Stores and spares	539.07	503.42	436.64
(d) Trading	-	4.16	5.01
Total	**2,418.74**	**2,099.08**	**2,433.84**

Annexure 12
Restated Standalone Ind AS Statement of Trade Receivables

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Unsecured, considered good *			
Trade receivables	716.75	522.48	484.40
Less : Provision for Doubtful Debt	5.78	5.22	4.84
Total	**710.97**	**517.26**	**479.56**

*** Trade Receivable stated above include debts due by:**

Private Company / Firm in which director is a member / Partner	4.51	0.70	60.44

Partiular	31.03.2018	31.03.2017	31.03.2016
Ageing analysis			
Upto 3 months	648.94	435.95	423.23
3-6 months	11.83	18.04	29.64
More than 6 months	50.20	63.27	26.69
	710.97	**517.26**	**479.56**

Annexure 13
Restated Standalone Ind AS Statement of Cash and Bank Balances

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Cash & Cash Equivalents			
(a) Balances with banks	12.53	9.01	8.76
(b) Cash on hand	3.29	4.05	8.80
	15.82	13.06	17.56
Bank Balance other than cash and cash equivalents			
(a) Margin Money with banks	144.97	175.14	158.35
Total	**160.80**	**188.19**	**175.91**

Annexure 14
Restated Standalone Ind AS Statement of Current Loans

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Unsecured, considered good			
(a) Loans and advances *	269.32	2,477.93	1,455.09
Total	**269.32**	**2,477.93**	**1,455.09**

Advance Recoverable in Cash or in kind or Value to be received above includes loan given to :-

* Subsidiary Company & Partnership firm in which company is a Partner/Member	269.32	2,477.93	1,455.09

Annexure 15
Restated Standalone Ind AS Statement of Other Current Financial Assets

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Interest Receivable	2.71	1.41	1.41
Insurance Claim Receivable	15.64	15.64	58.42
Advance Recoverable in Cash or in kind or Value to be received	5.83	9.38	6.69
Royalty Receivable	0.16	12.23	0.09
Total	**24.34**	**38.65**	**66.61**

Annexure 16
Restated Standalone Ind AS Statement of Other Current Assets

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Advance to Supplier	747.15	837.11	946.44
Balance with Central Excise & Sales Tax Department	57.17	86.24	64.18
Prepaid Expenses	30.22	27.63	22.22
Deferred Forward Contract Premium	37.13	61.21	44.70
Total	**871.67**	**1,012.19**	**1,077.53**

Annexure 17
Restated Standalone Ind AS Statement of Equity Share Capital

(₹ in Million)

2 Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Authorised Share Capital			
6,00,00,000 Equity Share of ₹10/- each	600.00	600.00	600.00
(Previous Year 6,00,00,000 Equity Share of ₹10/- each)			
Issued, Subscribed & Fully Paid-up Share Capital			
1,30,71,155 Equity Share of ₹ 10/- each fully paid up	130.71	130.71	130.71
(Previous Year 1,30,71,155 Equity Share of ₹10/- each)			

Reconciliation of number of equity shares outstanding at the beginning and at the end of the year

Particulars	31.03.2018	31.03.2017	31.03.2016
No of shares outstanding as at the beginning of the year	13,071,155	13,071,155	13,071,155
Add : Number Of Shares Allotted During The Year As Fully Paid-Up	-	-	-
Number of shares outstanding as at the end of the year	**13,071,155**	**13,071,155**	**13,071,155**

Shares in the company held by each shareholder holding more than 5% shares

Name of the shareholder	31.03.2018		31.03.2017		31.03.2016	
	No. of shares held in the Company	% of Shares held	No. of share held in the Company	% of Shares held	No. of share held in the Company	% of Shares held
Atlanta Securities Private Limited	2,039,500	15.60	2,039,500	15.60	2,039,500	15.60
Banka Finance & Securities Pvt. Ltd.	2,078,381	15.90	2,078,381	15.90	2,078,381	15.90
Bonus Dealcom Pvt Ltd.	717,300	5.49	717,300	5.49	717,300	5.49
Sukanya Merchandise Private Ltd	724,254	5.54	724,254	5.54	724,254	5.54

The Company has only one class of shares referred to as equity shares having a par value of ₹ 10/-. Each holder of equity shares is entitled to one vote per share.

Annexure 18
Restated Standalone Ind AS Statement of Other Equity

(₹ in Million)

Particulars	Reserve & Surplus					Other Comprehensive Income	Total Equity Attributable to Equity Holder of the Company
	Retained Earnings	Securities Premium Reserve	Amalgamation Reserve	Capital Redemption Reserve	Revaluation Reserve		
Balance as on April 1, 2015	**2,461.64**	**1,455.83**	**110.74**	**111.90**	**-**	**-**	**4,140.11**
Impact of Restatement of Financial Statement	(0.44)	-	-	-	-	-	**(044)**
Profit/(loss) for the period	(194.28)	-	-	-	813.07	-	**618.79**
Other comprehensive income For the Year	(0.02)	-	-	-	-	0.06	**(0.04)**
Balance as on March 31, 2016	**2,266.90**	**1,455.83**	**110.74**	**111.90**	**813.07**	**0.06**	**4,758.50**
Impact of Restatement of Financial Statement	2.55	-	-	-	-	-	**2.55**
Profit/(loss) for the period	311.22	-	-	-	-	-	**311.22**
Income Disclosed under IDS (Net of Tax)	11.00	-	-	-	-	-	**11.00**
Other comprehensive income For the Year	-	-	-	-	-	(1.31)	**(1.31)**
Balance as of March 31, 2017	**2,591.67**	**1,455.83**	**110.74**	**111.90**	**813.07**	**(1.26)**	**5,081.95**
Impact of Restatement of Financial Statement	(32.65)	-	-	-	-	-	**(32.65)**
Profit/(loss) for the period	798.87	-	-	-	-	-	**798.87**
Other comprehensive income For the Year	-	-	-	-	-	(2.49)	**(2.49)**
Balance as of March 31, 2018	**3,357.89**	**1,455.83**	**110.74**	**111.90**	**813.07**	**(3.75)**	**5,845.68**

Annexure 19

Restated Standalone Ind AS Statement of Borrowings

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
(a) Term Loans From Banks *			
Secured Loan			
Term Loans from State Bank of India	1,407.31	1,508.37	1,609.60
(Repayable in 177 monthly installments starting from July 2015 and			
last installment falling due on March 2030)			
Effective Rate of Interest:			
Rate of Interest 11.55% p.a.			
Term Loans from Bank of India	514.33	552.24	579.98
(Repayable in 174 Monthly installments starting from October 2015			
and last installment falling due on March 2030.)			
Effective Rate of Interest:			
Rate of Interest 12.45% p.a.			
Term Loans from Bank of Baroda	1,583.79	1,699.68	1,815.57
(Repayable in 177 Monthly installments starting from July 2015 and			
last installment falling due on March 2030.)			
Effective Rate of Interest:			
Rate of Interest 12.50% p.a.			
Term Loans from Karnataka Bank	268.94	288.02	303.41
(Repayable in 177 Monthly installments starting from July 2015 and			
last installment falling due on March 2030.)			
Effective Rate of Interest:			
Rate of Interest 12.50% p.a.			
Term Loans from Karnataka bank	92.30	98.96	104.32
(Repayable in 177 Monthly installments starting from July 2015 and			
last installment falling due on March 2030.).			
Effective Rate of Interest:			
Rate of Interest 13.25% p.a.			
(b) Term Loans From Others**			
Secured Loan			
L & T Infrastructure Finance Company Limited	-	12.51	27.08
(Repayable in 72 installments starting from December 2012 and last			
installment falling due on November 2018).			
Effective Rate of Interest:			
Rate of Interest 14.50% p.a.			
L&T Fincorp Limited	-	70.92	153.47
(Repayable in 65 installments starting from July 2013 and last			
installment falling due on November 2018).			
Effective Rate of Interest:			
Rate of Interest 14.50% p.a.			
Unsecured Loan			
LIC Housing Finance Limited	156.60	-	-
('Term Loan is Repayable in 180 installments starting			
from May 2018 & ending on March 2033))			

(c) Long Term Maturities' of Finance Lease Obligations ***			
Secured Loan	112.78	138.34	156.52
(Hypothecated by Asset Acquired under Finance Lease)			
Total	**4136.05**	**4369.05**	**4749.95**

Note: There are defaults upto 30 days for monthly repayments of term Loan amounting to ₹ 303.12 Million & ₹ 299.26 Million Of Principal & interest respectively. However these defaults of remedied before the Financial Statement were approved for issue.

Note: There was no prepayment of Loan in any of the respective previous year.

Note: Penal Interest had been charged due to delay payment of principal & interest.

Note: Current Maturities of Long term debts disclosed under the head "CURRENT FINANCIAL LIABILITIES - OTHERS".

Security and terms & conditions for above loans from Banks : *

The Term Loan granted under consortium finance from State Bank of India, Commercial Branch, Raipur working as a lead banker, Bank of Baroda, Mid-corporate banking Branch, Bank of India, Mid-corporate banking Branch, Raipur and Karnataka Bank, Main Branch, Raipur are secured by:

a) Hypothecation of plant and machinery and other movable assets and EM of Leasehold (from CSIDC) factory land at village: Borjhara, Urla Industrial Estate, Raipur (C.G.), Area of land 21.25 acres on pari-passu basis with other participating term lenders.
b) Equitable Mortgage of 39.15 acres of free hold factory land at village: Borjhara, Urla Industrial Estate, Raipur (C.G.) on first pari-passu basis.
c) First parri-passu charge with other participating lenders on the entire Fixed assets of Gondwara Divisions, along with EM of the land situated at khasara No. 2/1, 22, 23/2, 25, 26, 27/2, 30/1, 30/2, 32, 33 admeasuring 4.039 Hectare situated at Vill : Gondwara, Industrial Estate, Urla, Raipur(C.G.)
d) First mortgage charge on the Company's present and future movable Immovable assets on pari-passu basis with other participating lenders.
e) Equitable Mortgage on pari-passu basis in favour of lenders on 312.60 acres Land (excluding the 37.4 acres of the land for green belt which cannot be diverted) at Dharsiwa, Tilda, Raipur (C.G.).

Personal Guarantee of director :	Guarantee of Relative of Directors :	Corporate Guarantee :
Shri Suresh Goel S/o. Late Hari Ram Goel	Shri Anand Goel S/o. Late Hari Ram Goel	M/s. Shri Bajrang Alloys Limited
Shri Rajendra Goel S/o. Late Hari Ram Goel	Shri Sandeep Goel S/o. Shri Suresh Goel	M/s. Swastik Mercantile Limited
Shri Narendra Goel S/o. Late Hari Ram Goel	Shri Dinesh Goel S/o. Shri Suresh Goel	M/s. Shimmer Investment Pvt. Ltd.
	Smt. Suman Goel W/o. Shri Dinesh Goel	

** Security and terms & conditions for above loans from Others:

The Term Loan from L & T Infrastructure Finance company Limited & L&T Fincorp Limited (Non-Banking financial Institution) are secured by "second pari-pasu" charged by all movable & immovable assets including all current assets of the Company. The above loans are additionally secured by pledge of 26% shares (as on the date of pledge of shares) of the company in the name of corporate shareholders and also pledge of 40% share (as on the date of pledge of shares) of the Shri Bajrang Energy Private Limited in the name of director & relatives along with Demand Promissory Note.

*** In respect of Fixed Assets acquired on finance lease as per Indian Accounting Standered on Leases (IND AS -19), the minimum lease rentals outstanding as on 31st March, 2018 are as follows:

(₹ in Million)

Due	Total Minimum Lease Payments Outstanding as at		Interest not due		Present Value of the minimum lease payments as at	
	31.03.18	**31.03.17**	**31.03.18**	**31.03.17**	**31.03.18**	**31.03.17**
Not later than one year	77.80	72.72	18.13	19.03	59.67	53.70
Later than one year and not						
later than five years	117.51	119.20	38.62	39.06	78.89	80.14
Later than five year	52.19	78.07	18.30	19.87	33.89	58.20

Annexure 20

Restated Standalone Ind AS Statement of Long Term Provisions

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Provision for employee benefits			
Gratuity Payable	55.57	44.57	32.72
Total	**55.57**	**44.57**	**32.72**

Annexure 21

Restated Standalone Ind AS Statement of Deferred Tax Liabilities (Net)

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Deferred Tax Liability			
- Difference between Book & Tax base Related to PPE	1,164.67	1,079.31	994.13
- Difference between Book & Tax base Related to Investments	0.10	0.07	0.02
TOTAL (A)	**1,164.77**	**1,079.38**	**994.15**
Deferred Tax Assets			
- Unabsorbed Depreciation & Carried Forward Losses	226.23	618.19	693.84
- Disallowance u/s 43B of Income Tax 1961	29.20	21.13	16.16
TOTAL (B)	**255.42**	**639.31**	**710.00**
Net Liability (A-B)	**909.35**	**440.06**	**284.14**
Mat Credit Entitlement	(750.83)	(475.96)	(368.04)
Total	**158.52**	**(35.89)**	**(83.89)**

Reconciliation of Deferred Tax (Asset) / Liability

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Deferred Tax Asset / (Liability) at the beginning of the year	440.06	284.14	(16.90)
Deferred Tax (Income) / Expense Recognized During the Period in Profit & Loss	469.25	155.88	301.02
Deferred Tax (Income) / Expense Recognized During the Period in Other Comprehensive Income	0.03	0.05	0.02
Deferred Tax Asset / (Liability) at the End of the year	**909.35**	**440.06**	**284.14**

Movement in MAT Credit Entitlement

(₹ in Million)

Particulars	31.03.2018	31.03.2017	31.03.2016
Balance at the beginning of the year	475.96	368.04	296.28
Add: MAT Credit entitlement availed during the year	274.87	107.92	71.76
Less: MAT Credit entitlement Utilized during the year	-	-	-
Balance at the end of the year	**750.83**	**475.96**	**368.04**

Annexure 22
Restated Standalone Ind AS Statement of Other Long Term Liabilities

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
CSEB Cross Subsidy Payable A/c	60.80	60.80	60.80
Total	**60.80**	**60.80**	**60.80**

Annexure 23
Restated Standalone Statement of Current Financial Liabilities - Borrowings

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Loans Repayable on Demand			
Secured *			
Cash Credit Limit (State Bank of India)	1,020.01	1,102.10	1,113.06
Cash Credit Limit (Bank of Baroda)	1,422.07	1,585.20	1,557.49
Cash Credit Limit (Bank of Maharashtra)	399.12	574.11	577.37
Unsecured :			
From Corporate Body	2.44	132.23	247.00
Total	**2,843.64**	**3,393.64**	**3494.91**

Note: There was no prepayment of Loan in any of the respective previous year.
Note: Penal Interest had been charged due to delay payment of principal & interest.

Security and terms & conditions for above loans Repayable on Demand : *

Working Capital Facilities, granted under a consortium finance from State Bank of India, Commercial Branch, Raipur working as a lead banker are secured by hypothecation of entire stocks of raw material, finished goods, stocks in trade, Stores and spares, packing material, and other current assets of the company at their factory premises or at some other as approved by bank including goods in transit, outstanding moneys, books in debt, receivable etc. on first pari-passu basis with other consortium member viz. Bank of Baroda, Mid-corporate banking Branch Raipur, and Bank of Maharashtra, Main Branch Raipur.

Annexure 24
Restated Standalone Statement of Trade Payables

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Trade Payable			
Due to Micro & Small Enterprises*	25.73	7.92	3.69
Others	1,984.25	1,907.68	1,565.16
Total	**2,009.98**	**1,915.60**	**1,568.85**

*There is no principal amount and interest overdue to Micro and Small Enterprises. During the year no interest has been paid to such parties. This information has been determined to the extent such parties have been identified on the basis of information available with the company and the same has been relied upon by the auditors.

Annexure 25

Restated Standalone Ind AS Statement of Other Current Financial Liabilities

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Current Maturities of Long term Borrowings from Bank			
Secured :			
Term Loans from State Bank of India	102.52	102.52	58.89
Term Loans from Bank of India	37.02	37.02	27.98
Term Loans from Bank of Baroda	115.89	115.89	57.95
Term Loans from Karnataka Bank	19.46	19.46	14.06
Term Loans from Karnataka Bank	6.86	6.80	3.40
L & T Infrastructure Finance Company Limited	12.33	16.25	18.10
L&T Fincorp Limited	69.84	92.08	102.57
Current Maturities of Long term Borrowings from Others			
Unsecured :			
LIC Housing Finance Limited	8.36	-	-
Current Maturities of Finance Lease Obligations			
Secured :	59.67	53.70	78.74
Other Payables			
Creditors for Capital goods *	47.94	98.50	121.68
Other Expenses payables	128.71	210.19	160.54
Total	**608.60**	**752.42**	**643.91**

Debts due by Private Company / Firm in which director is a member / Partner

* Creditors for Capital Goods stated above	6.18	71.12	72.94

Note: There was no prepayment of Loan in any of the respective previous year.

Note: Penal Interest had been charged due to delay payment of principal & interest.

Annexure 26

Restated Standalone Ind AS Statement of Other Current Liabilities

(₹ in Million)

	As at	As at	As at
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Other Payables			
Advances from Customers **	71.59	112.71	83.12
Excise Duty Payable on Closing Stock	-	49.31	107.96
GST, Sales Tax & Entry Tax Payable	112.47	38.98	5.59
Service Tax payable	-	74.08	0.06
TDS Payable	12.23	10.93	9.16
Total	**196.29**	**286.01**	**205.88**

Debts due by Private Company / Firm in which director is a member / Partner

** Advances from Customers stated above	-	11.31	28.62

Annexure 27

Restated Standalone Ind AS Statement of Short Term Provisions

(₹ in Million)

Particulars	As at 31.03.2018	As at 31.03.2017	As at 31.03.2016 (Proforma)
Short Term Provisions			
Provision for employee benefits	30.76	29.35	24.45
Total	**30.76**	**29.35**	**24.45**

Annexure 28

Restated Standalone Ind AS Statement of Revenue from Operations

(₹ in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Sale of Products			
- Finished Goods	17,969.23	15,462.82	13,768.60
- Trading Goods	214.19	41.14	211.82
Sale of Services			
- Electricity	17.61	9.45	50.38
- Renewable Energy Certificate / Carbon Emission Certificate	98.28	91.39	75.64
Total	**18,299.32**	**15,604.80**	**14,106.44**

Annexure 29

Restated Standalone Ind AS Statement of Other Income

(₹ in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Recurring Income			
Interest on Margin Money	12.50	9.32	12.31
Other Interest Income	66.55	33.62	19.78
Rental Income	1.63	0.53	11.88
Non-Recurring Income			
Profit On Sale Of Fixed Assets	2.50	-	0.19
Freight outward	38.84	0.79	-
Foreign Exchange Gain	-	0.81	-
Insurance Claim Received	0.23	0.42	0.42
Dividend	0.00	0.00	0.00
Miscellaneous Income	18.63	4.23	1.39
Job Work Charges	-	-	0.09
Write Off (Sundry Balances)	1.79	(2.83)	1.18
Total	**142.67**	**46.89**	**47.24**

Annexure 30

Restated Standalone Ind AS Statement of Cost of Material Consumed

(₹ in Million)

	FY Ended	FY Ended	FY Ended
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Opening Stock	1062.72	897.52	856.68
Purchase	13480.77	10253.45	10125.12
	14543.49	**11150.97**	**10981.80**
Less : Sale/Disposal	886.85	632.60	504.45
Purchase Return	0.00	0.00	0.00
Closing Stock	970.85	1062.72	897.52
	1797.70	**1695.32**	**1411.53**
Total	**12745.79**	**9455.66**	**9570.27**

Break of Raw Material Consumed	**31.03.2018**	**31.03.2017**	**31.03.2016**
Imported	0.00	0.00	0.00
Percentage %	0.00	0.00	0.00
Indigenous	12745.79	9455.66	9570.27
Percentage %	100.00	100.00	100.00
Value of Imports on C.I.F. Basis (In Rs.)	0.00	0.00	0.00

Annexure 31

Restated Standalone Ind AS Statement of Increase/Decrease in Stock In Trade

(₹ in Million)

	FY Ended	FY Ended	FY Ended
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Closing Stock of Finished Goods	968.81	528.79	1094.67
Closing Stock of Finished Goods	0.00	4.16	5.01
	968.81	**532.95**	**1099.68**
Less : Opening Stock of Finished Goods	528.79	1094.67	823.88
Opening Stock of Traded Goods	4.16	501	19.29
	532.95	**1099.68**	**843.16**
(Increase)/Decrease in stock in Finished Goods	**(435.87)**	**566.73**	**-256.52**
(Increase)/Decrease in Excise in Closing Stock	**(49.31)**	**-58.64**	**17.35**
Total	**(485.18)**	**508.09**	**-239.16**

Annexure 32

Restated Standalone Ind AS Statement of Employee Benefit Expenses

(₹ in Million)

	FY Ended	FY Ended	FY Ended
Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Salaries, Wages & Other Benefits *	495.62	409.80	387.37
Contribution to Provident and Other Funds	37.20	27.43	24.49
Staff & Workers Welfare Expenses	4.15	8.14	5.50
Total	**536.97**	**445.37**	**417.36**

* It Includes payment made to Research & Development Personnel amounting to ₹ 4.60 Million.

Annexure 33
Restated Standalone Ind AS Statement of Finance Cost

(₹ in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Other Borrowing Cost	42.46	50.75	43.23
Interest Expenses	1001.55	1,120.08	1,009.67
Less : Amount included in Capital Work-in- Progress i.e. Capitalized	-	-	72.98
Total	**1,044.01**	**1,170.83**	**979.91**

Annexure 34
Restated Standalone Ind AS Statement of Other Expenses

(₹ in Million)

Particulars	FY Ended 31.03.2018	FY Ended 31.03.2017	FY Ended 31.03.2016 (Proforma)
Power & Fuel	324.58	244.79	250.96
Manufacturing Wages	180.60	157.15	118.44
Consumption of Stores & Spares	551.61	397.10	384.34
Repair & Maintenance			
- Factory Building	51.00	13.16	14.31
- Plant & Machinery	117.88	61.16	40.17
Insurance Charges	16.12	4.82	6.12
Water Cess Expenses	28.39	28.61	14.38
Other Manufacturing Expenses	82.56	61.97	51.30
Auditor's Remuneration:			
For Statutory Audit	1.10	1.10	1.10
For Tax Audit	0.30	0.30	0.30
For Cost Audit	0.13	-	-
For Secreterial Audit	0.02	-	-
For Certification & Other Consultancy	-	-	0.01
Internal Auditor Remuneration	0.86	0.93	0.46
Director's Remuneration	3.90	3.00	3.00
Director's Sitting Fees	0.15	0.15	0.15
Corporate Social Responsibility	18.63	17.16	9.25
Hiring Charges	1.65	-	-
Insurance Expenses	0.42	6.07	5.60
Subscription to Association & Membership Fees	1.43	0.92	1.37
Loss on Sale of Fixed Assets	11.99	0.31	0.62
Loss on Sale of Investment	-	-	8.06
Loss on Exchange Differences	10.40	-	0.04
Loss of Partnership Firm	-	33.42	-
Legal & Professional Charges	30.44	15.06	11.71
Office & General Expenses	18.42	9.59	5.80
Rent, Rates and Taxes	11.84	7.28	12.29
Printing & Stationary Expenses	2.91	2.39	2.27
Allowance for Credit Loss	1.94	0.38	4.84
Registration & Renewal Fees	5.09	6.26	9.97
Environmental Expenses	7.48	3.23	1.67
Repair & Maintenance (Others)	14.33	8.06	7.02

Director's Traveling Expenses	9.39	5.91	4.33
Traveling Expenses (Other)	20.18	9.28	9.56
Testing & Inspection Charges	1.43	0.92	2.38
Communication Expenses	4.80	4.55	5.24
Canteen Expenses *	5.41	2.85	4.07
Conveyance Expenses	8.58	7.24	8.45
Penalty & Fines	0.51	0.32	0.26
Advertisement & Publicity	237.25	83.35	29.24
Carriage Outward	48.50	13.88	7.11
Sales Commission	99.47	66.18	49.10
Sales Promotion & Planning	60.89	23.78	27.64
Finished Goods Handling Charges	13.85	17.60	17.35
Sales Tax, Service Tax & Custom Duty	3.13	3.23	5.82
Power Distribution Charges & Discount	18.78	20.44	18.60
Rebate & Discount	20.82	-	-
Total	**2,049.18**	**1,343.90**	**1,154.69**

*Canteen Expenses Includes Payment made to Research & Development Personnel amounting to Rs. 0.004 Million.

Break of Stores Consumed	**31.03.2018**	**31.03.2017**	**31.03.2016**
Imported	4.94	1.10	3.37
Percentage %	0.00	0.00	0.00
Indigenous	546.67	9455.66	9570.27
Percentage %	100.00	100.00	100.00
Value of Imports on C.I.F. Basis (In Rs.)	0.00	0.00	0.00

Annexure 35

Restated Standalone Ind AS Statement of Current Tax

(₹ in Million)

Particulars	**FY Ended 31.03.2018**	**FY Ended 31.03.2017**	**FY Ended 31.03.2016 (Proforma)**
Current Tax			
Current Tax (MAT)	294.35	113.05	8.92
Add: Taxes for Earlier Year	0.00	0.00	-0.26
	294.35	**113.05**	**8.66**
Deferred Tax			
Deferred tax to be recognized in Profit & Loss account	469.25	155.88	301.02
MAT Credit (Availed) / utilized during the year	(274.87)	(107.92)	(71.76)
	194.38	**47.95**	**229.06**
Deferred Tax to be recognized in Other Comprehensive Income	0.03	0.05	0.02
Total	**488.73**	**161.01**	**237.92**

Provision for Income Tax has been made in terms of provision of Sec. 115JB of Income Tax, 1961.

Annexure 36

Restated Standalone Ind AS Statement of Earning Per Equity Share

(₹ in Million)

Particulars	**As at 31.03.2018**	**As at 31.03.2017**	**As at 31.03.2016 (Proforma)**
Profit/(loss) after Taxation as per Profit & Loss Account	796.38	309.90	(194.24)
Weighted Avg. No. of Equity Share Outstanding	13.07	13.07	13.07
Basic/Diluted Earning/(Loss) per Share of Rs. 10/-	60.93	23.71	(14.86)

Annexure 37

Restated Standalone Ind AS Statement of First time adoption of Ind AS

(₹ in Million)

Particulars	**As at 31st March 17**			**As at 01st April 16**		
Sheet	**Previous GAAP Balance**	**Effect of Transition**	**As per Ind As Balance Sheet**	**Previous GAAP Balance**	**Effect of Transition**	**As per Ind AS Balance**
I. ASSETS						
(1) Non-current Assets						
(a) Property, Plant & Equipment	8,262.95	641.09	8,904.03	8,351.77	634.10	8,985.86
(b) Capital work-in-progress	91.18	-	91.18	235.54	-	235.54
(c) Investment Property	-	193.01	193.01	-	196.19	196.19
(d) Intangible Assets	147.21	-	147.21	152.21	-	152.21
(e) Financial Assets						
(i) Investments	208.51	0.19	208.70	134.10	0.06	134.15
(ii) Others	63.68	-	63.68	43.92	-	43.92
(f) Deferred Tax Assets (Net)	(114.99)	150.88	35.89	(2.74)	86.63	83.89
(f) Other Non-current assets	19.06	-	19.06	50.15	-	50.15
Total Non-Current Assets	**8,677.60**	**985.17**	**9,662.77**	**8,964.95**	**916.97**	**9881.92**
(2) Current Assets						
(a) Inventories	2,189.27	(90.18)	2,099.08	2,758.40	(324.56)	2,433.84
(b) Financial Assets						
(i) Trade Receivables	522.48	(5.22)	517.26	484.40	(4.84)	479.56
(ii) Cash and cash equivalents	13.06	-	13.06	17.56	-	17.56
(iii) Bank Balance other than						
Cash and cash equivalents	175.14	-	175.14	158.35	-	158.35
(iv) Loans	2,477.93	-	2,477.93	1,455.09	-	1,455.09
(v) Other Financial Assets	38.65	-	38.65	66.61	-	66.61
(c) Current Tax Assets (Net)	68.03	-	68.03	100.21	-	100.21
(d) Other current assets	1,444.52	(432.33)	1,012.19	1,445.57	(368.04)	1,077.53
Total Current Assets	**6,929.07**	**(527.74)**	**6,401.33**	**6,486.19**	**(697.44)**	**5,788.75**
Total Assets	**15,606.67**	**457.42**	**16,064.10**	**15,451.14**	**219.53**	**15,670.67**
II. EQUITY AND LIABILITIES						
(1) Equity						
(a) Equity Share Capital	130.71	-	130.71	130.71	-	130.71
(b) Other Equity	4,624.53	457.42	5,081.95	4,538.97	219.53	4,758.50
Total Equity	**4,755.24**	**457.42**	**5,212.66**	**4,669.68**	**219.53**	**4,889.21**
(2) Non-Current Liabilities						
(a) Financial Liabilities						
(i) Borrowings	4,369.05	-	4,369.05	4,749.95	-	4,749.95
(b) Provisions	44.57	-	44.57	32.72	-	32.72
(c) Deferred Tax Liabilities (Net)	-	-	-	-	-	-
(d) Other Long-Term Liabilities	60.80	-	60.80	60.80	-	60.80
Total Non-Current Liabilities	**4,474.42**	**-**	**4474.42**	**4843.47**	**-**	**4843.47**
(3) Current Liabilities						
(a) Financial Liabilities						
(i) Borrowings	3,393.64	-	3,393.64	3,494.91	-	3,494.91
(ii) Trade Payable	1,915.60	-	1,915.60	1,568.85	-	1,568.85
(iii) Other Financial Liabilities	752.42	-	752.42	643.91	-	643.91
(c) Other Current Liabilities	286.01	-	286.01	205.88	-	205.88
(d) Provisions	29.35	-	29.35	24.45	-	24.45
Total Current Liabilities	**6,377.02**	**-**	**6,377.02**	**5,938.00**	**-**	**5,938.00**
Total Liabilities	**10,851.43**	**-**	**10,851.43**	**10,781.47**	**-**	**10,781.47**
Total equity and liabilities	**15,606.67**	**457.42**	**16,064.10**	**15,451.14**	**219.53**	**15,670.67**

Reconciliation Notes explaining Ind AS Adjustments for Balance Sheet

Property, Plant and Equipment (PPE)

a) As per Ind AS 16, PPE are defined as tangible items that are held for use in the production or supply of goods or services, for rental to others, or for administrative purposes; and are expected to be used during more than one period. Certain spare parts now meets the definition of PPE and are accordingly classified as PPE.

b) Fair valuation as deemed cost for Property, Plant and Equipment: The Company have considered fair value for property, viz land situated in India, with impact of ₹ 813.07 million in accordance with stipulations of Ind AS 101 with the resultant impact being accounted for in the reserves.

Investments

Investments in Subsidiaries, Associates and Joint Ventures is accounted for at cost as per para 4 of Ind AS 27 on the date of transition and in case of other Investment in equity instruments, the same are carried at fair value through OCI in Ind AS compared to being carried at cost under IGAAP.

Inventory

Stores and spare parts in the nature of property, plant and equipment has been reclassified.

Trade receivables

Under the IGAAP, the company has create provision for impairment of trade receivables consist only in respect of specific amount for incurred loss.

Under the Ind AS, impairment allowance has been determined based on expected credit loss model (ECL).

Other Current Assets

The Unused MAT credit are reclassified to Deferred tax as on date of transition to Ind AS by reclassifying from Other current assets.

Other equity

Adjustments to retained earnings and other comprehensive income has been made in accordance with Ind AS, for the above mentioned line items.

Deferred Tax liabilities

Under the Ind AS, the Deferred Tax is calculated on the basis of the Balance Sheet approach and not the Income approach. Consequently, the Deferred Tax Liabilities (Net) have been increased by ₹ 281.40 million as at 1st April 2016 & ₹ 0.05 million as at 31st March' 2017.

Prior Period Error

As per Ind AS 8 'Accounting Policies, Changes in Accounting Estimates and Errors', an entity shall correct material prior period errors retrospectively in the first set of financial statements approved for issue after their discovery by restating the comparative amounts for the prior period(s) presented in which the error occurred or if the error occurred before the earliest prior period presented, restating the opening balances of assets, liabilities and equity for the earliest prior period presented. Accordingly, a prior period error for FY 2015-16 & 2016-17 has been restated and Consequently, the inventory decreased by ₹ 302.06 million & ₹ 55.96 million respectively.

Reclassification

To Comply with the Companies (Accounting Standards)Rules ,2006 , certain account balances have been regrouped as per the format prescribed under Division II of Schedule III to the Companies Act 2013

(₹ in Million)

	Particulars	For the year ended 31.03.2017			
		Revised previous GAAP	Effect of Reclassification	Effect of Transition	Balance as per Ind AS
I.	Revenue from Operations	13,923.15	-	1,681.64	15,604.80
II.	Other Income	46.89	-	-	46.89
III.	**Total Revenue (I+II)**	**13,970.05**	**-**	**1,681.64**	**15,651.69**
IV.	**Expenses**				
	Cost of Materials Consumed	9,455.66	-	-	9,455.66
	Purchase of Stock in Trade	34.66	-	-	34.66
	(Increase) / Decrease in Stock in Trade	754.18	-	(246.10)	508.09
	Excise Duty On Sales	-	-	1,681.64	1,681.64
	Employees benefit Expenses	446.77	-	(1.40)	445.37
	Financial Costs	1,170.83	-	-	1,170.83
	Depreciation	531.40	-	7.91	539.31
	Manufacturing Expenses	968.76	(968.76)	-	-
	Administrative Expenses	146.31	(146.31)	-	-
	Selling & Distribution Expenses	228.45	(228.45)	-	-
	Other Expenses	-	1,343.52	0.38	1,343.90
Total	**Expenses**	**13,737.03**	**-**	**1,442.44**	**15,179.47**
V.	**Profit Before Exceptional and Tax (III-IV)**	**233.02**	**-**	**239.20**	**472.22**
VI.	Exceptional items	-	-	-	-
VII.	**Profit Before Tax (VII- VIII)**	**233.02**	**-**	**239.20**	**472.22**
X.	**Tax expenses:**				
	Net current Tax	55.35	-	-	55.35
	Deferred Tax	9.77	-	-	9.77
XI	**Profit (Loss) for the period (VII-VIII)**	**167.90**	**-**	**239.20**	**407.11**
X	**Other Comprehesive Income :**				
	(i) Items that will not be reclassified to profit or loss				
	a) Re-measurements of the defined benefit plans	-	-	**(1.40)**	**(1.40)**
	b) Equity instruments through Other comprehensive income	-	-	0.13	0.13
	c) Income tax relating to items that will not be reclassified to profit or loss		-	(0.05)	(0.05)
XI	**Total Comprehensive Income for the year**	**167.90**	**-**	**237.89**	**405.79**

Reconciliation Notes explaining Ind AS Adjustments for Statement of Profit & Loss

Excise Duty

In accordance with Ind AS 18 "Revenue", Revenue from Operations includes Excise Duty. Excise Duty has been presented separately as expenditure.

Employee Benefit Expenses

In accordance with Ind AS 19 'Employee Benefits',Acturial gains/losses on remeasurement of Defined Benefit Plans have been classified under 'Other Comprehensive Income'. Accordingly, the Employee Benefit Expenses have been decreased by ₹1.40 million.

Depreciation

a) Recognition of additional PPE from spare parts has resulted in additional depreciation charge for the year ended March 31, 2017 amounting to ₹ 5.21 million .
b) Significant components of plant and equipment which have different useful life are depreciated based on their specific useful lives. Consequently, the amount of Depreciation charge for the year ended March 31, 2017 has increased by ₹ 2.70 million.

Other Expenses
Other manufacturing expenses, other administrative expenses and selling & distribution expenses have been classified into Other expenses .

Under Indian GAAP, the company has created provision for impairment of receivables consists only in respect of specific amount for incurred losses. Under Ind AS, impairment allowance has been determined based on Expected Loss model (ECL).

Prior Period Error
As per Ind AS 8 'Accounting Policies, Changes in Accounting Estimates and Errors', an entity shall correct material prior period errors retrospectively in the first set of financial statements approved for issue after their discovery by restating the comparative amounts for the prior period(s) presented in which the error occurred or if the error occurred before the earliest prior period presented, restating the opening balances of assets, liabilities and equity for the earliest prior period presented. Accordingly, a prior period error for the period before FY 2016-17 has been restated in the changes in Inventories of finished good and stock-in-trade and decreased by ₹ 246.1 million.

Deferred Tax
Under the Ind AS, the Deferred Tax is calculated on the basis of the Balance Sheet approach and not the Income approach. Consequently, the Deferred Tax Expenses for the year ended 31st March 2017 are lower/higher by ₹ 0.047 million.

Reconciliation of total comprehensive income for the year ended March 31, 2017

(₹ in Million)

Particulars	**For the year ended 31.03.2017**
Revised profit as per previous GAAP	**167.90**
Adjustments :	
i. Depreciation impact on account of Component Accounting	(5.21)
ii. Depreciation impact on Transfer of Store item to PPE	(2.70)
iii. Acturial Gain on Remeasurement of Defined Benefit Plans transferred to OCI	1.40
iv. Rectification of Errors in Previous GAAP	246.10
v. Impairment of Receivable as per ECL Model	(0.38)
Total effect of transition to Ind AS	239.20
Profit for the year as per Ind AS	407.11
Other comprehensive income for the year (net of tax)	
iv. Acturial Gain on Remeasurement of Defined Benefit Plans transferred to OCI	(1.40)
v. Investments in equity instruments measured at fair value	0.13
vi. Tax Impact on above	(0.05)
Total comprehensive income under Ind AS	**405.79**

Reconciliation of Other Equity as at March 31, 2017 and April 1, 2016

(₹ in Million)

Particulars	**31.03.2017**	**31.03.2016**
		(Proforma)
Other Equity as per previous GAAP	**4,591.34**	**4,409.89**
Effect of Transition to Ind AS		
i. Net Reversal of Transaction Cost	-	-
ii. Deferred Tax Liability increased	(281.45)	(281.41)
iii. Investments in equity instruments measured at fair value	0.19	0.06
iv. Fair Valuation of Land	-	-
v. Impact of Store Trf to FA	(13.20)	(5.29)
vi. Revaluation of Land	813.07	813.07
vii. Rectification of Errors in Previous GAAP	(55.96)	(302.06)
viii. Impairment of Receivable as per ECL Model	(5.22)	(4.84)
ix. Tax Impact on Restatement Adjustment	33.18	129.07
Total adjustment to equity	**490.61**	**348.60**
Other Equity under Ind AS	**5,081.95**	**4,758.50**

Annexure 38
Notes to the Restated Standalone Summary Statement

I) EMPLOYEE BENEFITS

a) Gratuity

As per IND AS 19 "Employee benefits", the disclosures as defined are given below:

a. Defined Contribution Plans : -

Contribution to Defined Contribution Plans, recognized as expense for the year is as under :

(₹ in Million)

Benefit (Contribution to)	**31.03.2018**	**31.03.2017**	**31.03.2016 (Proforma)**
Employer's Contribution to Provident Fund	24.47	17.81	16.96
Employer's Contribution to Employee State Insurance	12.99	9.43	7.43

Defined Benefit Plan :-

Gratuity

The Company has a defined benefit gratuity plan. Every employee who has completed five years or more of service gets a gratuity on departure at 15 days salary (last drawn salary) for each completed year of service or part thereof in excess of 6 month and its payable on retirement / termination/ resignation. The benefit vests on the employees after completion of 5 Year of service. The gratuity liability has not been externally funded.

The present value of obligation is determined based on actuarial valuation using the Projected Unit Credit Method, which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation.

	Gratuity (Non Funded)		**(₹ in Million)**
I) Reconciliation of opening & closing balances of defined benefit obligation	**31.03.2018**	**31.03.2017**	**31.04.2016**
			(Proforma)
Defined Benefit obligation at beginning of year	49.29	36.85	24.76
Current Service Cost	10.22	8.57	7.24
Interest Cost	3.77	3.23	2.47

Actuarial (gain) / loss	2.56	1.40	2.81
Benefits paid	(1.33)	(0.75)	(0.43)
Defined Benefit obligation at year end	**64.50**	**49.29**	**36.85**
II) Reconciliation of fair value of assets and obligations	**31.03.2018**	**31.03.2017**	**31.03.2016**
Defined Benefit obligation	64.50	49.29	36.85
Fair value of Plan assets	-	-	-
Amount recognised in Balance Sheet	**64.50**	**49.29**	**36.85**

Since the entire amount of plan obligation is unfunded, therefore change in the fair value of plan assets are not given. Further the entire amount of plan obligation is unfunded, therefore categories of plan asset as a percentage of the fair value of total plan assets and company's expected contribution to the plan assets in the next year is not given.

III) Expenses recognised during the year

(₹ in Million)

Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
In Income Statement			
Current Service Cost	10.22	8.57	7.24
Interest Cost	3.77	3.23	2.47
Expected return on Plan assets	-	-	-
Net Cost	**13.98**	**11.80**	**9.71**
In Other Comprehensive Income			
Actuarial (gain) / loss	2.56	1.40	2.81
Return on Plan Assets	-	-	-
Net (Income)/Expenses for the period recognised in OCI	**2.56**	**1.40**	**2.81**

(₹ in Million)

IV) Actuarial assumptions	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Mortality Table (LIC) Ultimate	IALM (2006-08) Table		
Discount rate (per annum)	75%	7.50%	8.00%
Expected rate of return on plan assets (per annum)	-	-	-
Rate of escalation in salary (per annum)	6.00%	6.00%	6.00%
Expected Average remaining working lives of employees Years)	21.03	21.69	21.89

Principal Plan is under Payment of Gratuity Act 1972 (as amended up to date).

The estimates of rate of escalation in salary considered in actuarial valuation, take into account inflation, seniority, promotion and other relevant factors including supply and demand in the employment market. The above information is certified by the actuary.

The expected rate of return on plan assets is determined considering several applicable factors, mainly the composition of Plan assets held, assessed risks, historical results of return on plan assets and the Company’s policy for plan assets management.

(₹ in Million)

VI) "Quantitative Sensitivity analysis for significant assumption is as below:"	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Salary Escalation (Up by 1%)	70.63	55.30	41.55
Salary Escalation (Down by 1%)	59.14	44.03	32.75
Discount Rate (Up by 1%)	59.43	44.14	32.85
Discount Rate (Down by 1%)	70.37	55.29	41.50

(ii) Leave Encashment

The obligation for leave encashment is recognised during the year of ₹ 6.59 million (P.Y. ₹ 6.25 million), is equivalent to one month salary and charged to Profit & Loss Account.

ANNEXURE-39

RESTATED STANDALONE IND AS STATEMENT OF FINANCIAL RISK MANAGEMENT OBJECTIVE AND POLICIES

The Company's principal financial liabilities comprise of loans and borrowings, trade payables and other financial liabilities. The main purpose of these financial liabilities is to finance the Company's operations. The Company's principal financial assets include investments, loans, trade and other receivables, and cash and short-term deposits that derive directly from its operations. The Company also enters into derivative contracts.

The Company is exposed to the following risks from its use of financial instruments:

- Credit Risk
- Liquidity Risk
- Interest Rate Risk
- Currency Risk
- Price Risk

The Company's board of directors has overall responsibility for the establishment and oversight of the Company's risk management framework. This note presents information about the risks associated with its financial instruments, the Company's objectives, policies and processes for measuring and managing risk, and the Company's management of capital.

Credit Risk

The Company is exposed to credit risk as a result of the risk of counterparties non performance or default on their obligations. The Company's exposure to credit risk primarily relates to investments, accounts receivable and cash and cash equivalents. The Company monitors and limits its exposure to credit risk on a continuous basis. The Company's credit risk associated with accounts receivable is primarily related to party not able to settle their obligation as agreed. To manage this the Company periodically reviews the financial reliability of its customers, taking into account the financial condition, current economic trends and analysis of historical bad debts and ageing of accounts receivables.

Trade receivables

Trade receivables represent the most significant exposure to credit risk and are stated after an allowance for impairment and expected credit loss.

Loans and Advances

Financial assets in the form of loans and advances are written off when there is no reasonable expectations of recovery. Where recoveries are made, these are recognise as income in the statement of profit and loss. The company measures the expected credit loss of dues based on historical trend, industry practices and the business environment in which the entity operates. Loss rates are based on actual credit loss experience and passed trends. Based on historical data, loss on collection of dues is not material hence no additional provisions considered.

Bank, Cash and cash equivalents

Bank, Cash and cash equivalents comprise cash in hand and deposits which are readily convertible to cash. These are subject to insignificant risk of change in value or credit risk.

The carrying amount of financial assets represents the maximum credit exposure. The maximum exposure to credit risk at the reporting date was:

(₹ in Million)

Particular	**31.03.2018**	**31.03.2017**	**31.03.2016 (Proforma)**
Trade receivables	710.97	517.26	479.56
Loans and advances	269.32	2477.93	1455.09
Bank, Cash and cash equivalents	160.80	188.19	175.91

Particular	31.03.2018	31.03.2017	31.03.2016 (Proforma)
Trade receivables (measured under life time excepted credit			
Opening balance	716.75	522.48	484.40
Provided during the year	7.17	5.22	4.84
Reversal of provision	-1.39	-	-
Unwinding of discount	-	-	-
Closing balance	710.97	517.26	479.56

Partiular	31.03.2018	31.03.2017	31.03.2016 (Proforma)
Ageing analysis			
Upto 3 months	648.94	435.95	423.23
3-6 months	11.83	18.04	29.64
More than 6 months	50.20	63.27	26.69
	710.97	**517.26**	**479.56**

No significant changes in estimation techniques or assumptions were made during the reporting period

Liquidity risk

The Company is exposed to liquidity risk related to its ability to fund its obligations as they become due. The Company monitors and manages its liquidity risk to ensure access to sufficient fund to meet operational and financial requirements. The Company has access to credit facilities and debt capital markets and monitors cash balances daily. In relation to the Company's liquidity risk, the Company's policy is to ensure, as far as possible, that it will always have sufficient liquidity to meet its liabilities when due, under both normal and stressed conditions as they fall due while minimizing finance costs, without incurring unacceptable losses or risking damage to the Company's reputation.

Financial Arrangements

(₹ in Million)

Particulars	31.03.2018	31.03.2017	31.03.2016 (Proforma)
Term Loans	-	-	-
Cash Credit Facilities	408.80	-	2.09

Maturities of financial liabilities

The contractual undiscounted cash flows of financial liabilities are as follows:

As At 31st March' 2018	Less than 1 yr	1 -5 Years	More than 5 Year	Total
Borrowing	3,275.59	1,730.64	2405.41	**7,411.64**
Trade Payable	2,009.98	-	-	**2,009.98**
Other financial liabilities	176.65	-	-	**176.65**

As At 31st March' 2017	Less than 1 yr	1 -5 Years	More than 5 Year	Total
Borrowing	3,837.37	1,722.89	2,646.15	**8,206.42**
Trade Payable	1,915.60	-	-	**1,915.60**
Other financial liabilities	308.69	-	-	**308.69**

As At 31st March' 2016	Less than 1 yr	1 -5 Years	More than 5 Year	Total
Borrowing	3856.60	1769.20	2980.74	**8606.54**
Trade Payable	1568.85	-	-	**1568.85**
Other financial liabilities	282.22	-	-	**282.22**

Interest rate risk

Interest rate risk is the risk that an upward movement in the interest rate would adversely effect the borrowing cost of the company. The Company is exposed to long term and short-term borrowings, Commercial Paper Program. The Company manages interest rate risk by monitoring its mix of fixed and floating rate instruments, and taking action as necessary to maintain an appropriate balance.

The exposure of the Company's borrowings to interest rate changes at the end of the reporting period are as follows

a) Interest rate risk exposure **(₹ in Million)**

As At 31st March' 2018	1 -5 Years	More than 5 Year	Total
Variable Rate Borrowing	7411.64	8206.42	8606.54
Fixed Rate Borrowing	-	-	-

b) Sensitivity analysis

Profit or loss estimate to higher/lower interest rate expense from borrowings as a result of changes in interest rates.

(₹ in Million)

Particular	31.03.2018	31.03.2017	31.03.2016 (Proforma)
Interest rates - increase by 70 basis points	(51.88)	(57.44)	(60.25)
Interest rates - decrease by 70 basis points	51.88	57.44	60.25

FOREX EXPOSURE RISK

The Company operates internationally and portion of the business is transacted in several currencies and consequently the Company is exposed to foreign exchange risk through purchases from overseas suppliers in various foreign currencies.

Foreign currency exchange rate exposure is partly balanced by purchasing of goods in the respective currencies.

The Company evaluates exchange rate exposure arising from foreign currency transactions and the Company follows established risk management policies, including the use of derivatives like interest rate swap to hedge exposure to foreign currency risk.

		(₹ in Million)		
Particular		31.03.2018	31.03.2017	31.03.2016 (Proforma)
Borrowings	USD	31.65	31.07	38.11
Trade Payables	USD	0.00	0.00	0.00
Derivative- Interest Swap	USD	0.00	0.00	0.00

Particular	Impact on Profit after Tax		
	31.03.2018	31.03.2017	31.03.2016 (Proforma)
Foreign Exchange Rates - increase by 1%	(0.32)	(0.31)	(0.38)
Foreign Exchange Rates - decrease by 1%	0.32	0.31	0.38

PRICE RISK:

The entity is exposed to equity price risk, which raised out from FVTOCI quoted and unquoted equity shares. The management monitors the proportion of equity securities in its investment portfolio based on market indices. Material investments within the portfolio are managed on an individual basis and all buy and sell decisions are approved by the management. The primary goal of the entity's investment strategy is to maximize investments returns.

ANNEXURE-40

Restated Standalone Ind As Statement Of Capital Management

The Company's main objectives when managing capital are to :

- ensure sufficient liquidity is available (either through cash and cash equivalents, investments or committed credit facilities) to meet the needs of the business;
- ensure compliance with covenants related to its credit facilities; and
- minimize finance costs while taking into consideration current and future industry, market and economic risks and conditions.
- safeguard its ability to continue as a going concern
- to maintain an efficient mix of debt and equity funding thus achieving an optimal capital structure and cost of capital

The Board of Directors has the primary responsibility to maintain a strong capital base and reduce the cost of capital through prudent management of deployed funds and leveraging opportunities in domestic and international financial markets so as to maintain investor, creditor and market confidence and to sustain future development of the business.

For the purpose of Company's capital management, capital includes issued capital and all other equity reserves. The Company manages its capital structure in light of changes in the economic and regulatory environment and the requirements of the financial covenants.

The Company manages its capital on the basis of net debt to equity ratio which is net debt (total borrowings net of cash and cash equivalents) divided by total equity.

(₹ in Million)

Particular	31.03.2018	31.03.2017	31.03.2016 (Proforma)
Total Liability	7411.64	8206.42	8606.54
Less : Bank, Cash and cash equivalent	160.80	188.19	175.91
Net debt	**7250.85**	**8018.22**	**8430.63**
Total equity	5163.32	4399.59	4076.14
Net debt to equity ratio	**0.71**	**0.55**	**0.48**

ANNEXURE-41

Restated Standalone Ind As Statement Of Financial Instruments - Accounting Classifications And Fair Value Measurements

The following methods and assumptions were used to estimate the fair values:

1. Fair value of cash and short-term deposits, trade and other short term receivables, trade payables, other current liabilities, short term loans from banks and other financial institutions approximate their carrying amounts largely due to the short-term maturities of these instruments.
2. Financial instruments with fixed and variable interest rates are evaluated by the Company based on parameters such as interest rates and individual credit worthiness of the counter party.

Based on this evaluation, allowances are taken to account for the expected losses of these receivables. The Company uses the following hierarchy for determining and disclosing the fair value of financial instruments by valuation technique :

Level 1: quoted (unadjusted) prices in active markets for identical assets or liabilities

Level 2: other techniques for which all inputs which have a significant effect on the recorded fair value are observable, either directly of indirectly

Level 3: techniques which use inputs that have a significant effect on the recorded fair value that are not based on observable market data

(₹ in Million)

Particular	Carrying Amount As at 31.03.18	Level 1	Level 2	Level 3
Financial assets at amortised cost:				
Investments	2,407.14	-	-	-
Trade receivables	710.97	-	-	-
Loans	269.32	-	-	-
Bank, Cash and bank balances	160.80	-	-	-
Other Financial Assets	71.79	-	-	-
	3,620.02	**-**	**-**	**-**
Financial assets at fair value through other comprehensive income:				
Investments	0.84	0.84	-	-
Total	**0.84**	**0.84**	**-**	**-**
Financial liabilities at amortised cost:				
Long term borrowings	4,568.00	-	-	-
Short term borrowings	2,843.64	-	-	-
Trade payables	2009.98	-	-	-
Other financial liabilities	176.65	-	-	-
Total	**9,598.28**	**-**	**-**	**-**

Particular	Carrying Amount As at 31.03.17	Level 1	Level 2	Level 3
Financial assets at amortised cost:				
Investments	207.95	-	-	-
Trade receivables	517.26	-	-	-
Loans	2,477.93	-	-	-
Bank, Cash and bank balances	188.19	-	-	-
Other Financial Assets	86.89	-	-	-
	3478.23	**-**	**-**	**-**

Financial assets at fair value through other comprehensive income: Investments	0.74	0.74	-	-
Total	**0.74**	**0.74**	**0.00**	**0.00**
Financial liabilities at amortised cost: Long term borrowing Short term borrowing Trade payables Other financial liabilities	 4,812.78 3,393.64 1,915.60 308.69	 - - - -	 - - - -	 - - - -
Total	**10,430.71**	**-**	**-**	**-**

Particular	**Carrying Amount** **As at 31.03.16 (Proforma)**	**Level 1**	**Level 2**	**Level 3**
Financial assets at amortised cost: Investments Trade receivables Loans Bank, Cash and bank balances Other Financial Assets	 133.54 479.56 1,455.09 175.91 110.53	 - - - - -	 - - - - -	 - - - - -
	2,354.63	**-**	**-**	**-**
Financial assets at fair value through other comprehensive income: Investments	0.61	0.61	-	-
Total	**0.61**	**0.61**	**-**	**-**
Financial liabilities at amortised cost: Long term borrowings Short term borrowings Trade payables Other financial liabilities	 5111.63 3494.91 1568.85 282.22	 - - - -	 - - - -	 - - - -
Total	**10,457.61**	**-**	**-**	**-**

ANNEXURE-42

Restated Standalone Ind As Statement Of Payment To Auditors

(₹ in Million)

SN	**Particular**	**31.03.2018**	**31.03.2017**	**31.03.2016 (Proforma)**
a)	Auditors			
	- Statutory Auditors Fees	1.10	1.10	1.10
	- Tax Audit Fees	0.30	0.30	0.30
b)	Certification and Consultation Fees	-	-	-
c)	Internal Audit Fees	0.86	0.93	0.46
d)	Cost Audit fees	0.12	-	-
e)	Secretrial Audit Fees	0.02	-	-

Annexure 43
Restated Standalone Ind AS Statement of Related Parties

a) **Subsidiary (Control Exists)**
- -- IA Hydro Energy Pvt. Ltd.
- -- Shri Bajrang Energy Private Limited
- -- S B Power (Partnership Firm)

b) **Joint Venture**
- -- Chhattisgarh Captive Coal Mining Ltd. W.e.f. 01.04.2007

c) **Enterprises Under Control of KMP & their Relatives**
- -- Shri Bajrang Alloys Limited
- -- S. B. Multimedia (P) Limited
- -- Shri Bajrang Ispat & Plywood Limited
- -- Shimmer Investment Private Limited
- -- Swastik Mercantiles Limited
- -- Shri Bajrang Steel & Power Limited
- -- I A Energy Private Limited
- -- I A Energy (Partnership Firm)
- -- Jainarayan Hariram Goel Charitable Trust
- -- Shri Bajrang Hydro Energy Private Limited

d) **Key Management Personnel**
- -- Shri Narendra Goel
- -- Shri Pawan Goel
- -- Shri Shravan Kumar Goel
- -- Parul Verma

e) **Relatives of Key Management Personnel**
- -- Shri Suresh Goel -- Shri Rajendra Goel
- -- Shri Anand Goel -- Shri Ashutosh Goel
- -- Shri Sarla Goel -- Shri Archit Goel
- -- Shri Neeta Goel -- Shri Suman Goel
- -- Shri Aruna Goel -- Shri Rashmi Goel

Transaction with Related Parties in the ordinary course of business

(₹ in Million)

Particulars	**FY Ended 31.03.2018**	**FY Ended 31.03.2017**	**FY Ended 31.03.2016 (Proforma)**
Subsidiary			
Purchase of Materials	13.66	1.28	-
Sale of Materials	0.80	0.37	-
Investment	2,375.44	175.44	101.44
Interest Expenses	3.31	-	-
Interest Income	18.40	-	-
Outstandings:			
Payables	-	1.28	-
Receivables	269.32	2,477.93	50.86
Associates			
Sale of Materials	-	-	48.48
Investment	-	-	0.09
Outstandings:			
Receivables	-	-	1,406.53
Joint Venture			
Investments	30.69	30.69	30.69
Outstandings:			
Payables	6.18	6.18	6.01
Enterprises Under the control of KMP & their relative			
Purchase of Materials	51.52	203.44	255.14
Sale of Materials	360.42	343.75	121.26
Interest Expenses	0.13	-	13.58
Services Received	123.00	-	0.06
Outstandings:			
Payables	4.87	197.17	120.01
Receivable	60.61	-	37.65

Key Management			
Remuneration Paid	9.72	3.24	3.22
Interest Paid	-	-	-
Services Received	7.20	-	-
Payables	1.08	-	-

The following table provides the total amount of transactions that have been entered into with related parties for the relevant financial year:-

(₹ in Million)

Particulars	**31.03.2018**	**31.03.2017**	**31.03.2016**
			(Proforma)
Purchase of Materials:			
Shri Bajrang Alloys Limited	51.52	203.44	255.14
IA Hydro Energy Private Limited	13.66	-	-
Shri Bajrang Energy Private Limited	-	1.28	-
Purchase of Fixed Asset:			
Shri Bajrang Alloys Limited	-	-	1.53
Sale of Materials:			
Shri Bajrang Alloys Limited	344.08	320.99	114.63
Shri Jainarayan Hariram Goel Charitable Trust	4.48	0.34	0.59
Shimmer Investments Private Limited	11.85	22.42	6.04
I A Energy (Partnership Firm)	-	0.37	48.48
IA Hydro Energy Private Limited	0 .80	-	-
Service Received:			
SB Multimedia Pvt. Ltd.	123.00	50.00	-
Shri Bajrang Alloys Limited	-	0.06	0.06
Ashutosh Goel	3.60	-	-
Ayush Goel	3.60	-	-
Remuneration Paid:			
Shri Narendra Goel	2.10	1.80	1.80
Shri Rajendra Goel	1.80	1.80	1.20
Pawan Goel	1.80	1.20	1.20
Ashutosh Goel	0.60	1.20	1.20
Pradeep Tiwari	1.73	1.30	-
Shri Shravan Kumar Goyal	1.69	1.44	1.42
Interest Expenses:			
Sanskar Info TV Private Limited	-	13.59	13.58
Shri Bajrang Ispat & Plywood Limited	0.13	-	-
S. B. Power	3.31	-	-
Interest Income:			
I A Hydro Energy Private Limited	18.40	6.82	-

Annexure 44

Restated Standalone Ind AS Statement of Contingent Liabilities

Contingent Liabilities and Capital Commitments are not provided for in respect of:-

(₹ in Million)

Description	31.03.2018		31.03.2017		31.03.2016 (Proforma)	
	Value of Liability	Margin Money	Value of Liability	Margin Money	Value of Liability	Margin Money
ii)Claims against the Co. / disputed	469.16	-	132.52	-	159.18	-
tax liabilities not acknowledged as debt						
iii)Bank Guarantees outstanding	227.30	5.69	213.79	12.93	110.11	15.05
iv)Letter of Credit & Guarantee	104.56	-	311.12	-	274.03	NA
issued by bank						
v)Jointly and severely corporate						
guarantee to the bank on behalf	-	-	-	-	-	-
of Joint venture company						
vi)Jointly and severely corporate						
guarantee to the bank on behalf	3311.00	-	3311.00	-	3311.00	-
of Partnership Firm						

Annexure 45
Restated Standalone Ind AS Statement of Segment Reporting

Basis of preparation :
The Company's operations predominantly relate to manufacturing, trading, generation and sale of sponge iron, billets, ferro alloys and power. The risks and rewards associated with these three businesses are significantly different. Therefore, the primary segment consists of "Iron & Steel" and "Power".

The geographic segments identified as secondary segments are "Domestic Market" and "Export Market". Since there is no significant export market revenue, the same has not been disclosed. The entire capital employed is within India.

Information about business segments - Primary

(₹ in Million)

Business Segment	**Iron & Steel**			**Power**			**Total**		
	2017-18	2016-17	2015-16	2017-18	2016-17	2015-16	2017-18	2016-17	2015-16
			(Proforma)			(Proforma)			(Proforma)
Revenue									
External Turnover (Gross)	18,183.42	15,503.96	13,980.43	115.89	100.84	126.02	18,299.32	15,604.80	14106.44
Inter-segment Transfer	-	-	-	1,820.99	1,944.83	1,321.79	1,820.99	1,944.83	1,321.79
Eliminations	-	-	-	(1,820.99)	(1,944.83)	(1,321.79)	(1,820.99)	(1,944.83)	(1,321.79)
Total Revenue	18,183.42	15,503.96	13,980.43	115.89	100.84	126.02	18,299.32	15,604.80	14,106.44
Result									
Segment Result	1,019.79	(483.52)	(568.64)	267.82	955.74	618.96	1,287.60	472.22	50.32
Unallocated Expense/Income	-	-	-	-	-	-	-	-	-
Operating Profit	-	-	-	-	-	-	1,218.04	429.59	18.66
(+) Interest Income	-	-	-	-	-	-	79.05	42.94	32.09
(+) Profit on Sale of Fixed Assets	-	-	-	-	-	-	(9.50)	(0.31)	(0.43)
(-) Income Taxes	-	-	-	-	-	-	294.35	113.05	8.92
(-) Earlier Year Taxes	-	-	-	-	-	-	-	-	(0.26)
(-) Deferred Taxes	-	-	-	-	-	-	194.38	47.95	229.26
(+) Other Comprehensive Income	-	-	-	-	-	-	(2.49)	(1.31)	0.04
(+) Exceptional Items	-	-	-	-	-	-	-	-	(6.67)
Net Profit	**1,019.79**	**(483.52)**	**(568.64)**	**267.82**	**955.74**	**618.96**	**796.38**	**309.90**	**(194.24)**
Other Information									
Segment Assets	7,978.28	8,160.33	8,372.43	1,144.09	1,175.11	1,197.38	9,122.37	9,335.44	9,569.81
Unallocated Corporate Assets	-	-	-	-	-	-	7,074.20	6,728.66	6,100.87
Total Assets	7,978.28	8,160.33	8,372.43	1,144.09	1,175.11	1,197.38	16,196.57	16,064.10	15,670.67
Segment Liabilities	7,483.77	7,674.12	7,422.44	191.46	208.02	459.70	7,675.23	7,882.14	7,882.14
Unallocated Corporate Liabilities	-	-	-	-	-	-	2,544.94	2,969.29	2,899.32
Total Liabilities	7,483.77	7,674.12	7,422.44	191.46	208.02	459.70	10,220.17	10,851.43	10,781.47
Depreciation	501.50	502.30	510.90	37.15	37.01	36.35	538.65	539.31	547.24

Annexure 46
Restated Standalone Ind AS Statement of Capitalisation (₹ in Million)

Particular	Pre -Issue as at 31.03.2018	As adjusted for Issue
Borrowing		
Long-term borrowings (A)	4136.05	-
Current maturities of long term borrowings (B)	431.95	-
Total long-term borrowings (C)=(A)+(B)	**4568.00**	**-**
Short-term borrowings	2843.64	
Total Borrowings (D)	**7411.64**	**-**
Shareholders' funds		
Share capital	130.71	-
(1,30,71,155 Equity Shares of Rs. 10/- each fully paid up)		
Reserves and surplus		
Securities premium	1455.83	-
Amalgamation Adjustment reserve	111.90	-
Capital Subsidy	110.74	-
Surplus i.e. balance in the restated standalone summary statement of profit and loss	3354.14	-
Total shareholders' funds (E)	**5163.32**	**-**
Long-term borrowings / Shareholders' funds (C/E)	**0.88**	**-**
Total borrowings / Shareholders' funds (D/E)	**1.44**	**-**

Note : Since March 31, 2018 (which is the last date as of which financial information has been given in para of this report) share capital was increased form ₹ 130.71 million to ₹ 522.84 million by the issue of bonus shares in the ratio of 3 equity share for every 1 equity shares."

Annexure 47
Restated Standalone Ind AS Statement of Tax Shelter (₹ in Million)

SN	PARTICULAR	31/3/2018	31/03/2017	31/03/2016
				(Proforma)
A	Restated Profit/ (Loss) Before Tax	1287.60	472.22	43.65
B	Tax Rate	34.61%	34.61%	33.06%
C	Tax Thereon on Above Rate (A x B)	445.61	163.43	14.43
D	**Adjustment for Permanent Difference**			
1	**Expenses disallowed under Income Tax Act**			
	Loss on Sale of Fixed Assets & Investment	9.50	0.31	15.35
	Profit on Sale of Fixed Assets	0.00	0.00	(0.19)
	Loss in Share of Subsidiary	0.00	33.42	0.00
	Interest on TDS	0.35	0.05	0.10
	Penalty & Fine	0.29	0.14	0.61
	Donation	0.19	0.13	0.14
	Corporate Social Responsibility	18.63	17.16	9.25
	Dividend Exempt Under IT ACT	0.00	0.00	0.00
	Deduction u/s 32AC	0.00	(47.73)	(57.82)
	TOTAL (D)	**28.96**	**3.48**	**(32.57)**
E	**Adjustments for Timing Differences**			
	"Difference in book depreciation and Depreciation under	(84.97)	(257.86)	(339.13)
	Income Tax Act 1961"			
	Expenses allowable on payment basis	(16.35)	(14.50)	(20.50)
	Provision for gratuity	15.34	13.20	12.52
	Provision for leave encashment	3.52	1.47	0.00
	Provision for Bonus	18.26	14.77	13.75
	Provision for Doubtful advances	1.94	0.00	0.00
	Deduction allowed as per Sec. 35(2) & 35(2AB)	(46.95)	0.00	0.00
	TOTAL (E)	**(109.22)**	**(242.92)**	**(333.37)**
	Net Adjustments (D+E)	**(80.26)**	**(239.44)**	**(365.94)**
	Taxable income before set off of losses			
	Taxable Income for the year	1,207.35	232.79	(322.29)
	Brought forward Losses			
	- Business Losses	0.00	0.00	0.00
	- Unabsorbed depreciation	653.68	1,861.03	2,088.78
	- Long term capital loss	13.06	14.63	14.63

Annexure 48
Restated Ind AS Standalone Statement of Accounting Ratios **(₹ in Million)**

S.No.	PARTICULAR		31/3/2018	31/03/2017	31/03/2016
					(Proforma)
	Basic earnings per share (Rs.) (refer note 3(a) below)	A/C	60.93	23.71	(14.86)
	Diluted earnings per share (Rs.) (refer note 3(b) below)	B/D	60.93	23.71	(14.86)
	Return on Net Worth (%) (refer note 3(c) below)	A/E	15.42%	7.04%	(4.77%)
	Net asset value per equity share (Rs.) (refer note 3(d) below)	E/F	395.02	336.59	311.84
1	Restated Profit /(loss) after tax, attributable to equity	A	796.38	309.90	(194.24)
	Shareholder				
	Add: Adjustment for loss on fair valuation of convertible		-	-	-
	preference shares				
	Net Profit/(loss) available for calculation of DEPS	B	796.38	309.90	(194.24)
2	Weighted average number of equity shares considered	C	13.07	13.07	13.07
	for calculating basic earnings per share				
	Effect of dilution:				
	Stock option under ESOP				
	Compulsory convertible preference shares				
	Weighted average number of equity shares considered for	D	13.07	13.07	13.07
	calculating diluted earnings per share				
3	**Restated net worth at the end of the year (refer note 4 below)**	E	5163.32	4399.59	4076.14
	Face value per share		10.00	10.00	10.00
	Total number of equity shares outstanding at the end of the year	F	13.07	13.07	13.07
	Weighted average number of equity shares outstanding during the year,	H	13.07	13.07	13.07
	after giving the impact of bonus shares, used for diluted earning per share				

Notes

1 The figures disclosed above are based on the Restated Ind AS Standalone Financial Information of the Company.

The above statement should be read with the Notes to the Restated Ind AS Standalone Financial Information - Accounting Policies - Annexure 5 and Statement of Restatement – Annexure 6

2 The Ratios have been computed as below:

a) Basic Earnings per share (Rs.)

$$\frac{\text{Restated Profit /(loss) after tax, attributable to equity shareholders}}{\text{Weighted average number of equity shares considered for calculating basic earnings per share}}$$

b) Diluted Earnings per share (Rs.)

$$\frac{\text{Net Profit /(loss) available for calculation of DEPS}}{\text{Weighted average number of diluted equity shares}}$$

c) Return on net worth (%)

$$\frac{\text{Restated Profit /(loss) after tax, attributable to equity shareholders}}{\text{Restated Net worth at the end of the year}}$$

d) Net asset value per share (Rs.) $\dfrac{\text{Restated net worth at the end of the year}}{\text{No of Equity Shares Outstanding at the end of the Year}}$

3 Weighted average number of equity shares is the number of equity shares outstanding at the beginning of the year adjusted by the number of equity shares issued during year multiplied by the time weighting factor. The time weighting factor is the number of days for which the specific shares are outstanding as a proportion of total number of days during the year.

4 Net worth includes Equity share capital + Other equity (including Share Premium, General Reserve, Employee share based payment reserve and Retained earnings).

5 Earnings per share calculations are in accordance with Ind AS 33 (Earnings per Share).

6 The Company has allotted bonus shares to the existing equity shareholders on 4 September 2018 in the ratio of 1:3 as approved by the shareholders at the general meeting held on 3 September 2018. Consequently, the number of shares have increased from 13,071,155 equity shares to 52,284,620 equity shares.

Annexure 49
Restated Ind AS Standalone Statement of Other Notes

I. Balances of the sundry debtors, sundry creditors, loans and advances etc. are subject to confirmation and reconciliation.

II. In the opinion of the Board, the value of realization of loans, advances and current assets in the ordinary course of business will not be less than the amount at which they are stated in the balance sheet.

III. BORROWING COST

During the year under review the Company has capitalized a sum of Nil (Previous Year ₹ 72.98/- Million) in respect of cost of borrowings and added to the cost of related assets.

IV. A fire incident was happened in Unit III Tilda during the year. Due to which some of the fixed assets has been burnt (Refer Annexure 7), for which insurance claim has been lodged and the same is yet to be settled.

V. Inventories and consumption of stores materials have been taken as valued and certified by the management.

VI. Amounts have been rounded off to the nearest rupees million and previous year's figures have been regrouped, rearranged and reclassified wherever considered necessary to confirm to the current presentation.

VII. Details of Interest of the Company in Joint Venture:

i) Name of the Joint Venture entity : Chhattisgarh Captive Coal Mining Ltd.
ii) Country of Incorporation : India
iii) Principal Activities : Extraction of Coal
iv) Ownership Interest : 19.753%

The Company's interests in these joint ventures are reported as Non-current Investment and stated at cost. However, the company's share of each of the assets, liabilities, income & expenses etc. are :

(₹ in Million)

Particulars	**31.03.2018**	**31.03.2017**
Fixed Assets (including Capital WIP & Pre-operative expenses)	15.55	15.57
Investments	5.33	6.01
Cash, Bank & Loans and Advances	0.92	0.29
Loan Fund	-	-
Current Liabilities	0.22	0.19
Revenue	0.02	0.02
Expenses	0.05	0.14

VIII. As set out in sub section (3) of section 129 of the companies Act, 2013 the balance sheet of subsidiaries company is attached and its Financial information are as follows.-

Particulars		
Name of Subsidiary Company	Shri Bajrang Energy Private Limited	
Reporting Currency	₹ in Million	
Country of Incorporation	India	
Percentage of Holding	79.83%	79.83%
Financial Year	2017-18	2016-17
Capital	2.53	2.53
Reserves	78.53	77.17
Total Assets	81.21	404.60
Total Liabilities	81.21	404.60
Investments	71.49	21.49
Gross Turnover (Incl. other income)	1.82	2.44
Profit Before Taxation	1.69	(21.74)
Prov. for Tax (including deferred Tax)	0.03	-
Profit After Taxation	1.36	(21.74)
Proposed Dividend	-	-

Particulars		
Name of Subsidiary Company	IA Hydro Energy Private Limited	
Reporting Currency	₹ In Million	
Country of Incorporation	India	
Percentage of Holding	90.46%	74.00%
Financial Year	2017-18	2016-17
Capital	325.00	100.00
Reserves	1,573.77	(14.46)
Total Assets	6,316.93	6,307.69
Total Liabilities	6,316.93	6,307.69
Investments	-	-
Gross Turnover (Incl. other income)	225.68	14.17
Profit Before Taxation	(630.94)	(78.81)
Prov. for Tax (including deferred Tax)	(194.03)	(19.07)
Profit After Taxation	(436.91)	(59.75)
Proposed Dividend	-	-

IX. (i) A Legal case pending with the Honourable First Class Judicial Magistrate, Raipur against Advance to supplier for ` 9.31 million .
(ii) Amount of ₹ 60.80 million is shown under other Long Term Liability related to electricity duty of earlier years due to litigation pending with High Court Bilaspur.

(XI) Remittance in Foreign Currency
Breakup Of Raw Material Consumed

(₹ in Million)

Particulars	2017-18		2016-17		2015-16	
	%	Amount	%	Amount	%	Amount
Indigenous	100.00%	12,745.79	100.00%	9,455.66	100.00%	9,570.27
Imported	-	-	-	-	-	-
	100.00%	**12,745.79**	**100.00%**	**9,455.66**	**100.00%**	**9,570.27**

Breakup of Stores Consumed

(₹ in Million)

Particulars	2017-18		2016-17		2015-16	
	%	Amount	%	Amount	%	Amount
Indigenous	99.10%	546.67	99.72%	396.00	99.12%	380.97
Imported	0.90%	4.94	0.28%	1.10	0.88%	3.37
	100.00%	**551.61**	**100.00%**	**397.10**	**100.00%**	**384.34**

Value of import on CIF basis

Particulars	Currency	2017-18		2016-17		2015-16	
		USD/EURO	₹ in Million	USD/EURO	₹ in Million	USD/EURO	₹ in Million
- Raw Materials	USD	-	-				
- Stores & Spares	USD	75,202.33	4.86	11,864.36	0.80	53,212.89	3.37
	EURO	950.00	0.08	4286.00	0.30	-	-
- Trading Goods	USD	-	-	-	-	-	-
- Capital Goods	USD	1,52,927.91	12.13	18,592.00	1.24	-	-
	EURO	-	-	563,622.87	42.71	-	-
Exp. in Foreign Currency	USD	34,66,273.20	226.06	23,10,271.58	154.44	810,503.64	46.38
Earning in Foreign Exchange on							
Sale of Finished Goods							
Carbon Credits	EURO	-	-	125,163.50	9.10	128,361.48	9.18
Wire-rod Coil	USD	-	-	703,597.92	46.33	-	-
TMT	USD	-	-	147,601.50	7.26	-	-

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2, 2018

For and behalf of
Shri Bajrang Power and Ispat Limited

Pawan Goel
Chief Financial Officer

Suresh Goel
Chairman
DIN: 00115834

Parul Verma
Company Secretary

Narendra Goel
Managing Director
DIN : 00115883

Auditors' Report on the Restated Standalone Accounting Principles Generally Accepted in India ("IGAAP") Financial Information of Shri Bajrang Power and Ispat Limited

To,
The Board of Directors
Shri Bajrang Power and Ispat Limited
Village Borjhara , Urla Industries Area,
Raipur (C.G) -493221

Independent Auditors' Report on the Restated Standalone IGAAP Financial Information prepared in connection with the proposed initial public offering (the "IPO") by Shri Bajrang Power and Ispat Limited.

Dear Sirs,

1. We have examined the attached Restated Standalone IGAAP Financial Information of Shri Bajrang Power and Ispat Limited (the "**Company**"), which comprise of the Restated Standalone IGAAP Summary Statement of Assets and Liabilities as at March 31, 2015 and March 31, 2014, the Restated Standalone IGAAP Summary Statement of Profit and Loss and the Restated Standalone IGAAP Summary Statement of Cash Flows for each of the years ended March 31, 2015, and March 31, 2014 and the Significant Accounting Policies and Other Information – including schedules, notes and annexures thereto (collectively referred to as the "**Restated Standalone IGAAP Financial Information**"), as approved by the Board of Directors of the Company prepared in terms of the requirements of the relevant provisions of the:

   a. Section 26 of Part I of Chapter III of the Companies Act, 2013 ("the **Act**");

   b. the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 as amended from time to time in pursuance of provisions of Securities and Exchange Board of India Act, 1992 ("**SEBI ICDR Regulations**").

   The preparation of the Restated Standalone IGAAP Financial Information, is the responsibility of the management of the Company. The management's responsibility includes designing, implementing and maintaining adequate internal control relevant to the preparation and presentation of the Restated Standalone IGAAP Financial Information. The management is also responsible for identifying and ensuring that the Company complies with the SEBI ICDR Regulations.

2. We have examined such Restated Standalone IGAAP Financial Information taking into consideration:

   a. the terms of reference and terms of our engagement agreed with you vide our engagement letter dated August 14, 2018, requesting us to carry out the assignment, in connection with the proposed initial public offering of the Company;
   b. Guidance Note on Reports in Company Prospectus (Revised 2016) issued by the Institute of Chartered Accountants of India ("**ICAI**") as amended from time to time (the "**Guidance Note**"). which include the concepts of test checks and materiality. This Guidance Note requires us to obtain reasonable assurance based on verification of evidence supporting the Restated Standalone IGAAP Financial Information. This Guidance Note also requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

3. The Restated Standalone IGAAP Financial Information have been compiled by the management of the Company from:

   a. the audited standalone financial statements of the Company as at and for the year ended March 31, 2015 and March 31, 2014, which were prepared in accordance with the accounting principles generally accepted in India ("**IGAAP**") at the relevant time which have been approved by the Board of Directors at their meetings held on July 14, 2015 and August 24, 2014 respectively; and

   b. Audit for the financial year ended March 31, 2015 and March 31, 2014 was conducted by the previous auditor , R. K. Singhania & Associates , Chartered Accountants Raipur , and accordingly reliance has been placed on the financial information examined by them for the said years .The financial report included for these years i.e. March 31, 2015 and March 31, 2014 are based solely on the report submitted by R.K. Singhania & Associates, Chartered Accountants Raipur and the company have also confirmed that the restated standalone financial information :

   - have been made after incorporating adjustments for the changes in accounting policies retrospectively in respective financial years to reflect the same accounting treatment as per changed accounting policy for all the reporting periods;
   - have been made after incorporating adjustments for the material amounts in the respective financial years to which they relate;

- as per requirements of IGAAP, do not contain any extra-ordinary items that need to be disclosed separately in the Restated Standalone IGAAP Financial Information;
- There were qualifications in the auditors' reports on the audited standalone financial statements of the Company as at March 31, 2015 and March 31, 2014 and for which adjustment have been done to the Restated Standalone IGAAP Financial Information. (Refer Annexure 5 for the details)

4. In accordance with the requirements of Section 26 of Part I of Chapter III of the Act, read with Rules 4 to 6 of Companies (Prospectus and Allotment of Securities) Rules, 2014 the SEBI ICDR Regulations and the Guidance Note, we have examined the following financial statements contained in the Restated Standalone IGAAP Financial Information as at March 31 ,2015 and March 31, 2014 ,examined and reported by R.K. Singhania & Associates , Chartered Accountants Raipur , on which reliance has been placed by us , have been arrived after making adjustments and regrouping/ reclassifications as in our opinion were appropriate below and have been fully described in Annexure 5: Statement of Restatement Adjustment to Audited IGAAP Standalone Financial Statements and based on our examination, we report that:

   a. The Restated Standalone IGAAP Standalone Summary Statement of Assets and Liabilities of the Company as at March 31, 2015 and March 31, 2014, as set out in Annexure 1 to this report;

   b. The Restated Standalone IGAAP Standalone Summary Statement of Profit and Losses of the Company for each of the years ended March 31, 2015 and March 31, 2014, as set out in Annexure 2 to this report;

   c. The Restated IGAAP Standalone Summary Statement of Cash Flows of the Company for each of the years ended March 31, 2015 and March 31, 2014, as set out in Annexure 3 to this report and

   Based on the above and according to the information and explanations given to us and reliance placed on the reports submitted by the previous auditor R.K. Singhania & Associates , Chartered Accountants Raipur , we further report that the Restated Standalone IGAAP Financial Information of the Company: (as attached to this report and as mentioned above, read with basis of preparation and respective significant accounting policies given in Annexure 4 as described in paragraph 1 have been prepared in accordance with the SEBI ICDR Regulations and these Restated Standalone IGAAP Financial Information)

   a. have been made after incorporating adjustments for the changes in accounting policies retrospectively in respective financial years to reflect the same accounting treatment as per changed accounting policy for the reporting periods;

   b. have been made after incorporating adjustments and regroupings for the material amounts in the respective financial year to which they relate;

   c. as per requirements of IGAAP, do not contain any extra-ordinary items that need to be disclosed separately in the Restated Standalone I GAAP Financial Information;

   d. There were qualifications in the auditors' reports on the audited standalone financial statements of the Company as at March 31, 2015 and March 31, 2014 and for which adjustment have been done to the Restated Standalone IGAAP Financial Information. (Refer Annexure 5 for the details)

   e. Other audit qualifications included in the Annexure to the auditors' report issued under Companies (Auditor's Report) Order 2003, as applicable, on the standalone financial statements for each of the years ended March 31, 2015 and March 31, 2014, which do not require any corrective adjustment in the Restated IGAAP Standalone Summary Statements, are as follows:

A. As at and for the year ended March 31, 2015

Clause I (a) - Fixed Assets

According to the information and explanations given to us the Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets except componentization of fixed assets during the year.

Clause VII (b) - Disputed liabilities pending before appropriate authorities

S. No.	Name of the Statute	Nature of the duties	"₹" in Millions	Period to which the amount relates	Forum where dispute is pending
1.	Income Tax Act ,1961	Income Tax	24.49	FY 2004-05	High Court of Chhattisgarh

2.		Income Tax	48.81	FY 2010-11	ITAT Chhattisgarh
3.		Income Tax	34.12	FY 2009-10	ITAT Chhattisgarh
4.	Central Excise Act, 1944.	Custom duty	2.2	FY 2007-08	CESTAT, Mumbai
5.		Custom duty	2.21	FY 2012-13	The Additional Commissioner of Custom. Vizag.
6.		Excise duty	22.83	FY 2005-09	CESTAT, Dehli
7.		Service Tax	6.49	FY 2011-12	Commission of Excise , Raipur
8.		Excise duty	1.59	FY 2005-06	DGECL, Raipur.
9.		Excise duty	.32	FY 2006-07	Commission of Excise , Raipur
10.		Excise duty	.25	FY 2005-06 & 2007-08	Commission of Excise , Raipur
11.		Excise & Service Tax	1.48	FY 2010-11	Commission of Excise , Raipur
12.		Excise & Service Tax	5.65	FY 2012-13	Commission of Excise , Raipur
13.		Excise & Service Tax	.57	FY 2014-15	Commission of Excise , Raipur
14.		Excise & Service Tax	6.90	FY 2012-13	CESTAT, New Delhi
15.	Central Sales tax & CG VAT Act	Sales Tax	5.22	FY 2005-06	Additional Commissioner o f Commercial Tax (Appeal) Raipur.
	Total		**159.18**		

B. As at and for the year ended March 31, 2014

Clause VII (b) – Disputed liabilities pending before appropriate authorities

S.No	Name of the Statute	Nature of the duties	"₹" in Millions	Period to which the amount relates	Forum where dispute is pending
1.	Income Tax Act , 1961	Income Tax	24.49	FY 2004-05	High Court of Chhattisgarh
2.		Income Tax	48.81	FY 2010-11	ITAT Chhattisgarh
3.		Income Tax	34.12	FY 2009-10	ITAT Chhattisgarh
4.	Central Excise Act, 1944.	Custom duty	2.20	FY 2007-08	CESTAT, Mumbai
5.	Central Excise Act, 1944.	Custom duty	2.21	FY 2012-13	The Additional Commissioner of Custom. Vizag.
6.	Central Excise Act, 1944	Excise duty	22.83	FY 2005-09	CESTAT, Delhi
7.	Central Excise Act, 1944	Service Tax	6.49	FY 2011-12	Commission of Excise , Raipur
8.	Central Excise Act, 1944.	Excise duty	1.59	FY 2005-06	DGECL, Raipur.
9.	Central Excise Act, 1944.	Excise duty	.32	FY 2006-07	Commission of Excise, Raipur.
10.	Central Excise Act, 1944.	Excise duty	.25	FY 2005-06 & 2007-08	Commission of Excise, Raipur

11.	Central Excise Act, 1944.	Excise & Service Tax	1.48	FY 2010-11	Commission of Excise, Raipur
12.	Central Excise Act, 1944.	Excise & Service Tax	5.65	FY 2012-13	Commission of Excise, Raipur
13.	Central Excise Act, 1944.	Excise & Service Tax	6.90	FY 2012-13	CESTAT, New Delhi
14.	Central Sales tax & CG VAT Act	Sales Tax	5.22	FY 2005-06	Additional Commissioner o f Commercial Tax (Appeal) Raipur.
	Total		**158.61**		

Clause XVII

According to the information and explanation given to us and on an overall examination of the Balance Sheet of the Company, we are of the opinion that the funds raised on short term basis have nominally been used for the long term Investments & not vice-versa.

5. We have also examined the following Restated Standalone IGAAP Financial Information set out in Annexures prepared by the management and approved by the Board of Directors of the Company and annexed to this report relating to the Company as at and for each of the years ended March 31, 2015 and March 31, 2014.Information have been included based upon the reports submitted by previous auditors, R.K. Singhania & Associates, Chartered Accountants Raipur and replied upon by us:

1. Restated Standalone IGAAP Summary Statement of Assets and Liabilities in **Annexure 1**;
2. Restated Standalone IGAAP Summary Statement of Profit and Loss in **Annexure 2**;
3. Restated Standalone IGAAP Summary Statement of Cash Flows in **Annexure 3**;
4. Notes to the Restated Standalone IGAAP Financial Information - Significant Accounting Policies in **Annexure 4**;
5. Statement of Restatement Adjustment to Audited IGAAP Standalone Financial Statements in **Annexure 5**;
6. Restated Standalone Statement of Share Capital, enclosed as **Annexure 6**;
7. Restated Standalone Statement of Reserves, enclosed as **Annexure 7**;
8. Restated Standalone Statement of Long-term Borrowings, enclosed as **Annexure 8**;
9. Restated Standalone Statement of Deferred Tax liability (Net), enclosed as **Annexure 9**;
10. Restated Standalone Statement of Long-term Provisions, enclosed as **Annexure 10**;
11. Restated Standalone Statement of Short-term Borrowings, enclosed as **Annexure 11**;
12. Restated Standalone Statement of Other Current Liabilities, enclosed as **Annexure 12**;
13. Restated Standalone Statement of Short-Term Provisions, enclosed as **Annexure 13**;
14. Restated Standalone Statement of Fixed Assets, enclosed as **Annexure 14**;
15. Restated Standalone Statement of Non-Current investments, enclosed as **Annexure 15**;
16. Restated Standalone Statement of Long term Loans and Advances, enclosed as **Annexure 16**;
17. Restated Standalone Statement of Inventories, enclosed as **Annexure 17**;
18. Restated Standalone Statement of Trade Receivables, enclosed as **Annexure 18**;
19. Restated Standalone Statement of Cash and Bank Balances, enclosed as **Annexure 19**;
20. Restated Standalone Statement of Short term Loans and Advances, enclosed as **Annexure 20**;
21. Restated Standalone Statement of Other Current Assets, enclosed as **Annexure 21**;
22. Restated Standalone Statement of Revenue from operations, enclosed as **Annexure 22**;
23. Restated Standalone Statement of Other Income, enclosed as **Annexure 23**;
24. Restated Standalone Statement of Cost of Material consumed, enclosed as **Annexure 24**;
25. Restated Standalone Statement of Increased/decreased in stock in trade, enclosed as **Annexure 25**;
26. Restated Standalone Statement of Employee Benefit Expense, enclosed as **Annexure 26**;
27. Restated Standalone Statement of Finance Costs, enclosed as **Annexure 27**;
28. Restated Standalone Statement of Other Manufacturing Expenses, enclosed as **Annexure 28**;
29. Restated Standalone Statement of Other Administrative Expenses, enclosed as **Annexure 29**;
30. Restated Standalone Statement of Other Selling & Distribution Expenses, enclosed as **Annexure 30**;
31. Notes to the Restated Standalone of Current tax, enclosed as **Annexure 31**;
32. Notes to the Restated Standalone of Earning Equity per shares, enclosed as **Annexure 32;**
33. Restated Standalone Statement of Accounting Ratios, enclosed as **Annexure 33**;
34. Restated Standalone Statement of Tax Shelter, enclosed as **Annexure 34**;
35. Restated Standalone Statement of Segment Reporting, enclosed as **Annexure 35**;
36. Notes to the Restated Standalone Summary Statement, enclosed as **Annexure 36**;

6. According to the information and explanations given to us and also as per the reliance placed on the statutory audit reports of the previous auditors furnished to us and representations made by the Company's

management, in our opinion, the Restated Standalone IGAAP Financial Information and the abovementioned restated IGAAP financial information contained in Annexures 1 to 35 accompanying this report, read with Summary of Significant Accounting Policies disclosed in Annexure 4, are prepared after making adjustments and regroupings as considered appropriate and disclosed in Annexure 5and have been prepared in accordance with Section 26 of Part I of Chapter III of the Act, the SEBI ICDR Regulations and the Guidance Note.

7. This report should not in any way be construed as a re-issuance or re-dating of any of the previous audit reports issued by the previous auditors of the Company or by us nor should it be construed as a new opinion on any of the financial statements referred to therein.

8. We have no responsibility to update our report for events and circumstances occurring after the date of the report.

9. Our report is intended solely for use of the management for inclusion in the offer documents to be filed with SEBI, National Stock Exchange of India Limited and BSE Limited in connection with the proposed IPO of the Company. Our report should not be used, referred to or distributed for any other purpose except with our prior consent in writing.

For S S S D & CO Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur

Date: September 2, 2018

Annexure 1

Restated Standalone IGAAP Summary Statement of Assets and Liabilities **(₹ 'in Million)**

Particulars	Annexure	As at 31.03.2015	As at 31.03.2014
I. EQUITY AND LIABILITIES			
(1) Shareholders' Fund			
(a) Share Capital	6	130.71	129.93
(b) Reserve & Surplus	7	4,140.11	4,045.68
(2) Share application money pending allotment		-	25.00
(3) Non-Current Liabilities			
(a) Long-Term Borrowings	8	4,656.50	4,212.14
(b) Deferred Tax Liabilities (Net)	9	(16.90)	(9.60)
(c) Long-Term Provisions	10	82.71	63.12
(4) Current Liabilities			
(a) Short-Term Borrowings	11	3,146.15	3,100.43
(b) Trade Payables		1,257.68	1,295.42
(c) Other Current Liabilities	12	1,419.96	1,302.42
(d) Short-Term provisions	13	40.70	35.27
	Total	**14,857.61**	**14,199.80**
II. ASSETS			
(1) Non-current Assets			
(a) Fixed Assets			
(i) Tangible Assets	14	8,435.72	7,832.62
(ii) Intangible Assets		-	-
(iii) Capital work-in-progress	14	374.95	905.42
(b) Non-current investments	15	151.51	151.51
(c) Long-term loans and advances	16	163.74	208.56
(2) Current Assets			
(a) Inventories	17	2,109.90	2,070.38
(b) Trade Receivables	18	832.17	528.27
(c) Cash and cash equivalents	19	426.27	218.02
(d) Short-Term loans and advances	20	1,992.76	1,933.69
(e) Other current assets	21	370.60	351.34
	Total	**14,857.61**	**14,199.80**

The above should be read with Statement of Restatement Adjustment to Audited IGAAP Standalone Financial Statements to Restated Standalone Financial Statements appearing in Annexure 5 and Significant Accounting Policies and Notes forming part of the Restated Standalone IGAAP Financial Information.

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2, 2018

For and behalf of
Shri Bajrang Power and Ispat Limited

Pawan Goel
Chief Financial Officer

Suresh Goel
Chairman
DIN: 00115834

Parul Verma
Company Secretary

Narendra Goel
Managing Director
DIN: 00115883

Annexure 2

Restated Standalone IGAAP Summary Statement of Profit and Loss **(₹ 'in Million)**

			For The Year Ended	For The Year Ended
	Particulars	**Annexure**	**31.03.2015**	**31.03.2014**
I.	Revenue from Operations	22	18,778.45	11,640.17
II.	Other Income	23	54.04	32.64
III.	**Total Revenue (I+II)**		**18,832.49**	**11,672.81**
IV.	**Expenses**			
	Cost of Materials Consumed	24	11,290.16	8,535.44
	Purchase of Stock in Trade		4,329.39	477.73
	(Increase) / Decrease in Stock in Trade	25	(194.87)	313.47
	Employees benefit Expenses	26	371.16	274.22
	Financial Costs	27	1,087.80	866.74
	Depreciation	14	622.28	668.27
	Other Manufacturing Expenses	28	1,024.99	583.11
	Other Administrative Expenses	29	107.44	71.29
	Other Selling & Distribution Expenses	30	116.31	78.19
		Total	**18,754.66**	**11,868.46**
V.	**Profit Before Exceptional and Extraordinary Items and Tax (III-IV)**		**77.83**	(195.65)
VI.	Exceptional items		-	-
VII.	**Profit Before Extraordinary Items and Tax (V-VI)**		**77.83**	(195.65)
VIII.	Extraordinary Items		-	-
IX.	**Profit Before Tax (VII- VIII)**		**77.83**	(195.65)
X.	**Tax expenses:**			
	Net current Tax	31	16.31	(192.44)
	Deferred Tax		(7.30)	(167.40)
XI	**Profit (Loss) for the period from continuing operations**		**68.81**	**164.20**
XII	**Profit/(loss) from discontinuing operations**		**-**	**-**
XIII	**Tax expense of discontinuing operations**		**-**	**-**
XIV	**Profit/(loss) from Discontinuing operations (after tax) (XII-XIII)**		**-**	**-**
XV	**Profit (Loss) for the period (XI + XIV)**		**68.81**	**164.20**
XVI	**Basic / Diluted Earnings per Equity Share**	**32**	**5.27**	**12.71**

The above should be read with Statement of Restatement Adjustment to Audited IGAAP Standalone Financial Statements to Restated Standalone Financial Statements appearing in Annexure 5 and Significant Accounting Policies and Notes forming part of the Restated Standalone IGAAP Financial Information.

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

For and behalf of
Shri Bajrang Power and Ispat Limited

Pawan Goel
Chief Financial Officer

Suresh Goel
Chairman
DIN: 00115834

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2, 2018

Parul Verma
Company Secretary

Narendra Goel
Managing Director
DIN : 00115883

Annexure 3

Restated Standalone IGAAP Summary Statement of Cash Flows **(₹ 'in Million)**

		As at	As at
Particulars		**31.03.2015**	**31.03.2014**
A	**CASH FLOW FROM OPERATING ACTIVITIES**		
	Net Profit before Tax	77.83	(195.65)
	ADJUSTMENTS FOR:		
	Depreciation	622.28	668.27
	Financial Costs	1,087.80	866.74
	Interest Income	(54.49)	(29.43)
	Dividend Income	-	-
	Other Adjustment due to Restatement	1.39	0.99
	Loss on Sale of Fixed Asset	17.61	0.68
OPERATING PROFIT BEFORE WORKING CAPITAL CHANGES		**1,752.41**	**1,311.59**
	ADJUSTMENTS FOR CHANGE IN CURRENT ASSETS & LIABILITIES:		
	(Increase)/Decrease in Inventories	(39.52)	(277.27)
	(Increase)/Decrease in Trade Receivables	(303.91)	(124.09)
	(Increase)/Decrease in Other Current Assets	(78.33)	(313.46)
	Increase/(Decrease) in Current Liabilities & Provisions	104.81	1,045.77
	CASH GENERATED FROM OPERATIONS	**1,435.46**	**1,642.56**
	Direct Taxes Paid/Deducted at Source	16.31	-
	NET CASH FROM OPERATING ACTIVITIES	**1,419.15**	**1,642.56**
B	**CASH FLOW FROM INVESTING ACTIVITIES**		
	Deletion/(Addition) to Tangible Assets	(738.43)	(1,395.20)
	Increase/(Decrease) in Long-Term Loans & Advances	44.82	7.32
	Sale of Tangible Asset	25.91	22.47
	Dividend Income	-	-
	Interest Income	54.49	29.43
	(Purchase)/Sale of Non-current Investments	-	(2.39)
	NET CASH USED IN INVESTING ACTIVITIES	**(613.19)**	**(1,338.37)**
C	**CASH FLOW FROM FINANCING ACTIVITIES**		
	Proceeds from Long-Term Borrowings (Net)	444.37	(176.55)
	Proceeds from issued of Share Capital	-	0.38
	Increase / (Decrease) in Short-Term Borrowings	45.73	889.94
	Financial Costs	(1,087.80)	(866.74)
	NET CASH USED IN FINANCING ACTIVITIES	**(597.70)**	**(152.98)**
	NET INCREASE / (DECREASE) IN CASH &		
	CASH EQUIVALENTS (A+B+C)	**208.25**	**151.22**
	Cash and Cash Equivalents at the beginning of the year	**218.02**	**66.81**
	Cash and Cash Equivalents at the end of the year	**426.27**	**218.02**
	Components of cash and cash equivalents as at		
	Cash in hand	21.77	25.31
	With bank: On Current Account	272.70	72.50
	: Margin Money with Bank	131.80	120.21
		426.27	**218.02**

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2, 2018

For and behalf of
Shri Bajrang Power and Ispat Limited

Pawan Goel
Chief Financial Officer

Suresh Goel
Chairman
DIN: 00115834

Parul Verma
Company Secretary

Narendra Goel
Managing Director
DIN: 00115883

Annexure 4

Notes to the Restated Standalone IGAAP Financial Information - Significant Accounting Policies

1. Significant Accounting Policies:

Corporate Information:

Shri Bajrang Power & Ispat Limited is a public limited (CIN: U27106CT2002PLC015184) company having its registered office at Village Borjhara, Urla Industrial Area, Borjhara, Raipur (Chhattisgarh). The company is dealing in Sponge Iron, Billets, Pellets, TMT Bars, Wire rod, Filter Cake, Ferro Alloys, Fly Ash Bricks and generation of electricity. The company is having its major operation in steel, power & other incidental & ancillary operations related to steels & mining.

Significant Accounting Policies

1.01 Basis of Preparation of Financial Statements:

i. The financial statements have been prepared on Historical Cost convention in accordance with the generally accepted accounting principles ("IGAAP") and the provisions of the Companies Act, 2013 and the applicable Accounting Standards in India.

ii. The Accounting policies have been consistently applied by the company with those used in previous year.

1.02 Use of Estimates:

The preparation of financial statements requires estimates and assumptions to be made that affect the reported amount of assets and liabilities on the date of the financial statements and the reported amount of revenues & expenses during the reported period. Difference between the actual results and the estimates are recognized in the period in which the results are known / materialized.

1.03 Tangible Assets

i. Fixed Assets are stated at acquisition cost less depreciation. Cost includes related taxes, duties, freight, insurance etc, attributable to acquisition and installation of assets and borrowing cost incurred up to the date of commencing operations, but excludes duties and taxes that are recoverable subsequently from the taxing authorities.

ii. The various expenditure incurred during the construction stage and up to the date of commercial production for setting-up the relevant project are grouped under the head "Pre-operative Expenditure" and allocated to related assets on pro-rata basis.

iii. Asset under Construction as at the Balance sheet date are shown as Capital Work in Progress.

iv. If any Fixed Asset disposed/ sold its Losses or Gain is Recognize in Profit and Loss Account.

v. The Tangible Assets purchased from other units of the company are stated at prevailing market price.

1.04 Depreciation / Amortization

i. Depreciable amount for assets is the cost of an asset, or other amount substituted for cost, less its estimated residual value.

ii. Depreciation on tangible fixed assets has been provided on the straight-line method as per the useful life prescribed in Schedule II to the Companies Act, 2013 except Rolls (Rolling Mill Division), where life of the assets has been assessed (as one year) as under based on technical advice, taking into account the nature of the asset, the estimated usage of the asset, the operating conditions of the asset, past history of replacement, anticipated technological changes etc.. Leasehold land and mines are amortized over the period of the lease.

iii. Free-hold lands are not depreciated/amortized.

iv. Expenditure of amount below ₹ 5000/- had been written of in full.

1.05 Investments

i. Investment, which are readily realizable & intended to be held for not more than one year from the date on which such investment are made, are classified as "Current Investment". All other investment are classified as "Long Term Investment".

ii. Long Term Investments are stated at cost including directly attributable cost. A provision for diminution in the value of long term investments is made only if such is other than temporary, in the opinion of Management.

iii. Current Investments are stated at lower of cost and fair value.

1.06 Inventories

i. Inventories are valued at lower of cost and net realizable value after providing cost of obsolescence if any.

ii. Cost of Raw Materials and stores & spares are computed on FIFO basis and cost of Finished Goods are computed on Weighted average basis.

iii. Cost of Finished Goods includes direct materials, labour, conversion and proportion of manufacturing overheads incurred in bringing the inventories to their present location and condition.

iv. Inventory of Carbon Credit is recognized on the basis of certificate to be received of CERs from CDM board and valued at net Realizable value.

1.07 Excise Duty

i. The Excise Duty in respect of closing inventory of finished goods is provided in books of account and included as part of inventory.

ii. CENVAT Credit relating to raw materials/components are debited under short term loans and advances for availing credit against CENVAT and credited to respective materials/component account.

1.08 Revenue recognition

Revenue is recognized to the extent that it is probable that the economic benefits will flow to the company and the revenue can be reliably measured.

(i) Sale of Finished Products

Revenue is recognized when the significant risks and rewards of ownership of the goods have passed to the buyer. Sales and Operational income is inclusive of Excise duty, Sales Tax, Job Work Charges but net of Returns, Rebate & discount.

Disclosure of Turnover is made in accordance with AS 14 on 'Disclosure of Revenue from Sales Transactions' issued by Institute of Chartered Accountants of India, with reference to Accounting standard - 9 that means Excise Duty deducted from turnover (gross) is the amount that is included in the amount of turnover (gross) and not the entire amount of liability arised during the year.

Proceeds in respect of sales/disposal of raw materials is credited to the raw material purchase account.

(ii) Sale of Electricity

Revenue from Power Supply is accounted for on the basis of billing to consumers and generally all consumers are billed on the basis of recording of consumption of energy by installed meters. Shortfall of Power Unit supplied and Actual Received is recorded as Power Sale Discount and its charges recorded in Profit and Loss Account.

(iii) Interest

Revenue is recognised on accrual basis taking into account the amount outstanding and the rate applicable.

(iv) Income on Investment

Income from investment is recognised based on the terms of investments. Profit on sale of Investment is accounted on sale of such investment. Income from Mutual fund scheme having fixed maturity Plans is accounted on declaration of dividend or on maturity of such investment.

(v) Carbon Credit (Certified Emission Reduction)

Revenue is recognized in accordance with Approved Consolidated Monitoring Methodology issued by United Nation Framework Convention of Climate Change (UNFCCC) on accrual basis of accounting, assuming the CER will be certified & received in future from CDM board.

(vi) Renewable Energy Certificates

Revenue is recognised when the Company received certification of quantity of Renewable Energy Certificates and on the basis of eligible claims made by the Company.

1.09 Borrowing Cost

Interest and other costs in connection with the borrowing of the funds to the extent related/attributed to the acquisition/construction of fixed assets are capitalized only with respect to qualifying fixed assets i.e. those which take substantial period of time to get ready for its intended use. All other Borrowing cost is charged to Profit and Loss Account.

1.10 Contingent Liabilities

Liabilities which are material and whose future outcome cannot be reasonably ascertained are treated as contingent and not provided for and disclosed by way of notes to the accounts.

1.11 Taxes on Income

(i) Provision for current tax is made after taking into consideration benefits admissible under the provisions of the Income Tax Act, 1961. Deferred tax resulting from "timing difference" between book profit and taxable profit is accounted for using the tax rate and laws that have been enacted or substantially enacted as on the balance sheet date. The deferred tax asset is recognized and carried forward only to the extent that there is reasonable certainty that the asset will be realized in future.

(ii) The company recognizes MAT credit available as an asset only to the extent that there is convincing evidence that the company will pay normal income tax during the specified period, i.e., the period for which MAT credit is allowed to be carried forward. In the year in which the company recognizes MAT credit as an asset in accordance with the Guidance Note on Accounting for Credit Available in respect of Minimum Alternative Tax under the Income-tax Act, 1961, the said asset is created by way of credit to the statement of profit and loss and shown as “MAT Credit Entitlement.” The company reviews the “MAT credit entitlement "asset at each reporting date and writes down the asset to the extent the company does not have convincing evidence that it will pay normal tax during the specified period.

1.12 Forward Currency Transactions

(i) Foreign currency transactions are recorded in the reporting currency, by applying to the foreign currency amount the exchange rate between the reporting currency and the foreign currency at the date of transaction.

(ii) Foreign currency monetary items are reported using closing rate. Non-monetary items which are carried in terms of historical cost denominating in a foreign currency are reported using the exchange rate at the date of transaction and non-monetary items which are carried at fair value or other similar valuation denominated in a foreign currency are reported using the exchange rates that existed when the values are determined.

(iii) Exchange differences arising on the settlement of monetary items or on reporting company's monetary items at the rates different from those at which they were initially recorded during the year, or reported in previous financial statements, are recognised as income or as expense in the year in which they arise. Exchange differences arising in respect of fixed assets acquired from outside India are capitalised as a part of fixed assets.

(iv) All loans and deferred credits repayable in foreign currency and outstanding at the close of the year are expressed in Indian currency at the appropriate rates of exchange prevailing as on the date of the balance sheet.

(v) In respect of transactions covered by Forward Foreign Exchange Contracts, the difference between the forward rate and exchange rate at the inception of contract is recognized as income or expenses over the life of the contract except for contracts relating to liabilities incurred for purchase of Fixed Assets, the difference thereof is adjusted in the carrying amount of respective Fixed Assets.

(vi) The loss/gain in respect of currency hedge transactions, where the certainties of liability/gain is not ascertainable as on the date of balance sheet, are recognized and accounted for on the actual date of final settlement of such transactions and where the amount of such gain/loss to the extent ascertainable on the date of balance are recognized on accrual basis.

1.13 Employee Benefits

(i) Defined Contribution plan

Company's contribution to Provident Fund and Employees' state Insurance is charged to Profit and Loss Account. The Company makes monthly contributions and has no other obligation other than the contribution Payable to respective authorities.

(ii) Defined Benefit plan

Company's Liabilities towards gratuity are recognized as an expense in the Profit and Loss account for the year in which the employee has rendered services. The expense is determined using actuarial valuation techniques & assumptions. Actuarial gains/losses are immediately taken to statement of profit and loss and are not deferred

Value of encashable leave are encashed during the year is equivalent to one month salary and charged to Profit & Loss Account.

1.14 Provisions

Provisions are recognized, where the company has any legal or constructive obligation or where reliable estimate can be made for the amount of the obligation and as a result of past events, for which it is probable that an outflow of economic benefits will be required to settle the obligation at the balance sheet date. These are reviewed at each balance sheet date and adjusted to reflect the current best estimates.

1.15 Impairment of Assets

The Company assesses at each balance sheet date whether there is any indication that any asset may be impaired. If any such indication exists, the carrying value of such assets is reduced to its estimated recoverable amount and the amount of such impairment loss is charged to profit & loss account. If at the balance sheet date there is an indication that previously assessed impairment loss no longer exists, then such loss is reversed and the asset is restated to that effect.

1.16 Cash and Cash equivalents

Cash and Cash equivalents in the balance sheet comprise cash in hand, cash at banks and Margin money with banks.

1.17 Segment Reporting Policies

Identification of Segment

The Company's operating businesses are organized and managed separately according to the nature of product and services provided, with each segment representing a strategic business unit that offers different products and serves different markets. the analysis of geographical segments is based on the areas in which major operating divisions of the company operate.

Inter Segment Transfer

The Company generally accounts for inter segment sales and transfers as if the sales or transfers were to third Parties at current market Prices.

Allocation of common Costs

Common allocable cost are allocated to each segment according to the reasonable basis of each segment to the common costs.

Unallocated Items

The corporate and other segment includes general corporate income and expense items which are not allocated to any business segment.

1.18 Earnings Per Share

Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders by weighted average number of equity shares outstanding during the period.

For the Purpose of calculating Diluted Earning Per Share the net profit or loss for the period attributable to equity shareholders by weighted average number of equity shares outstanding during the year are adjusted for the effect of all dilutive potential Equity share.

1.19 Preliminary Expenses

As per the provision of Accounting Standard- 26 issued by Institute of Chartered Accountants of India , preliminary expenses have been written off in full in the year in which incurred.

1.20 Government Grant

Government Grant is recognized only when there is reasonable certainty of its collection. Infrastructure capital subsidy received is treated as Capital Reserve being "Subsidy in the nature of Promoter's Contribution" .

1.21 Lease Obligation

(i) Finance leases, which effectively transfer to the company substantially all the risks and benefits incidental to ownership of the leased item, are capitalized at the inception of the lease term at the lower of the fair value of the leased property and present value of minimum lease payments. Lease payments are apportioned between the 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 recognized as finance costs in the statement of profit and loss. Lease management fees, legal charges and other initial direct costs of lease are capitalized.

(ii) A leased asset is depreciated on a straight-line basis over the useful life of the asset. However, if there is no reasonable certainty that the company will obtain the ownership by the end of the lease term, the capitalized asset is depreciated on a straight-line basis over the shorter of the estimated useful life of the asset or the lease term.

(iii) Leases, where the lessor effectively retains substantially all the risks and benefits of ownership of the leased item, are classified as operating leases. Operating lease payments are recognized as an expense in the statement of profit and loss on a straight-line basis over the lease term.

Annexure 5
Statement of Restatement Adjustments to Audited IGAAP Standalone Financial Statements

The summary of results of restatement made in the audited previous IGAAP Standalone financial statements for the respective years and its impact on the profit of the Company is as follows:

(₹ 'in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
Net Profit/(loss) as per audited financial statement	**102.65**	**315.79**
Restated Adjustment:		
A) Audit Qualification		
'---Recognition of Uncertified unit of CER	22.50	35.30
Sub-total (A)	**22.50**	**35.30**
B) Other Material Adjustment		
---Sundry Balances Written off/back	2.95	0.65
---Prior Period Tax	(1.87)	0.83
---Service Tax, Excise Duty etc. paid	0.05	(0.94)
---Employee Related Expense	-	0.34
---Expenses of earlier year (Interest, legal & Professional, registration	(10.68)	11.08
charges, Fines & Penalty and Rent, Rates & Taxes,		
---Change in Tax	(40.01)	(89.02)
Sub-total (B)	**(49.55)**	**(77.10)**
C) Change in Accounting Policy		
---Change in Revenue Recognition (CER)	60.89	193.40
Sub-total (C)	**60.89**	**193.40**
Total (A+B+C)	**33.84**	**151.60**
Net Profit/ (loss) as per Restated financial statement	**68.81**	**164.20**

A) Adjustments

1) Adjustments for Audit Qualifications:
The Company had recognized the uncertified unit of Certified Emission Reduction (CER) in closing stock as per the company's policy, which was not certified by the CDM Board due to which the profit of company has been enhanced. Thus the rectification/adjustment has been made in respective year i.e. for financial year ended March 31, 2015 and March 31, 2014.

2) Other Material Adjustments

a. In the audited financial statements of the company for the financial years ended March 31, 2015 and March 31, 2014 , certain amounts have been written off for which advances have been given to vendors which are considered bad & doubtful hence are appropriately adjusted in the respective years to which they relate.
b. In the audited financial statements of the Company for the financial years ended March 31, 2015 and March 31, 2014, certain provisions/ liabilities created in earlier years were written back. For the purpose of this statement, the said provisions/ liabilities have been appropriately adjusted in the respective years in which they were originally created.
c. In the audited financial statements of the company for the financial years ended March 31, 2015 and March 31, 2014, certain amounts of tax adjustment for prior period were appropriately adjusted in the respective year to which they relate.
d. In the audited financial statements of the company for the financial years ended March 31, 2015 and March 31, 2014, certain amounts of expenses were appropriately adjusted in the respective year to which they relate.
e. The Tax rate applicable for the respective year has been used to calculate the deferred tax impact on other material adjustments.

3) Change in Accounting Policy

Carbon Credit (Certified Emission Reduction)
Revenue is recognized in accordance which approved consolidated monitoring methodology issued by United Nation Framework Convention of Climate Change (UNFCCC) on receipt basis, earlier which was on accrual basis of accounting assuming the CER will be certified & received in future from CDM Board. Thus the impact for change in accounting policy has been made in respective year i.e. for financial year ended March 31, 2015 and March 31, 2014.

4) Opening Reserve Reconciliation **(₹ 'in Million)**

Surplus in the statement of Profit & Loss, as per audited balance sheet as at 1st April 2013	2,226.25
Adjustment on account of Restatement	
Other Material Adjustment	
---Sundry Balances Written off/back	(21.37)
---Prior Period Tax	(1.28)
---Service Tax, Excise Duty etc. paid	(0.89)
---Expenses of earlier year(Interest, legal & Professional, registration charges, Fines & Penalty and Rent, Rates & Taxes,	(4.61)
Balance as per Restated Standalone Financial Information as at 1st April 2013	2,198.09

Annexure 6
Restated Standalone Statement of Share Capital

(₹ 'in Million)

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
<u>Authorised Share Capital</u>		
6,00,00,000 Equity Share of ₹10/- each (Previous Year 6,00,00,000 Equity Share of ₹ 10/- each)	600.00	600.00
<u>Issued, Subscribed & Fully Paid-up Share Capital</u>		
1,30,71,155 Equity Share of ₹ 10/- each fully paid up	130.71	129.93
(Previous Year 1,29,93,030 Equity Share of ₹ 10/- each)		

Reconciliation of number of equity shares outstanding at the beginning and at the end of the year

	As at	**As at**
Particulars	**31.03.2015**	**31.03.2014**
No of shares outstanding as at the beginning of the year	12,993,030	12,913,730
Add : Number Of Shares Allotted During The Year As Fully Paid-Up	78,125	79,300
Number of shares outstanding as at the end of the year	**13,071,155**	**12,993,030**

Shares in the company held by each shareholder holding more than 5% shares

Name of the shareholder	31.03.2015		31.03.2014	
	No. of shares held in the Company	% of Shares held	No. of share held in the Company	% of Shares held
Atlanta Securities Private Limited	2,039,500	15.60	2,039,500	15.70
Banka Finance & Securities Pvt. Ltd.	2,078,381	15.90	2,078,381	16.00
Bonus Dealcom Pvt Ltd.	717,300	5.49	717,300	5.52

(d) The Company has only one class of shares referred to as equity shares having a par value of ₹ 10/-. Each holder of equity shares is entitled to one vote per share.

Annexure 7

Restated Standalone Statement of Reserves **(₹ 'in Million)**

Particulars	As at 31.03.2015	As at 31.03.2014
Securities Premium Account		
Balance as per last financial statements	1,431.61	1,407.03
Add: Addition during the year	24.22	24.58
Closing Balance	**1,455.83**	**1,431.61**
Surplus/ (deficit) in the statement of profit and loss		
Balance as per last financial statements	2,391.43	2,198.09
Add: Current year Surplus	68.61	164.20
Less: Impact of Restatement of Financial Statement	(1.39)	(29.15)
Less : Transfer on Merger	-	-
Net Carried Forward Surplus	**2,461.64**	**2,391.43**
Capital Subsidy		
Balance as per last financial statements	110.74	110.74
Add: Addition during the year	-	-
Closing Balance	**110.74**	**110.74**
Amalgamation Reserve		
Balance as per last financial statements	111.90	111.90
Add: Addition on Account of Merger	-	-
Closing Balance	**111.90**	**111.90**
Total	**4,140.11**	**4,045.68**

Net Profit for the year includes loss of ₹ 0.17 Million due to exchange difference due to AS-11

Annexure 8

Restated Standalone Statement of Long-term Borrowings **(₹ 'in Million)**

Particulars	As at 31.03.2015	As at 31.03.2014
(a) Term Loans From Banks *		
Secured Loan		
Term Loans from State Bank of India	1,414.92	1,115.28
(Repayable in Quarterly 26 installments starting from December 2013		
and last installment falling due on March 2020 and 60 monthly installment		
starting from February 2014 and last installments falling due on Jan 2020		
and 60 Installment Starting from April 2016 to March 2021).		

Term Loans from Bank of India	560.00	674.00
(Repayable in 78 Monthly installments starting from October 2013 and		
last installment falling due on March 2020).		
Term Loans from Bank of Baroda	1,724.70	1,473.22
(Repayable in 78 Monthly installments starting from October 2013 and		
last installment falling due on March 2020 and 60 Installment Starting		
from April 2016 to March 2021).		
Term Loans from Karnataka Bank	279.64	337.41
(Repayable in 78 Monthly installments starting from October 2013 and		
last installment falling due on March 2020).		
Term Loans from Karnataka bank	73.89	116.67
(Repayable in 36 installments starting from November 2014 and last		
installment falling due on October 2017).		
(b) Term Loans From Others**		
Secured Loan		
L & T Infrastructure Finance Company Limited	43.33	59.59
(Repayable in 72 installments starting from December 2012 and last		
installment falling due on November 2018).		
L&T Fincorp Limited	245.55	337.65
(Repayable in 65 installments starting from July 2013 and last		
installment falling due on November 2018).		
(c) Long Term Maturities' of Finance Lease Obligations ***		
Secured Loan	100.10	55.01
(Hypothecated by Asset Acquired under Finance Lease)		
(d) Loans And Advances From Related Parties		
Unsecured:		
a) From Director & its Relative	-	-
b) From Corporate Body	214.38	43.32
Total	**4,656.50**	**4,212.14**

Note: There is no default, continuing or otherwise, as at the balance sheet date, in repayment of any of the above loans.
Note: There was no prepayment of loans in the respective years.
Note: No penal interest had been charged.
Note: Current Maturities of Long term debts disclosed under the head "other current liabilities"

Security and terms & conditions for above loans from Banks : *
The Term Loan granted under consortium finance from State Bank of India, Commercial Branch, Raipur working as a lead banker, Bank of Baroda, Mid-corporate banking Branch, Bank of India, Mid-corporate banking Branch, Raipur and Karnataka Bank, Main Branch, Raipur are secured by:

a) Hypothecation of plant and machinery and other movable assets and EM of Leasehold (from CSIDC) factory land at village: Borjhara, Urla Industrial Estate, Raipur (C.G.), Area of land 21.25 acres on pari-passu basis with other participating term lenders.

b) Equitable Mortgage of 39.15 acres of free hold factory land at village: Borjhara, Urla Industrial Estate, Raipur (C.G.) on first pari-passu basis.

c) First pari-passu charge with other participating lenders on the entire Fixed assets of Gondwara Divisions, along with EM of the land situated at khasara No. 2/1, 22, 23/2, 25, 26, 27/2, 30/1, 30/2, 32, 33 admeasuring 4.039 Hectare situated at Vill : Gondwara, Industrial Estate, Urla, Raipur(C.G.)

d) First mortgage charge on the company's present and future movable Immovable assets on pari-passu basis with other participating lenders.

e) Equitable Mortgage on pari-passu basis in favour of lenders on 312.60 acres Land (excluding the 37.4 acres of the land for green belt which cannot be diverted) at Dharsiwa, Tilda, Raipur (C.G.).

f) Pari-passu charge on all the project's bank account including but not limited to the trust & retention account (TRA) opened at CB, Bhilai where all cash inflows from the project are deposited and all the proceeds shall be utilized in a manner and priority to be decided by the Lenders.

Personal Guarantee of director :
Shri Suresh Goel S/o. Late Hari Ram Goel
Shri Rajendra Goel S/o. Late Hari Ram Goel
Shri Narendra Goel S/o. Late Hari Ram Goel

Guarantee of Relative of Directors :
Shri Anand Goel S/o. Late Hari Ram Goel
Shri Sandeep Goel S/o. Shri Suresh Goel
Shri Dinesh Goel S/o. Shri Suresh Goel
Smt. Suman Goel W/o. Shri Dinesh Goel

Corporate Guarantee :
M/s. Shri Bajrang Alloys Limited
M/s. Swastik Mercantile Limited
M/s. Shimmer Investment Pvt. Limited

* Security and terms & conditions for above loans from Karnataka Bank:
Hypothecation of all the movable assets in respect of hot rolling mill plant to be installed at Unit I of the Company in the above property (including movable plant and machinery, machinery spares, tools and accessories).

** Security and terms & conditions for above loans from others:
The Term Loan from L & T Infrastructure Finance company Limited & L&T Fincorp Limited (Non-Banking financial Institution) are secured by "second pari-pasu" charged by all movable & immovable assets including all current assets of the Company. The above loans are additionally secured by pledge of 26% shares (as on the date of pledge of shares) of the company in the name of corporate shareholders and also pledge of 40% share (as on the date of pledge of shares) of the Shri Bajrang Energy Private Limited in the name of director & relatives along with Demand Promissory Note.

*** In respect of Fixed Assets acquired on finance lease as per Accounting Standard on Leases (AS -19), the minimum lease rentals outstanding as on 31st March, 2015 are as follows:

(₹ in Million)

Due	Total Minimum Lease Payments Outstanding as at		Interest not due		Present Value of the minimum lease payments as at	
	31.03.15	**31.03.14**	**31.03.15**	**31.03.14**	**31.03.15**	**31.03.14**
Not later than one year	106.05	63.15	17.52	9.28	88.53	53.87
Later than one year and not later than five years	119.92	63.42	19.83	8.41	100.10	55.01

Annexure 9
Restated Standalone Statement of Deferred Tax Liabilities (Net)

(₹. in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
Deferred Tax Liabilities		

On Account of Depreciation – Opening	496.97	332.01
Add: Charge during the year	127.68	164.97
Closing	624.65	496.97
Less: Deferred Tax Assets		
On Account of Bonus, Leave Encashment & Gratuity – Opening	(11.87)	(6.18)
Add: Charge during the year	(2.38)	(5.70)
Closing	(14.25)	(11.87)
On Account of MAT & Carried forward Losses – Opening	(494.70)	(168.04)
Add: Charge during the year	(132.60)	(326.67)
Closing	(627.30)	(494.70)
Deferred Tax Liabilities (Net) **Total**	**(16.90)**	**(9.60)**

"In accordance with "Accounting Standard – 22" issued by the "Institute of Chartered Accountants of India", the Company has recognized net of deferred tax assets and deferred tax liability amounting to ₹. (16.90) Million as on 31/03/2015 under a separate head "Deferred Tax Liabilities". Net of deferred tax liability and asset for the year amounting to ₹. (7.30) Million has been recognized in the Profit & Loss Account."

Annexure 10
Restated Standalone Statement of Long Term Provisions

Particulars	As at 31.03.2015	As at 31.03.2014
Long Term Provisions		
Provision for employee benefits		
Gratuity Payable	21.44	16.37
Salary Payable	0.47	1.07
Other Provisions		
Cross Subsidy Payable A/c	60.80	45.68
Total	**82.71**	**63.12**

Annexure 11
Restated Standalone Statement of Short-term Borrowings **(₹ 'in Million)**

Particulars	As at 31.03.2015	As at 31.03.2014
Loans Repayable on Demand		
Secured:		
Cash Credit Limit (State Bank of India)	1,093.75	1,014.56
Cash Credit Limit (Bank of Baroda)	1,472.52	1,504.55
Cash Credit Limit (Bank of Maharashtra)	579.88	581.32
Total	**3,146.15**	**3,100.43**

Note: There is no default, as at the balance sheet date, in service of interest of above Loans
Note: There was no prepayment of loans in the respective years.
Note: No penal interest had been charged.

Security and terms & conditions for above loans from Banks: *
Working Capital Facilities, granted under a consortium finance from State Bank of India, Commercial Branch, Raipur working as a lead banker are secured by hypothecation of entire stocks of raw material, finished goods, stocks in trade, Stores and spares, packing material, and other current assets of the company at their factory premises or at some other as approved by bank including goods in transit, outstanding moneys, books in debt, receivable etc. on first pari-passu basis with other consortium member viz. Bank of Baroda, Mid-corporate banking Branch Raipur, and Bank of Maharashtra, Main Branch Raipur.

Annexure 12

Restated Standalone Statement of Other Current Liabilities

(₹ 'in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
Current Maturities of Long term Borrowings from Bank		
Secured:		
Term Loans from Syndicate Bank	-	90.03
Term Loans from State Bank of India	247.60	126.88
Term Loans from Bank of India	128.67	99.48
Term Loans from Bank of Baroda	248.52	184.44
Term Loans from Karnataka Bank	63.81	41.82
Term Loans from Karnataka Bank	47.93	23.34
L & T Infrastructure Finance Company Limited	18.37	16.25
L&T Fincorp Limited	104.06	92.08
Current Maturities of Finance Lease Obligations		
Secured:	88.53	53.85
Other Payables		
Creditors for Capital goods *	180.08	360.14
Advances from Customers **	159.28	112.22
Excise Duty Payable on Closing Stock	90.61	67.53
Sales Tax & Entry Tax Payable	9.43	3.83
Service Tax payable	0.86	1.55
TDS Payable	7.98	8.78
Other Expenses payables	24.25	20.20
Total	**1,419.96**	**1,302.42**

Note: There was no prepayment of loans in the respective years.

Note: No penal interest had been charged.

Debts due by Company / Firm in which director is a member / Partner		
* Creditors for Capital Goods stated above	105.19	77.37
** Advances from Customers stated above	96.05	34.49

Annexure 13

Restated Standalone Statement of Short Term Provisions

Particulars	As at 31.03.2015	As at 31.03.2014
Provision for employee benefits	40.70	35.27
Total	**40.70**	**35.27**

Annexure 14: Restated Standalone Statement of Fixed Asset **(₹. In Million)**

PARTICULARS	Gross Block				DEPRECIATION					Net block	
	Balance as at 01/04/2014	Addition	Deductions	Cost as on 31.03.2015	Upto 01/04/2014	Provided/ for the year	Adjustment Due to Schedule II	On deposals	Total Up to 31.03.2015	Balance as at 31.03.2015	Balance as at 31.03.2014
Land & Site Development	455.75	34.57	0.00	490.32	0.00	23.07	20.59	0.00	43.56	446.66	455.75
Leasehold Land	19.80	0.00	0.00	19.80	0.82	0.23	0.00	0.00	1.06	18.75	18.98
Lease hold Land (Mines)	0.00	158.22	0.00	158.22	0.00	0.74	0.00	0.00	0.74	157.49	0.00
Factory Building	981.30	21.67	0.00	1,002.97	65.32	89.01	31.55	0.00	185.88	817.09	915.98
Factory Building (Power Plant)	132.13	0.00	0.00	132.13	19.10	4.17	1.95	0.00	25.23	106.90	113.03
Office Building	94.23	7.76	0.00	101.99	4.12	2.57	0.00	0.00	6.69	95.30	90.11
Residential Building (Flat)	30.75	55.63	0.00	86.38	1.85	0.93	0.00	0.00	2.78	83.59	28.89
Plant & Machinery	6,184.48	849.86	0.00	7,034.34	1,279.39	356.23	7.32	0.00	1,642.93	5,391.41	4,905.10
Plant & Machinery(Power Plant)	1,856.28	2.20	76.46	1782.02	753.37	32.56	0.00	36.00	749.94	1,032.08	1,102.91
Office Equipment	15.15	2.23	0.00	17.39	2.57	3.83	2.12	0.00	8.52	8.87	12.58
Computer	22.05	5.72	0.06	27.71	13.99	4.14	1.29	0.05	19.37	8.34	8.06
Furniture & Fixtures	19.24	3.96	0.00	23.20	5.75	3.14	0.04	0.00	8.93	14.28	13.49
Vehicle	230.66	127.11	8.72	349.05	67.89	30.59	1.25	5.63	94.09	254.96	162.77
Rolls	48.48	0.00	0.00	48.48	43.51	4.97	0.00	0.00	48.48	0.00	4.97
Intangible Asset	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	**10,090.31**	**1,268.83**	**85.24**	**11,274.01**	**2,257.69**	**556.17**	**66.11**	**41.68**	**2,838.29**	**8,435.72**	**7,832.62**
Previous Year	**8,002.11**	**2,113.29**	**25.09**	**10,090.31**	**1,591.37**	**668.27**	**0.00**	**1.94**	**2,257.69**	**7,832.62**	**6,410.75**

b) Capital work in progress

During the Year	905.42	441.63	972.11	374.95	0.00	0.00	0.00	0.00	0.00	374.95	905.42
TOTAL	**905.42**	**441.63**	**972.11**	**374.95**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**374.95**	**905.42**
Previous Year	**1,623.51**	**1,125.65**	**1,843.74**	**905.42**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**905.42**	**1,623.51**

Note:-

Pursuant to the enactment of Companies Act 2013, the company has applied the estimated useful lives as specified in Schedule II, except in respect of certain assets as disclosed in Accounting Policy in Depreciation, Amortization and Depletion. Accordingly the unamortized carrying value is being depreciated / amortized over the revised/remaining useful lives.

* The written down value of Fixed Assets whose lives have expired (due to Transitional Provision of Schedule II of the Companies Act, 2013) as at 1st April 2014 have been charged to Statement of Profit & Loss Account amounting to ₹ 66.11 Million.

Annexure 15

Restated Standalone Statement of Non-Current investments (₹ 'in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
In Subsidiary Company		
Shri Bajrang Energy Pvt. Ltd.	100.93	100.93
[2,01,860 (P.Y. 2,01,860) equity shares of ₹ 10/- each, fully paid-up]		
In Joint Venture		
Chhattisgarh Captive Coal Mining Limited	48.10	48.10
[3,38,241 (P.Y. 3,38,241) equity shares of ₹ 10/- each, fully paid-up]		
In Fixed Capital of Partnership Firm		
I A Energy	0.09	0.09
S B Power	0.51	0.51
Investment in Mutual Fund - Quoted, Fully Paid up		
SBI Infrastructure Fund -1- Growth	0.50	0.50
Investment in Debenture - Unquoted, Fully Paid up		
9.5% Non-Convertible Debenture of		
Yes Bank Limited	1.00	1.00
(1 unit of ₹ 10,00,000/- each, fully paid-up)		
Investment in Shares - Quoted, Fully Paid up		
Bhushan Steel Limited	0.01	0.01
(250 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 65.90 per share)		
Essar Steels Limited	0.00	0.00
(100 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 51.80 per share)		
JSW Steels Limited	0.01	0.01
(50 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 907.65 per share)		
Prakash Industries	0.00	0.00
(100 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 35.50 per share)		
Steel Authority of India Limited	0.01	0.01
(100 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 68.35 per share)		
Tata Steel Limited	0.02	0.02
(50 equity shares of ₹ 10/- each, fully paid-up, Market Price ₹ 316.85 per share)		
Investment in Shares - Unquoted, Fully Paid up		
Shri Bajrang Hydro Energy Limited	0.01	0.01
[5,100 (P.Y. 5,100 - Subsidiary) equity shares of ₹ 10/- each, fully paid-up]		
Investment in Gold Coin		
[10 numbers (P.Y. 10 numbers) of 10 gm. each]	0.31	0.31
Total	**151.51**	**151.51**

The company has entered into Partnership with

M/s I A Energy, Shimla having Profit Sharing Ratio of 9%

Name of the Partners	% Share	Fixed Capital Employed	Profit for the year
Indo Arya central Transport Ltd.	51%	0.51	N.A.
Shri Bajrang Power & Ispat Ltd.	40%	040	N.A.
Shri Bajrang Energy Private Ltd.	9%	0.09	N.A.
	100%	1.00	

M/s S B Power, Shimla having Profit Sharing Ratio of 51%

Name of the Partners	%	Fixed Capital	Profit for
	Share	Employed	the year
Shri Bajrang Power & Ispat Ltd.	51%	0.51	N.A.
Shri Bajrang Energy Private Ltd.	49%	0.49	N.A.
	100%	1.00	

Annexure 16

Restated Standalone Statement of Long term Loans and Advances **(₹ 'in Million)**

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
(a) Capital Advances *		
Unsecured, considered good	53.24	78.93
(b) Security Deposits		
Unsecured, considered good		
Deposit with Governments Authorities and others	110.49	129.63
Total	**163.74**	**208.56**

*** Capital Advance stated above include advance given:**

Company in which director is a member	0.00	4.82

Annexure 17

Restated Standalone Statement of Inventories

(₹. in Million)

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
(As valued, verified and certified by the management)		
(All Stock are Valued at cost or Net realizable value whichever is Lower)		
(a) Raw Materials and components	856.68	1088.71
(b) Finished goods	823.88	601.47
(c) Stores and spares	399.81	334.44
(d) Trading Goods	19.29	23.74
(e) Others		
- Furnace Oil	1.12	0.91
- Coal	9.12	21.10
Total	**2,109.90**	**2,070.38**

Annexure 18

Restated Standalone Statement of Trade Receivables **(₹ 'in Million)**

	As at	As at
Particulars	**31.03.2015**	**31.03.2014**
(a) Trade receivables outstanding for a		
period less than six months		
Unsecured, considered good *	812.90	516.45
(b) Trade receivables outstanding for		
more than six months		
Unsecured, considered good	19.27	11.81
Total	**832.17**	**528.27**

*** Trade Receivable stated above include debts due by:**

Private Company / Firm in which director is a member / Partner	60.00	2.33

Annexure 19

Restated Standalone Statement of Cash and Bank Balances (₹ 'in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
(a) Balances with banks	272.70	72.50
(b) Cash on hand	21.77	25.31
(c) Margin Money with banks	131.80	120.21
Total	**426.27**	**218.02**

Annexure 20

Restated Standalone Statement of Short term Loans and Advances (₹ 'in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
(a) Others		
Unsecured, considered good		
Advance Recoverable in Cash or in kind or Value to be received*	854.49	716.68
Advance to Supplier	1,049.33	1,009.26
Balance with Central Excise & Sales Tax Department	88.94	207.75
Total	**1,992.76**	**1,933.69**

Advance Recoverable in Cash or in kind or Value to be received above includes loan given to :-

* Partnership Firms in which company is a Partner	842.82	686.42

Annexure 21

Restated Standalone Statement of Other Current Assets (₹ 'in Million)

Particulars	As at 31.03.2015	As at 31.03.2014
Prepaid Expenses	7.67	6.43
Interest Receivable	1.45	2.21
TDS Receivable & Advance Tax	63.55	46.42
MAT Credit Entitlement Account	296.28	296.28
Royalty Receivable	1.65	-
Total	**370.60**	**351.34**

Annexure 22

Restated Standalone Statement of Revenue from operations (₹ 'in Million)

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Sale of Products	15,875.24	12,560.54
Sale of Trading Goods	4,535.70	272.01
Sale of Electricity	106.64	168.54
Less: Excise Duty paid	1,739.14	1,360.91
Total	**18,778.45**	**11,640.17**

Annexure 23

Restated Standalone Statement of Other Income (₹ 'in Million)

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Recurring Income:		
Interest on Margin Money	10.95	5.93
Other Interest Income	43.54	23.50
Rental Income	0.36	0.33
Non-Recurring Income:		
Profit on Sale Of Investment/Fixed Assets	0.29	0.06
Gain from Exchange Difference	0.07	-
Income from Job Work	0.62	-
Dividend from Non-Current Investments	0.00	0.00
Insurance Claim Received	0.02	0.29
Foreign Exchange Gain	0.02	-
Miscellaneous Income	(1.83)	2.52
Total	**54.04**	**32.64**

Annexure 24

Restated Standalone Statement of Cost of Material Consumed (₹. in Million)

Particulars		FY Ended 31.03.2015	FY Ended 31.03.2014
Opening Stock		1,088.71	587.73
Add: Transfer on Amalgamation		-	-
Add: Purchases		11,479.91	9,246.26
		12,568.62	**9,833.99**
Less: Sale / Disposal		421.78	209.83
Less: Closing Stock		856.68	1,088.71
Raw Material Consumed	**Total**	**11,290.16**	**8,535.44**

Breakup of Raw Material Consumed		
Imported	-	-
Percentage %	-	-
Indigenous	11,290.16	8,535.44
Percentage %	100.00%	100.00%
Value of Imports on C.I.F. Basis (In ₹.)	-	-

Annexure 25

Restated Standalone Statement of Increase/Decrease in Stock in trade (₹. in Million)

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Closing Stock of Finished Goods	823.88	601.47
Closing Stock of Traded Goods	19.29	23.74
	843.16	**625.22**
Less: Opening Stock of Finished Goods	601.47	918.68

Less: Opening Stock of Traded goods	23.74	36.85
	625.22	**955.53**
(Increase)/ Decrease in stock of finished goods	(217.95)	330.31
(Increase) / Decrease in Excise on Closing Stock	23.08	(16.84)
Net Increase (Decrease) in stock of finished goods **Total**	**(194.87)**	**313.47**

Annexure 26

Restated Standalone Statement of Employee Benefit Expense **(₹ 'in Million)**

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Salaries, Wages & Other Benefits	346.30	255.90
Contribution to Provident and Other Funds	19.77	12.62
Staff & Workers Welfare Expenses	5.09	5.40
Total	**371.16**	**273.91**

Annexure 27

Restated Standalone Statement of Finance Costs **(₹ 'in Million)**

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Other Borrowing Cost	47.06	46.85
Interest Expenses	1,049.00	1,014.12
Less: Amount included in Capital Work-in- Progress	8.26	194.23
Total	**1087.80**	**866.74**

Annexure 28

Restated Standalone Statement of Other Manufacturing Expenses **(₹ 'in Million)**

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Other Manufacturing Expenses:		
Power & Fuel	272.43	166.04
Manufacturing Wages	114.07	78.73
Consumption of Stores & Spares	480.92	218.92
Repair & Maintenance		
- Factory Building	15.35	6.31
- Plant & Machinery	77.37	48.43
Insurance Charges	5.48	4.79
Water Cess Expenses	15.03	11.65
Materials Handling & Processing	43.30	45.89
Entry Tax	0.95	1.53
Wind Mill Running Expenses	0.08	0.84
Total	**1,024.99**	**583.11**

Breakup of Stores Consumed		
Imported	4.24	1.42
Percentage %	0.88%	0.65%
Indigenous	476.68	217.49
Percentage %	99.12%	99.35%
Value of Imports on C.I.F. Basis (In ₹.)	-	-

Annexure 29

Restated Standalone Statement of Other Administrative Expenses (₹ 'in Million)

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Auditor's Remuneration:		
For Statutory Audit	0.90	0.75
For Tax Audit	0.30	0.25
For Certification & Other Consultancy	0.01	0.06
Internal Auditor Remuneration	0.66	0.68
Director's Remuneration	2.10	2.10
Director's Sitting Fees	0.18	0.15
Corporate Social Responsibility	4.31	0.98
Insurance Expenses	4.57	1.42
Subscription to Association & Membership Fees	1.50	0.70
Loss on Sale of Fixed Assets	17.90	0.74
Legal & Professional Charges	10.60	6.92
Office & General Expenses	6.60	5.36
Rent, Rates and Taxes	4.43	5.21
Printing & Stationary Expenses	2.78	2.35
Registration & Renewal Fees	7.40	5.91
Environmental Expenses	1.83	1.29
Repair & Maintenance (Others)	5.81	5.47
Director's Traveling Expenses	3.58	3.29
Traveling Expenses (Other)	9.32	9.32
Testing & Inspection Charges	1.19	0.40
Communication Expenses	4.85	3.69
Canteen Expenses	5.31	4.95
Conveyance Expenses	10.83	7.83
Penalty & Fines	0.34	0.45
Earlier Years Taxes	0.25	1.02
Total	**107.44**	**71.29**

Annexure 30

Restated Standalone Statement of Other Selling & Distribution Expenses **(₹ 'in Million)**

Particulars	FY Ended 31.03.2015	FY Ended 31.03.2014
Advertisement & Publicity	33.40	25.21
Carriage Outward	4.79	1.13
Sales Commission	41.12	29.29
Finished Goods Handling Charges	10.26	3.09
Sales Tax, Service Tax & Custom Duty	3.64	0.82
Power Distribution Charges & Discount	8.06	7.35
Rebate & Rate Difference	0.02	0.63
Sales Promotion & Planning	15.03	10.69
Total	**116.31**	**78.19**

Annexure 31

Restated Standalone Statement of Current tax **(₹. in Million)**

Particulars	As at 31.03.2015	As at 31.03.2014
Current Tax (MAT)	16.31	-
Less: MAT Credit Entitlement	-	192.44
Total	**16.31**	**(192.44)**

Provision for Income Tax has been made in terms of the provisions of Sec. 115JB of the Income Tax Act, 1961.

Annexure 32

Restated Standalone Statement of Earning Per Equity Share **(₹. in Million)**

Particulars	31.03.2015	31.03.2014
Profit / (Loss) after Taxation as per Profit & Loss Account	68.81	164.20
Weighted Avg. No. of Equity Share Outstanding	13.06	12.92
Basic / Diluted Earnings / (Loss) per Share of ₹ 10/-	5.27	12.71

Annexure 33

Restated Standalone IGAAP Statement of Accounting Ratios **(₹ 'in Million)**

SN	PARTICULAR		31.03.2015	31.03.2014
	Basic earnings per share (₹) (refer note 3(a) below)	A/C	5.27	12.71
	Diluted earnings per share (₹) (refer note 3(b) below)	B/D	5.27	12.71
	Return on Net Worth (%) (Refer note 3(c) below)	A/E	1.61%	3.93%
	Net asset value per equity share (₹) (refer note 3(d) below)	E/F	326.96	323.21
1	Restated Profit / loss after tax, attributable to equity shareholders	A	68.81	164.20
	Add: Adjustment for loss on fair valuation of convertible		-	-
	preference shares			
	Net loss available for calculation of DEPS	B	68.81	164.20
2	Weighted average number of equity shares considered	C	13.06	12.92
	for calculating basic earnings per share			
	Effect of dilution:			
	Stock option under ESOP		-	-
	Compulsory convertible preference shares		-	-
	Weighted average number of equity shares considered	D	13.06	12.92
	for calculating diluted earnings per share			
3	**Restated net worth at the end of the year (refer note 5 below)**	E	4,270.82	4,175.62

Face value per share		10.00	10.00
Total number of equity shares outstanding at the end of the year	F	13.06	12.92
Weighted average number of equity shares outstanding during the year,	H	13.06	12.92
after giving the impact of bonus shares, used for diluted earnings per share			

Notes

1 The figures disclosed above are based on the Restated Standalone IGAAP Financial Information of the Company.

2 The above statement should be read with the Notes to the Restated Standalone IGAAP Financial Information – Accounting Policies - Annexure 4 and Statement of Restatement – Annexure 5

3 The Ratios have been computed as below:

a) Basic Earnings per share (₹) = $\dfrac{\text{Restated Profit / loss after tax, attributable to equity shareholders}}{\text{Weighted average number of equity shares considered for calculating basic earnings per share}}$

b) Diluted Earnings per share (₹) = $\dfrac{\text{Net Profit / loss available for calculation of DEPS}}{\text{Weighted average number of diluted equity shares}}$

c) Return on net worth (%) = $\dfrac{\text{Restated loss after tax, attributable to equity shareholders}}{\text{Restated Net worth at the end of the year}}$

d) Net asset value per share (₹) = $\dfrac{\text{Restated net worth at the end of the year}}{\text{Total No of equity Share outstanding at the end of the year}}$

4 Weighted average number of equity shares is the number of equity shares outstanding at the beginning of the year adjusted by the number of equity shares issued during year multiplied by the time weighting factor. The time weighting factor is the number of days for which the specific shares are outstanding as a proportion of total number of days during the year.

5 Net worth includes Equity share capital + Reserve & Surplus (including Share Premium, General Reserve, Employee share based payment reserve and Retained earnings).

6 Earnings per share calculations are in accordance with AS 20 (Earnings per Share).

7 The Company has allotted bonus shares to the existing equity shareholders on September 4, 2018 in the ratio of 1:3 as approved by the shareholders at the general meeting held on September 3, 2018. Consequently, the number of shares have increased from 13,071,155 equity shares to 52,284,620 equity shares.

Annexure 34

Restated Standalone IGAAP Statement of Tax Shelter (₹ 'in Million)

SN	PARTICULAR	31.03.2015	31.03.2014
A	Restated Profit/ (Loss) Before Tax	77.83	(195.65)
B	Tax Rate	32.45%	30.90%
C	Tax Thereon on Above Rate (A x B)	25.25	(60.45)
D	**Adjustment for Permanent Difference**		
1	**Expenses disallowed under Income Tax Act**		
	Loss on Sale of Fixed Assets & Investment	17.90	00.74
	Profit on Sale of Fixed Assets	(00.29)	(00.06)
	Earlier Year Taxes	02.12	00.00
	Interest on TDS	00.09	00.05
	Penalty & Fine	00.44	00.00
	Donation	00.42	00.12
	Corporate Social Responsibility	04.31	00.00
	Dividend Exempt under IT ACT	00.00	00.00
	Deduction u/s 32AC	(126.60)	(265.28)
	TOTAL (D)	**(101.62)**	**(264.44)**
E	**Adjustments for Timing Differences**		
	"Difference in book depreciation and Depreciation under		
	Income Tax Act 1961"	(382.50)	(540.49)
	Expenses allowable on payment basis	(19.86)	(08.63)
	Provision for gratuity	06.94	06.08
	Provision for leave encashment	04.73	04.36
	Provision for Bonus	15.35	15.34
	Provision for Doubtful advances	00.00	00.00
	Deduction allowed as per Sec. 35(2) & 35(2AB)	00.00	00.00
	TOTAL (E)	**(375.34)**	**(523.33)**
	Net Adjustments (D+E)	**(476.96)**	**(787.77)**
	Taxable income/ (loss) before set off of losses		
	Taxable Income for the year	(399.13)	(983.42)
	Brought forward Losses		
	- Business Losses	00.00	00.00
	- Unabsorbed depreciation	1,766.65	1,367.47
	- Long term capital loss	00.00	00.00

Annexure 35
Restated Standalone IGAAP Statement of Segment Reporting
Basis of preparation:

The Company's operations predominantly relate to manufacturing, trading, generation and sale of sponge iron, billets, Ferro alloys and power. The risks and rewards associated with these three businesses are significantly different. Therefore, the primary segment consists of "Iron & Steel" and "Power".

The geographic segments identified as secondary segments are "Domestic Market" and "Export Market". Since there is no significant export market revenue, the same has not been disclosed. The entire capital employed is within India.

Information about business segments - Primary **(₹ 'in Million)**

Business Segment	**Iron & Steel**		**Power**		**Trading**		**Total**	
	2014-15	**2013-14**	**2014-15**	**2013-14**	**2014-15**	**2013-14**	**2014-15**	**2013-14**
Revenue								
External Turnover (Gross)	15,875.24	12,832.55	106.64	168.54	4535.70	-	20,517.58	13,001.08
Inter-segment Transfer	-	-	1,471.58	1,272.65	-	-	1,471.58	1,272.65
Eliminations	-	-	(1,471.58)	(1,272.65)	-	-	(1,471.58)	(1,272.65)
Total Revenue	15,875.24	12,832.55	106.64	168.54	4,535.70	-	20,517.58	13,001.08
Result								
Segment Result	(879.24)	(844.87)	755.19	649.23	201.87	-	77.83	(195.65)
Unallocated Corp.								
Expense/Income	-	-	-	-	-	-	-	-
Operating Profit	-	-	-	-	-	-	41.68	(227.54)
(+) Interest Income	-	-	-	-	-	-	54.49	29.43
(+) Profit on Sale of								
F. Assets	-	-	-	-	-	-	(17.61)	(0.68)
(+) Other Income	-	-	-	-	-	-	0.74	3.14
(-) Income Taxes	-	-	-	-	-	-	16.31	(192.44)
(-) Earlier Year Taxes	-	-	-	-	-	-	-	-
(-) Deferred Taxes	-	-	-	-	-	-	(7.30)	(167.40)
Net Profit	(879.24)	(844.87)	755.19	649.23	201.87	-	68.81	164.20
Other Information								
Segment Assets	7,289.84	6,609.78	1,145.88	1,222.84	-	-	8,435.72	7,832.62
Unallocated Corporate Assets	-	-	-	-	-	-	6,421.89	6,367.19
Total Assets	7,289.84	6,609.78	1,145.88	1,222.84	-	-	14,857.61	14,199.80
Segment Liabilities	5,464.60	4,990.28	619.31	737.76	-	-	6,083.91	5,728.04
Unallocated Corporate Liabilities	-	-	-	-	-	-	4,502.89	4,271.15
Total Liabilities	5,464.60	4,990.28	619.31	737.76	-	-	10,586.79	9,999.19
Depreciation	564.82	509.45	36.74	155.16	-	-	601.56	664.61
Unallocated Depreciation	-	-	-	-	-	-	20.72	36.56

Annexure 36
Notes to the Restated Standalone Summary Statement

I) EMPLOYEE BENEFITS

a) Gratuity
As per Accounting Standard 15 "Employee benefits", the disclosures as defined in the Accounting Standard are given below: **(₹ 'in Million)**

	31.03.2015	**31.03.2014**
Employer's Contribution to Provident Fund	12.07	6.12
Employer's Contribution to Employee State Insurance	7.64	6.55

Defined Benefit Plan:-

Gratuity

The Company has a defined benefit gratuity plan. Every employee who has completed five years or more of service gets a gratuity on departure at 15 days salary (last drawn salary) for each completed year of service or part thereof in excess of 6 month and its payable on retirement / termination/ resignation. The benefit vests on the employees after completion of 5 Year of service. The gratuity liability has not been externally funded.

The present value of obligation is determined based on actuarial valuation using the Projected Unit Credit Method, which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation.

	Gratuity (Non Funded) (₹ 'in Million)	
I) Reconciliation of opening & closing balances of defined benefit obligation	**31.03.2015**	**31.03.2014**
Defined Benefit obligation at beginning of year	18.37	12.64
Current Service Cost	5.67	4.04
Interest Cost	1.72	1.40
Actuarial (gain) / loss	(0.71)	0.62
Benefits paid	(0.30)	(0.33)
Defined Benefit obligation at year end	**24.76**	**18.37**
II) Reconciliation of fair value of assets and obligations		
Defined Benefit obligation	24.76	16.24
Fair value of Plan assets	-	-
	24.76	16.24
Less: Unrecognized Past Service Cost	-	-
Amount recognized in Balance Sheet	**24.76**	**16.24**

Since the entire amount of plan obligation is unfunded, therefore change in the fair value of plan assets are not given. Further the entire amount of plan obligation is unfunded, therefore categories of plan asset as a percentage of the fair value of total plan assets and company's expected contribution to the plan assets in the next year is not given.

III) Expenses recognized during the year		
Current Service Cost	5.67	4.04
Interest Cost	1.72	1.40
Expected return on Plan assets	0	0

Actuarial (gain) / loss	(0.71)	0.62
Net Cost	6.69	6.06
IV) Investment Details:		
V) Actuarial assumptions		
Mortality Table (LIC) Ultimate	1994-96	1994-96
Discount rate (per annum)	8.00%	8.25%
Expected rate of return on plan assets (per annum)	0%	0%
Rate of escalation in salary (per annum)	5.00%	5.00%
Expected Average remaining working lives of employees Years)	21.79	22.29
Principal Plan is under Payment of Gratuity Act 1972 (as amended up to date).		

The estimates of rate of escalation in salary considered in actuarial valuation, take into account inflation, seniority, promotion and other relevant factors including supply and demand in the employment market. The above information is certified by the actuary.

The expected rate of return on plan assets is determined considering several applicable factors, mainly the composition of Plan assets held, assessed risks, historical results of return on plan assets and the Company's policy for plan assets management.

(ii) Leave Encashment

The obligation for leave encashment is recognized during the year of ₹. 18.93 Million (P.Y. ₹. 14.86 Million), is equivalent to one month salary and charged to Profit & Loss Account."

II) CONTINGENT LIABILITIES

Contingent Liabilities and Capital Commitments are not provided for in respect of:-

(₹ 'in Million)

Description	**31.03.2015**		**31.03.2014**	
	Value of Liability	**Margin Money**	**Value of Liability**	**Margin Money**
i)Estimated amount of contracts				
remaining to be executed on	-	-	-	-
capital accounts				
ii)Claims against the Co. / disputed	159.18	-	158.61	-
tax liabilities not acknowledged as debt				
iii)Bank Guarantees outstanding	11.01	1.50	55.42	8.08
iv)Letter of Credit & Guarantee	147.45	12.32	341.11	19.68
issued by bank				
v)Jointly and severely corporate				
guarantee to the bank on behalf	-	-	417.50	-
of Joint venture company				
vi)Jointly and severely corporate				
guarantee to the bank on behalf	3,311.00	-	2,305.50	-
of Partnership Firm				

(III) Balances of the sundry debtors, sundry creditors, loans and advances etc. are subject to confirmation and reconciliation.

(IV) The company has not received any information from any of the suppliers of their being a Small Scale Industrial Unit. Hence the amounts due to Small Scale Industrial Unit as on 31st March 2015 are not ascertainable.

(V) In the opinion of the Board, the value of realization of loans, advances and current assets in the ordinary course of business will not be less than the amount at which they are stated in the balance sheet.

(VI) Information on Related Party as required by Accounting Standard-18, "Related Party Disclosures" issued by The Institute of Chartered Accountants of India, are given below:

Related Parties

a) Subsidiary (Control Exists)

-- Shri Bajrang Energy Private Limited w.e.f. 31.03.2012

b) Joint Venture

-- Chhattisgarh Captive Coal Mining Ltd. W.e.f. 01.04.2007

c) Associate

-- Shri Bajrang Alloys Limited
-- S. B. Multimedia (P) Limited
-- Shri Bajrang Ispat & Plywood Limited
-- Shimmer Investment Private Limited
-- Swastik Mercantiles Limited
-- Shri Bajrang Steel & Power Limited
-- I A Energy Private Limited
-- J.J. Re-Rollers
-- Bajrang Rice Mills
-- Jainarayan Hariram Goel Charitable Trust
-- I A Energy (Partnership Firm)
-- S B Power (Partnership Firm)
-- Shri Bajrang Hydro Energy Private Limited

d) Key Management Personnel

-- Shri Suresh Goel
-- Shri Narendra Goel
-- Shri Rajendra Goel
-- Shri Pawan Goel

e) Relative of Key Management Personnel

-- Shri Anand Goel
-- Smt. Sarla Goel
-- Smt. Neeta Goel
-- Smt. Aruna Goel
-- Smt. Kiran Goel
-- Shri Dinesh Goel
-- Shri Sandeep Goel
-- Shri Bajrang Goel
-- Shri Ashutosh Goel
-- Shri Archit Goel
-- Smt. Suman Goel
-- Smt. Rashmi Goel
-- Smt. Esha Goel
-- Smt. Ankita Goel
-- Shri Shimmer Goel

Transaction with Related Parties in the ordinary course of business **(₹ 'in Million)**

Particulars	31.03.2015	31.03.2014
Subsidiary		
Investment	100.93	100.93
Associates		
Purchase of Materials	22.02	32.17
Purchase of Fixed Assets	1.45	18.81
Sale of Materials	184.43	295.14
Service Received	-	0.23
Interest Expenditure	-	1.13
Rent received	0.06	0.06
Outstandings:		
Investment, Loans & Advance Payable / (Receivable)	14.40	0.01
Payables	217.38	77.37
Receivables	3.26	-
Joint Venture		
Investments	48.10	48.10
Outstandings:		
Payables	13.37	-
Partnership		
Sale of Materials	52.17	25.58
Investments	0.60	0.60
Advances given	842.82	686.42
Out standings:		
Receivables	60.00	-
Key Management		
Remuneration Paid	3.46	3.20
Interest Paid	-	0.37
Purchase of Material	0.28	0.31
Receivables	3.09	1.32

The following table provides the total amount of transactions that have been entered into with related parties for the relevant financial year:-

Particulars	31.03.2015	31.03.2014
Purchase of Materials:		
Shri Bajrang Alloys Limited	22.02	32.17
Shri Narendra Goel	0.28	0.31
Purchase of Fixed Assets:		
Shri Bajrang Alloys Limited	1.45	18.81
Sale of Materials:		
Shri Bajrang Alloys Limited	179.09	288.70
Shri Jainarayan Hariram Goel Charitable Trust	4.88	1.26
Shimmer Investments Pvt. Ltd.	0.45	5.18
Suresh Goel & Brothers	-	-
I A Energy (Partnership Firm)	52.17	25.58
Service Received:		
SB Multimedia Pvt. Ltd.	-	0.23

Service Rendered:		
Shri Bajrang Alloys Limited	0.06	0.06
Remuneration Paid:		
Shri Narendra Goel	1.20	1.20
Shri Rajendra Goel	0.90	0.90
Shri Shravan Kumar Goyal	1.36	1.10
Interest Paid:		
Shri Rajendra Goel	-	0.37
Shri Jai Narayan Hariram Goel Charitable Trust	-	1.13

(VII)Details of Interest of the Company in Joint Venture:

i) Name of the Joint Venture entity : Chhattisgarh Captive Coal Mining Ltd.
ii) Country of Incorporation : India
iii) Principal Activities : Extraction of Coal
iv) Ownership Interest : 19.753%

The Company's interests in these joint ventures are reported as Non-current Investment and stated at cost. However, the company's share of each of the assets, liabilities, income & expenses etc. are:

(₹ 'in Million)

Particulars	**31.03.2015**	**31.03.2014**
Fixed Assets (including Capital WIP & Pre-operative expenses)	15.70	27.23
Investments	7.08	7.08
Cash, Bank & Loans and Advances	21.78	13.86
Loan Fund	-	-
Current Liabilities	0.01	0.07
Revenue	-	-
Expenses	-	-
Contingent Liabilities	97.28	102.77

(IX) As set out in sub section (3) of section 129 of the companies Act, 2013 the balance sheet of subsidiaries company is attached and its Financial information are as follows.-

Particulars			
Name of Subsidiary Company		Shri Bajrang Energy Private Limited	
Reporting Currency	:	**(₹ 'in Million)**	
Country of Incorporation	:	India	
Percentage of Holding		79.83%	79.83%
Financial Year		2014-15	2013-14
Capital		2.53	2.53
Reserves		98.91	98.91
Total Assets		131.51	101.45
Total Liabilities		131.51	101.45
Investments		129.93	99.93
Gross Turnover (Incl. other income)		-	-
Profit Before Taxation		-	-
Prov. for Tax (including deferred Tax)		-	-
Profit After Taxation		-	-
Proposed Dividend		-	-

(X) A Legal case pending with the Honorable First Class Judicial Magistrate, Raipur against Advance to supplier for ₹ 9.31 Million.

(XI) REMITTANCE IN FOREIGN CURRENCY

Value of import on CIF basis

Particulars	Currency	31.03.2015		31.03.2014	
		USD/EURO	**₹ in Million**	**USD/EURO**	**₹ in Million**
- Raw Materials	USD	-	-	-	-
- Stores & Spares	USD	68306.13	4.24	27447.49	1.42
- Trading Goods	USD	367320.22	24.43	-	-
- Capital Goods	USD	78000.00	4.80	38487.68	2.32
	EUR	-	-	42860.00	3.07
	SEK	1057000.00	9.49	-	-
Expenditure in Foreign Currency					
	USD	4472.00	0.22	65917.00	5.05
Earning in Foreign Exchange on					
Sale of Finished Goods					
Carbon Credits	EURO	98314.00	7.82	89191.00	6.84
Wire-rod Coil	USD	-	-	-	-
TMT	USD	259167.00	13.41	129370.05	7.82

(XII) BORROWING COST

During the year under review the Company has capitalized a sum of ₹ 8.26 Million (Previous Year ₹ 194.23 Million) in respect of cost of borrowings and added to the cost of related assets.

(XIII) Inventories and consumption of stores materials have been taken as valued and certified by the management.

(XIV) Amounts have been rounded off to the nearest to million and previous year's figures have been regrouped, rearranged and reclassified wherever considered necessary to confirm to the current presentation.

For S S S D & CO
Chartered Accountants
Firm Registration Number: 020203C

Vidhan Chandra Srivastava
Partner
Membership Number: 073712
Place: Raipur
Date: September 2 , 2018

For and behalf of
Shri Bajrang Power and Ispat Limited

Pawan Goel
Chief Financial Officer

Suresh Goel
Chairman
DIN: 00115834

Parul Verma
Company Secretary

Narendra Goel
Managing Director
DIN: 00115883

MANAGEMENT'S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS

The following discussion is intended to convey management's perspective on our financial condition and results of operations for Financial Year ended March 2016, 2017 and 2018. You should read the following discussion and analysis of our financial condition and results of operations in conjunction with our Restated Financial Statements. This discussion contains forward-looking statements and reflects our current views with respect to future events and our financial performance and involves numerous risks and uncertainties, including, but not limited to, those described in "Risk Factors" beginning on page 22. Actual results could differ materially from those contained in any forward-looking statements and for further details regarding forward-looking statements, see "Forward-Looking Statements" beginning on page 20. Unless otherwise stated, the financial information of our Company used in this section has been derived from Restated Financial Statements.

*Our Restated Financial Statements for the Financial Year 2018 and 2017 is prepared under Indian Accounting Standards ("**Ind AS**") and our Restated Financial Statements for Financial Year 2016 have been prepared as proforma Ind AS notified under the with Companies (Indian Accounting Standards) Rules, 2015, as amended, read with Section 133 and other relevant provisions of the Companies Act, 2013, in each case restated in accordance with the requirements of Section 26 of the Companies Act, 2013, the SEBI ICDR Regulations and the Guidance Note on "Reports in Company Prospectus (Revised 2016)" issued by the ICAI. For Financial Years 2014 and 2015, our Restated Financial Statements are prepared and presented in accordance with Indian GAAP. As required by applicable law, we transitioned from Indian GAAP to Ind AS and for the purposes of transition to Ind AS, we have followed the guidance prescribed in "Ind AS 101 - First Time adoption of Indian Accounting Standard". Ind AS differs in certain material respects from Indian GAAP, IFRS and GAAP in other countries.*

Accordingly, The Restated Financial Statements prepared for Financial Years 2016, 2017, 2018 may not be comparable to our historical financial statements.

For purposes of this section, unless the context requires otherwise, reference to "Financial Year" is to the Financial Year ended March 31 of the relevant year.

OVERVIEW

Shri Bajrang Power and Ispat Limited, the flagship company of Goel group of companies, is an integrated manufacturer of long steel products in India. Our current product portfolio comprises of TMT bars, wire rod, HB wires, sponge iron, pellets, steel billets, ferro alloys, and fly ash bricks. The Goel group is involved in, inter-alia, the manufacturing of steel, generation and sale of hydro-power, generation of captive power, and operating a regional television channel.

Our Company is led by an experienced management team, consisting of professionals with experience across various sectors. Each of our individual Promoters, namely Suresh Goel, Rajendra Goel, Narendra Goel, and Anand Goel have more than three decades of hands on experience in the steel industry. Our Company believes that our management team's collective experience and capabilities enable us to understand and anticipate market trends, manage our business operations and growth, leverage customer relationships and respond to changes in customer preferences.

Our TMT Bars and HB wires, are sold under the brands "Goel TMT" and "Goel TMT WireX" respectively which, our Company believes, are well recognized brands in their respective categories. Revenues from sale of TMT Bars and HB Wires has been the pre-dominant revenue stream for our Company and contributes 58.57% of our standalone revenues for Financial Year 2017 - 2018.

Our Company caters primarily to the infrastructure and construction industry in India especially across the central and western regions of India which is serviced through 6 distributors with a network of 385 dealers.

Our Company is an integrated steel manufacturer, with three strategically located manufacturing facilities in Raipur, which is the capital of the state of Chhattisgarh – a state rich in various minerals, including coal and iron ore which are the primary and critical raw materials that our Company requires for manufacturing its products. (*source: http://chhattisgarhmines.gov.in/sites/default/files/MiningBooklet_2017_web.pdf*). Availability of these raw materials in close proximity to our manufacturing facilities, helps our Company in minimising our operating costs and achieve operational efficiencies.

Our customer base during the Financial Year 2017 - 2018 was spread across 24 states, with primary market presence being in the central and western regions of India. During Financial Year 2017 - 2018, our revenue share from state of Chhattisgarh, Madhya Pradesh and Maharashtra constituted 61.90%, 16.52% and 9.63% respectively of our standalone restated revenues.

Our Company endeavors to be innovative in its sector and has relied on process re-design and re-engineering to reduce the time and cost involved in manufacturing of its products. In an effort to enhance our backward integration, increase raw material security, and enhance profits, our Company has applied for, and have been allotted exclusive mining rights, in connection with an iron ore mine located in the Uttar Bastar Kanker district at Chhattisgarh. Our Company also have exclusive mining rights in connection with an open-cast manganese ore mine located in Vizianagaram district, in Andhra Pradesh with an area of 3.95 Ha.

For the details of our manufacturing facilities and our captive power generating facilities please see "*Our Business*" beginning on page 162.

FACTORS AFFECTING OUR RESULTS OF OPERATIONS AND FINANCIAL CONDITION

Our business, results of operations and financial condition are affected by a number of factors, some of which are beyond our control. This section sets out certain key factors that we believe have affected our business, results of operations and financial condition in the past or which we expect will affect our business, results of operations or financial condition in the future. For a detailed discussion of certain factors that may adversely affect our business, results of operations and financial condition, see "*Risk Factors*" beginning on page 22.

Cost and availability of raw materials.

Our cost of materials consumed accounted for approximately 67.86%, 61.85%, 70.85% of our total expenses for Financial Years 2015-2016, 2016-2017 and 2017-2018 respectively. The key raw materials required for the products that are manufactured by us are iron ore, coal and dolomite.

We procure iron-ore from captive mines at Kanker district, Chhattisgarh state, Orissa sector and local market. Our Company has executed a lease agreement dated November 21, 2014, with the Government of Chhattisgarh for leasing of the iron ore mines for a period of thirty years with the latest approval for mining upto 6,00,000 TPA. Our coal requirements for sponge iron steel plant and power plant production are met through the local supply arrangement with South Eastern Coalfields Limited. Additionally, our Company has also procured coal from local vendors which is sourced from South Africa as well as directly import from South Africa. Our Company has executed an agreement with our Promoter Director, Narendra Goel on April 1, 2014 for the purchase of dolomite. This agreement is for a period of 5 years. Our Company procures billets, one of also raw materials form local market for manufacturing of TMT in Unit II. The cost of certain key raw materials may increase, and we may not be able to effectively pass on all increases in cost to our consumers, which may affect our margins and profitability. Furthermore, any shortage of raw materials in the market generally could lead to an increase in the cost of raw materials which could result in an increase in prices of our products which may reduce demand for our products and thereby affecting our margins and profitability

Miscellaneous expenses, employee and labor-related expenses, finance cost and other expenses (including consumption of stores and spares, consumption of power and fuel, and other manufacturing expenses) and freight and handling and other selling expenses constitute a large portion of our total expenditure Although these costs are not subject to the same level of volatility as raw material costs, which fluctuate significantly depending on market conditions, the relatively fixed nature of such costs may have a material adverse impact on profitability during times of low production, as such costs cannot be reduced in accordance with our lower production volume.

Distribution network

Our Company has established strong customer relations during our sixteen years of operations. our Company manages the channel and retail business through distributors who in turn manage a network of dealers throughout the central and western regions of India. As of July 31, 2018, our Company had a network of 6 distributors with a network of 385 dealers. For details of the geographies in which our Company sells the products, please see "*Our Business - Sales and distribution*" on page 175. Our Company manages our channel and retail sales through a sales and marketing team of 63 employees as at July 31, 2018, who aid the distribution process and are primarily engaged in distributor/dealer relationship management, appointment of dealers and distributors, procuring orders, product promotions and collections. For further details see, "*Risk Factors - We sell our products through a large network of channel partners, (distributors and dealers). Any deficiency in services, by any of our channel partners, could adversely affect us, our goodwill, operations, and profitability."* on page 27.

Sales Volume and Prices for Steel Products

Our results of operations are significantly impacted by sales volume and prices of our steel products, which can vary widely. We recorded steel sales of 262,038.00 MT in Financial Year 2015-2016, 283,274.00 MT in Financial Year 2016-2017 and 308,767.00 MT in Financial Year 2017-2018. The market for steel is substantially driven by changes in supply and demand in the Indian and global steel markets, which are significantly affected by the state of the Indian and global economy and competition and consolidation within the steel industry.

Our sales also depends on the price of steel in the domestic and international markets. The domestic and global prices for steel, in turn, depend upon a combination of factors, including steel demand and supply, the availability and cost of raw materials, worldwide production and capacity, fluctuations in the volume of steel imports, transportation costs, protective trade measures and various social and political factors. We rely on key consumers of steel products in both the public and private sector and in various segments such as housing and infrastructure. These industries are in turn affected by the state of the markets in India.

Capacity Utilization

We have been working towards optimum capacity utilization and increasing operational efficiencies for the steel business. Further, we continuously strive to attain cost efficiency, enhanced productivity and product excellence through technological innovation and optimum deployment of resources, as well as improved integration and achieving economies of scale through our past capacity expansions. Strengthening internal processes, work flow and optimizing manpower utilization through multi-skills training are the key focus areas for us.

The sponge iron plants at Unit III and Unit I have achieved more than 100% of its capacity utilization for the Financial Year 2016, 2017 and unit III have achieved more than 100 % in Financial Year 2017-2018 respectively. Further, the power plants at Unit I have also achieved more than 100% of its capacity utilization for the Financial Years 2016-2017 and 2017-2018.

Government Policy

The Indian economy expanded by a sharper 7.1% and 6.7%, respectively, in 2016 and 2017. This makes it one of the fastest growing large economies in the world, along with China (+6.7% and +6.9%). The pace of growth of the Indian economy in 2016 and 2017 has been significantly healthier than the performance of South Africa (+0.6% and +1.3%), Brazil (-3.5% and +1.0%) and Russia (-0.2% and +1.5%).

Some of the key Government Regulation and policy that impact the steel industry include the following: (i) National Steel Policy 2017, (ii) Policy intervention to encourage greater use of steel, (iii) 'Make in India' Push and (iv) Impact of GST. The details of some of these policies are as mentioned below:

(i) **Policy intervention to encourage greater use of steel**

The principle of 'Life Cycle Cost' has been included in the Rule 136 (1) (iii) of the 'General Financial Rules (GFR), 2017' which emphasizes on the concept of total ownership cost during the entire tenure of a project's life while evaluating proposals rather than solely focusing on the upfront capital cost in isolation. This would encourage greater usage of steel in Government projects like bridges where the upfront cost could be higher than the alternatives, but the life cycle cost would be lower.

(ii) **'Make in India' Push**

The Government launched the 'Make in India' programme on September 25, 2014 to create an ecosystem that would support best-in-class manufacturing from India. Action plans for key sectors like automobile, construction, defence, electrical machinery, oil & gas, ports and shipping, railways, power, and roads were identified for specific actions pertaining to policy and fiscal initiatives, improving the ease of doing business, facilitating infrastructure creation, fostering R&D, and supporting skill development.

To encourage domestic manufacturing as part of the Make in India initiative, the Government issued the 'Public Procurement (Preference to Make in India), Order 2017' on June 15, 2017 to give preference to local procurement in Government tenders through enabling clauses like minimum 50% local content, and a margin of purchase preference of 20%. Earlier, on May 08, 2017, to encourage the procurement of steel from domestic producers, The Ministry of Steel notified a policy for giving preference to domestically manufactured iron & steel products on Government procurements having a minimum value addition of 15%. Further, to promote the export of iron and steel products, duty exemption schemes have been provided to manufacturers for import of duty-free raw materials for production of steel made for export.

(iii) **Impact of GST**

The GST has been rolled out from July 01, 2017, replacing multiple Central and State taxes and levies. The implementation of the GST is expected to lead to better tax compliance for the industry. The Government has kept the total indirect tax rate for steel products largely unchanged at 18.0% under the GST against an effective rate of 18.1% in the pre-GST regime. For the key steelmaking ingredients, the tax rate for iron ore has been kept unchanged at 5.0%, but the same for coal has been reduced substantially from 11.3% to 5.0%, which is expected to lower working capital requirement for steel companies. Moreover, the GST rollout is expected to lead to efficient transmission of input tax credits, especially for items like Central Sales Tax (CST) on input raw materials, and entry tax where credit was not available in the earlier regime.

GST is not only gradually reducing the friction in the intra and inter-state movement of goods, but also bringing in an architectural change in the logistics sector through more cost-efficient planning of logistics assets like warehouses. This is expected to improve the operating efficiency for fleet operators, whose gains can partly trickle down to the steel industry where logistics typically account for around 15% of the cost of steelmaking

(source: ICRA Report.)

Our core markets of central and western India are expected to witness significant construction activity driven by various schemes including 'Bharatmala' project, 'Pradhan Mantri Urja Ganga' programme, 'Pradhan Mantri Awas Yojana', 'Sagarmala' programme and 'Atal Mission of Rejuvenation & Urban Transformation' (AMRUT).

SIGNIFICANT ACCOUNTING POLICIES

2.1 BASIS OF PREPARATION AND SIGNIFICANT ACCOUNTING POLICIES

(i) The Consolidated financial statements are prepared in accordance with Indian Accounting Standards (Ind AS) notified under the Companies (Indian Accounting Standards) Rules, 2015

(ii) For all periods upto and including the year ended 31st March 2017, the company prepared its conolidated financial statements in accordance with accounting standards notified as Companies (Accounting Standards) Rules, 2006 and considered as "Previous GAAP" and other pronouncements of the Institute of Chartered Accountants of India (ICAI), relevant applicable provisions of Companies Act 1956 and Companies Act 2013 to the extent applicable.

(iii) These financial statements for the year ended 31st March, 2018 are our Company's first Ind AS standalone financial statements.

(iv) The standalone financial statements have been prepared on a historical cost basis, except for the following assets and liabilities which have been measured at fair value:

- Certain financial assets and liabilities (including derivative instruments) and

- Defined benefit plans - plan assets

(v) The consolidated financial statements have been prepared using uniform accounting policies for like transactions and other events in similar circumstances. The accounting policies adopted in the preparation of financial statements are consistent with those of previous year. The financial statements of our Company and its subsidiaries have been combined on a line-by-line basis by adding together the book values of like items of assets, liabilities, income and expenses, after eliminating intra-group balances, intra-group transactions and the unrealised profits/losses, unless cost/revenue cannot be recovered.

(vi) The excess of cost to the Group of its investment in subsidiaries, on the acquisition dates over and above the Group's share of equity in the subsidiaries, is recognised as 'Goodwill on Consolidation' being an asset in the consolidated financial statements. The said Goodwill is not amortised, however, it is tested for impairment at each Balance Sheet date and the impairment loss, if any, is provided for. On the other hand, where the share of equity in subsidiaries as on the date of investment is in excess of cost of investments of the Group, it is recognised as 'Çapital Reserve' and shown under the head 'Reserves and Surplus' in the consolidated financial statements.

(vii) Non-controlling interests in the net assets of consolidated subsidiaries is identified and presented in the consolidated Balance Sheet separately within equity.

(viii) Non-controlling interests in the net assets of consolidated subsidiaries consists of :

a) The amount of equity attributable to non-controlling interests at the date on which investment in a subsidiary is made; and

b) The non-controlling interests share of movements in equity since the date parent subsidiary relationship came into existence.

(ix) Investments in associates and joint venture are accounted for using the equity method of accounting, after initially being recognised at cost. Under the equity method of accounting, the investments are adjusted thereafter to recognise our Company's share of the post-acquisition profits or losses of the investee in the profit & loss, and our Company's share of other comprehensive income of the investee in the other comprehensive income.

(x) Our Company's financial statements are presented in Indian Rupees (₹), which is also its functional currency.

2.2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

a) Property, Plant and Equipment (PPE)

i) Property, plant and equipment are stated at cost, net of recoverable taxes, trade discount and rebates less accumulated depreciation and impairment losses, if any. Such cost includes purchase price, borrowing cost and any cost directly attributable to bringing the assets to its working condition for its intended use, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the assets.

ii) Subsequent costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the entity and the cost can be measured reliably. In the carrying amount of an item of PPE, the cost of replacing the part of such an item is recognized when that cost is incurred if the recognition criteria are met. The carrying amount of those parts that are replaced is derecognized in accordance with the derecognition principles.

iii) Expenses incurred relating to project, net of income earned during the project development stage prior to its intended use, are considered as pre - operative expenses and disclosed under Capital Work - in - Progress.

iv) "Depreciation on property, plant and equipment is provided using straight line method. Depreciation is provided based on useful life of the assets as prescribed in Schedule II to the Companies Act, 2013 except, in respect of Rolls (Rolling Mill Division), where useful life taken for one year only as per the technical advice.Each part of an item of Property, Plant & Equipment with a cost that is significant in relation to total cost of the Machine is depreciated separately, if its useful life is different than the life of the Machine."

v) The residual values, useful lives and methods of depreciation of property, plant and equipment are reviewed at each financial year end and adjusted prospectively, if appropriate.

vi) Gains or losses arising from derecognition of a property, plant and equipment 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 and Loss when the asset is derecognised.

vii) Spare parts procured along with the Plant & Machinery or subsequently which meet the recognition criteria are capitalized and added in the carrying amount of such item. The carrying amount of those spare parts that are replaced is derecognized when no future economic benefits are expected from their use or upon disposal. Other machinery spares are treated as "stores & spares" forming part of the inventory.

viii) Our Company has adopted a revaluation model for Freehold Land, wherein the assets which have been revalued shall be reviewed on an periodical basis and any accretion or discretion in value arising out of such revaluation shall be credited / debited to the revaluation reserve.

b) Leases

i) Leases are classified as finance leases whenever the terms of the lease, transfers substantially all the risks and rewards of ownership to the lessee. All other leases are classified as operating leases.

ii) Leased assets: Assets held under finance leases are initially recognised as assets of our Company at their fair value at the inception of the lease or, if lower, at the present value of the minimum lease payments. The corresponding liability to the lessor is included in the balance sheet as a finance lease obligation.

iii) Lease payments are apportioned between finance expenses and reduction of the lease obligation so as to achieve a constant rate of interest on the remaining balance of the liability. Finance expenses are recognised immediately in Statement of Profit and Loss, unless they are directly attributable to qualifying assets, in which case they are capitalized. Contingent rentals are recognised as expenses in the periods in which they are incurred.

iv) A leased asset is depreciated over the useful life of the asset. However, if there is no reasonable certainty that our 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.

v) Operating lease payments are recognised as an expense in the Statement of Profit and Loss on a straight-line basis over the lease term except where another systematic basis is more representative of time pattern in which economic benefits from the leased assets are consumed.

c) Intangible assets

i) Intangible Assets are stated at cost of acquisition net of recoverable taxes, trade discount and rebates less accumulated amortization /depletion and impairment loss, if any. Such cost includes purchase price, borrowing costs, and any cost directly attributable to bringing the asset to its working condition for the intended use, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the intangible assets.

ii) Subsequent costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the entity and the cost can be measured reliably.

iii) 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 and Loss when the asset is derecognised

d) Capital Work in Progress

i) Expenditure incurred on assets under construction (including a project) is carried at cost under Capital Work in Progress. Such costs comprises purchase price of asset including import duties and non-refundable taxes after deducting trade discounts and rebates and costs that are directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

ii) Cost directly attributable to projects under construction include costs of employee benefits, expenditure in relation to survey and investigation activities of the projects, cost of site preparation, initial delivery and handling charges, installation and assembly costs, professional fees, expenditure on maintenance and up-gradation etc. of common public facilities, depreciation on assets used in construction of project, interest during construction and other costs if attributable to construction of projects. Such costs are accumulated under "Capital works in progress" and subsequently allocated on systematic basis over major assets, other than land and infrastructure facilities, on commissioning of projects.

iii) Capital Expenditure incurred for creation of facilities, over which our Company does not have control but the creation of which is essential principally for construction of the project is capitalized and carried under "Capital work in progress" and subsequently allocated on systematic basis over major assets, other than land and infrastructure facilities, on commissioning of projects, keeping in view the "attributability" and the "Unit of Measure" concepts in Ind AS 16- "Property, Plant & Equipment". Expenditure of such nature incurred after completion of the project, is charged to Statement of Profit and Loss.

e) Research and Development Expenditure

Revenue expenditure pertaining to research is charged to the Statement of Profit and Loss. Development costs of products are charged to the Statement of Profit and Loss unless a product's technological and commercial feasibility has been established, in which case such expenditure is capitalised.

f) Finance Cost

i) Borrowing costs include exchange differences arising from foreign currency borrowings to the extent they are regarded as an adjustment to the interest cost. 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. A qualifying asset is one that necessarily takes substantial period of time to get ready for its intended use.

ii) Interest income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalisation.

iii) All other borrowing costs are expensed in the period in which they occur.

g) Inventories

i) Items of inventories are measured at lower of cost and net realisable value after providing for obsolescence, if any, except in case of by-products which are valued at net realisable value. Cost of inventories comprises of cost of purchase, cost of conversion and other costs including manufacturing overheads net of recoverable taxes incurred in bringing them to their respective present location and condition.

ii) Cost of raw materials, stores and spares, packing materials, trading and other products are determined at Cost, with moving average price on FIFO basis

iii) Cost of Finished Goods includes direct materials, labour, conversion and proportion of manufacturing overheads incurred in bringing the inventories to their present location and condition.

h) Impairment of non-financial assets - property, plant and equipment and intangible assets

i) Our Company assesses at each reporting date as to whether there is any indication that any property, plant and equipment and intangible assets or group of assets, called Cash Generating Units (CGU) may be impaired. If any such indication exists the recoverable amount of an asset or CGU is estimated to determine the extent of impairment, if any. When it is not possible to estimate the recoverable amount of an individual asset, our Company estimates the recoverable amount of the CGU to which the asset belongs.

ii) An impairment loss is recognised in the Statement of Profit and Loss to the extent, asset's carrying amount exceeds its recoverable amount. The recoverable amount is higher of an asset's fair value less cost of disposal and value in use. Value in use is based on the estimated future cash flows, discounted to their present value using pre-tax discount rate that reflects current market assessments of the time value of money and risk specific to the assets.

iii) The impairment loss recognised in prior accounting period is reversed if there has been a change in the estimate of recoverable amount.

i) Provisions, Contingent Liabilities and Contingent Assets and Commitments

i) Provisions are recognised when our Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. Such provisions are determined based on management estimate of the amount required to settle the obligation at the balance sheet date. When our Company expects some or all of a provision to be reimbursed, the reimbursement is recognised as a standalone asset only when the reimbursement is virtually certain.

ii) 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 recognised as a finance cost.

iii) Contingent liabilities are disclosed on the basis of judgment of management. These are reviewed at each balance sheet date are adjusted to reflect the current management estimate.

iv) Contingent assets are not recognized but are disclosed in the financial statements when inflow of economic benefits is probable.

j) Income Taxes

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

i) Current tax

Current tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities, based on tax rates and laws that are enacted or substantively enacted at the Balance sheet date.

ii) Deferred tax

Deferred tax is recognised on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period. The carrying amount of deferred tax liabilities and assets are reviewed at the end of each reporting period.

k) Foreign Currency Transactions

i) Transactions in foreign currencies are initially recorded at the exchange rate prevailing on the date of transaction. Monetary assets and liabilities denominated in foreign currencies are translated at the functional currency closing rates of exchange at the reporting date.

ii) Exchange differences arising on settlement or translation of monetary items are recognised in Statement of Profit and Loss except to the extent of exchange differences which are regarded as an adjustment to interest costs on foreign currency borrowings that are directly attributable to the acquisition or construction of qualifying assets, are capitalized as cost of assets.

iii) Non-monetary items that are measured in terms of historical cost in a foreign currency are recorded using the exchange rates at the date of the transaction. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was measured. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e., translation differences on items whose fair value gain or loss is recognised in OCI or Statement of Profit and Loss are also recognised in OCI or Statement of Profit and Loss, respectively).

l) Employee Benefits Expense

Short Term Employee Benefits

The undiscounted amount of short term employee benefits expected to be paid in exchange for the services rendered by employees are recognised as an expense during the period when the employees render the services.

Post-Employment Benefits

Defined Contribution Plans

A defined contribution plan is a post-employment benefit plan under which our Company pays specified contributions to a separate entity. Our Company makes specified monthly contributions towards Provident Fund, Superannuation Fund and Pension Scheme. Our Company’s contribution is recognised as an expense in the Statement of Profit and Loss during the period in which the employee renders the related service.

Defined Benefits Plans

"The cost of the defined benefit plan and other post-employment benefits and the present value of such obligation are determined using actuarial valuations. An actuarial valuation involves making various assumptions that may differ from actual developments in the future. These include the determination of the discount rate, future salary increases, mortality rates and future pension increases. Due to the complexities involved in the valuation and its long-term nature, a defined benefit obligation is highly sensitive to changes in these assumptions. All assumptions are reviewed at each reporting date.

The liability in respect of gratuity and other post-employment benefits is calculated using the Projected Unit Credit Method and spread over the period during which the benefit is expected to be derived from employees' services.
Re-measurement of defined benefit plans in respect of post- employment are charged to the Other Comprehensive Income.

Value of encashable leave are encashed during the year is equivalent to one month salary and charged to Profit & Loss Account.

m) Mining Assets

(i) Exploration and Evaluation Assets

Upon obtaining the legal rights to explore a specific area but before the technical feasibility and commercial viability of extracting a mineral resource are demonstrable, the expenditure incurred on finding specific mineral resources are capitalised as Exploration and Evaluation Assets. These expenditure include expenses on acquisition of rights to explore; topographical, geological, geochemical and geophysical studies; exploratory drilling; trenching; sampling; activities in relation to evaluating the technical feasibility and commercial viability of extracting a mineral resource and such other related expenses. When the technical feasibility and commercial viability of extracting a mineral resource are demonstrated, the Exploration and Evaluation Assets are reclassified as part of the right to mine.

At the initial recognition the Exploration and Evaluation Assets are measured at cost. After recognition, the company continues to use the cost model.

Exploration and Evaluation Assets are assessed for impairment when facts and circumstances suggest that the carrying amount of such assets may exceed its recoverable amount.

After the reclassification of the Exploration and Evaluation Assets as part of the Right to Mine, the cost is then amortised over the remaining useful life of the mining rights.

(ii) Stripping Activity

During the development phase of the mine (before production begins), stripping costs are capitalised as part of the cost of right to mine.

During the production phase, two benefits accrue from the stripping activity: usable ore that can be used to produce inventory and improved access to further quantities of material that will be mined in future periods.

To the extent that the benefit from the stripping activity is realised in the form of inventory produced, the costs of that stripping overburden removal activity is accounted for in accordance with the principles of Ind AS 2, Inventories.

To the extent the benefit is improved access to ore, these costs are recognised as Stripping Activity Asset, if the following criteria are met:-

- it is probable that the future economic benefit (improved access to the ore body) associated with the stripping activity will flow;
- the component of the ore body for which access has been improved can be identified; and
- the costs relating to the stripping activity associated with that component can be measured reliably.

The Stripping Cost capitalised during the development phase or during the production phase is amortised using the units or production method.

In accordance with Ind AS 101 First Time Adoption of Ind AS, the previously recognised asset balance that resulted from stripping activity undertaken during the production phase ('predecessor stripping asset' classified as Iron Ore Mines under Intangible Assets) is reclassified as a part of an existing asset i.e Right to Mine to which the stripping activity relates, to the extent that there remains an identifiable component of the ore body with which the predecessor stripping asset can be associated. Such balances will be amortised over the remaining expected useful life of the Right to Mine.

n) Revenue recognition

Revenue from sale of goods is recognised when the significant risks and rewards of ownership have been transferred to the buyer, recovery of the consideration is probable, the associated cost can be estimated reliably, there is no continuing effective control or managerial involvement with the goods, and the amount of revenue can be measured reliably.

Revenue from rendering of services is recognised when the performance of agreed contractual task has been completed.

Revenue from sale of goods is measured at the fair value of the consideration received or receivable, taking into account contractually defined terms of payment and excluding taxes or duties collected on behalf of the government.

Revenue from operations includes sale of goods, services, service tax, excise duty and adjusted for discounts (net), and gain/ loss on corresponding hedge contracts.

Revenue from Power Supply is accounted for on the basis of billing to consumers and generally all consumers are billed on the basis of recording of consumption of energy by installed meters. Shortfall of Power Unit supplied and Actual Received is recorded as Power Sale Discount and its charges recorded in Profit and Loss Account."
Interest income

Interest income from a financial asset is recognised using effective interest rate (EIR) method.

Dividends

Revenue is recognised when our Company's right to receive the payment has been established, which is generally when shareholders approve the dividend.

Carbon Credit (Certified Emission Reduction)

Revenue is recognized in accordance with Approved Consolidated Monitoring Methodology issued by United Nation Framework Convention of Climate Change (UNFCCC) on receipt basis.

Renewable Energy Certificates

Revenue is recognised when our Company Sold certification of quantity of Renewable Energy Certificates.

o) Insurance Claims

Insurance claims are accounted for on the basis of claims admitted/ expected to be admitted to the extent that there is no uncertainty in receiving the claims.

p) Financial Intruments

i) Financial Assets

A. Initial recognition and measurement

All financial assets and liabilities are initially recognized at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities, which are not at fair value through profit or loss, are adjusted to the fair value on initial recognition. Purchase and sale of financial assets are recognised using trade date accounting.

B. Subsequent measurement

Financial assets carried at amortised cost

A financial asset is measured at amortised cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Financial assets at fair value through other comprehensive income (FVTOCI)

A financial asset is measured at FVTOCI 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.

Financial assets at fair value through profit or loss (FVTPL)

A financial asset not classified as either amortised cost or FVOCI, is classified as FVTPL.

C. Investment in subsidiaries, Associates and Joint Ventures

"Our Company has elected to measure investment in subsidiaries, joint venture and associate at cost. On the date of transition, the fair value has been considered as deemed cost.
Investment in Equity shares & Mutual Funds etc., are classified at fair value through the profit and loss account.

D. Other Equity Investments

All other equity investments are measured at fair value, with value changes recognised in Statement of Profit and Loss, except for those equity investments for which our Company has elected to present the value changes in 'Other Comprehensive Income'.

E. Impairment of financial assets

"In accordance with Ind AS 109, our Company uses 'Expected Credit Loss' (ECL) model, for evaluating impairment of financial assets other than those measured at fair value through profit and loss (FVTPL).

Expected credit losses are measured through a loss allowance at an amount equal to:

- The 12-months expected credit losses (expected credit losses that result from those default events on the financial instrument that are possible within 12 months after the reporting date); or

- Full lifetime expected credit losses (expected credit losses that result from all possible default events over the life of the financial instrument)

For trade receivables Company applies 'simplified approach' which requires expected lifetime losses to be recognised from initial recognition of the receivables. Our Company uses historical default rates to determine impairment loss on the portfolio of trade receivables. At every reporting date these historical default rates are reviewed and changes in the forward-looking estimates are analysed.

For other assets, our Company uses 12 months ECL to provide for impairment loss where there is no significant increase in credit risk. If there is significant increase in credit risk full lifetime ECL is used.

ii) Financial Liabilities

A. Initial recognition and measurement

All financial liabilities are recognized at fair value and in case of loans, net of directly attributable cost. Fees of recurring nature are directly recognised in the Statement of Profit and Loss as finance cost.

B. Subsequent measurement

Financial liabilities are carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

Derivative financial instruments and Hedge Accounting

"Our Company uses various derivative financial instruments such as interest rate swaps, currency swaps, forwards & options and commodity contracts to mitigate the risk of changes in interest rates, exchange rates and commodity prices. Such derivative financial instruments are initially recognised at fair value on the date on which a derivative contract is entered into and are also subsequently measured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative.

Any gains or losses arising from changes in the fair value of derivatives are taken directly to Statement of Profit and Loss, except for the effective portion of cash flow hedges which is recognised in Other Comprehensive Income and later to Statement of Profit and Loss when the hedged item affects profit or loss or treated as basis adjustment if a hedged forecast transaction subsequently results in the recognition of a non-financial assets or non-financial liability.

Hedges that meet the criteria for hedge accounting are accounted for as follows:

a) Cash flow hedge

Our Company designates derivative contracts or non-derivative financial assets / liabilities as hedging instruments to mitigate the risk of movement in interest rates and foreign exchange rates for foreign exchange exposure on highly probable future cash flows attributable to a recognised asset or liability or forecast cash transactions. When a derivative is designated as a cash flow hedging instrument, the effective portion of changes in the fair value of the derivative is recognized in the cash flow hedging reserve being part of other comprehensive income. Any ineffective portion of changes in the fair value of the derivative is recognized immediately in the Statement of Profit and Loss. If the hedging relationship no longer meets the criteria for hedge accounting, then hedge accounting is discontinued prospectively. If the hedging instrument expires or is sold, terminated or exercised, the cumulative gain or loss on the hedging instrument recognized in cash flow hedging reserve till the period the hedge was effective remains in cash flow hedging reserve until the underlying transaction occurs. The cumulative gain or loss previously recognized in the cash flow hedging reserve is transferred to the Statement of Profit and Loss upon the occurrence of the underlying transaction. If the forecasted transaction is no longer expected to occur, then the amount accumulated in cash flow hedging reserve is reclassified in the Statement of Profit and Loss."

b) Fair Value Hedge

Our Company designates derivative contracts or non-derivative financial assets / liabilities as hedging instruments to mitigate the risk of change in fair value of hedged item due to movement in interest rates, foreign exchange rates and commodity prices.

Changes in the fair value of hedging instruments and hedged items that are designated and qualify as fair value hedges are recorded in the Statement of Profit and Loss. If the hedging relationship no longer meets the criteria for hedge accounting, the adjustment to the carrying amount of a hedged item for which the effective interest method is used is amortised to Statement of Profit and Loss over the period of maturity.

Derecognition of financial instruments

Our Company derecognizes a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the financial asset and the transfer qualifies for derecognition under Ind AS 109. A financial liability (or a part of a financial liability) is derecognized from our Company's Balance Sheet when the obligation specified in the contract is discharged or cancelled or expires.

q) Operating Cycle

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

An asset is treated as current when it is:

a) Expected to be realized or intended to be sold or consumed in normal operating cycle;
b) Held primarily for the purpose of trading;
c) Expected to be realized within twelve months after the reporting period, or
d) Cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period All other assets are classified as non-current."

"A liability is current when:

a) It is expected to be settled in normal operating cycle;
b) It is held primarily for the purpose of trading;
c) It is due to be settled within twelve months after the reporting period, or
d) There is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period

All other liabilities are classified as non-current.

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

Our Company has identified twelve months as its operating cycle."

r) Earnings Per Share

Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders by weighted average number of equity shares outstanding during the period. The weighted average number of equity shares outstanding during the period are adjusted for events of bonus issue; bonus element in a right issue to existing shareholders.

For the purpose of calculating diluted earnings per share, the net profit or loss for the year attributable to equity shareholders and the weighted average number of shares outstanding during the year are adjusted for the effects of all dilutive potential equity shares.

s) Borrowing Cost

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 the company 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.

t) Segment Reporting Policies

"Identification of segments: 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 and loss and is measured consistently with profit and loss in the financial statements. The Operating segments have been identified on the basis of the nature of products."

"Inter segment Transfers: Our Company generally accounts for intersegment sales and transfers as if the sales or transfers were to third parties at current market prices."

"Allocation of common costs: Common allocable costs are allocated to each segment according to the relative contribution of each segment to the total common costs."

"Unallocated items: The Corporate and Other segment includes general corporate income and expense items which are not allocated to any business segment."

u) Government Grant

Grant from the government are recognized at the fair value where there is a reasonable assurance that the grant will be received and the company will comply with the attached conditons.

v) Dividend Distribution

Dividend distribution to the shareholders is recognised as a liability in the company's financial statements in the period in which the dividends are approved by the company's shareholders.

w) Statement of Cash Flows

i) Cash and Cash equivalents

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

ii) Statement of Cash Flows is prepared in accordance with the Indirect Method prescribed in the relevant Accounting Standard.

PRINCIPAL COMPONENTS OF INCOME AND EXPENSES

The following is a brief description of the principal line items that are included in the restated summary statement of profit and losses of the Restated Consolidated Financial Statements.

Total income

Our total income is comprised of revenue from operations and other income. Our total income for Financial Years 2015-2016, 2016-2017 and 2017-2018 was ₹ 14,153.68 million, ₹ 15,663.64 million and ₹ 18,644.28 million, respectively.

Revenue from operations

Our revenue from operations is comprised of sale of products and other operating revenues. Our revenue from operations was 99.67 %, 99.71 %, and 99.29 % of our total income for Financial Years 2015-2016, 2016-2017 and 2017-2018 respectively.

Sale of products

Sale of products represents income we earn from sale of Steel Products and Sale of Electricity.

Other operating revenue

Other operating revenue represents income we earn from, among other things, Interest Income, and Other Miscellaneous Receipt.

Other income

Other income includes: ₹ 47.24 million, ₹ 45.24 million, ₹132.28 million Our other income was 0.33%, 0.29%, and 0.71 % of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018 respectively. This includes income from transportation and interest on bill discounting.

Expenses

Our expenses are comprised of cost of materials consumed, purchases of stock in trade, increase/decrease in Stock in Trade, Excise Duty/GST on Sale, employee benefits expense, finance costs, depreciation and amortisation expense and other expenses. Our total expenses for Financial Years 2015-2016, 2016- 2017 and 2017-2018 were ₹ 14,103.36 million, ₹ 15,288.97 million and ₹ 17,990.60 million respectively.

Cost of materials consumed

The materials consumed primarily include iron ore fines, coal, Manganese Ore, Billet, Furnace Oil, Rice Husk and Manganese Slag. Our cost of materials consumed was 67.62 %, 60.37 % and 68.36 % of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018 respectively.

Purchases of stock-in-trade

The purchases of stock-in-trade were 1.08%, 0.23%, and 1.08% of our total income for Financial Years 2015-2016, 2016-2017 and 2017-2018 respectively.

Changes in inventories of finished goods, stock-in-trade and work-in-progress

The changes in inventories primarily reflect the movement in our inventories of finished goods, stock-in-trade and work-in-progress at the beginning and the end of the period. The changes in inventories was (1.69)%, 3.24%, and (2.60)% of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018respectively.

Excise duty / GST on sale of goods

Excise duty / GST on sale of goods were 10.74%, 10.74%, and 2.81% of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018 respectively.

Employee benefits expense

Our employee benefits expenses comprise primarily the salaries, wages and bonus of our employees and also contribution to provident and other funds and staff welfare expenses. Our employee benefits expenses were 2.95%, 2.86%, 3.08% of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018 respectively.

Finance costs

Finance cost includes interest expense on term loans and others. Interest expense (others) includes ₹ 936.68 million, ₹ 1,171.42 million, and ₹ 1,427.00 million for the Financial Years 2015-2016, 2016-2017 and 2017-2018 respectively. In addition, finance cost also includes other borrowing costs such as 43.23, 50.87 and 43.70. Our finance costs were 6.92%, 7.80% and 7.89 % of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018 respectively.

Depreciation and amortisation expense

Depreciation and amortization expenses consist of depreciation on tangible assets and amortization on lease hold land. Our depreciation and amortisation expenses were 3.87%, 3.61% and 3.80% of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018 respectively.

Other expenses

Other expenses primarily comprise conversion and job work charges, consumption of stores and spares, power and fuel, excise duty on stock, auditors' remuneration, directors' sitting fees, rent, repairs to machinery, buildings and others, sales promotion and advertisement, , other selling expenditures, insurance, rates and taxes, research and development, travelling and conveyance, legal and professional charges, net foreign exchange loss, bad debt provision for doubtful debts, provision for doubtful advances, donation and corporate social responsibility expenses and miscellaneous expenses. Our other expenses were 8.16%, 8.76% and 12.08% of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018 respectively.

Tax expenses

Our tax expenses primary comprises of current tax and deferred tax. Our tax expenses were 1.68%, 0.91% and 1.58% of our total income for Financial Years 2015-2016, 2016- 2017 and 2017-2018respectively.

RESULTS OF OPERATIONS

The following table sets forth a breakdown of our result of operations for Financial Years 2015-2016, 2016-2017 and 2017-2018 and each item as a percentage of our total income for periods indicated:

(₹ in million)

Particulars	For the year ended March 31, 2018	% of total income	For the year ended March 31, 2017	% of total income	For the year ended March 31, 2016 (Proforma Ind AS)	% of total income
REVENUE						
Revenue From Operations	18,512.00	99.29	15,618.40	99.71	14,106.44	99.67
Other Income	132.28	0.71	45.24	0.29	47.24	0.33
Total income	18,644.28	100.00	15,663.64	100.00	14,153.68	100.00
EXPENSES						
Cost of materials consumed	12,745.79	68.36	9,455.66	60.37	9,570.27	67.62
Purchases of stock-in-trade	201.75	1.08	35.92	0.23	153.15	1.08
Changes in inventories of finished goods, stock-in-trade and work-in-progress	(485.18)	-2.60	508.09	3.24	(239.16)	(1.69)
Excise Duty on sale of goods	523.22	2.81	1,681.64	10.74	1,519.89	10.74
Employee benefits expense	573.92	3.80	448.71	2.86	417.36	2.95
Finance costs	1,470.70	7.89	1,222.29	7.80	979.91	6.92
Depreciation and amortisation expense	708.19	3.80	564.81	3.61	547.24	3.87
Other expenses	2,252.21	12.08	1,371.86	8.76	1,154.69	8.16

Particulars	For the year ended March 31, 2018	% of total income	For the year ended March 31, 2017	% of total income	For the year ended March 31, 2016 (Proforma Ind AS)	% of total income
Total expenses	17,990.60	96.49	15,288.97	97.61	14,103.36	99.64
Profit before Tax and Exceptional Items	653.68	3.51	374.67	2.39	50.32	0.36
Exceptional Items	-	-	-	-	6.67	0.05
Tax expense:	-	-	-	-	-	-
Current tax	294.68	1.58	113.05	0.72	8.66	0.06
Deferred tax	0.36	0.00	28.88	0.18	229.26	1.62
	295.04	1.58	141.94	0.91	237.92	1.68
Profit for the year	358.65	1.92	232.73	1.49	(194.28)	(1.37)
Share in Profit of Joint Venture	(0.03)		(0.12)		-0.42	
Minority Share in Profit	(12.61)		(5.73)		0	
Loss of Firm Transferred to Partners Capita	0		(45.16)		0	
Other Comprehensive Income	(2.31)		(1.27)		0.06	
Income tax on above	(0.03)		(0.05)		-0.02	
Total Comprehensive Income for the year	368.88	1.98	282.19	1.80	(194.66)	(1.38)
Earnings per equity share	28.22		21.59		(14.89)	
Equity Share of face value of Rs. 10/- each	13.07		13.07		13.07	
Basic and Diluted (Total)	28.22		21.59		(14.89)	

Financial Year 2017 -2018 Compared to Financial Year 2016-2017

Income

Our total income increased by 19.03% from ₹ 15,663.64 million for the Financial Year 2016- 2017 to **₹** 18,644.28 million for the Financial Year 2017-2018. This was mainly due to a 18.53 % increase in revenue from operations in Financial Year 2017-2018 from Financial Year 2016-2017 which was mainly pursuant to increase in realisation price and quantity sold of finished product.

Revenue from operations

Our revenue from operations increased by 18.53% from ₹ 15,618.40 million for Financial Year 2016-2017 to ₹ 18,512.00 million for Financial Year 2017- 2018. Such an increase was primarily due to increase in realisation price and quantity sold of finished product. The details of which are stated below:

Sr. No	Item		2017-2018		2016-2017	
		Unit	Quantity	Rate	Quantity	Rate
1	Re-Rolled Product	MT	292,324.41	33,724.75	271,456.09	27,335.15
2	H B Wire	MT	15,594.21	35,482.04	11,083.88	29,221.62
3	Iron ore Pellet	MT	482,865.15	5,396.73	389,363.84	4,448.27
4	Sponge Iron	MT	209,227.62	17,126.23	263,044.77	12,659.62
5	Silico Manganese	MT	8,526.10	64,561.40	12,421.63	54,638.56

Other Income

Our other income Increase by 192.40% from ₹ 45.24 million for Financial Year 2016-2017 to ₹ 132.28 million for Financial Year 2017-2018, primarily due to an increase in transportation income by 4,816.46% from ₹ 0.79 million in Financial Year 2016-2017 to ₹ 38.84 million in Financial Year 2017-2018 and interest on Bill Discounting by 79.87% from ₹ 28.61 million in Financial Year 2016-2017 to ₹ 51.46 million in Financial Year 2017-2018.

Expenses

Our total expenses increased by 17.67% from ₹ 15,288.97 million for the Financial Year 2016-2017 to ₹ 17,990.60 million for the Financial Year 2017- 2018. This was primarily due to increase in price of raw material, financial cost, employee expenses and other expenses. The percentage price of raw material, financial cost, employee expenses and other expenses refer the details as mentioned below). The expenses of subsidiary company (IAHEPL) was for 41 days i.e. from February 17, 2017 to March 31, 2017 in previous year, however in current year it covers full financial year. So total expenses had been increased in comparison to previous year.

Cost of materials consumed

Our cost of materials consumed increased by 34.80% from ₹ 9,455.66 million for the Financial Year 2016-2017 to ₹ 12,745.79 million for the Financial Year 2017-2018 due to increase in price of Raw Material primarily in Billet, Pig Iron, Waste & Scrap, Iron Ore fines and Manganese Ore and quantity produced as mentioned below.

Comparison of Increase in Production Quantity

S. No.	Item Name	Production (2016-17) (in Mt.)	Production (2017-18) (in Mt.)	% Increase in Production
1	Re- Rolled Products	277,802	311,646	10.86%
2	Billets & Blooms	185,832	193,523	3.97%
3	H.B. Wire	11,377	15,613	27.13%
4	Iron Ore Pellets	868,244	995,497	12.78%
5	Iron Ore Benification	894,948	988,416	9.46%

Purchases of stock-in-trade

The purchases of stock-in-trade increased by 461.66% from ₹ 35.92 million in Financial Year 2016- 2017 to ₹ 201.75 million in Financial Year 2017-2018. This was primarily due to Increase in Trading of Steel Products.

Changes in inventories of finished goods, stock-in-trade and work-in-progress

The inventories of finished goods, stock-in-trade and work-in-progress changed from ₹ 508.09 million in Financial Year 2016-2017 to ₹ (485.18) million in Financial Year 2017-2018.

Excise duty on sale of goods

The excise duty on sale of goods decreased by 68.89 % from ₹ 1,681.64 million in Financial Year 2016- 2017 to ₹ 523.22 million in Financial Year 2017- 2018 on account of non-inclusion of GST in valuation of closing stock in 2017-2018 whereas excise duty is included in 2016-2017. The same is change because of implementation of GST with effect from. July 1, 2017.

Employee benefits expense

Our employee benefits expense increased by 27.90% from ₹ 448.71 million in Financial Year 2017 to ₹ 573.92 million in Financial Year 2018 primarily due to an increase in the salaries, wages and bonus from ₹ 412.91 million in Financial Year 2016-2017 to ₹ 530.98 million in Financial Year 2017-2018. This was on account of the increase in the in salaries of the existing empoyess of the our Company and also on account of increase in salaries of our Subsidiary Company from ₹ 3.32 million in Financial Year 2016-17 to ₹ 36.93 million in Financial Year 2017-18.

Finance costs

The finance costs increased by 20.32% from ₹ 1,222.29 million in Financial Year 2016-2017 to ₹ 1,470.70 million in Financial Year 2017-2018. This was due to an increase in the interest expenses from ₹ 1,171.42 million in Financial Year 2017 to ₹ 1427.00 million in Financial Year 2018. This increase was on account of increase in the interests costs of the Subsidiary which increased from ₹ 57.98 million in 2016-17 to ₹ 447.18 Million in 2017-18 and unsecured loan in Subsidiary Company was ₹ 24.01 Million in Financial Year 2017-18.

Depreciation and amortisation expense

Depreciation and amortization expense increased by 25.39% from ₹ 564.81 million in Financial Year 2016-2017 to ₹ 708.19 million in Financial Year 2017-2018. This was primarily due to new plant & machinery installed. This was on account the consolidation with the IAHEPL, the depreciation of IAHEPL was increased from ₹ 25.49 million in Financial Year 2016-17 to ₹ 169.53 million in Financial Year 2017-18.

Other expenses

Other expenses increased by 64.17% from ₹ 1,371.86 million in Financial Year 2016-2017 to ₹ 2,252.21 million in Financial Year 2017-2018. This was primarily because of increase in store consumption, power & fuel, other manufacturing expenses, legal & professional charges, loss on sale of fixed assets, repair & maintenance (others), advertisement & publicity, sales promotion expenses, and travelling expenses (others) etc. and also on account of the account the consolidation with the IAHEPL.

Tax expense

Our tax expense increased by 107.88% from ₹ 141.93 million for Financial Year 2016-2017 to ₹ 295.04 million for Financial Year 2017-2018 primarily due increase in Revenue from Operations.

Restated profit for the year

As a result of the foregoing, our restated profit for the year increased by 30.72% from ₹ 282.19 million for Financial Year 2016-2017 to ₹ 368.88 million for Financial Year 2017-2018.

Financial Year 2016- 2017 Compared to Financial Year 2015- 2016

Income

Our total income increased by 10.67% from ₹ 14153.68 million for the Financial Year 2015- 2016 to ₹ 15663.64 million for the Financial Year 2016- 2017.

Revenue from operations

Our revenue from operations increased by 10.72% from ₹ 14,106.44 million for Financial Year 2015- 2016 to ₹ 15,618.40 million for Financial Year 2016-2017 primarily due to an increase of sale of products from ₹ 13,768.60 million in Financial Year 2015- 2016 to ₹ 15,462.82 million in Financial year 2016-2017 and an decrease in the other operating revenues from ₹ 337.84 million for Financial Year 2015- 2016 to ₹ 155.58 million in Financial Year 2016- 2017. Such an increase was due to an increase in sale of products by ₹ 1,694.21 million and decrease in other operating revenues by ₹ 182.26 million.

Other income

Our other income decreased by 4.23% from ₹ 47.24 million for Financial Year 2015- -2016 to ₹ 45.24 million for Financial Year 2016- 2017, primarily due to decrease in Hire Charges income by ₹ 11.35 million by 95.54% from ₹ 11.88 million in Financial Year 2015- 2016 to ₹ 0.53 million in Financial Year 2016 - 2017.

Expenses

Our total expenses increased by 8.41% from ₹ 14,103.36 million for the Financial Year 2015- 2016 to ₹ 15,288.97 million for the Financial Year 2016- 2017.

Cost of materials consumed

Our cost of materials consumed decreased by 1.20% from ₹ 9,570.27 million for the Financial Year 2015- 2016 to ₹ 9,455.66 million for the Financial Year 2016-2017. The decrease in cost of materials consumed was primarily due to increase in closing stock of raw material from ₹ 897.52 million in Financial Year 2015- 2016 to ₹ 1,062.72 million in Financial Year 2016- 2017.

Purchases of stock-in-trade

The purchases of stock-in-trade decreased by 76.55% from ₹ 153.15 million in Financial Year 2015- 2016 to ₹ 35.92 million in Financial Year 2016- 2017 due to non-dealing in trading items.

Changes in inventories of finished goods, stock-in-trade and work-in-progress

The changes in inventories of finished goods, stock-in-trade and work-in-progress increase by 312.45% from ₹ (239.16) million in Financial Year 2015- 2016 to ₹ 508.09 million in Financial Year 2016-2017 due to decrease in Closing Finished Goods ₹ 566.73 million by 51.54% from ₹ 1,099.68 million to ₹ 532.95 million.

Excise duty on sale of goods

The excise duty on sale of goods increase by 10.64% from ₹ 1,519.89 million in Financial Year 2015- 2016 to ₹ 1681.64 million in Financial Year 2016- 2017 due to increase in turnover.

Employee benefits expense

Our employee benefits expense increased by 7.51% from ₹ 417.36 million in Financial Year 2015-2016 to ₹ 448.71 million in Financial Year 2016- 2017 primarily due to an increase in the salaries, wages and bonus from ₹ 387.37 million in Financial Year 2016 to ₹ 412.91 million in Financial Year 2017.

Finance costs

The finance costs increased by 24.73% from ₹ 979.91 million in Financial Year 2015-2016 to ₹ 1,222.29 million in Financial Year 2016-2017. This was due to an increase in the rate of interest, on the term loan availed for our IAHEPL for the hydro power project

Depreciation and amortisation expense

Depreciation and amortization expense increased by 3.21% from ₹ 547.24 million in Financial Year 2015-2016 to ₹ 564.81 million in Financial Year 2016-2017. This was primarily due to capitalisation of hydro power project of Subsidiary company.

Other expenses

Other expenses increased by 18.81% from ₹ 1,154.69 million in Financial Year 2015- 2016 to ₹ 1,371.86 million in Financial Year 2016-2017. This was primarily because of increase in Manufacturing Wages, Repair & Maintenance of Plant & Machinery, Water Cess, Loss of Partnership Firm and Advertisement & Publicity Expenses.

Tax expense

Our tax expense decreased by 40.35% from ₹ 237.92 million for Financial Year 2015- 2016 to ₹ 141.93 million for Financial Year 2016- 2017 primarily due to an decrease in deferred tax from ₹ 229.26 million for Financial Year 2015- 2016 to ₹ 28.88 million for Financial Year 2016- 2017

Restated profit for the year

As a result of the foregoing, our restated profit for the year increased by 244.97% from ₹ (194.66) million for Financial Year 2015-2016 to ₹ 282.19 million for Financial Year 2016-2017.

LIQUIDITY AND CAPITAL RESOURCES

Overview

We finance our operations and capital requirements primarily through cash flows from operations and borrowings under credit facilities from certain banks. We believe that our credit facilities, together with cash generated from our operations will be sufficient to finance our working capital needs for the 12 months following the date of this Draft Red Herring Prospectus. We expect that these sources will continue to be our principal sources of cash in the medium term.

Cash flows

Cash and bank balances primarily consist of balances in current accounts with banks, fixed deposits with banks and cash on hand.

The following table sets forth a summary of our statement of cash flows for the periods indicated.

(*₹ in million*)

	For Financial Year ended March 31,		
	2018	**2017**	**2016**
Net cash generated / (used in) operating activities	2,112.90	5,297.53	218.60
Net cash generated / (used in) investing activities	(398.91)	(6,514.68)	(443.56)
Net cash generated / (used in) financing activities	(1770.40)	(1,274.25)	(52.47)
Opening balance of cash and cash equivalents	75.33	18.23	295.66
Closing balance of cash and cash equivalents	18.91	75.33	18.23
Net increase / (decrease) in cash and cash equivalents	(56.41)	57.10	(277.44)

Net Cash Flow from Operating Activities

Our net cash flow generated from/ (used in) operating activities for Financial Year 2017-2018 was ₹ 2,112.90 million, primarily due to other operating activity of ₹ 2,761.06 million, adjustments for changes in working capital of ₹ (353.47) million and net taxes paid of ₹ 294.68 million.

Our net cash flow generated from/ (used in) operating activities for Financial Year 2016-2017 was ₹ 5,297.53 million, primarily due to other operating activities of ₹ 2,178.85 million, adjustments for changes in working capital of ₹ 3,231.72 million and net taxes paid of ₹ 113.05 million.

Our net cash flow generated from/ (used in) operating activities for Financial Year 2015-2016 was ₹ 218.60 million, primarily due to other operating activities of ₹ 1,549.86 million, adjustments for changes in working capital of ₹ (1,322.60) million and net taxes paid of ₹ 8.66 million.

Net Cash Flow from Investing Activities

Our net cash flow generated from/ (used in) investing activities for Financial Year 2017-2018 was ₹ (398.91) million, primarily due to purchase of fixed assets and movements in capital work in progress / capital advances worth ₹ (435.18) million, sale of fixed assets worth ₹ 68.14 million, sale of investments worth ₹ 0.74 million, loan given to body corporate worth ₹ (131.75) million, interest received worth ₹ 63.97 million and others ₹ 35.16 million.

Our net cash flow generated from/ (used in)investing activities for Financial Year 2016-2017 was ₹ (6,514.68) million, primarily due to purchase of fixed assets and movements in capital work in progress / capital advances worth ₹ (6,537.07) million, sale of fixed assets worth ₹ 26.02 million, purchase of investments worth ₹ (0.02) million, loan given to body corporate worth ₹ (19.66) million, interest received worth ₹ 37.93 million and others ₹ (21.88) million.

Our net cash flow generated from/ (used in) investing activities for Financial Year 2015-2016 was ₹ (443.56) million, primarily due to purchase of fixed assets and movements in capital work in progress / capital advances worth ₹ (605.28) million, sale of fixed assets worth ₹ 79.76 million, sale of investments worth ₹ 17.78 million, loan given to body corporate worth ₹ 58.65 million, interest received worth ₹ 32.09 million and others ₹ (26.55) million.

Net Cash Flow from Financing Activities

Our net cash flow generated from/ (used in) financing activities for Financial Year 2017-2018 was ₹ (1,770.40) million, primarily due to proceeds from borrowings of ₹ (299.70) million and interest paid worth of ₹ (1,470.70) million.

Our net cash flow generated from/ (used in) financing activities for Financial Year 2016-2017 was ₹ 1,274.25 million, primarily due to proceeds from borrowings of ₹ 2491.54 million, proceeds from issue of Share of ₹ 5.00 million and interest paid worth of ₹ (1,222.29) million.

Our net cash flow generated from/ (used in) financing activities for Financial Year 2015-2016 was ₹ (52.47) million, primarily due to proceeds from borrowings of ₹ 927.44 million and interest paid worth of ₹ (979.91) million.

BORROWINGS

Set forth below is a summary of our aggregate borrowings as of July 31, 2018:

(*₹ in million)*

Category of borrowing	Sanctioned Amount	Outstanding amount as on July 31, 2018
Fund based facilities		
Term loans		
Secured	9,438.70	7,104.01
Unsecured	433.00	430.29
Total (A)	9,871.70	7,534.30
Working capital facilities		
Secured	3295.00	2518.09
Unsecured	-	-
Total (B)	3295.00	2518.09
Vehicle Loan		
Secured	720.52	316.07
Unsecured	-	-
Total (C)	720.52	316.07
Total (A+B +C)	**13,887.22**	**10,368.46**
Non-fund based facilities		
Secured	1,750.00	1,452.30
Unsecured	-	-
Total (D)	**1,750.00**	**1,452.30**
Total (A + B + C + D)	**15,637.22**	**11,820.76**

See "*Financial Indebtedness*" for a description of broad terms of our indebtedness on beginning page 461.

CAPITAL EXPENDITURES AND CAPITAL INVESTMENTS

Historical Capital Expenditures

The following table shows our capital expenditures in respect of additions to property, plant and equipment and intangible assets for each of the periods indicated:

(*₹ in million*)

	As at March 31,		
	2018	**2017**	**2016**
Freehold land & Site Development	2.47	14.12	78.49
Leasehold land	-	-	-
Buildings	60.39	60.86	187.20
Plant and equipment's*	341.72	5,988.47	398.68
Furniture and fixtures	0.54	0.56	7.84
Motor vehicle	74.17	56.37	22.21
Office equipment	2.47	0.72	1.53
Electrical installation	-	-	-
Roads	-	-	-
Computer software	2.06	1.71	1.53

* *Plant and machinery and factory Building had been added during 2016-17 on account of the consolidation of the IAHEPL and also addition in of assets of our Company.*

CONTRACTUAL OBLIGATIONS AND COMMITMENTS

Our Company has certain operating lease arrangements for storage of goods and other commercial purposes with tenure ranging from 11 months to three years. Terms of some of these lease arrangements include escalation clause for rent and deposit/refund of security deposit. Expenditure incurred on account of rent has been recognized in the statement of profit and loss amounting to ₹ 14.76 million, ₹ 2.34 million and ₹ 2.66 million for the Financial Years 2015-2016, 2016-2017 and 2017-2018 respectively.

Our Company has certain finance lease arrangements for land taken on lease from government authorities for setting up of factory premises / office thereon with tenure of 99 years. Terms of some of these lease arrangements include escalation clause for rent. The net carrying amount of the leasehold land is ₹ 18.52 million, ₹ 122.33 million and ₹ 122.33 million for the Financial Years 2015-2016, 2016-2017 and 2017-2018 respectively. For further details in relation to finance lease liabilities, see *"Restated Financial Statements"* on page 228.

Estimated amount of contracts remaining to be executed on capital account and not provided for:

(*₹ in million*)

	For Financial Year ended March 31,		
	2018	**2017**	**2016**
Estimated amount of contracts remaining to be executed on capital account and not provided for	NA	NA	NA

OFF-BALANCE SHEET ARRANGEMENTS

We do not have any material off-balance sheet arrangements.

CONTINGENT LIABILITIES AND COMMITMENT (TO THE EXTENT NOT PROVIDED FOR)

We have had the following contingent liabilities and commitments that had not been provided for:

(*₹ in million*)

Contingent Liabilities and Commitment (To the extent not provided for):	March 31, 2018	March 31, 2017	March 31, 2016
(a) Claims against the Co. / disputed tax liabilities not acknowledged as debt	469.16	132.52	159.18
(b) Bank Guarantees outstanding	227.30	213.79	110.91
(c) Letter of Credit & Guarantee issued by ban	104.56	311.12	274.03
(d) Jointly and severely corporate guarantee to the bank on behalf of subsidiary company	3,311.00	3,311.00	-
(e) Jointly and severely corporate guarantee to the bank on behalf of Partnership Firm	-	-	3311.00
Total	**4,112.01**	**3,968.42**	**3,855.12**

For further details on our contingent liabilities and commitments that had not been provided for, see *"Restated Financial Statements"* on page 228.

MARKET RISKS

We are exposed to price risk, interest rate risk, credit risk, liquidity risk and foreign currency exchange risk and commodity price risk among others. Our risk management approach seeks to minimize the potential material adverse effects from these exposures. Accordingly, we have established a framework and process to monitor the exposures to implement appropriate measures in a timely and effective manner. We do not have a fixed hedging policy.

Interest Rate Risk

Interest rate risk is a risk that primarily arises from floating rate that we pay on our borrowings with banks and financial institutions. We are exposed to the effects of fluctuations in the prevailing levels of market rates on our financial position. As at March 31, 2018 substantially all of our Company's borrowings were subject to floating interest rate, which are reset at short intervals. We expect that any changes in such rates would have a material impact on our financial condition and results of operations.

Commodity Price Risk

We are exposed to the price risk associated with purchasing our raw materials such as iron ore, coal and dolomite. We have the necessary arrangements with our suppliers. Therefore, our financial results may not be affected significantly by fluctuations in these prices, which depend on many factors, including the demand in local and international markets, changes in the economy, worldwide production levels, worldwide inventory levels and disruptions in the supply chain.

Credit Risk

Our Company is exposed to credit risk as a result of the risk of counterparties non-performance or default on their obligations. Our Company's exposure to credit risk primarily relates to investments, accounts receivable and cash and cash equivalents. Our Company monitors and limits its exposure to credit risk on a continuous basis. Our Company's credit risk associated with accounts receivable is primarily related to party not able to settle their obligation as agreed. To manage this our Company periodically reviews the financial reliability of its customers, taking into account the financial condition, current economic trends and analysis of historical bad debts and ageing of accounts receivables.

Trade receivables

Trade receivables represent the most significant exposure to credit risk and are stated after an allowance for impairment and expected credit loss.

Loans and Advances

Financial assets in the form of loans and advances are written off when there is no reasonable expectations of recovery. Where recoveries are made, these are recognise as income in the statement of profit and loss. Our Company measures the expected credit loss of dues based on historical trend, industry practices and the business environment in which the entity operates. Loss rates are based on actual credit loss experience and passed trends. Based on historical data, loss on collection of dues is not material hence no additional provisions considered.

Bank, Cash and cash equivalents

Bank, Cash and cash equivalents comprise cash in hand and deposits which are readily convertible to cash. These are subject to insignificant risk of change in value or credit risk.

Liquidity risk

Liquidity risk is defined as the risk that our Company will not be able to settle or meet our obligations on time or at a reasonable price. Our Company monitors our liquidity risk and maintains a level of cash and cash equivalents deemed adequate by management to finance our Company's operations and to mitigate the effects of fluctuations in cash flows..

Foreign Currency Risk

Our Company has not generated revenues internationally as on date our Company has no unhedged foreign currency exposure.

Inflation Risk

We do not consider our exposure to inflation risk to be material.

Price risk

The entity is exposed to equity price risk, which raised out from FVTOCI quoted and unquoted equity shares. The management monitors the proportion of equity securities in its investment portfolio based on market indices. Material investments within the portfolio are managed on an individual basis and all buy and sell decisions are approved by the management. The primary goal of the entity's investment strategy is to maximize investments returns.

SIGNIFICANT ECONOMIC CHANGES THAT MATERIALLY AFFECT OR ARE LIKELY TO AFFECT INCOME FROM OPERATIONS

Our business has been subject, and we expect it to continue to be subject, to significant economic changes that materially affect or are likely to affect income from operations identified above in "*Management's Discussion and Analysis of Financial Condition and Results of Operations - Factors Affecting Our Results of Operation*" on page 431 and uncertainties described in "*Risk Factors*" on page 22.

TOTAL TURNOVER IN EACH MAJOR INDUSTRY SEGMENT

(₹ in Million)

Sr.No.	Item	Amount
1.	Re-Rolled Product	9,858. 57
2.	H B WIRE	553.31
3.	SPONGE IRON	3,583.28
4.	SILICO MANGANESE	550.46
5.	IRONORE PELLET	2,605.89

UNUSUAL OR INFREQUENT EVENTS OR TRANSACTIONS

To our knowledge there have been no transactions or events which, in our judgment, would be considered unusual or infrequent.

FUTURE RELATIONSHIP BETWEEN COST AND REVENUE

Other than as described in the section "*Risk Factors*" beginning on page 22, there are no known factors that might affect the future relationship between cost and revenue.

PUBLICLY ANNOUNCED NEW PRODUCTS OF BUSINESS SEGMENTS / MATERIAL INCREASES IN REVENUE DUE TO INCREASED DISBURSEMENTS AND INTRODUCTION OF NEW PRODUCTS.

There are no new products or business segments that have or are expected to have a material impact on our business, prospects, and results of operation or financial conditions.

SIGNIFICANT DEVELOPMENTS SUBSEQUENT TO THE LAST FINANCIAL PERIOD

Other than as disclosed in this Draft Red Herring Prospectus, there has not arisen, since the date of the last financial statements set out herein, any circumstance that materially or adversely affects or is likely to affect our profitability, taken as a whole, or the value of our consolidated assets or our ability to pay our liabilities over the next twelve months.

SIGNIFICANT DEPENDENCE ON SINGLE OF FEW CUSTOMERS OR SUPPLIERS

Other than as described in this Draft Red Herring Prospectus particularly in "*Risk Factors* - 22" and "*Management's Discussion and Analysis of Financial Condition and Results of Operations*" on pages 431 respectively, to our knowledge, there is no dependence on a single or few customers or suppliers.

COMPETITIVE CONDITIONS

We operate in a competitive environment. For further details, see "*Our Business*" "*Industry*" and "*Risk Factors*" on pages 162, 125 and 22.

SEASONALITY

Our business operations are not subject to significant seasonal trends.

KNOWN TRENDS AND UNCERTAINTIES

Our business has been impacted and we expect will continue to be impacted by the trends identified above in "*Management's Discussion and Analysis of Financial Condition and Results of Operations–Factors Affecting Our Results of Operations*" and the uncertainties described in "*Risk Factors*" beginning on pages 431 and 22, respectively. To our knowledge, except as we have described in this Draft Red Herring Prospectus, there are no known factors that we expect to have a material adverse impact on our revenues or income from operations.

Significant Developments after March 31, 2018 that may affect our Future Results of Operations

Except as stated in this Draft Red Herring Prospectus, to our knowledge, no circumstances have arisen since the date of our restated financial statements as disclosed in this Draft Red Herring Prospectus which materially and adversely affect or are likely to affect the operations or profitability of our Company, or the value of our assets or our ability to pay our material liabilities within the next 12 months.

Reservations, qualifications or adverse remarks by Auditors

Please see below a summary of reservations, qualifications or adverse remarks of statutory auditors in the last five Financial Years and of their impact on the financial statements and financial position of our Company and the corrective steps taken and proposed to be taken by our Company for each of the said reservations, qualifications or adverse remarks:

Sr. No.	FY	Qualifications / Adverse Remark/s	Impact on the financial statements and financial position of our Company	Corrective steps taken
1	2013-14	Our Company has recognised the uncertified units of REC\CER amounting to ₹ 22.50 million in closing stock as per our Company 's policy, which is not yet certified by the CDM Board.	Impact on financial statement of our Company is affected as , the Profit and shareholder's fund of our Company has been enhanced by ₹ 22.50 million amount for the Financial Year 2013-14	Impact taken on Restated Financial Statement. By the said adjustment closing stock is reduced by ₹ 22.50 million to the extent accordingly profit reduced by ₹ 22.50 million. For details refer Annexure 5 of the Restated financials Statement .
2.	2014-15	Our Company has recognised the uncertified units of REC\CER amounting to ₹ 35.30 million in closing stock as per our Compan's	Impact on financial statement of our Company is	Impact taken on Restated Financial Statement. By the

Sr. No.	FY	Qualifications / Adverse Remark/s	Impact on the financial statements and financial position of our Company	Corrective steps taken
		policy, which is not yet certified by the CDM Board	affected as, the Profit and shareholder's fund of our Company has been enhanced by ₹ 35.30 million amount for the Finanical Year 2014-2015	said adjustment closing stock is reduced by ₹ 35.30 million to the extent accordingly profit reduced by ₹35.30 million.
3.	2015-16	(i) Our Company has recognised the uncertified units of REC\CER amounting to ₹ 36.00 million in closing stock as per our Company's policy, which is not yet certified by the CDM Board. (ii) Emphasis of Matter our Company has not made any provision against the expected diminution of its joint venture investment due to coal block cancellation , the management has opined that the expected realizable value of the assets of the JV will be more as compared to its book value ; in the absence of corroborative evidence of permanent decline ,the impact could not be ascertained at this juncture.	Impact on financial statement of our Company is affected as , the Profit and shareholder's fund of our Company has been enhanced by ₹ 36.00 million amount for the Financial Year 2015-2016	The rectification/ adjustment for the Financial Year 2015-2016 has been done in our Company's first Ind-AS Financial Statement for the year ended Financial Year 2017-2018. By the said adjustment closing stock is reduced by ₹ 36.00 million to the extent accordingly profit reduced by ₹ 36.00 million .
4.	2016-17	Our Company has recognised the uncertified units of CER amounting to ₹ 3.20 million in closing stock as per our Company 's policy, which is not yet certified by the CDM Board.	Impact on financial statement of our Company is affected as, the Profit and shareholder's fund of our Company has been enhanced by ₹ 3.20 million amount for the F.Y 2016-17.	The rectification/ adjustment for the Financial Year 2016-2017 has been done in our Company's first Ind-AS Financial Statement for the year ended Financial Year 2017-2018. By the said adjustment closing stock is reduced by ₹ 3.20 million to the extent accordingly profit reduced by ₹3.20 million.
5.	2017-18	(i) Emphasis of Matter Our Company has invested in equity shares amounting to ₹ 2,200.00 million in its subsidiary company (IA Hydro Energy Private Limited) during the year resulting into utilization of short term fund for long term purpose. (ii) Other Matters	No Impact on financial statement.	Since there has been no impact on financial statement of the Company, no corrective measure is warranted.

Sr. No.	FY	Qualifications / Adverse Remark/s	Impact on the financial statements and financial position of our Company	Corrective steps taken
		Other matter, with respect to the adequacy of the internal financial controls over financial reporting of our Company and the operating effectiveness of such controls, included in the auditor's report on the consolidated financial statement as at and for the year ended Finanial Years 2017-2018, 2016-2017 and 2015-2016 which do not require any corrective adjustment in the Restated Ind AS Consolidated Financial Information, are as follows Adequacy and operating effectiveness of the internal financial controls over financial reporting in so far as it relates to subsidiary companies and Joint venture incorporated in India is based on the corresponding report of the auditor of our Company.		

Note: Point 1,2,3(i),4 are for Standalone & Consolidation.
Note: Point 3(ii) & 5(i) are for Standalone.
Note: Point 5(ii) is for Consolidation.

FINANCIAL INDEBTEDNESS

Our Company avails loans in the ordinary course of its business for the purposes of capital expenditure, working capital and other business requirements. Our Company has obtained the necessary consents required under the relevant loan documentation for change in our board of directors, change in our capital structure, change in our constitution and other related activities.

In accordance with the Articles of Association of our Company, our Board of Directors has been empowered to borrow funds in accordance with applicable law. Pursuant to the resolution dated January 21, 2015 passed by our shareholders, our Board of Directors has been authorized to borrow an amount up to ₹ 20,000 million.

Set forth below is a brief summary of our consolidated borrowings as of July 31, 2018:

Category of borrowing	Sanctioned Amount	Outstanding amount as on July 31, 2018
Fund based facilities		
Term loans		
Secured	9,438.70	7,104.01
Unsecured	433.00	430.29
Total (A)	9,871.70	7,534.30
Working capital facilities		
Secured	3,295.00	2,518.09
Unsecured	-	-
Total (B)	3,295.00	2,518.09
Vehicle Loan		
Secured	720.52	316.07
Unsecured	-	-
Total (C)	720.52	316.07
Total (A+B +C)	**13,887.22**	**10,368.46**
Non-fund based facilities		
Secured	1,750.00	1,452.30
Unsecured	-	-
Total (D)	**1,750.00**	**1,452.30**
Total (A + B + C + D)	**15,637.22**	**11,820.76**

* *As certified by S S S D & Co Chartered Accountants by way of their certificate dated September 12, 2018.*

Principal terms of the borrowings availed by us:

(a) ***Interest:*** In terms of the fund based i.e. term loans and cash credit facilities availed by us, the interest rate is decided by the lenders and mutually agreed by us. The interest rate typically ranges from 10.55% to 14.95% per annum. Typically, the non-fund based working capital facilities are availed in consideration of a commission, which depends on the nature of the non-fund based facility.

(b) ***Tenure:*** The tenor of the term loans availed by us typically ranges from fourteen years to fifteen years. Subject to periodical renewals, the tenor of the working capital facilities typically ranges from six months to one year.

(c) ***Penal interest***: The terms of facilities availed by our Company prescribe penal interest which typically ranges from 0.25 % to 2.00 % per annum or a flat penal interest per day is charged on the happening of certain events, including:

i. Non-submission of audited balance sheets within 7 months of closure of financial year;
ii. Non submission/delayed submission of financial follow up reports, within due date;
iii. Non submission of review/renewal data at least one month prior to due date;

iv. Overdue of interest/instalment in respect of term loans;
v. Overdrawings above the drawing power/limit in fund based working capital accounts on account of interest/devolvement of letter of credits/bank guarantee, insufficient stocks and receivables;
vi. Non-submission of stock statements and
vii. Adverse deviation of any financial parameter i.e. interest coverage ratio, debt service coverage ratio, debt/EBIDTA ratio from the benchmark as provided in the loan documents.

This is an indicative list and there may be additional terms that may amount to penal interest under the various borrowing arrangements entered into by us.

(d) ***Security:*** In terms of our borrowings where security needs to be created, we are typically required to:

i. Create charge on fixed assets (present & future) on pari-passu basis;
ii. Create charge on current assets (present & future) on pari-passu basis;
iii. Create equitable mortgage on pari- passu basis on immovable properties;
iv. Create hypothecation of plant and machinery, entire stocks of raw-material, finished goods, stocks-in-process, stores and spares, packing materials and other current assets of our Company, outstanding moneys, book-debts, receivables etc against which the relevant loan facility has been availed;
v. Provide corporate guarantees;
vi. Provide a personal guarantee from certain of our Promoters; and
vii. Pledge of shares.

This is an indicative list and there may be additional requirements for creation of security under the various borrowing arrangements entered into by us.

Further, our Company has provided a corporate guarantee, in favor of Bank of Baroda, lender of IAHEPL, one of our Subsidiary.

(e) ***Re-payment:*** The working capital facilities are typically repayable on demand. The term loans are typically repayable within a period of fourteen years to fifteen years in monthly instalments.

(f) ***Events of Default:*** Borrowing arrangements entered into by our Company contain standard events of default, including:

i. Withholding of important information or providing any misleading information by the company/promoters that is detrimental to the interest of the lenders;
ii. Diverting any amount from the operations of the company for meeting any unrelated expenditure or payment to any other concern without approval of lenders;
iii. Any sale, transfer, mortgage, removal or disposal of the assets without prior approval of the lenders;
iv. Non-payment of any dues.
v. Any further expansion or new project in the company without specific approval of the lenders.
vi. Non- submission of annual and half yearly financial statements.
vii. Not adhering to the financial discipline envisaged in the Flexible Structuring Scheme; and
viii. Default on any obligations to lenders as per the approved terms of the Flexible Structuring Scheme.

This is an indicative list and there may be additional terms that may amount to an event of default under the various borrowing arrangements entered into by us.

Additionally, our Company is required to ensure the aforementioned events of default and other events of default, as specified under the respective loan documentation, are not triggered.

(g) **Borrowing arrangement entered into by our own Company contain restrictive covenants such as:** Several of our financing arrangements entail various restrictive covenants and conditions restricting certain corporate actions, and we are required to take the prior approval of the respective lender before carrying out such actions, including for:

i. Effect any change in our Company's capital structure.
ii. Formulate any scheme of amalgamation.
iii. Implement any scheme of expansion / diversification / modernisation other than incurring routine capital expenditure.
iv. Make any corporate investments or investment by way of share capital or debentures or lend or advance funds to or place deposits with, any other concern except in the normal course of business or make advance to employees, provided that our Company may make such investments by way of deposits or advances that are required statutorily to be made as per the existing laws of the country or the rules or regulations issued by the authorities from time to time.
v. Undertake guarantee obligations on behalf of any third party or any other company.
vi. Any alteration in our Company's MoA or AoA.
vii. Declare any dividend during the currency of the Bank Loan without the prior consent of the Bank.
viii. Pledge of Promoter's shares to any bank/NBFC/institution outside the consortium/multiple banking arrangements.
ix. Enter into borrowing arrangement either secured or unsecured with any other bank, financial institution, company or arrangement indicated in the otherwise accept deposits apart from the arrangements indicated in the funds flow statements submitted to the bank from time to time and approved by the bank.
x. Create any charge, lien or encumbrance over its undertaking or any part thereof in favour of any financial institution, bank, company firm or persons.
xi. Sell, assign, mortgage or otherwise dispose of any of the fixed assets charged to the banks.
xii. Change the practice with regard to remuneration of directors by means of ordinary remuneration or commission, scale of sitting tees etc. except where mandated by any legal or regulatory provisions.
xiii. Undertake any trading activity other than the sale of products arising out of its own manufacturing operations.
xiv. Permit any transfer of the controlling interest or make any drastic change in the management set- up.
xv. Escrow the future cash flow, except discounting of bills in the normal course of business; or create any charge or lien or interest thereon of whatsoever nature except as provided in the flexible structuring package.

SECTION VI: LEGAL AND OTHER INFORMATION

OUTSTANDING LITIGATION AND OTHER MATERIAL DEVELOPMENTS

Except as described in this section, there are no (i) outstanding criminal or civil proceedings involving our Company, Subsidiaries, Group Companies, Promoters and Directors; (ii) outstanding actions taken by statutory or regulatory authorities involving our Company, Subsidiaries, Group Company, Promoters or Directors; (iii) outstanding claims involving our Company, Subsidiaries, Group Company, Promoters or Directors for any direct and indirect tax liabilities; (iv) outstanding dues to creditors of our Company; (v) pending defaults or over-dues, or non- payment of statutory dues by our Company; (vi) outstanding dues to micro, small and medium enterprises and other creditors; and (vii) outstanding litigations involving our Company, Subsidiaries, Group Company, Promoters or Directors as determined to be material by our Board of Directors as per the Materiality Policy in accordance with the SEBI ICDR Regulations. Further, there are no pending proceedings initiated for economic offences or defaults against our Company in respect of dues payable.

Pursuant to the SEBI ICDR Regulations and the Materiality Policy adopted by our Board of Directors on September 02, 2018, for the purposes of disclosure, any other pending litigation involving our Company, Subsidiaries, Group Company, Promoters or Directors other than criminal proceedings, statutory or regulatory actions and taxation matters, would be considered 'material' if the monetary amount of claim made by or against our Company, Subsidiaries, Group Company, Promoters or Directors, in any such pending litigation is in excess of ₹ 1.00 million (being 0.13% of the Restated Standalone Profit after Tax of our Company for Financial Year 2017-18) or any such litigation, any such litigation, an adverse outcome of which would materially and adversely affect our Company's business, prospects, operations, financial position or reputation, irrespective of the amount involved in such litigation.

Notices received by our Company, Subsidiaries, Group Company, Promoters or Directors, from third parties (excluding statutory/ regulatory/ tax authorities or notices threatening criminal action) shall, in any event, not be evaluated for materiality until such time that any such persons are impleaded as defendants in litigation proceedings before any judicial forum.

Unless stated to the contrary, the information provided below is as of the date of this Draft Red Herring Prospectus.

A. Legal Proceedings involving our Company:

Proceedings Litigations initiated against our Company

a) **Criminal proceedings (including proceedings for economic offences):** One legal proceeding has been initiated by the Inspector of Factories, against our Company and an Officer of the Company, before the Judicial Magistrate, First Class, Tilda, in connection with claims associated with an industrial accident. No monetary claim is involved. The matter is pending hearing and final disposal.

b) **Proceedings initiated by statutory and/or regulatory authorities:**

1. Proceedings have been initiated by the Central Electricity Regulatory Commission against Hanuman Agro Industries Limited and others, (including our Company), before the Supreme Court of India, (T P (C) Nos 1258-1261 of 2017 (T P (C) No. 1259 of 2017), in connection with, inter-alia: (i) setting aside of the Central Electricity Regulatory Commission (Terms and Conditions for Recognition and Issuance of Renewable Energy Certificate for Renewable Energy Generation) (Fourth Amendment) Regulations, 2016, dated March 28, 2016; (ii) directing the Respondents to continue with the mechanism introduced vide the First Amendment to Central Electricity Regulatory Commission (Terms and condition for Recognition and Issuance of renewable Energy certificate for renewable energy generation) Regulations, 2010. There are no monetary claims involved. The matter is pending hearing and final disposal.
2. Proceedings have been initiated by the Factory Inspector/Labour Inspector against our Company and an Officer of our Company, before the Court of Judicial First Class Labour, at Raipur, in connection with alleged non-compliance with certain safety measures. The mater is pending final hearing and disposal.
3. A Special Leave Petition has been filed before the Supreme Court of India, (Civil Appeal 5172 of 2007), against our Company, by the Department Of Energy (Chief Electrical Inspector), Government of Chhattisgarh. These proceedings are in connection with the judgement and order dated December 15, 2006,

as passed by the High Court of Chhattisgarh at Bilaspur, in connection with the imposition of an energy development cess @ 10 paise per unit, on the supply of electricity being levied by the Chhattisgarh State Government, which was struck down by the said order as being discriminatory, as captive power producers were being charged the cess while other independent power producers were not required to pay the same. While the amount involved in these proceedings would be significant, the same is not ascertained. Notably however, a provision for ₹ 60.80 Million has been made by our Company in this regard in our Restated Consolidated Financial Statements of 2018, under the head "other Long Term Liability." The said notation however erroneously still mentions the matter as being before the High Court, Bilaspur, although the said High Court, Bilaspur, matter is the one that is being challenged vide this SLP. The matter is pending hearing and final disposal.

4. Proceedings have been initiated by the Chhattisgarh State Electricity Board at Raipur, against the Chhattisgarh State Electricity Regulatory Commission, at Raipur, and our Company, (represented by our Managing Director Mr. Narendra Goel), before the Supreme Court, (C.A. No. 002578 - 002579 / 2008), in connection with the lower Court holding that a particular tariff policy, in connection with electricity generation, was discriminatory in nature and ought to be negated. This appeal has been filed under Section 125 of the Electricity Act, 2003. No monetary reliefs have been quantified or claimed in these proceedings. The matter is pending final hearing and disposal.

c) **Direct tax proceedings:** Nine proceedings have been initiated against our Company in connection with various tax related disputes. The aggregate amount involved is approximately ₹ 320.36 million . These proceedings are pending final hearing and disposal.

d) **Indirect tax proceedings:** Ten proceedings have been initiated against our Company in connection with various tax related disputes. The aggregate amount involved is approximately ₹ 137.79 million. These proceedings are pending final hearing and disposal.

e) **Civil proceedings (including proceedings for economic offences):**

1. Proceedings have been initiated by Mr. Rajesh Rangari, against the Union of India and others, including our Company, before the National Green Tribunal Central Zone, Bhopal, (Application No. 04/2018 (CZ), in connection with, inter-alia, (i) alleged violations of the Environment Clearance and the Forest Clearance approvals as provided by the Central Government in connection with mining activities; and, (ii) the potential cancellation of the relevant mining lease. These proceedings do not involve any direct monetary claims. The matter is pending hearing and final disposal.

2. A Revision Petition has been filed by Indus Steel & Power Limited, ("**Petitioner**"), against the State of Chhattisgarh, (the Secretary Mineral Resource Department Raipur), ("**Respondent No. 1**"), and others, (including our Company), before the Secretary To Government of India, Ministry of Mines, New Delhi, (namely the authority constituted under Section 30 of the Mines and Minerals (Regulation and Development) Act, 1957, as read with Rule 54 of the Mineral Concession Rules, 1960. This Petition, inter-alia, challenges the order dated Feb 18, 2011, of the Respondent No. 1, which rejects the Petitioners Prospecting License Application. Our Company has been made a party to these proceedings as the Petitioner has, inter-alia, alleged that Respondent No. 1 has been granting prospecting licenses to other persons who allegedly do not hold any priority under law. The Petition prays for, inter-alia, the grant of the said Prospecting License, and the setting aside of the said order dated Feb 18, 2011. No monetary reliefs have been claimed in this Petition. The matter is pending hearing and final disposal.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** Five show cause notices have been issued against our Company in connection with certain indirect tax related disputes. Two of these notices (dated February 28, 2018), have also been addressed to Mr. Rajendra Goel, our Promoter. The approximate aggregate amount involved is ₹ 187.70 million.

Proceedings initiated by our Company:

a) **Criminal proceedings:**

1. Proceedings have been initiated by our Company and another, against the Chhattisgarh Environment Conservation Board, and others, before the High Court of Chhattisgarh at Bilaspur, (Cr. M. P. No. 916 of 2017), in connection with, inter-alia, the quashing and setting aside of an impugned order dated April 29,

2017, as passed by the Court of Additional Session Judge, (Special Judge of Special Court for trial of CBI Cases, Raipur, in Criminal Revision No. 272 of 2016), in connection with allegations of non-compliance with Sections 37 and 40 of the Air (Prevention and Control of Pollution) Act, 1981. No amounts have been quantified in these proceedings. The matter is pending hearing and final disposal.

2. Proceedings have been initiated by our Company against Mr. Vikas Bafna, director of Big Boss Steel and Alloys Limited, under Section 138 of the Negotiable Instruments Act, 1881, before the First Class Judicial Magistrate at Raipur. The amount involved is ₹ 9.31 million. The matter is pending hearing and final disposal.

b) **Proceedings initiated against any statutory and/or regulatory authorities:**

1. Proceedings have been initiated by our Company and another, against the State of Chhattisgarh and others, before the High Court of Chhattisgarh at Bilaspur, (W. P (C) No. 952 of 2013), in connection with an impugned circular dated June 05, 2012, issued by the Department of Industries, Government of Chhattisgarh, and a consequent claim for payment of a premium by our Company, in connection with the lease of immoveable property by our Company from the Chhattisgarh State Industrial Development Corporation. These proceedings have been initiated, to inter-alia, quash the said claim for payment of premium, and for a declaration that the said circular does not apply to our Company. The amount involved in these proceedings is ₹ 22.55 million. The matter is pending hearing and final disposal.

2. Proceedings have been initiated by our Company and another, against the State of Chhattisgarh and another, before the High Court of Chhattisgarh at Bilaspur, (WP (Civil) No. 95 of 2016). Our Company has sought, inter-alia, the following reliefs in these proceedings: (i) a declaration that Section 41(2) (c) of the Indian Forest Act, 1927, does not apply to our Company, as the activities in question are governed by the Mines and Minerals (Development and Regulation) Act, 1957; (ii) a declaration that Rule 5 of the Chhattisgarh Transit (Forest Produce) Rules, 2001, is ultra vires to the provisions of the Forest Act, 1927, the Mines and Minerals (Development and Regulations) Act, 1957, and Articles 14, 19, 265 and 301 of the Constitution of India; (iii) an order quashing and setting aside the two State notifications in this regard; (iv) a direction for the refund of the amounts deposited by our Company under protest, as transit fee, with interest thereon. The matter is pending hearing and final disposal.

3. Proceedings have been initiated by our Company against the State of Chhattisgarh and others, before the High Court of Chhattisgarh at Bilaspur, (W P (C) No. 1368 /2013), in connection with, inter-alia, (i) a declaration that the following regulations are ultra vires being unconstitutional, illegal, without competence and without jurisdiction: Regulation 11(6)(b)(ii) of the Chhattisgarh Electricity Regulatory Commission (Intra State Open Access in Chhattisgarh) Regulations, 2005, (collectively referred to as the "**Impugned Regulations**"); and, Regulation 33 (6)(b)(ii) of the Chhattisgarh Electricity Regulatory Commission (Intra State Open Access in Chhattisgarh) Regulations, 2011; (ii) quashing three demand cum disconnection notices which seek to levy a cross subsidy surcharge for the years 2009-10 to 2011-12, on the basis of the Impugned Regulations. No specific amount has been prayed for in these proceedings. The matter is pending hearing and final disposal.

4. Proceedings have been initiated by our Company against: (a) the Union of India (Ministry of Mines); (b) the Union of India (Ministry of Environment, Forest and Climate Change), ("**Respondent No. 2**"); and, (c) the State of Jharkhand, (Department of Mineral Resources, Government of Chhattisgarh), before the High Court of Delhi, (W P (C) No. 262 of 2017), in connection with part of our mining activities for iron ore. In this Writ Petition, our Company has sought, inter-alia, a Writ/Order/direction/declaration confirming/directing that: (i) the right of our Company for grant of mining lease shall not be forfeited in the event the mining lease deed is not executed and/or re-executed on or before Jan 11, 2017; (ii) the provisions of Rule 8(4) of the Mineral Concession Rules, 2016, to the extent it seeks to forfeit the right of our Company on or before Jan 11, 2017, is declared as being ultra vires; (iii) the mining lease can be executed even after Jan 11, 2017, and should be executed promptly; and, (iv) Respondent No. 2 to expedite the process of grant of approval for execution of the Mining Lease Deed. No monetary claims have been raised in these proceedings. The matter is pending hearing and final disposal. Our Company has not at any stage commenced mining operations in connection with the mine in question.

5. Proceedings have been initiated by our Company against the Additional Commissioner of Customs, Visakhapatnam, before the Commissioner of Customs, in connection with, inter-alia, differential customs duty aggregating approximately ₹ 2.22 million. The matter is pending final hearing and disposal.

6. Proceedings have been initiated by our Company against the Central Electricity Regulatory Commission and Others, before the High Court of Chhattisgarh, (W.P. (C) No. 2061/2016), in connection with, inter-alia, quashing two notices as well as a declaration for nullifying the effect of certain regulations pertaining to electricity generation. No monetary claims are involved in these proceedings. The matter is pending final hearing and disposal.

7. Proceedings have been initiated by our Company and Mr. Rajendra Goel, against the State of Chhattisgarh, before the High Court of Chhattisgarh at Bilaspur, (WPT No. 147 of 2015). These proceedings are in connection with an alleged tax liability/notice dated December 11, 2015, as served on our Company. Our Company has sought to quash the said notice on the grounds that our Company is eligible for a subsidy/adjustment in connection with any such tax claim. No monetary amount has been claimed in these proceedings. The matter is pending hearing and final disposal.

8. Proceedings have been initiated by our Company and Mr. Rajendra Goel, against the State of Chhattisgarh and others, before the High Court of Chhattisgarh at Bilaspur, (Writ Petition (T) No. 37 of 2017). These proceedings are in connection with an alleged tax liability/notice dated January 01, 2016, as served on our Company. Our Company has sought to quash the said notice on the grounds that our Company is eligible for a subsidy/adjustment in connection with any such tax claim. No monetary amount has been claimed in these proceedings. The matter is pending hearing and final disposal.

9. Proceedings have been initiated by our Company, and Mr. S. K. Goyal against the State of Chhattisgarh and others, before the High Court of Chhattisgarh at Bilaspur, (Writ Petition (T) No. 33 of 2016). These proceedings are in connection with an Order of the State Appellate Forum dated October 09, 2015, which seeks to deny our Company the benefits of the connection with the industrial policy of 2004-09, from a total subsidy of approximately ₹ 128 million to approximately ₹ 1.29 million. No monetary amount has been claimed in these proceedings. The matter is pending hearing and final disposal.

10. Proceedings have been initiated by our Company, and Mr. S. K. Goyal before the High Court of Chhattisgarh at Bilaspur, (W. P (C) No. 952 of 2013), in connection with an impugned circular dated June 05, 2012, issued by the Department of Industries, Government of Chhattisgarh, and a consequent claim for payment of a premium by our Company, which has been raised in light of an impugned circular dated March 12, 2012, which arbitrarily revised the rate of government land retrospectively. These proceedings have been initiated so as to, inter-alia, declare that the aforesaid impugned circular is inapplicable to our company, and quash the additional demand made against our Company of approximately ₹ 22.55 million. The matter is pending final hearing and disposal.

11. Proceedings have been initiated by our Company, and Mr. S. K. Goyal, against the State of Chhattisgarh before the High Court of Chhattisgarh at Bilaspur, (W P (C) No. 36 of 2013). These proceedings are in connection with the quashing of two notifications in connection with the industrial policy of 2004-09, which had the effect of arbitrarily altering the subsidies that were otherwise available to the Company by virtue of the Fixed Capital Investment Subsidy Scheme and Rules of 2004, being 25% of the total investment made by our Company. No monetary amount has been claimed in these proceedings. The matter is pending hearing and final disposal.

c) **Direct tax proceedings:**

1. Proceedings have been initiated against The Commissioner of Income Tax and others, before the High Court of Chhattisgarh at Bilaspur, in connection with, inter-alia, setting aside an order dated September 22, 2017 as passed in W.P. (T) No. 4990/2009. No quantified amount is involved in the prayers in these proceedings. The matter is pending hearing and final disposal.

d) **Indirect tax proceedings:** Six proceedings have been initiated by our Company in connection with indirect tax related claims. The aggregate amount involved in these proceedings is approximately ₹ 45.03 million. These proceedings are pending final hearing and disposal.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

B. Legal Proceedings involving our Corporate Promoters:

1. Legal Proceedings involving Atlanta Securities Private Limited, ("ASPL"), our corporate promoter:

Proceedings initiated by ASPL:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against ASPL:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

2. Proceedings involving Banka Finance & Securities Private Limited, ("BFSPL"), our corporate promoter:

Proceedings initiated by BFSPL:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against BFSPL:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

C. **Legal Proceedings involving our Individual Promoters:**

1. **Legal Proceedings involving Mr. Narendra Goel, (our Promoter and our Managing Director):**

Proceedings initiated by Mr. Narendra Goel:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against Mr. Narendra Goel:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated by statutory and/or regulatory authorities:** Proceedings have been initiated by the Chhattisgarh State Electricity Board at Raipur, against the Chhattisgarh State Electricity Regulatory Commission, at Raipur, and our Company, (represented by our Managing Director Mr. Narendra Goel), before the Supreme Court, (C.A. No. 002578 - 002579 / 2008), in connection with the lower Court holding that a particular tariff policy, in connection with electricity generation, was discriminatory in nature and ought to be negated. This appeal has been filed under Section 125 of the Electricity Act, 2003. No monetary reliefs have been quantified or claimed in these proceedings. The matter is pending final hearing and disposal. For details see "Proceedings initiated against our Company" on page 464.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** Ashow cause notice has been issued against our Company by Ministry of Corporate Affairs. Mr. Narendra Goel has been made a party to the notice (dated February 09, 2018). For details see "Proceedings initiated against our Company" on page 464.

2. **Legal Proceedings involving Mr. Suresh Goel, (our Promoter, Executive Director and Chairman):**

Proceedings initiated by Mr. Suresh Goel:

a) **Criminal proceedings:** Proceedings have been initiated by our Company and Mr. Suresh Goel, against the Chhattisgarh Environment Conservation Board, and others, before the High Court of Chhattisgarh at Bilaspur, (Cr. M. P. No. 916 of 2017). For details see "Proceedings initiated by Company" on page 465.

b) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated or threatened against Mr. Suresh Goel:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

3. Legal Proceedings involving Mr. Rajendra Goel, (our Promoter and Executive Director):

Proceedings initiated by Mr. Rajendra Goel:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated against any statutory and/or regulatory authorities:**

1. Proceedings have been initiated by our Company and Mr. Rajendra Goel, against the State of Chhattisgarh, before the High Court of Chhattisgarh at Bilaspur, (WPT No. 147 of 2015). For further details please see the section pertaining to "Proceedings initiated by our Company" on page 465.

2. Proceedings have been initiated by our Company and Mr. Rajendra Goel, against the State of Chhattisgarh and others, before the High Court of Chhattisgarh at Bilaspur, (Writ Petition (T) No. 37 of 2017). For further details please see the section pertaining to "Proceedings initiated by our Company" on page 465.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings: N**IL.

Proceedings initiated against Mr. Rajendra Goel:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** Various show cause notices have been issued against our Company in connection with certain indirect tax related disputes. Mr. Rajendra Goel has been made a party to two of these notices (both dated February 28, 2018). For details please see the "Proceedings initiated against our Company" on page 464.

4. Legal Proceedings involving Mr. Anand Goel, (our Promoter and Executive Director):

Proceedings initiated by Mr. Anand Goel:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against Mr. Anand Goel:

a) **Criminal proceedings:** NIL.

b) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.

c) **Direct tax proceedings:** NIL.

d) **Indirect tax proceedings:** NIL.

e) **Civil proceedings:** NIL.

f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

D. Legal Proceedings involving our Subsidiaries:

1. Legal Proceedings involving Shri Bajrang Energy Private Limited, ("SBEPL"), (our Subsidiary):

Proceedings Initiated by SBEPL:

a) **Criminal proceedings:** NIL.

b) **Civil proceedings:** NIL.

c) **Proceedings initiated against statutory and/or regulatory authorities:** NIL.

d) **Arbitral proceedings:** NIL.

e) **Tax proceedings:** NIL.

Proceedings initiated or threatened against SBEPL:

a) **Criminal proceedings:** NIL.

b) **Civil proceedings:** NIL.

c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.

d) **Arbitral proceedings:** NIL.

e) **Tax proceedings:** NIL.

f) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

2. Legal Proceedings involving I.A. Hydro Energy Private Limited, ("IAHEPL"), (our Subsidiary):

Proceedings Initiated by IAHEPL:

a) **Criminal proceedings:** IAHEPL had entered into a consultancy services agreement with M/s Ashwini Saini and Co. IAHEPL has sought to initiate arbitral proceedings against M/s Ashwini Saini and Co., (proprietor), in connection with a claim amounting to ₹ 5 million, and a cheque being dishonoured in this regard. Accordingly, an arbitration petition has been filed before the High Court at New Delhi by IAHEPL. The appointment of an arbitrator is pending. M/s Ashwini Saini and Co., being moved the High Court of Chhattisgarh, Bilaspur, (M. Cr. C. (A) No.490/2016 845/2016), against the State of Chhattisgarh, in connection with the bail being granted to him in light of the criminal complaint which was filed against him by IAHEPL before the relevant police station. IAHEPL has filed its objections in this regard and the matter is pending final hearing and disposal.

b) **Civil proceedings:**

1. A review petition has been filed by IAHEPL, against the Chhattisgarh State Power Distribution Company Limited, and, the Chhattisgarh State Electricity Regulatory Commission, ("**Respondents**"), in connection with the determination of tariff, for power supplied to the Respondents. This petition has been filed before the Chhattisgarh State Electricity Regulatory Commission, Raipur, Chhattisgarh, (Review Petition No. 28 of 2018). The amount involved in this matter is approximately ₹ 100 million. The mater is pending final hearing and disposal.
2. IAHEPL has initiated legal proceedings against Shri Hem Raj, before Civil Judge Senior Division at Chamba, in connection with the specific performance for the sale of certain land at Chamba and the registration of a sale deed in this regard. The suit has been valued at ₹ 1.31 million. The matter is pending final hearing and disposal.

c) **Proceedings involving any statutory and/or regulatory authorities: NIL.**

d) **Arbitral proceedings:** IAHEPL had entered into a consultancy services agreement with M/s Ashwini Saini and Co. IAHEPL has sought to initiate arbitral proceedings against M/s Ashwini Saini and Co., (proprietor), in connection with a claim amounting to ₹ 5 million, and a cheque being dishonoured in this regard. Accordingly, an arbitration petition has been filed before the High Court at New Delhi by IAHEPL. The appointment of an arbitrator is pending. M/s Ashwini Saini and Co., being moved the High Court of Chhattisgarh, Bilaspur, (M. Cr. C. (A) No.490/2016 845/2016), against the State of Chhattisgarh, in connection with the bail being granted to him in light of the criminal complaint which was filed against him by IAHEPL before the relevant police station. IAHEPL has filed its objections in this regard and the matter is pending final hearing and disposal.

e) **Tax proceedings:** NIL.

Proceedings Initiated against IAHEPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** Two civil legal proceedings have been initiated against IAHEPL, under various provisions of the Workmen's Compensation Act, 1923, in connection with compensation claimed for injuries/death caused in the course of employment. The aggregate amount involved in these proceedings is ₹ 2.5 million. These matters are pending final hearing and disposal.
c) **Proceedings involving any statutory and/or regulatory authorities:** NIL.
d) **Arbitral proceedings:** NIL.
e) **Tax proceedings:** NIL.

E. Legal Proceedings involving our Group Companies:

1. Legal Proceedings involving Chhattisgarh Captive Coal Mining Limited, ("CCCML"), (our Group Company):

Proceedings initiated by CCCML:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** Nil.

Proceedings initiated against CCCML:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

2. Legal Proceedings involving Shri Bajrang Alloys Limited, ("SBAL"), (our Group Company):

Proceedings initiated by SBAL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** Three legal proceedings have been initiated by SBAL, (against (i) ERA Infra Engineering Limited; (ii) Quadricon Private Limited; and, (iii) M/s. M. J. Engineering), in connection with the recovery of various dues in the day to day course of business. The aggregate amount involved is approximately ₹ 12 million. These matters are pending final hearing and disposal.

c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against SBAL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

3. Legal Proceedings involving S.B. Multimedia Private Limited, ("SBMPL"), (our Group Company):

Proceedings initiated by SBMPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against SBMPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

4. **Legal Proceedings Involving Shri Bajrang Ispat & Plywood Limited, ("SBIPL"), (our Group Company):**

Proceedings initiated by SBIPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against SBIPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** The Commissioner of Central Excise and Customs, Vishakhapatnam (A.P.), has initiated appellate proceedings against SBIPL, before the High Court of Andhra Pradesh at Hyderabad, in connection with certain tax disputes which were adjudicated upon in favour of SBIPL. The amount involved is approximately ₹ 52.85 million. The matter is pending final hearing and disposal.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

5. **Legal Proceedings involving Shimmer Investments Private Limited, ("SIPL"), (our Group Company):**

Proceedings initiated by SIPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against SIPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

6. **Legal Proceedings involving Swastik Merchantile Limited, ("SML"), (our Group Company):**

Proceedings initiated by SML:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.

c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against SML:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

7. Legal Proceedings involving Shri Bajrang Steel & Power Limited, ("SBSPL"), (our Group Company):

Proceedings initiated by SBSPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against SBSPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

8. Proceedings Involving Shri Bajrang Hydro Energy Private Limited, ("SBHEPL"), (our Group Company):

Proceedings initiated by SBHEPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against SBHEPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.

d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

9. Proceedings Involving IA Energy Private Limited, ("IAEPL"), (our Group Company):

Proceedings initiated by IAEPL:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against IAEPL:

a) **Criminal proceedings:** NIL.
b) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
c) **Direct tax proceedings:** NIL.
d) **Indirect tax proceedings:** NIL.
e) **Civil proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

F. Legal Proceedings involving our Directors:

1. **Proceedings Involving Mr. Narendra Goel, (our Promoter and Managing Director):** See "Legal Proceedings involving our Individual Promoters" above.
2. **Proceedings Involving Mr. Suresh Goel, (our Promoter, Executive Director and Chairman):** See "Legal Proceedings involving our Individual Promoters" above.
3. **Proceedings Involving Mr. Rajendra Goel, (our Promoter and our Executive Director):** See "Legal Proceedings involving our Individual Promoters" above.
4. **Proceedings Involving Mr. Anand Goel, (our Promoter and our Executive Director):** See "Legal Proceedings involving our Individual Promoters" above.
5. **Proceedings Involving Mr. Shravan Kumar Goyal, (our Whole Time Director**):

Proceedings initiated by Mr. Shravan Kumar Goyal:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:**

1. Proceedings have been initiated by our Company, and Mr. S. K. Goyal against the State of Chhattisgarh and others, before the High Court of Chhattisgarh at Bilaspur, (Writ Petition (T) No. 33 of 2016). For details see the section "Proceedings initiated by our Company" on page 465.
2. Proceedings have been initiated by our Company, and Mr. S. K. Goyal before the High Court of Chhattisgarh at Bilaspur, (W. P (C) No. 952 of 2013), in connection with an impugned circular dated June 05, 2012, issued by the Department of Industries, Government of Chhattisgarh, and a consequent claim for payment of a premium by our Company. For further details see the section "Proceedings initiated by our Company" on page 465.
3. Proceedings have been initiated by our Company, and Mr. S. K. Goyal, against the State of Chhattisgarh before the High Court of Chhattisgarh at Bilaspur, (W P (C) No. 36 of 2013). For further details see the section "Proceedings initiated by our Company" on page 465.

d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against Mr. Shravan Kumar Goyal:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

6. Proceedings Involving Mr. Anshul Dave, (our Independent Director):

Proceedings initiated by Mr. Anshul Dave:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against Mr. Anshul Dave: .

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

7. Proceedings Involving Mr. Hemendra Nath, (our Independent Director):

Proceedings initiated by Mr. Hemendra Nath:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against the Mr. Hemendra Nath:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.

g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

8. Proceedings Involving Mrs. Hema Thakur, (our Independent Director):

Proceedings initiated by Mrs. Hema Thakur:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against the Mrs. Hema Thakur:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

9. Proceedings Involving Mr. Rakesh Bhargava, (our Independent Director):

Proceedings initiated by Mr. Rakesh Bhargava:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated against any statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

Proceedings initiated against the Mr. Rakesh Bhargava:

a) **Criminal proceedings:** NIL.
b) **Civil proceedings:** NIL.
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL.
d) **Direct tax proceedings:** NIL.
e) **Indirect tax proceedings:** NIL.
f) **Arbitration proceedings:** NIL.
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL.

10. Proceedings Involving Mr. Ravindra Singh Rajput, (our Independent Director):

Proceedings initiated by Mr. Ravindra Singh Rajput:

a) **Criminal proceedings**: NIL
b) **Civil proceedings**: NIL
c) **Proceedings initiated by statutory and/or regulatory authorities**: NIL
d) **Direct tax proceedings**: NIL
e) **Indirect tax proceedings**: NIL
f) **Arbitration proceedings**: NIL
g) **Legal Notices and Other Threatened Legal Proceedings**: NIL

Proceedings initiated against Mr. Ravindra Singh Rajput:

a) **Criminal proceedings:** NIL
b) **Civil proceedings:** NIL
c) **Proceedings initiated by statutory and/or regulatory authorities:** NIL
d) **Direct tax proceedings:** NIL
e) **Indirect tax proceedings:** NIL
f) **Arbitration proceedings:** NIL
g) **Legal Notices and Other Threatened Legal Proceedings:** NIL

G. Outstanding dues as on March 31, 2018, to Micro and Small Scale Undertakings and Other Creditors:

Particulars	Number of Creditors	As on March 31, 2018 (₹ millions)
Dues to small and micro enterprises	33	25.73
Other dues to creditors	1019	1984.25

The details pertaining to outstanding dues to micro and small enterprises and outstanding dues to creditors are available on the website of our Company at http://sbpil.co.in/home/outstanding.

It is clarified that information provided on the website of our Company do not form a part of this Draft Red Herring Prospectus and should not be deemed to be incorporated by reference. Anyone placing reliance on any other source of information, including our Company's website, would be doing so at their own risk

H. Material Developments since last Balance Sheet:

Other than the issue of bonus share to the existing shareholders of our Company in the ratio of 3:1 (Three shares for every one share held), no material developments have occurred since the last Balance Sheet.

I. Outstanding litigation against any other person or companies whose outcome could have an adverse effect on our Company

Other than as already disclosed under "Legal Proceedings involving our Company" on page 464, there are no pending litigations involving any other person whose outcome could have material adverse effect on the position of our Company.

GOVERNMENT AND OTHER APPROVALS

Except as disclosed herein and in "Risk Factors", beginning on page 22, we have obtained necessary material consents, licenses, permissions and approvals from the governmental and regulatory authorities that are required for carrying on our present business or have applied for such consents, licenses, permissions and approvals as stated below. Some of the approvals and licenses that we require for our present business operations may have expired or have expired in the ordinary course of business, and we have applied/ will apply for their renewal from time to time. In view of these material approvals, we can undertake this Issue and our current business activities.

The material approvals, consents, licenses, registrations and permits obtained by our Company and our Subsidiaries which enable us to undertake our current business activities, are set out below:

1. Approvals in relation to the Issue

For details approvals and authorizations in relation to the Issue, see the section "*Other Regulatory and Statutory Disclosures*", beginning on page 520.

2. Approvals in relation to incorporation of our Company.

a) Certificate of Incorporation dated July 25, 2002, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh.

b) Our Company has been allotted a corporate identity number U27106CT2002PLC015184.

c) Certificate for commencement of business dated February 5, 2004, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh.

d) Certificate of registration of order of high court on scheme of amalgamation of companies dated December 7, 2011 issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh.

3. Approvals in relation to our Company's business operations:

Sr. No	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	PAN Card	Income Tax Department, Government of India	AACCB2944D	July 25, 2002	-
2.	Allotment of Importer-exporter code number	Office of Joint Director General of Foreign Trade	Importer-Exporter Code No: 1104003082	August 13, 2004	-
3.	GST Registration Certificate for Chhattisgarh	Government of India	22AACCB2944D1ZA	November 07, 2017	-
4.	Certificate of provisional registration for GST.	Government of India and Government of Maharashtra	27AACCB2944D1Z0	June 28, 2017	
5.	GST Certificate of Andhra Pradesh	Government of India	37AACCB2944D1ZZ	July 10, 2018	-
6.	Certificate of Registration of Trademark under Trademarks Act 1999	Government of India, Trademarks Registry	Trade Mark No.: 2011124 Class No. 17	August 19, 2010	August 18, 2020

Approvals in relation to Unit I

Environment related approvals

a) Consents under the Air (Prevention and control of Pollution), 1981

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Renewal of consent under Section 21 of Air (Prevention and Control of pollution) Act, 1981 with respect to production capacities of sponge iron & waste heat based recovery power plant.	Chhattisgarh Environment Conservation Board	6241/TS/CECB/2018	February 06, 2018	March 31, 2019
2.	Renewal of consent under Section 21 of Air (Prevention and Control of pollution) Act, 1981 with respect to production capacities of coal washery, hot re-rolling mill.	Chhattisgarh Environment Conservation Board	6787/TS/CECB/2018	March 01, 2018	December 31, 2019
3.	Renewal of consent under Section 21 of Air (Prevention and Control of pollution) Act, 1981 with respect to production capacities of billets & blooms.	Chhattisgarh Environment Conservation Board	4631/TS/CECB/2017	November 28, 2017	June 30, 2019
4.	Renewal of consent under Section 21 of Air (Prevention and Control of pollution) Act, 1981 with respect to production capacities of ferro alloys and biomaas based power plant.	Chhattisgarh Environment Conservation Board	2897/TS/CECB/2017	August 26, 2017	May 30, 2020
5.	Renewal of consent under Section 21 of Air (Prevention and Control of	Chhattisgarh Environment Conservation Board	519/TS/CECB/2015	April 28, 2015	September 30, 2019

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	pollution) Act, 1981 with respect to production capacities of fly ash bricks.				

b) Consent under the Water (Prevention and Control of Pollution) Act, 1974

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Renewal of consent under Section 25/26 of Water (Prevention and control of Pollution) Act, 1974 with respect to production capacities of sponge iron & waste heat based recovery power plant.	Chhattisgarh Environment Conservation Board	6239/TS/CECB/2018	February 06, 2018	March 31, 2019
2.	Renewal of consent under Section 25/26 of Water (Prevention and control of Pollution) Act, 1974 with respect to production capacities of coal washery, hot re-rolling mill.	Chhattisgarh Environment Conservation Board	6785/TS/CECB/2018	March 01, 2018	December 31, 2019
3.	Renewal of consent under Section 25/26 of Water (Prevention and control of Pollution) Act, 1974 with respect to production capacities of billets & blooms.	Chhattisgarh Environment Conservation Board	4629/TS/CECB/2017	November 28, 2017	September 19, 2019
4.	Renewal of consent under Section 25/26 of Water (Prevention and control of Pollution) Act, 1974 with respect to production capacities of ferro alloys and biomass based power plant.	Chhattisgarh Environment Conservation Board	2895/TS/CECB/2017	August 26, 2017	May 30, 2020

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
5.	Renewal of consent under Section 25/26 of Water (Prevention and control of Pollution) Act, 1974 with respect to production capacities of fly ash bricks.	Chhattisgarh Environment Conservation Board	517/TS/CECB/2015	April 28, 2015	September 30, 2019

Employment related approvals

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Registration of Contract Labor License under Section 7(2) of Contract Labor (Registration and Abolition) Act, 1970.	Government of Chhattisgarh, Office of Registering Officer	377/RPR/2004	April 28, 2004	-
2.	Registration of Employees of the Factories and Establishments under Section 2(12) of the E.S.I. Act of 1943, as amended and implementation of the Act.	Employee State Insurance Corporation	59-0154-52	July 06, 2005	-
3.	Registration under the under Employees Provident Fund Scheme, 1952	Employees Provident Fund Organisation	18409	July 18, 2005	-

Certificates for commencement of production

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Certificate of commencement of Production	Directorate of Industries, Chhattisgarh, Raipur	No.142/F.A./2005/248	April 13, 2006	-
2.	Amendment in the Certificate of commencement of Production with respect to investments made by our Company and	Directorate of Industries, Chhattisgarh, Raipur	No.142/F.A./2005/759	December 07, 2007	-

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	commencement of commercial production.				
3.	Additional certificate of production with respect to commencement of production of ferro alloys, captive power plant and fly ash bricks.	Directorate of Industries, Chhattisgarh, Raipur	No. 142/ F.A./2005/578	September 11, 2009	-
4.	Additional certificate of production with respect to commencement of production of coal washery and rolling mill.	Directorate of Industries, Chhattisgarh	No. 142/ F.A./2005/377	April 11, 2014	-

Verification certificate for electronic road weigh bridge

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Borjhara Weigh Bridge Certificate (Capacity of 100,000 Kg)	Office of Controller of Legal Measurement Science , Government of Chhattisgarh	Enroll No. 81	July 20, 2018	July 19, 2019
2.	Borjhara Weigh Bridge Certificate (Capacity of 100,000 Kg)	Office of Controller of Legal Measurement Science , Government of Chhattisgarh	Enroll No. 06	August 09, 2018	August 08, 2019
3.	Borjhara Weigh Bridge Certificate (Capacity of 60,000 Kg)	Office of Controller of Legal Measurement Science , Government of Chhattisgarh	Enroll No. 15	May 9, 2018	May 8, 2019
4.	Borjhara Weigh Bridge Certificate (Capacity: 1,00,000 Kg)	Office of Controller of Legal Measurement Science , Government of Chhattisgarh	Enroll No. 91	September 25, 2017	September 24, 2018

Examination certificates with regard to examination of various machinery like cranes, fork lift trucks, electric chain hoists etc.

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
1.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT crane with Safe Working Load ("**SWL**") 3.0 MT and span of 40 Feet.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. EOT-01	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
2.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT crane with SWL 40/15.0 MT and span of 40 Feet.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PP/ EOT- 01	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
3.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT crane with SWL 10.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PP/ EOT- 02	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
4.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of electric hoists with SWL 1.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PP/ EOT- 03	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
5.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL 3.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. RMP/CB- 01	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
6.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL 3.0 MT	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. RMP/CB- 02	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
7.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL 3.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. RMP/CB- 03	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
8.	Examination certificate under the	Chartered Engineer and	Local ID No. RMP/CB- 04	May 18, 2018	One year from the date of issue

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL 5.0 MT.	Approved Valuer (C.G. Factories Acts and Rules)			or after repair or alteration whichever is earlier.
9.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Hydraulic Jack with SWL 100.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. SID/ HJ- 01	May 19, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
10.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Hydraulic Jack with SWL 100.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. SID/ HJ- 02	May 19, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
11.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Fowler/Hydra/Mobile crane with SWL 8.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Engine No. S-433069829	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
12.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Electrical Winch with SWL 5.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. EW- 01	May 18, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
13.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Wire Rope Sling.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No.: RS- 01 to RS- 02 RS- 03 to RS-04	May 19, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
14.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of D shackle	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No.: DS- 01 to DS- 05 DS- 06 to DS- 11	May 19, 2018	One year from the date of issue or after repair or alteration whichever is earlier.
15.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Skip Hoist	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID: FAD/SH-02	May 19, 2018	One year from the date of issue or after repair or alteration whichever is earlier.

Examination certificates of pressure vessels

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if Specified
1.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of air receiver with 5.0 m^3 capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	3187/09/04	May 18, 2018	Six months from the date of issue
2.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of air receiver with 1.0 m^3 capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Sr. No.: 3186/09/04	May 18, 2018	Six months from the date of issue
3.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of air receiver with 5.0 m^3 capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Sr. No.: 07051054	May 18, 2018	Six months from the date of issue
4.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of air receiver with 5.0 m^3 capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Sr. No.: 07051053	May 18, 2018	Six months from the date of issue

Certification for boiler under the scheme of Government of Chhattisgarh 'Self certification of Boiler'

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Certificate for the use of boiler	Issued under the scheme of Government of Chhattisgarh 'Self certification of Boiler'	Self-certification No: 224131720645 Registry No. of boiler: CG/115	February 10, 2018	February 09, 2019
2.	Certificate for the use of boiler	Issued under the scheme of Government of Chhattisgarh 'Self certification	Self-certification No.: 224101720231 Registry No. of boiler: CG/89	September 21, 2017	September 20, 2018

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
		of Boiler'			
3.	Certificate for the use of boiler	Issued under the scheme of Government of Chhattisgarh 'Self certification of Boiler'	Self-certification No:224131720828 Registry No. of boiler : CG/332	April 13, 2018	April 12, 2019

Licenses issued by Bureau of Indian Standards

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	License for carbon steel cast billet ingots, billets, blooms and slabs for re-rolling into steel for general structural purposes	Bureau of Indian Standards	8978218	November 03, 2017	November 02, 2019
2.	License for carbon steel cast billet ingots, billets, blooms and slabs for re-rolling into low tensile structural steel-(ordinary quality)	Bureau of Indian Standards	3004326	February 16, 2018	February 12, 2020

Other approvals/licenses

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
1.	License issued under the Factories Act, 1948 and the rules thereof for the maximum number of workers permitted to be employed on any one day in a factory/unit.	Dy, Chief Inspector of Factories, Government of Chhattisgarh	1852/1852/B-1,B-5/RPR/2MI	September 29, 2017	December 31, 2017- 2020
2.	Tax Deduction Account Number (TAN)	National Securities Depositories Limited	TAN: JBPS02603G	March 28, 2008	-
3.	Permission under Metalliferous Mines Regulation, 1961, to work by	Director General of Mines Safety , Bilaspur Region	1748	April 13, 2015	Five years

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
	the system of deep hole blasting in conjunction with heavy earth moving machinery (HEMMs) for digging and excavation of iron ore				
4.	Water allotment certificate	Ministry of Water Resources, Government of Chhattisgarh, Raipur	5010/302/JS/TSHA/ AUJPR/03/D-4	October 26, 2004	-
5.	Temporary License for the generation of power through DG sets.	Chief Electricity Inspector, Government of Chhattisgarh	N-6/8/6264 /thirteen/ 836	March 21, 2005	-

Other Certifications

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	OHSAS 18001:2007 certification issued for conforming to the standard of management system for manufacture of sponge iron, ferrous billets, bloom, Ferro alloys, Rolled steel section, 18 MW WHRB Power plant and 8 MW Biomass Power Plant.	LMS Certification Pvt. Ltd.	Certificate No: IN110410C	September 28, 2017	September 27, 2020
2.	ISO 14001:2015 certification issued for conforming to the standard of environmental management system for manufacture of sponge iron, ferrous billets,	LMS Certifications Private Limited	Certificate No :: IN111269B	January 12, 2018	January 11, 2021

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	bloom, ferro alloys, rolled steel section, 18 MW WHRB Power plant and 8 MW biomass power plant				
3.	ISO 9001:2015 certification for conforming to the standard for defined scope of supply for manufacture of rolled steel section and ferrous billets blooms	IMS International	Certificate No: IMS/QMS/SBR/0517091	May 9, 2017	May 8, 2019

Approvals in relation to Unit - II

Environmental related approvals

a. Consent under Air (Prevention and Control of Pollution) Act, 1981

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Renewal of consent under Section 21 of Air (Prevention and Control of pollution) Act, 1981 with respect to production capacities of rolling mill, coal based captive power plant & coal gasifier plant	Chhattisgarh Environment Conservation Board	1916/TS/CECB/2016	June 30, 2016	June 30, 2021
2.	Renewal of consent under Section 21 of Air (Prevention and Control of pollution) Act, 1981 with respect to production capacities of M.S. round, CTD bars etc., M.S. ingots & billets	Chhattisgarh Environment Conservation Board	4627/TS/CECB/2017	November 28, 2017	August 28, 2019
3.	Renewal of consent under Section 21 of Air	Chhattisgarh Environment Conservation	8135/RO/TS/CECB/2018	March 31, 2018	January 31, 2023

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	(Prevention and Control of pollution) Act, 1981 with respect to production capacities of wire drawing unit	Board			

b. Consent under the Water (Prevention and Control of Pollution) Act, 1974

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Renewal of consent under Section 25/26 of Water (Prevention and control of Pollution) Act, 1974 with respect to production capacities of rolling mill, coal based captive power plant & coal gasifier plant	Chhattisgarh Environment Conservation Board	1914/TS/CECB/2016	June 30, 2016	June 30, 2021
2.	Renewal of consent under Section 25/26 of Water (Prevention and control of Pollution) Act, 1974 with respect to production capacities of M.S. round, CTD bars etc., M.S. ingots & billets	Chhattisgarh Environment Conservation Board	4625/TS/CECB/2017	November 28, 2017	August 28, 2019
3.	Renewal of consent under Section 25/26 of Water (Prevention and control of Pollution) Act, 1974 with respect to production capacities of wire drawing unit	Chhattisgarh Environment Conservation Board	8134/RO/TS/CECB/2018	March 31, 2018	January 31, 2023

Employment related approvals

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Registration of Contract Labor License under	Government of Chhattisgarh, Office of	331/RPR/2002	March 15, 2002	-

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	Section 7(2) of Contract Labor (Registration and Abolition) Act, 1970.	Registering Officer			
2.	Registration of Employees of the Factories and Establishments under Section 2(12) of the E.S.I. Act of 1943, as amended and implementation of the Act.	Employee State Insurance Corporation	M.P. 18-13081-57 /INSURANCE	May 17, 2000	-
3.	Registration under Employees Provident Fund Scheme, 1952	Employees Provident Fund Organisation	P.F. Code – CG/11887	August 31, 2000	-

Certificates for commencement of production

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/renewal	Date of expiry, if specified
1.	Commencement of Production certificate	District Trade & Industries Centre.	2003/2050	June 09, 2003	-
2.	Additional Certificate for commencement of production with respect to commencement of commercial production of TMT bars and Power Generation (coal based)	District Trade & Industries Centre.	Certificate No.: DTIC-R/LMI/2011/256	March 31, 2011	-

Examination certificates with regard to examination of various machinery like cranes, fork lift trucks, electric chain hoists etc.

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
1.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5.0 ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. H- 01	January 9, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
2.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5 ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. H- 02	January 9, 2018	-
3.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5 ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. H- 03	January 9, 2018	-
4.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Gantry Crane with SWL capacity of 10 ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. H- 04	January 9, 2018	-
5.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Gantry Crane with SWL capacity of 10 ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. H- 05	January 9, 2018	-
6.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Skip Hoist with SWL capacity of 1.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. SH- 01	January 9, 2018	-
7.	Examination certificates issued under the C.G.	Chartered Engineer and Approved	-	January 9, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	Factories Act & Rules, 1962 certifying the examination of Chain Sling with SWL capacity of 2 ton.	Valuer (C.G. Factories Acts and Rules)			
8.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 7.5 ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. H- 07	January 9, 2018	-
9.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5 ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. H- 08	January 9, 2018	-
10.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5 ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. H- 09	January 9, 2018	-
11.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 25.0/10.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. C- 01	January 7, 2018	-
12.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. C- 02	January 7, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	SWL capacity of 25.0/10.0 Ton.				
13.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 15.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. C- 03	January 10, 2018	-
14.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 15.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. C- 04	January 10, 2018	-
15.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 25.0/10.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. C- 05	January 10, 2018	-
16.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Electric Hoist with SWL capacity of 2.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. C- 06	January 7, 2018	-
17.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Electric Hoist with SWL capacity of 2.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. C- 07	January 7, 2018	-
18.	Examination certificates issued	Chartered Engineer and	Local ID No. C- 07	January 7, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	under the C.G. Factories Act & Rules, 1962 certifying the examination of Hydra/ Mobile Crane with SWL capacity of 8.0 Ton.	Approved Valuer (C.G. Factories Acts and Rules)			
19.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 3.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. CB- 01	January 7, 2018	-
20.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 3.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. CB- 02	January 10, 2018	-
21.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 5.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. CB- 03	January 10, 2018	-
22.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 2.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. CB- 04	January 10, 2018	-
23.	Examination certificates issued under the C.G.	Chartered Engineer and Approved	-	January 7, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	Factories Act & Rules, 1962 certifying the examination of Chain Sling with SWL capacity of 1.0, 0.8 & 3.0 Ton.	Valuer (C.G. Factories Acts and Rules)			
24.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 7.5 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ C- 01	January 9, 2018	-
25.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 10.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/C-02	January 9, 2018	-
26.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/C-03	January 9, 2018	-
27.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Gantry Crane (Goliath) with SWL capacity of 10.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/C-04	January 9, 2018	-
28.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ C- 05	January 10, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	Gantry Crane (Goliath) with SWL capacity of 10.0 MT.				
29.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 10.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ C- 06	January 10, 2018	-
30.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 10.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ C- 07	January 10, 2018	-
31.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Fork Lift with SWL capacity of 3.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ FL- 01	January 10, 2018	-
32.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Fork Lift with SWL capacity of 3.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ FL- 02	January 9, 2018	-
33.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Fork Lift with SWL capacity of 3.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ FL- 03	January 9, 2018	-
34.	Examination certificates issued	Chartered Engineer and	Local ID No. TMT/ FL- 04	January 9, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	under the C.G. Factories Act & Rules, 1962 certifying the examination of Fork Lift with SWL capacity of 3.0 Ton.	Approved Valuer (C.G. Factories Acts and Rules)			
35.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Hydra/ Mobile Crane with SWL capacity of 5.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ HC- 01	January 9, 2018	-
36.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Hydra/ Mobile Crane with SWL capacity of 12.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ HC- 02	January 9, 2018	-
37.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Skip Hoist with SWL capacity of 1.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ SH- 01	January 10, 2018	-
38.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Electric Hoist with SWL capacity of 5.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ C- 08	January 10, 2018	-
39.	Examination certificates issued under the C.G. Factories Act & Rules, 1962	Chartered Engineer and Approved Valuer (C.G.	Local ID No. TMT/ C- 09	January 10, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	certifying the examination of Electric Hoist with SWL capacity of 5.0 MT.	Factories Acts and Rules)			
40.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 3.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ CB- 01	January 10, 2018	-
41.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 3.0 MT.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. TMT/ CB- 02	January 10, 2018	-
42.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 10.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. EOT-01	January 7, 2018	-
43.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 25.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. EOT-02	January 7, 2018	-
44.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of JCB Loder with	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Chassis No. – 1029763- 2004	January 7, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	M3 capacity of 1.0 M3.				
45.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 3.0 Ton SWL	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 01	January 7, 2018	-
46.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 5.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 02	January 7, 2018	-
47.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 1.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 03	January 7, 2018	-
48.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block Mounted with Travelling Trolley with SWL capacity of 2.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 04	January 7, 2018	-
49.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 05	January 7, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	Block Mounted with Travelling Trolley with SWL capacity of 2.0 Ton.				
50.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block Mounted with Travelling Trolley with SWL capacity of 2.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 06	January 7, 2018	-
51.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block Mounted with Travelling Trolley with SWL capacity of 2.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 07	January 7, 2018	-
52.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block with SWL capacity of 3.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 08	January 7, 2018	-
53.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Pulley Block Mounted with Travelling Trolley with SWL capacity of 2.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. CB- 09	January 7, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
54.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Electric Hoist with SWL capacity of 2.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. EH- 01	January 7, 2018	-
55.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of D- Shackle with SWL capacity of 10.0 & 5.0 Ton.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. DS- 01 to DS- 02 DS- 03 to DS- 05	January 7, 2018	-
56.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. WDM/ EOT- 01	January 10, 2018	-
57.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. WDM/ EOT- 02	January 10, 2018	-
58.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. WDM/ EOT- 03	January 10, 2018	-
59.	Examination certificate under the C.G. Factories Act &	Chartered Engineer and Approved Valuer (C.G.	Local ID No. WDM/ EOT- 04	January 10, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	Rules, 1962 certifying the examination of EOT Crane with SWL capacity of 5.0 Ton.	Factories Acts and Rules)			
60.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Fork Lift with SWL capacity of 3.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. WDM/ FL- 01	January 10, 2018	-
61.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Fork Lift with SWL capacity of 3.0 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. WDM/ FL- 02	January 10, 2018	-
62.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Chain Sling with SWL capacity of 0.8 & 0.8 Ton.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. CB-CS- 01 CS- 02	January 10, 2018	-

Examination certificates of pressure vessels

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
1.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 1.0 M3 capacity.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-01	July 09, 2018	-
2.	Examination certificates	Chartered Engineer and	Local ID No. PV-02	July 09, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 100 Lt. capacity.	Approved Valuer (M.P. Factories Acts and Rules)			
3.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 30* Diameter x 94* Height.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-03	July 09, 2018	-
4.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 500 Lt. capacity.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-01	July 09, 2018	-
5.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 500 Lt. capacity.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-02	July 09, 2018	-
6.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Bottle with Size- 14” Diameter.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-03	July 09, 2018	-
7.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PV-01	July 09, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	of Air Receiver with 46 Lt. capacity.				
8.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 46 Lt. capacity.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PV-02	July 09, 2018	-
9.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 46 Lt. capacity.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PV-03	July 09, 2018	-
10.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 3.0 m3 capacity.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PV-04	July 09, 2018	-
11.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 2 M3 capacity.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PV-05	July 09, 2018	-
12.	Examination certificates issued under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 2 M3 capacity.	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No. PV-06	July 09, 2018	-
13.	Examination certificate under the C.G.	Chartered Engineer and Approved	Local ID No. PV-01	July 09, 2018	-

Sr. No	Name/ description of license/ approval	Issuing authority	Reference/ Registration Number	Date of Issue/ renewal	Date of expiry, if specified
	Factories Act & Rules, 1962 certifying the examination of Air Receiver with 5.0 M3 capacity.	Valuer (M.P. Factories Acts and Rules)			
14.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 5.0 M3 capacity.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-02	July 09, 2018	-
15.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 1.0 M3 capacity.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-03	July 09, 2018	-
16.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 2.0 M3 capacity.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-04	July 09, 2018	-
17.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver 24* Diameter x 58* Height.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Local ID No. PV-05	July 09, 2018	-
18.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver.	Chartered Engineer and Approved Valuer (M.P. Factories Acts and Rules)	Sr. No. 2067077	July 09, 2018	-

Licenses issued by Bureau of Indian Standards

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	License for Mild steel and medium tensile, steel bars and hard-drawn steel, wire for concrete reinforcement, part i mild steel and medium tensile steel bars.	Bureau of Indian Standards	5900035009	April 12, 2018	April 04, 2019
2.	License for Pulverized fuel ash-lime bricks.	Bureau of Indian Standards.	2566767	April 25, 2018	March 31, 2019
3.	License for carbon steel cast billet ingots, billets. blooms and slabs for re-rolling into low tensile structural steel.	Bureau of Indian Standards	2555964	January 16, 2018	January 21, 2020
4.	License for carbon steel cast billet ingots, billets, blooms and slabs for re-rolling into steel for general structural purposes.	Bureau of Indian Standards	8572792	November 16, 2017	November 30, 2019
5.	License for high strength deformed steel bars and wires for concrete reinforcement.	Bureau of Indian Standards	8406270	January 31, 2018	January 31, 2019

Other approvals

Sr. No	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/renewal	Date of expiry, if specified
1.	Licenses issued under the Factories Act, 1948 and the rules thereof for the maximum number of workers permitted to be employed on any	Dy, Chief Inspector of Factories, Government of Chhattisgarh	License No.: 1453/1453/B-3/B-5/RPR/2M(i)	June 27, 2017	December 31, 2020

Sr. No	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/renewal	Date of expiry, if specified
	one day in a factory/unit.				
2.	Allotment of Tax Deduction Account Number (TAN) as per the Income Tax Act, 1961.	National Securities Depository Limited	TAN: JBPS08929E	June 05, 2012	-
3.	Certificate for the use of boiler.	Issued under the scheme of Government of Chhattisgarh 'Self certification of Boiler'	Self-Certification No. – 224101720230 Ref No. - 0805053155	September 21, 2017	September 20, 2018
4.	Licenses issued for radio frequency communications	Government of India, DOT., Wireless Planning and Co-ordination Wing, Regional Licensing Office.	License No.: 1673/WRLO-12/1-20	July 05, 2017	March 31, 2019
5.	Temporary License issued for the generation of power through DG sets.	Chief Electrical Inspector, Government of Chhattisgarh	N-6/8/6439/part one/thirteen / 4481 N-3/8/3197	December 22, 2010	-
6.	Weigh Bridge Certificate	Legal Metrology Department, Government of Chhattisgarh	Enrol No. 60	December 19, 2017	December 18, 2018

Other certifications

Sr. No	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	ISO 9001: 2015 certification issued for conforming the quality system management standard for manufacture of rolled steel section and ferrous billets blooms.	DNV GL	98252-2011-AQ-IND-RvA	July 11, 2017	July 10, 2020
2.	OHSAS 18001:2007 certification issued for	Trans Continental Certification Private	Q-912901214	January 29, 2018	January 28, 2021

Sr. No	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	conforming the Occupational Health & Safety Management System for manufacture of rolled steel section, ferrous billets, blooms & power generation up to 16 MW	Limited.			

Approvals in relation to Unit III

Environment related approvals

a. Consent under the Air (Prevention and control of Pollution), 1981

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Renewal of Air Prevention and control of Pollution for sponge iron, Waste Heat Recovery ("WHR") based power plant, palletization plant, iron ore beneficiation plant, producer gas plant, fly ash brick plant	Chhattisgarh Environment Conservation Board	6365/TS/CECB/2018	February 09, 2018	February 28, 2020

b. Consent under the water (Prevention and control of pollution) Act, 1974

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Renewal of Water Prevention and control of Pollution for sponge iron, WHR based power plant, palletization plant, iron ore beneficiation plant, producer gas plant, fly ash	Chhattisgarh Environment Conservation Board	6363/TS/CECB/2018	February 09, 2018	February 28, 2020

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	brick plant				

c. Certificates of Environmental Clearance

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Environmental clearance with regard to proposed integrated steel plant	Ministry of Environment and Forests, Government of India	F No. J-11011/394/2009-IA II (I)	October 06, 2010	-
2.	Environmental clearance with regard to expansion of iron ore beneficiation and pelletilization plant	Ministry of Environment and Forests, Government of India	F No. J-11011/394/2009-IA II (I)	May 23, 2012	-
3.	Environmental clearance with regard to installation of coal gasifier and fly ash brick plant.	Ministry of Environment and Forests, Government of India	F No. J-11011/394/2009-IA II (I)	September06, 2016	-

d. Certificates for permission to establish

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Permission to establish integrated steel plant	Chhattisgarh Environment Conservation Board	6014/TS/CECB/2011	January 25, 2011	-
2.	Amendment is permission to establish of iron ore beneficiation plant	Chhattisgarh Environment Conservation Board	1429/TS/CECB/2012	June 14, 2012	June 13, 2019
3.	Amendment in permission to establish for sponge iron unit, coal gasifier at pellet plant and fly ash brick plant	Chhattisgarh Environment Conservation Board	5525/TS/CECB/2017	January 11, 2017	-
4.	Amendment in permission to establish for sponge iron unit, coal gasifier at pellet plant and	Chhattisgarh Environment Conservation Board	359/TS/CECB/2017	April 25, 2017	-

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	fly ash brick plant				

Employment related approvals

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Registration certificate under the Contract Labour (Regulation and Abolition) Act, 1970 for the employment of contract labour.	Office of Registering Officer, Government of Chhattisgarh	691/RPR/2011	May 13, 2011	-
2.	Registration of Employees of the Factories and Establishments under Section 2(12) of the E.S.I. Act of 1943, as amended and implementation of the Act.	Regional Office, Employees' State Insurance Corporation.	Allotted code No. : 59001536000000599	April 09, 2013	-
3.	Registration under the Employees Provident Fund Scheme, 1952	Employees Provident Fund Organization	Circle III/CG/23310	May 06, 2013	-

Examination certificates with regard to examination of various machinery like cranes, fork lift trucks, electric chain hoists etc.

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
1.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of EOT crane with SWL-30/5.0Ton and 14.9 meter span	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No.: EOT 01	April 19, 2018	One year from the date of issue or after repair or alteration whichever earlier
2.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of monorail electric	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No: EH 04	April 20, 2018	One year from the date of issue or after repair or alteration whichever earlier

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
	hoist with SWL- 5.0 MT				
3.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Monorail Electric Hoist with SWL- 5.0 MT	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No.: EH 05	April 20, 2018	One year from the date of issue or after repair or alteration whichever earlier
4.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of monorail electric hoist with SWL- 5.0 MT	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No.: EH 06	April 20, 2018	One year from the date of issue or after repair or alteration whichever earlier
5.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Hydrolic Telescopic Crane with SWL- 16.0Ton	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Sr. No: PY-5260-5	April 21, 2018	One year from the date of issue or after repair or alteration whichever earlier
6.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of Fowler/hydra/mobile crane) with SWL- 12.0Ton	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No: H01	April 21, 2018	One year from the date of issue or after repair or alteration whichever earlier
7.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of fowler/hydra/mobile crane with SWL- 14.0 Ton	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No: H 02	April 21, 2018	One year from the date of issue or after repair or alteration whichever earlier
8.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of chain pulley block with SWL- 3.0 Ton	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No: PP/CB- 01	April 20, 2018	One year from the date of issue or after repair or alteration whichever earlier

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
9.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of D shackle with SWL-9.50 Ton	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No: DS 01 to DS 06	April 19, 2018	One year from the date of issue or after repair or alteration whichever earlier
10.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of wire rope sling	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID No: RS 01-RS 02/ RS 03-RS06	April 20, 2018	One year from the date of issue or after repair or alteration whichever earlier
11.	Examination certificate under the C.G. Factories Act & Rules, 1962 certifying the examination of horizontal F.O.Storage tank with 25.0 KL capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	-	April 21, 2018	One year from the date of issue or after repair or alteration whichever earlier

Examination certificates of pressure vessels

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
1.	Examination certificates under the C.G. C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 8.0 m^3 capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Sr. No: R 12041293	April 19, 2018	Six months from date of issue
2.	Examination certificates under the C.G. C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 3.0 m^3 capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Sr. No: R 12041416	April 19, 2018	Six months from date of issue
3.	Examination certificates under the C.G. C.G. Factories Act &	Chartered Engineer and Approved Valuer (C.G.	-	April 20, 2018	Six months from date of issue

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
	Rules, 1962 certifying the examination of Air Receiver with 63.0 litre capacity	Factories Acts and Rules)			
4.	Examination certificates under the C.G. C.G. Factories Act & Rules, 1962 certifying the examination of Air Receiver with 15.0 m^3 capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Sr. No: .R14020623	April 19, 2018	Six months from date of issue
5.	Examination certificates under the C.G. C.G. Factories Act & Rules, 1962 certifying the examination of Air Oil Tank with 63.0 litres capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	-	April 20, 2018	Six months from date of issue
6.	Examination certificates under the C.G. C.G. Factories Act & Rules, 1962 certifying the examination of Softener of (1000 ¢ x 2500 Height) mm size	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	-	April 19, 2018	Six months from date of issue
7.	Examination certificates under the C.G. C.G. Factories Act & Rules, 1962 certifying the examination of Air Blaster with 150 litre capacity	Chartered Engineer and Approved Valuer (C.G. Factories Acts and Rules)	Local ID: BLA 01	April 19, 2018	Six months from date of issue

Certificates for commencement of production

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Certificate for commencement of production	Directorate of Industries, Chhattisgarh	No.16/F.A./Prod/2013/1115	December 31, 2013	-
2.	Additional	Directorate of	No.16/F.A./Prod/2013/181	February 17,	-

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
	Certificate for commencement of production with respect to commencement of commercial production of iron ore beneficiation plant.	Industries, Chhattisgarh		2017	

Certificates with regard to the trading licenses

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Trading License (Jharkhand)	Department of Mines	02/SBM/2016-17	August 01, 2016	March 31, 2021
2.	Trading License (Odisha)	Department of Mines, Dy. Director of Mines, Mining Officer	NLD/9395/2014	February 23, 2015	February 22, 2020

Other approvals/licenses

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
1.	Licenses issued under the Factories Act, 1948 and the rules thereof for the maximum number of workers permitted to be employed on any one day in a factory/unit.	Dy, Chief Inspector of Factories, Government of Chhattisgarh	License No.: 6045/6045/B-1, B-5/RPR/HQ/2MI	January 03, 2017	December 31, 2017-2019
2.	Allotment of Tax Deduction Account Number (TAN) as per the Income Tax Act, 1961.	National Securities Depository Limited	TAN: JBPS08136C	April 07, 2011	-
3.	Certificate for the use of boiler under the Indian Boilers Act, 1923	Inspector of Boilers, Government of Chhattisgarh	Self-Certification No. – 224131720269 Ref No. - 3504234204	October 23, 2017	October 06, 2018
4.	Temporary License issued for the generation	Chief Electrical Inspector,	N- 3/8/3785/Thirteen/ 504	March 22, 2013	-

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
	of power through DG sets.	Government of Chhattisgarh			
5.	Registration of Fire Safety Certificate	Fire Fighting and Emergency State Services	NO. 107/2641 fire service/NOC 2017	November 20, 2017	One year
6.	Water allotment certificate	Ministry of Water Resources, Government of Chhattisgarh, Raipur	5666/302/JS/TSHA/03/ AUJPR/D 04	August 19, 2010	-
7.	License for storage of petroleum products.	Government of India, Ministry of Commerce & Industry, Petroleum & Explosives Safety Organization (PESO)	P/CC/CG/14/2095	November 29, 2017	December 31, 2019

4. Approvals in relation to our mining business

Iron Ore Mine, Uttar Bastar Kanker, Chhattisgarh

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
1.	Iron Ore Mining Lease, Chhattisgarh	Government of Chhattisgarh	Certificate no: IN-CG00419064576824M	November 21, 2014	30 years
2.	Expansion of Iron ore mine with production capacity from 0.25 Million TPA to 0.60 Million TPA	Ministry of Environment and Forests and Climate Change, Government of India	J-11015/150/2016-IA(II)-M Online Application No: IA/CH/MIN/53139/2016	February 21, 2018	-
3.	Consent for expansion in mining of iron ore under the Air (Prevention & Control of Pollution) Act, 1981	Chhattisgarh Environment Conservation Board	6795/TS/CECB/2018	March 01, 2018	February 28, 2019
4.	Consent for expansion in mining of iron ore under the	Chhattisgarh Environment Conservation Board	6793/TS/CECB/2018	March 01, 2018	February 28, 2019

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry/Validity period, if specified
	Water (Prevention & Control of Pollution) Act, 1974				

Manganese Ore Mine, Vizinagaram, Andhra Pradesh

Sr. No.	Name/ description of license/ approval	Issuing authority	Reference / Registration Number	Date of issue/ renewal	Date of expiry, if specified
1.	Transfer letter of manganese ore held by Sri. S. Narayana Raju in favor of our Company.	Government of Andhra Pradesh, Department of Mines and Geology	Lr No: 3765/N/1993	May 5, 2010	September 26, 2020
2.	Grant of consent to operate under Section 25 of the Water (Prevention and control of Pollution) Act, 1974 & Section 21 of the Air (Prevention and control of Pollution) Act, 1981 for the Vishakhapatnam mining unit	Andhra Pradesh Pollution Control Board, Vishakhapatnam	Order No.: 9178/VZN/APPCB/ZOVSP/CFO/2016/1060	October 19, 2016	November 30, 2018
3.	GST Registration Certificate	Government of India	37AACCB2944D1ZZ	September 21, 2017	-

5. Approvals applied for but yet to be received by our Company.

Our Company have made an application dated March 22, 2018 for authorization under the Hazardous Wastes Rules to Chhattisgarh Environment Conservation Board in relation to our Unit I.

Our Company have made an application dated July 13, 2018 for authorization under the Hazardous Wastes Rules to Chhattisgarh Environment Conservation Board in relation to our Unit II.

Our Company have made an application dated July 5, 2018 for authorization under the Hazardous Wastes Rules to Chhattisgarh Environment Conservation Board in relation to our Unit III.

Our Company have made an application dated June 12, 2018 to the Department of Telecommunication, Wireless Planning and Coordination Wing seeking renewal of license for radio frequency communications in relation to our Unit I.

Our Company have made an application dated August 18, 2017 to the Department of Telecommunication, Wireless Planning and Coordination Wing bearing application number 2017109247 for installation of radio frequency communications in our Unit III.

Our Company have made an application dated June 4, 2018 for renewal of certificate mark license – 5900018413 for ms round bars to the Bureau of Indian Standards for our Unit II.

6. Approvals expired but not applied for by our Company.

As on the date of this Draft Red Herring Prospectus, there are no approvals which are expired and not applied for by our Company.

7. Approvals required but not obtained or applied for by our Company.

As on the date of this Draft Red Herring Prospectus, there are no approvals which are required for our business but not obtained or applied by our Company.

8. Material approvals in relation to our Subsidiaries

Shri Bajrang Energy Private Limited

a) Certificate of incorporation dated December 20, 2007, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh.

b) Fresh Certificate of incorporation dated July 28, 2009, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh consequent to the conversion into a private limited company.

c) Shri Bajrang Energy Private Limited was allotted corporate identity number U40101CT2007PLC020484.

d) Permanent account number AALCS4792H issued by the Income Tax Department under the Income Tax Act, 1961.

e) Tax deduction account number JBPS06083A issued by the Income Tax Department under the Income Tax Act.

I A Hydro Energy Private Limited

a) Certificate of incorporation dated March 23, 2017, issued by the Registrar of Companies, Central Registration Centre.

b) I A Hydro Energy Private Limited has been allotted corporate identity number U40300HP2017PTC006529.

c) Permanent account number AAECI4543B issued by the Income Tax Department under the Income Tax Act, 1961.

d) Tax deduction account number PTLI11767A issued by the Income Tax Department under the Income Tax Act.

e) Goods and services tax registration number is 02AAEC14543B1Z8.

f) Approval of plan for hydro power generation, employment of 140 workers and using power load 1350 KW under Factories Act, 1948 bearing reference no. Una – 174303 dated April 12, 2018.

g) Consent to operate under Water Act, 1974 and Air Act, 1981 from Himachal Pradesh State Pollution Control Board bearing reference no. 21063-65 dated February 17, 2018, which is valid up to March 31, 2022.

OTHER REGULATORY AND STATUTORY DISCLOSURES

Authority for the Issue

The Issue has been authorised by a resolution of the Board passed at their meeting held on September 2, 2018 and the Shareholders have approved the Issue pursuant to a special resolution passed at the AGM of our Company held on September 3, 2018.

Our Company has received in-principle approvals from the BSE and the NSE for the listing of the Equity Shares pursuant to letters, both dated [●] and [●] respectively.

For details with respect to restrictions on participation in the Issue, see "*Issue Procedure*" and "*Restrictions on Foreign Ownership of Indian Securitie*s" beginning on pages 542 and 587.

Prohibition by SEBI or other Governmental Authorities

Our Company, our Promoters, natural persons in control of our corporate Promoters, our Directors, the members of the Promoter Group, Group Companies have not been debarred from accessing or operating in capital markets under any order or direction passed by SEBI or any other regulatory or governmental authority.

The companies, with which our Promoters or our Directors are or were associated as promoters, directors or persons in control have not been debarred from accessing or operating in capital markets under any order or direction passed by SEBI or any other regulatory or governmental authority.

None of our Directors are associated with the securities market in any manner.

There has been no action taken by SEBI against our Directors or any entity in which our Directors are involved in as promoters or directors.

The listing of any securities of our Company and our Subsidiaries has never been refused at any time by any of the Stock Exchanges in India or abroad.

Prohibition by RBI

Neither our Company nor our Promoters, relatives (as defined under Companies Act) of our Promoters, Directors and Group Companies have been identified as Wilful Defaulters.

Eligibility for the Issue

Our Company is eligible for the Issue in accordance with Regulation 26(1) of the SEBI ICDR Regulations as set out below:

a) Our Company has net tangible assets of at least ₹ 30 million in each of the preceding three full years (of 12 months each) of which not more than 50% of net tangible assets are monetary assets;

b) Our Company has a minimum average pre-tax operating profit of ₹ 150 million calculated on a restated and consolidated basis, during the three most profitable years out of the immediately preceding five years;

c) Our Company has a net worth of at least ₹ 10 million in each of the three preceding full years (of 12 months each);

d) The aggregate size of the proposed Issue and all previous issues made in the same Financial Year, in terms of Issue size, is not expected to exceed five times the pre-Issue net worth as per the audited balance sheet of our Company for the Financial Year 2017 - 2018; and

e) Our Company has not changed its name in the last one year.

The following table sets forth details of our Company's pre-tax operating profit, as restated, net worth, net tangible assets, monetary assets and monetary assets as a percentage of the net tangible assets derived from the Restated Financial Statements included in this Draft Red Herring Prospectus as at, and for the last five Financial Years.

(₹ in million, unless otherwise stated)

Consolidated Basis:					
Description	**As at 31st March,**				
	2018	**2017**	**2016**	**2015**	**2014**
Restated Net tangible assets	5,268.10	4,927.52	4,603.72	4,116.03	4,044.30
Restated Monetary assets	163.98	255.56	176.58	428.47	231.99
% of monetary assets to net tangible assets	3.11%	5.19%	3.84%	10.41%	5.74%
Pre-tax operating profits, as restated as per the Restated Profit and Loss Account	653.68	374.67	43.65	67.65	(195.65)
Net worth for equity shareholders	6,739.17	4,437.10	4,144.35	4,339.46	4,254.58

(₹ in million, unless otherwise stated)

Standalone Basis:					
Description	**As at 31st March,**				
	2018	**2017**	**2016**	**2015**	**2014**
Restated Net tangible assets	3,588.00	4,817.98	4,520.10	3,991.92	3,909.87
Restated Monetary assets	160.80	188.19	175.91	426.27	218.02
% of monetary assets to net tangible assets	4.48%	3.91%	3.89%	10.68%	5.58%
Pre-tax operating profits, as restated as per the Restated Profit and Loss Account	1287.60	472.22	43.65	77.83	(195.65)
Net worth for equity shareholders	5,163.32	4,399.59	4,076.14	4,270.82	4,175.62

Net Tangible Assets = Net block of fixed assets + Capital work in progress for fixed assets (including capital advances) + Current assets, loans and advances – Loan funds (Secured loans + Unsecured loans) – Current liabilities and provisions.

Monetary Assets = Cash in hand + Balance with bank in current and deposit account (net of bank deposits not considered as cash and cash equivalent).

Net Worth for Equity Shareholders = Equity share capital + Reserves and surplus.

The average restated pre tax consolidated operating profit of our Company for the three most profitable years out of the above, i.e. years ended March 31, 2015, 2017 and 2018 is ₹ 365.33 million.

For the purpose of calculation of pre-tax profit, other income is excluded.

Further, in accordance with Regulation 26(4) of the SEBI ICDR Regulations, our Company shall ensure that the number of prospective Allottees to whom the Equity Shares will be Allotted will be not less than 1,000.

Our Company is in compliance with the conditions specified in Regulation 4(2) of the SEBI ICDR Regulations, to the extent applicable.

DISCLAIMER CLAUSE OF SEBI

IT IS TO BE DISTINCTLY UNDERSTOOD THAT SUBMISSION OF THIS DRAFT RED HERRING PROSPECTUS TO SEBI SHOULD NOT IN ANY WAY BE DEEMED OR CONSTRUED THAT THE SAME HAS BEEN CLEARED OR APPROVED BY SEBI. SEBI DOES NOT TAKE ANY RESPONSIBILITY EITHER FOR THE FINANCIAL SOUNDNESS OF ANY SCHEME OR THE PROJECT FOR WHICH THE ISSUE IS PROPOSED TO BE MADE OR FOR THE CORRECTNESS OF THE STATEMENTS MADE OR OPINIONS EXPRESSED IN THIS DRAFT RED HERRING PROSPECTUS. THE BRLMs, BEING IDBI CAPITAL MARKETS & SECURITIES LIMITED, EQUIRUS CAPITAL PRIVATE LIMITED AND SBI CAPITAL MARKETS LIMITED HAVE CERTIFIED THAT THE DISCLOSURES MADE IN THIS DRAFT RED HERRING PROSPECTUS ARE GENERALLY ADEQUATE AND ARE IN CONFORMITY WITH SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2009 IN FORCE FOR THE TIME BEING. THIS REQUIREMENT IS TO FACILITATE INVESTORS TO TAKE AN INFORMED DECISION FOR MAKING AN INVESTMENT IN THE PROPOSED ISSUE.

IT SHOULD ALSO BE CLEARLY UNDERSTOOD THAT WHILE THE COMPANY IS PRIMARILY RESPONSIBLE FOR THE CORRECTNESS, ADEQUACY AND DISCLOSURE OF ALL RELEVANT INFORMATION IN THE DRAFT RED HERRING PROSPECTUS, THE BRLMs ARE EXPECTED TO EXERCISE DUE DILIGENCE TO ENSURE THAT THE COMPANY DISCHARGE THEIR RESPONSIBILITY ADEQUATELY IN THIS BEHALF AND TOWARDS THIS PURPOSE, THE BRLMs HAVE FURNISHED TO SEBI, A DUE DILIGENCE CERTIFICATE DATED SEPTEMBER 12, 2018 WHICH READS AS FOLLOWS:

WE, THE BRLMs TO THE ABOVE MENTIONED FORTHCOMING ISSUE, STATE AND CONFIRM AS FOLLOWS:

1. **WE HAVE EXAMINED VARIOUS DOCUMENTS INCLUDING THOSE RELATING TO LITIGATION LIKE COMMERCIAL DISPUTES, PATENT DISPUTES, DISPUTES WITH COLLABORATORS, ETC. AND OTHER MATERIAL DOCUMENTS IN CONNECTION WITH THE FINALISATION OF THIS DRAFT RED HERRING PROSPECTUS PERTAINING TO THE ISSUE;**

2. **ON THE BASIS OF SUCH EXAMINATION AND THE DISCUSSIONS WITH THE COMPANY, ITS DIRECTORS AND OTHER OFFICERS, OTHER AGENCIES, AND INDEPENDENT VERIFICATION OF THE STATEMENTS CONCERNING THE OBJECTS OF THE ISSUE, PRICE JUSTIFICATION AND THE CONTENTS OF THE DOCUMENTS AND OTHER PAPERS FURNISHED BY THE COMPANY CONFIRM THAT:**

    (A) THE DRAFT RED HERRING PROSPECTUS FILED WITH THE SECURITIES AND EXCHANGE BOARD OF INDIA ("SEBI") IS IN CONFORMITY WITH THE DOCUMENTS, MATERIALS AND PAPERS RELEVANT TO THE ISSUE;

    (B) ALL THE LEGAL REQUIREMENTS RELATING TO THE ISSUE AS ALSO THE REGULATIONS, GUIDELINES, INSTRUCTIONS, ETC. FRAMED/ISSUED BY THE SECURITIES AND EXCHANGE BOARD OF INDIA, THE CENTRAL GOVERNMENT AND ANY OTHER COMPETENT AUTHORITY IN THIS BEHALF HAVE BEEN DULY COMPLIED WITH; AND

    (C) THE DISCLOSURES MADE IN THE DRAFT RED HERRING PROSPECTUS ARE TRUE, FAIR AND ADEQUATE TO ENABLE THE INVESTORS TO MAKE A WELL INFORMED DECISION AS TO THE INVESTMENT IN THE PROPOSED ISSUE AND SUCH DISCLOSURES ARE IN ACCORDANCE WITH THE REQUIREMENTS OF THE COMPANIES ACT, THE SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2009, AS AMENDED (THE "SEBI ICDR REGULATIONS") AND OTHER APPLICABLE LEGAL REQUIREMENTS.

3. WE CONFIRM THAT BESIDES OURSELVES, ALL THE INTERMEDIARIES NAMED IN THE DRAFT RED HERRING PROSPECTUS ARE REGISTERED WITH SEBI AND THAT TILL DATE SUCH REGISTRATION IS VALID.

4. WE HAVE SATISFIED OURSELVES ABOUT THE CAPABILITY OF THE UNDERWRITERS TO FULFIL THEIR UNDERWRITING COMMITMENTS. NOTED FOR COMPLIANCE

5. WE CERTIFY THAT WRITTEN CONSENT FROM THE PROMOTERS HAVE BEEN OBTAINED FOR INCLUSION OF THEIR EQUITY SHARES AS PART OF PROMOTERS' CONTRIBUTION SUBJECT TO LOCK-IN AND THE EQUITY SHARES PROPOSED TO FORM PART OF PROMOTERS' CONTRIBUTION SUBJECT TO LOCK-IN SHALL NOT BE DISPOSED/SOLD/TRANSFERRED BY THE PROMOTERS DURING THE PERIOD STARTING FROM THE DATE OF FILING OF THE DRAFT RED HERRING PROSPECTUS WITH THE SECURITIES AND EXCHANGE BOARD OF INDIA TILL THE DATE OF COMMENCEMENT OF LOCK-IN PERIOD AS STATED IN THE DRAFT RED HERRING PROSPECTUS .COMPLIED WITH AND NOTED FOR COMPLIANCE.

6. WE CERTIFY THAT REGULATION 33 OF THE SEBI ICDR REGULATIONS, WHICH RELATES TO EQUITY SHARES INELIGIBLE FOR COMPUTATION OF PROMOTERS' CONTRIBUTION, HAS BEEN DULY COMPLIED WITH AND APPROPRIATE DISCLOSURES AS TO COMPLIANCE WITH THE SAID REGULATION HAVE BEEN MADE IN THE DRAFT RED HERRING PROSPECTUS. COMPLIED WITH AND NOTED FOR COMPLIANCE

7. WE UNDERTAKE THAT SUB-REGULATION (4) OF REGULATION 32 AND CLAUSES (C) AND (D) OF SUB-REGULATION (2) OF REGULATION 8 OF THE SEBI ICDR REGULATIONS SHALL BE COMPLIED WITH. WE CONFIRM THAT ARRANGEMENTS HAVE BEEN MADE TO ENSURE THAT PROMOTERS' CONTRIBUTION SHALL BE RECEIVED AT LEAST ONE DAY BEFORE THE OPENING OF THE ISSUE. WE UNDERTAKE THAT AUDITORS' CERTIFICATE TO THIS EFFECT SHALL BE DULY SUBMITTED TO SEBI. WE FURTHER CONFIRM THAT ARRANGEMENTS HAVE BEEN MADE TO ENSURE THAT PROMOTERS' CONTRIBUTION SHALL BE KEPT IN AN ESCROW ACCOUNT WITH A SCHEDULED COMMERCIAL BANK AND SHALL BE RELEASED TO THE COMPANY ALONG WITH THE PROCEEDS OF THE PUBLIC ISSUE. NOT APPLICABLE

8. WE CERTIFY THAT THE PROPOSED ACTIVITIES OF THE COMPANY FOR WHICH THE FUNDS ARE BEING RAISED IN THE PRESENT ISSUE FALL WITHIN THE 'MAIN OBJECTS' LISTED IN THE OBJECT CLAUSE OF THE MEMORANDUM OF ASSOCIATION OR OTHER CHARTER OF THE COMPANY AND THAT THE ACTIVITIES WHICH HAVE BEEN CARRIED OUT UNTIL NOW ARE VALID IN TERMS OF THE OBJECT CLAUSE OF ITS MEMORANDUM OF ASSOCIATION. COMPLIED WITH

9. WE CONFIRM THAT NECESSARY ARRANGEMENTS HAVE BEEN MADE TO ENSURE THAT THE MONIES RECEIVED PURSUANT TO THE ISSUE ARE KEPT IN A SEPARATE BANK ACCOUNT AS PER THE PROVISIONS OF SUB SECTION (3) OF SECTION 40 OF THE COMPANIES ACT, 2013 AND THAT SUCH MONEYS SHALL BE RELEASED BY THE SAID BANK ONLY AFTER PERMISSION IS OBTAINED FROM ALL THE STOCK EXCHANGES MENTIONED IN THE PROSPECTUS. NOTED FOR COMPLIANCE. ALL MONIES RECEIVED OUT OF THE ISSUE SHALL BE CREDITED/TRANSFERRED TO A SEPARATE BANK ACCOUNT AS REFERRED TO IN SUBSECTION (3) OF SECTION 40 OF THE COMPANIES ACT, 2013.

10. WE CERTIFY THAT A DISCLOSURE HAS BEEN MADE IN THE DRAFT RED HERRING PROSPECTUS THAT THE INVESTORS SHALL BE GIVEN AN OPTION TO GET THE SHARES IN DEMAT OR PHYSICAL MODE. NOT APPLICABLE. UNDER SECTION 29 OF THE COMPANIES ACT, 2013, EQUITY SHARES IN THE ISSUE WILL BE ISSUED IN DEMATERIALISED FORM ONLY.

11. **WE CERTIFY THAT ALL THE APPLICABLE DISCLOSURES MANDATED IN THE SEBI ICDR REGULATIONS HAVE BEEN MADE IN ADDITION TO DISCLOSURES WHICH, IN OUR VIEW, ARE FAIR AND ADEQUATE TO ENABLE THE INVESTOR TO MAKE A WELL INFORMED DECISION.**

12. **WE CERTIFY THAT THE FOLLOWING DISCLOSURES HAVE BEEN MADE IN THE DRAFT RED HERRING PROSPECTUS:**

    (A) AN UNDERTAKING FROM THE COMPANY THAT AT ANY GIVEN TIME, THERE SHALL BE ONLY ONE DENOMINATION FOR THE EQUITY SHARES OF THE COMPANY; AND

    (B) AN UNDERTAKING FROM THE COMPANY THAT IT SHALL COMPLY WITH SUCH DISCLOSURE AND ACCOUNTING NORMS SPECIFIED BY SEBI FROM TIME TO TIME.

13. **WE UNDERTAKE TO COMPLY WITH THE REGULATIONS PERTAINING TO ADVERTISEMENT IN TERMS OF THE SEBI ICDR REGULATIONS WHILE MAKING THE ISSUE. <u>NOTED FOR COMPLIANCE</u>**

14. **WE ENCLOSE A NOTE EXPLAINING HOW THE PROCESS OF DUE DILIGENCE HAS BEEN EXERCISED BY US IN VIEW OF THE NATURE OF CURRENT BUSINESS BACKGROUND OF THE COMPANY, SITUATION AT WHICH THE PROPOSED BUSINESS STANDS, THE RISK FACTORS, PROMOTERS' EXPERIENCE, ETC.**

15. **WE ENCLOSE A CHECKLIST CONFIRMING REGULATION-WISE COMPLIANCE WITH THE APPLICABLE PROVISIONS OF THE SEBI ICDR REGULATIONS, CONTAINING DETAILS SUCH AS THE REGULATION NUMBER, ITS TEXT, THE STATUS OF COMPLIANCE, PAGE NUMBER OF THE DRAFT RED HERRING PROSPECTUS WHERE THE REGULATION HAS BEEN COMPLIED WITH AND OUR COMMENTS, IF ANY.**

16. **WE ENCLOSE STATEMENT ON 'PRICE INFORMATION OF PAST ISSUES HANDLED BY MERCHANT BANKERS (WHO ARE RESPONSIBLE FOR PRICING THE ISSUE)', AS PER FORMAT SPECIFIED BY THE SECURITIES AND EXCHANGE BOARD OF INDIA THROUGH CIRCULAR.**

17. **WE CERTIFY THAT PROFITS FROM RELATED PARTY TRANSACTIONS HAVE ARISEN FROM LEGITIMATE BUSINESS TRANSACTIONS. <u>COMPLIED WITH TO THE EXTENT OF THE RELATED PARTY TRANSACTIONS OF THE COMPANY REPORTED AS PER THE ACCOUNTING STANDARD 18 / 24 AS APPLICABLE IN THE RESTATED FINANCIAL STATEMENTS OF THE COMPANY AND INCLUDED IN THE DRAFT RED HERRING PROSPECTUS</u> AS CERTIFIED BY S S S D & CO CHARTERED ACCOUNTANTS, THE STATUTORY AUDITOR OF THE COMPANY**

18. **WE CERTIFY THAT THE ENTITY IS ELIGIBLE UNDER 106Y (1) (A) OR (B) (AS THE CASE MAY BE) TO LIST ON THE INSTITUTIONAL TRADING PLATFORM, UNDER CHAPTER XC OF THE SEBI ICDR REGULATIONS (IF APPLICABLE). <u>NOT APPLICABLE</u>**

The filing of this Draft Red Herring Prospectus does not, however, absolve our Company and any person who has authorised the issue of this Draft Red Herring Prospectus from any liabilities under Section 34 or Section 36 of Companies Act, 2013, or from the requirement of obtaining such statutory and/or other clearances as may be required for the purpose of the Issue. SEBI further reserves the right to take up at any point of time, with the BRLMs, any irregularities or lapses in this Draft Red Herring Prospectus.

All legal requirements pertaining to the Issue will be complied with at the time of filing of this Draft Red Herring Prospectus with the RoC in terms of Section 32 of the Companies Act, 2013. All legal requirements pertaining to the Issue will be complied with at the time of registration of the Prospectus with the RoC in terms of Sections 26, 30 and 32 of the Companies Act, 2013.

Caution - Disclaimer from our Company and the BRLMs

Our Company, our Directors and the BRLMs accept no responsibility for statements made otherwise than in this Draft Red Herring Prospectus or in the advertisements or any other material issued by or at our Company's instance and anyone placing reliance on any other source of information, including our Company's website www.sbpil.co.in or the respective websites of our Subsidiaries or our Group Companies would be doing so at his or her own risk.

The BRLMs accept no responsibility, save to the limited extent as provided in the Issue Agreement and the Underwriting Agreement.

All information shall be made available by our Company and the BRLMs to the public and investors at large and no selective or additional information would be made available by our Company or the BRLMs for a section of the investors in any manner whatsoever, including at road show presentations, in research or sales reports, at bidding centres or elsewhere.

Neither our Company nor any member of the Syndicate shall be liable for any failure in uploading the Bids due to faults in any software/hardware system or otherwise.

Investors who Bid in the Issue will be required to confirm and will be deemed to have represented to our Company, Underwriters and their respective directors, officers, agents, affiliates, and representatives that they are eligible under all applicable laws, rules, regulations, guidelines and approvals to acquire the Equity Shares and will not issue, sell, pledge, or transfer the Equity Shares to any person who is not eligible under any applicable laws, rules, regulations, guidelines and approvals to acquire the Equity Shares. Our Company, Underwriters and their respective directors, officers, agents, affiliates, and representatives accept no responsibility or liability for advising any investor on whether such investor is eligible to acquire the Equity Shares.

The BRLMs and their associates and affiliates may engage in transactions with and perform services for our Company in the ordinary course of business or may in the future engage in commercial banking and investment banking transactions with our Company, for which they may in the future receive customary compensation.

Disclaimer in respect of Jurisdiction

This Issue is being made in India to persons resident in India (including Indian nationals resident in India who are competent to contract under the Indian Contract Act, 1872, HUFs, companies, corporate bodies and societies registered under the applicable laws in India and authorised to invest in shares, Indian Mutual Funds registered with the SEBI, Indian financial institutions, commercial banks, regional rural banks, co-operative banks (subject to RBI permission), or trusts under applicable trust law and who are authorised under their constitution to hold and invest in shares, permitted insurance companies and pension funds, insurance funds set up and managed by the army and navy and insurance funds set up and managed by the Department of Posts, India) and Eligible NRIs. This Draft Red Herring Prospectus does not, however, constitute an invitation to subscribe to or purchase shares offered hereby in any jurisdiction other than India to any person to whom it is unlawful to make an offer or invitation in such jurisdiction. Any person into whose possession this Draft Red Herring Prospectus comes is required to inform himself or herself about, and to observe, any such restrictions. Any dispute arising out of this Issue will be subject to the jurisdiction of appropriate court(s) in Raipur, Chhattisgarh only.

No action has been or will be taken to permit a public offering in any jurisdiction where action would be required for that purpose, except that this Draft Red Herring Prospectus had been filed with the SEBI for its observations. Accordingly, the Equity Shares represented thereby may not be offered or sold, directly or indirectly, and this Draft Red Herring Prospectus may not be distributed, in any jurisdiction, except in accordance with the legal requirements applicable in such jurisdiction. Neither the delivery of this Draft Red Herring Prospectus nor any sale hereunder shall, under any circumstances, create any implication that there has been no change in the affairs of our Company, our Subsidiaries or our Group Companies since the date hereof or that the information contained herein is correct as of any time subsequent to this date.

The Equity Shares offered in the Issue have not been and will not be registered under the Securities Act or any state securities laws in the United States, and unless so registered may not be offered or sold within the United States, except pursuant to an exemption from, or in a transaction not subject to, the registration requirements of the Securities Act and applicable state securities laws. Accordingly, such Equity Shares

are being offered and sold outside of the United States in offshore transactions in reliance on Regulation S and the applicable laws of the jurisdiction where those offers and sales occur;

The Equity Shares have not been and will not be registered, listed or otherwise qualified in any other jurisdiction outside India and may not be offered or sold, and Bids may not be made by persons in any such jurisdiction, except in compliance with the applicable laws of such jurisdiction.

Bidders are advised to ensure that any Bid from them does not exceed investment limits or maximum number of Equity Shares that can be held by them under applicable law.

Further, each Bidder where required must agree in the Allotment Advise that such Bidder will not sell or transfer any Equity Shares or any economic interest therein, including any off-shore derivative instruments, such as participatory notes, issued against the Equity Shares or any similar security, other than pursuant to an exemption from, or in a transaction not subject to, the registration requirements of the Securities Act.

Disclaimer Clause of BSE

As required, a copy of this Draft Red Herring Prospectus has been submitted to BSE. The disclaimer clause as intimated by BSE to our Company, post scrutiny of this Draft Red Herring Prospectus, shall be included in the Red Herring Prospectus and the Prospectus prior to the RoC filing.

Disclaimer Clause of the NSE

As required, a copy of this Draft Red Herring Prospectus has been submitted to NSE. The disclaimer clause as intimated by NSE to our Company, post scrutiny of this Draft Red Herring Prospectus, shall be included in the Red Herring Prospectus and the Prospectus prior to the RoC filing.

Filing

A copy of this Draft Red Herring Prospectus has been filed with SEBI at Corporate Finance Department, Plot No. C 4-A, 'G' Block, Bandra Kurla Complex, Bandra (East), Mumbai 400 051, Maharashtra and electronically on the platform provided by SEBI.

A copy of the Red Herring Prospectus, along with the documents required to be filed under Section 32 of the Companies Act, 2013 would be delivered for registration to the RoC and a copy of the Prospectus to be filed under Section 26 of the Companies Act, 2013 would be delivered for registration with ROC, Bilaspur.

Listing

Applications have been made to the Stock Exchanges for permission to deal in and for an official quotation of the Equity Shares. [●] will be the Designated Stock Exchange with which the Basis of Allotment will be finalised. If the permissions to deal in, and for an official quotation of, the Equity Shares are not granted by any of the Stock Exchanges mentioned above, our Company will forthwith repay without interest, all moneys received from the applicants in pursuance of the Red Herring Prospectus as required by applicable law. If such money is not repaid within the prescribed time, then our Company and every officer in default shall be liable to repay the money, with interest, as prescribed under applicable law.

Our Company shall ensure that all steps for the completion of the necessary formalities for listing and commencement of trading of the Equity Shares at all the Stock Exchanges mentioned above are taken within six Working Days from the Bid/Issue Closing Date.

If our Company does not allot the Equity Shares pursuant to the offer within six working days of the Issue Closing date or such timelines prescribed by SEBI, it shall repay, without interest all monies received from the bidders, failing which interest shall be due to the bidders at rate as prescribed under applicable law, for delayed period.

Price information of past issues handled by the BRLMs

A. IDBI Capital Markets & Securities Limited

Table 1: Price information of past issues (during current financial year and two financial years preceding the current financial year) handled by IDBI Capital Markets & Securities Limited

Sr. No.	Issue Name	Issue Size (in ₹ Million)	Issue Price (₹)	Listing Date	Opening price on listing date	+/- % change in closing price, [+/- % change in closing benchmark] - 30th calendar days from listing	+/- % change in closing price, [+/- % change in closing benchmark] - 90th calendar days from listing	+/- % change in closing price, [+/- % change in closing benchmark] - 180th calendar days from listing
1.	RITES Limited	4,604.40	185.00(4)	July 02, 2018	190.00	+34.97% (+6.56%)	N.A.	N.A.
2.	Mishra Dhatu Nigam Limited	4,328.96	90.00(3)	April 04, 2018	87.00	+67.89% (+5.44%)	+40.44% (+5.22%)	N.A
3.	Bharat Dynamics Limited	9,527.88	428.00(2)	March 23, 2018	370.00	-4.65% (+5.87%)	-9.78% (+7.74%)	N.A
4.	Security and Intelligence Services (India) Limited	7,795.30	815.00	August 10, 2017	879.00	-3.29% (+1.17%)	3.14% (5.40%)	+39.12% (+8.62%)
5.	Central Depository Services (India) Limited	5,239.91	149.00	June 30, 2017	250.00	+127.92% (+5.84%)	+128.86% (+2.26%)	+146.71% (+10.61%)
6.	Housing and Urban Development Corporation Limited	12,095.70	60.00(1)	May 19, 2017	73.00	+13.17% (+2.44%)	+34.67% (+4.98%)	+35.67% (+8.05%)

(1): Price for retail individual bidders bidding in the retail portion and to eligible employees was INR 58.00 per equity share
(2): Price for retail individual bidders bidding in the retail portion and to eligible employees was INR 418.00 per equity share
(3): Price for retail individual bidders bidding in the retail portion and to eligible employees was INR 87.00 per equity share
(4): Price for retail individual bidders bidding in the retail portion and to eligible employees was INR 179.00 per equity share
N.A: Not Available

Notes:

a. Source: www.nseindia.com for the price information

b. Wherever 30th/ 90th/ 180th calendar day from listing day is a holiday, the closing data of the next trading day has been considered.

c. The Nifty 50 index is considered as the benchmark index

Table 2: Summary statement of price information of past issues handled by IDBI Capital Markets & Securities Limited

Financial Year	Total no. of IPOs	Total amount of funds raised (₹ Million.)	No. of IPOs trading at discount - 30th calendar days from listing			No. of IPOs trading at premium - 30th calendar days from listing			No. of IPOs trading at discount - 180th calendar days from listing			No. of IPOs trading at premium - 180th calendar days from listing		
			Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%
2018 - date of this date of DRHP*	2	8,933.36	-	-	-	1	1	-	-	-	-	-	-	-
2017 - 18	4	34,658.79	-	-	2	1	-	1	-	-	-	1	2	-
2016-17	-	-	-	-	-	-	-	-	-	-	-	-	-	-

** The information is as on the date of the document*

The information for each of the financial years is based on issues listed during such financial year.

B. Equirus Capital Private Limited

Table 1: Price information of past issues handled by Equirus Capital Private Limited during current financial year and two financial years preceding the current financial year:

Sr. No.	Issue Name	Issue Size (in Rs. Million)	Issue Price (Rs.)	Listing Date	Opening price on listing date	+/- % change in closing price, [+/- % change in closing benchmark] - 30th calendar days from listing	+/- % change in closing price, [+/- % change in closing benchmark] - 90th calendar days from listing	+/- % change in closing price, [+/- % change in closing benchmark] - 180th calendar days from listing
1.	Shankara Building Products Limited	3,450.01	460.00	April 05, 2017	555.05	+51.04% (+1.02%)	+80.91% (+3.78%)	+210.58% (+5.65%)

Notes:

a. Source: www.nseindia.com for the price information

b. Wherever 30th/ 90th/ 180th calendar day from listing day is a holiday, the price of the immediately preceding working day has been considered.

c. The Nifty 50 index is considered as the benchmark index.

Table 2: Summary statement of price information of past issues handled by Equirus Capital Private Limited:

Fiscal Year	Total no. of IPOs	Total amount of funds raised (Rs. Million.)	No. of IPOs trading at discount - 30th calendar days from listing			No. of IPOs trading at premium - 30th calendar days from listing			No. of IPOs trading at discount - 180th calendar days from listing			No. of IPOs trading at premium - 180th calendar days from listing		
			Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%
2018 – 19	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2017 - 18	1	3,450.01	-	-	-	1	-	-	-	-	-	1	-	-
2016 - 17	-	-	-	-	-	-	-	-	-	-	-	-	-	-

** The information is as on the date of the document*

The information for each of the financial years is based on issues listed during such financial year.

C. SBI Capital Markets Limited

Table 1: Price information of past issues (during current financial year and two financial years preceding the current financial year) handled by SBI Capital Markets Limited

Sr. No.	Issue Name	Issue Size (₹ Mn.)	Issue Price (₹)	Listing Date	Opening Price on Listing Date	+/- % change in closing price, [+/- % change in closing benchmark]- 30th calendar days from listing	+/- % change in closing price, [+/- % change in closing benchmark]- 90th calendar days from listing	+/- % change in closing price, [+/- % change in closing benchmark]- 180th calendar days from listing
1	RITES Limited [4]	4,604.40	185	July 02, 2018	190.00	34.97% [+6.56%]	NA	NA
2	ICICI Securities Ltd	35,148.49	520	April 04, 2018	435.00	-27.93% [+5.44%]	-37.26% [+5.22%]	NA
3	Mishra Dhatu Nigam Limited [5]	4,328.96	90	April 04, 2018	87.00	67.89% [+5.44]	40.44% [+5.22%]	NA
4	Hindustan Aeronautics Ltd [6]	41,131.33	1,215	March 28, 2018	1,152.00	-6.96% [+4.98%]	-25.84% [+4.86%]	NA
5	Bharat Dynamics Limited [7]	9,527.88	428	March 23, 2018	370.00	-4.65% [+5.87%]	-9.78% [+7.74%]	NA
6	H. G. Infra Engineering Limited	4,620.00	270	March 9, 2018	270.00	22.96% [+1.49%]	8.35% [+4.48%]	NA
7	Amber Enterprises India Limited [8]	5,995.99	859	January 30, 2018	1,175.00	27.15% [-5.04%]	32.56% [-2.81%]	10.68% [+2.44%]
8	Reliance Nippon Life Asset Management Limited	15,422.40	252	November 06, 2017	295.90	3.61% [-3.19%]	8.12% [+2.05%]	-4.21% [+1.59%]
9	SBI Life Insurance Company Limited [9]	83,887.29	700	October 3, 2017	735.00	-7.56% [+5.89%]	-0.66% [+5.84%]	-2.30% [+3.57 %]
10	Cochin Shipyard Limited [10]	14,429.30	432	August 11, 2017	440.15	30.14% [+3.04%]	30.96% [+6.10%]	20.01% [+8.11%]

Source: www.nseindia.com

Notes:

1. *The 30th, 90th and 180th calendar day computation includes the listing day. If either of the 30th, 90th or 180th calendar days is a trading holiday, the next trading day is considered for the computation. We have taken the issue price to calculate the % change in closing price as on 30th, 90th and 180th day. We have taken the closing price of the applicable benchmark index as on the listing day to calculate the % change in closing price of the benchmark as on 30th, 90th and 180th day.*
2. *The Nifty 50 index is considered as the Benchmark Index*
3. *The number of Issues in Table-1 is restricted to 10*
4. *Retail Discount and Employee Discount of ₹ 6 per Equity Share to the Offer Price*
5. *Retail Discount and Employee Discount of ₹ 3 per Equity Share to the Offer Price*
6. *Retail Discount and Employee Discount of ₹ 25 per Equity Share to the Offer Price*
7. *Retail Discount and Employee Discount of ₹ 10 per Equity Share to the Offer Price*
8. *Employee Discount of ₹ 85 per Equity Share to the Offer Price*
9. *Employee Discount of ₹ 68 per Equity Share to the Offer Price*
10. *Retail Discount and Employee Discount of ₹ 21 per Equity Share to the Offer Price*

Table 2: Summary statement of price information of past issues handled by SBI Capital Markets Limited

Financial Year	Total no. of IPOs	Total amount of funds raised (₹ Mn.)	No. of IPOs trading at discount - 30th calendar days from listing			No. of IPOs trading at premium - 30th calendar days from listing			No. of IPOs trading at discount - 180th calendar days from listing			No. of IPOs trading at premium - 180th calendar days from listing		
			Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%	Over 50%	Between 25-50%	Less than 25%
2018-19	1	4,604.40	-	-	-		1	-	-	-	-	-	-	-
2017-18	12	2,39,623.05	-	-	5	2	2	3	-	-	2	1	2	2
2016-17	7	1,29,691.00	-	-	3	1	1	2	-	1	1	2	2	1

For details regarding the track record of the BRLMs, as specified in Circular reference CIR/MIRSD/1/2012 dated January 10, 2012 issued by the SEBI, see the websites of the BRLMs, as set forth in the table below:

Name of the BRLMs	Website
IDBI Capital Markets & Securities Limited	http://www.idbicapital.com/
Equirus Capital Private Limited	http://www.equirus.com/
SBI Capital Markets Limited	https://www.sbicaps.com/

Consents

Consents in writing of our Directors, our Company Secretary and Compliance Officer, our Chief Financial Officer, Indian legal counsel to our Company, bankers/lenders to our Company, the BRLMs, the Syndicate Members, the Escrow Collection Bank, the Refund Bank and the Registrar to the Issue to act in their respective capacities, have been obtained and filed along with a copy of this Draft Red Herring Prospectus with the RoC as required under the Companies Act, 2013 and such consents shall not be withdrawn up to the time of delivery of the Red Herring Prospectus for registration with the RoC. Further, consents received prior to filing of this Draft Red Herring Prospectus have not been withdrawn up to the time of delivery of this Draft Red Herring Prospectus with SEBI.

In accordance with the Companies Act, 2013 and the SEBI ICDR Regulations, our Statutory Auditors, S S S D & Co Chartered Accountants, have given their written consent for inclusion of their examination reports on the Restated Standalone Financial Statements and the Restated Consolidated Financial Statements, both dated September 2, 2018, and the statement of tax benefits dated September 12, 2018 in the form and context, included in this Draft Red Herring Prospectus and such consent has not been withdrawn up to the time of delivery of this Draft Red Herring Prospectus for filing with SEBI.

Expert to the Issue

Except as stated below, our Company has not obtained any expert opinions:

Our Company has received written consent from the Statutory Auditors namely, S S S D & Co Chartered Accountants, to include their names as required under Section 26(1)(a)(v) of the Companies Act, 2013 in this Draft Red Herring Prospectus and as "expert" as defined under section 2(38) of the Companies Act, 2013 in respect of their examination reports on the Restated Standalone Financial Statements and Restated Consolidated Financial Statements, both dated September 2, 2018, and the statement of tax benefits dated September 12, 2018 included in this Draft Red Herring Prospectus and such consent has not been withdrawn as on the date of this Draft Red Herring Prospectus.

Issue Expenses

The expenses of the Issue include, among others, brokerage and selling commission, printing and stationery expenses, legal fees, advertising and marketing expenses, registrar and depository fees and listing fees. For further details of Issue expenses, see "*Objects of the Issue – Issue Expenses*" on page 115.

Fees Payable to the Syndicate

The total fees payable to the Syndicate (including underwriting commission and selling commission and reimbursement of their out-of-pocket expense) will be as per the Syndicate Agreement, a copy of which will be available at the Registered Office of our Company.

Commission payable to SCSBs, Registered Brokers, RTAs and CDPs

For details of the commission payable to SCSBs, Registered Brokers, RTAs and CDPs, see "*Objects of the Issue – Issue Expenses*" on page 115.

Fees Payable to the Registrar to the Issue
The fees payable to the Registrar to the Issue for processing of applications, data entry, printing of Allotment Advice/CAN/refund order, preparation of refund data on magnetic tape and printing of bulk mailing register will

be as per the Registrar Agreement, a copy of which is available for inspection at the Registered Office of our Company.

The Registrar to the Issue will be reimbursed for all out-of-pocket expenses including cost of stationery, postage, stamp duty and communication expenses. Adequate funds will be provided to the Registrar to the Issue to enable it to send refund orders or Allotment advice by registered post/speed post/under certificate of posting. For details of the Issue expenses, see "*Objects of the Issue – Issue Expenses*" on page 115.

Particulars regarding public or rights issues by our Company during the last five years

Our Company has not made any public or rights issues during the five years preceding the date of this Draft Red Herring Prospectus.

Previous issues of Equity Shares otherwise than for cash

Except as disclosed in the "*Capital Structure*" on page 90, our Company has not issued any Equity Shares for consideration otherwise than for cash.

Commission and Brokerage paid on previous issues of the Equity Shares

Since this is the initial public issue of Equity Shares, no sum has been paid or has been payable as commission or brokerage for subscribing to or procuring or agreeing to procure subscription for the Equity Shares since our Company's inception.

Previous capital issue during the previous three years by listed Group Companies, Subsidiaries and Associate Company

None of our listed Group Companies or Subsidiaries has undertaken a capital issue in the last three years preceding the date of this Draft Red Herring Prospectus. Further, none of our listed Group Companies or Subsidiaries has undertaken any public or rights issue in the last ten years preceding the date of this Draft Red Herring Prospectus. Accordingly, the requirement to disclose performance vis-à-vis objects in respect of earlier offerings does not apply to our listed Subsidiaries or Group Companies.

Investor grievance mechanism and investor complaints for the listed Group Company

Except for SBAL, there are no listed Group Companies. For details with respect investor grievance mechanism and investor complaints please see "*Our Group Companies*" on page 219.

Performance vis-à-vis objects – Public/rights issue of our Company and/or listed Group Companies, Subsidiaries and Associate Company

Our Company has not undertaken any previous public or rights issue. There has been no shortfall in terms of performance *visa-vis* objects for any of the previous issues of our Company.

Outstanding Debentures or Bonds

Except as disclosed in "*Financial Indebtedness*" on page 461, our Company does not have any outstanding debentures or bonds as of the date of filing this Draft Red Herring Prospectus.

Outstanding Preference Shares or convertible instruments issued by our Company

Our Company does not have any outstanding preference shares or other convertible instruments, as on date of this Draft Red Herring Prospectus.

Partly Paid-up Shares

Our Company does not have any partly paid-up Equity Shares as on the date of this Draft Red Herring Prospectus.

Stock Market Data of Equity Shares

This being an initial public offer of our Company, the Equity Shares are not listed on any stock exchange.

Redressal of Investor Grievances

The Registrar Agreement provides for retention of records with the Registrar to the Issue for a period of at least three years from the last date of despatch of the letters of allotment and demat credit to enable the investors to approach the Registrar to the Issue for redressal of their grievances.

All grievances may be addressed to the Registrar to the Issue with a copy to the relevant Designated Intermediary to whom the Bid cum Application Form was submitted. The Bidder should give full details such as name of the sole or first Bidder, Bid cum Application Form number, Bidder DP ID, Client ID, PAN, date of the submission of Bid cum Application Form, address of the Bidder, number of the Equity Shares applied for and the name and address of the Designated Intermediary where the Bid cum Application Form was submitted by the Bidder.

Further, the Bidder shall also enclose a copy of the Acknowledgment Slip duly received from the concerned Designated Intermediary in addition to the information mentioned hereinabove.

Our Company estimates that the average time required by our Company or the Registrar to the Issue or the SCSB, for the redressal of routine investor grievances shall be [●] Working Days from the date of receipt of the complaint. In case of non-routine complaints and complaints where external agencies are involved, our Company will seek to redress these complaints as expeditiously as possible.

Our Company has appointed a Stakeholders' Relationship Committee comprising [●] and [●] as members. For details, see "*Our Management*" on page 194. As on the date of this Draft Red Herring Prospectus, there are no pending investor complaints. Our Company has not received any investor complaint in the three years prior to the filing of this Draft Red Herring Prospectus.

Our Company has also appointed Parul Verma, Company Secretary of our Company as the Compliance Officer for the Issue. For details, see "*General Information*" on page 82.

Changes in Auditors

Except as disclosed below, there have been no changes in the statutory auditors of our Company during the three years preceding the date of this Draft Red Herring Prospectus:

Name of Auditor	Date of change
R. K. Singhania & Associates to S S S D & Co. Chartered Accountants	September 29, 2017

Capitalisation of Reserves or Profits

Our Company has not capitalised its reserves or profits at any time during the last five years, except as stated in "*Capital Structure*" on page 90.

Revaluation of Assets

Our Company has undertaken a revaluation of its assets in accordance with IND AS. For further details, see *"Restated Financial Statements"* on page 228.

SECTION VII: ISSUE INFORMATION

TERMS OF THE ISSUE

The Equity Shares being issued pursuant to this Issue are subject to the provisions of the Companies Act, the SEBI ICDR Regulations, SCRA, SCRR, the Memorandum of Association and Articles of Association, terms of the Red Herring Prospectus, the Prospectus, the abridged prospectus, Bid cum Application Form, the Revision Form, the CAN, the Allotment Advice and other terms and conditions as may be incorporated in the Allotment Advices and other documents/certificates that may be executed in respect of the Issue. The Equity Shares shall also be subject to laws as applicable, guidelines, rules, notifications and regulations relating to the issue of capital and listing and trading of securities issued from time to time by SEBI, the Government of India, the Stock Exchanges, the RBI, RoC and/or other authorities, as in force on the date of the Issue and to the extent applicable or such other conditions as may be prescribed by the SEBI, the RBI, the Government of India, the Stock Exchanges, the RoC and/or any other authorities while granting its approval for the Issue.

Ranking of the Equity Shares

The Equity Shares being issued pursuant to the Issue shall be subject to the provisions of the Companies Act, the Memorandum of Association and Articles of Association and shall rank *pari passu* in all respects with the existing Equity Shares including in respect of the rights to receive dividend. The Allottees upon Allotment of Equity Shares under the Issue will be entitled to dividend and other corporate benefits, if any, declared by our Company after the date of Allotment. For further details, see "*Main Provisions of Articles of Association*" beginning on page 588.

Mode of Payment of Dividend

Our Company shall pay dividends, if declared, to the Shareholders in accordance with the provisions of the Companies Act, the Memorandum of Association and Articles of Association and provisions of the SEBI Listing Regulations and equity listing agreement to be entered into with the Stock Exchanges. For further details in relation to dividends, see "*Dividend Policy*" and "*Main Provisions of the Articles of Association*" beginning on pages 227 and 588, respectively.

Face Value and Issue Price

The face value of each Equity Share is ₹ 10 and the Issue Price is ₹ [●] per Equity Share. The Anchor Investor Issue Price is ₹ [●] per Equity Share.

The Price Band and the minimum Bid Lot size for the Issue will be decided by our Company, in consultation with the BRLMs, which shall be advertised in [●]editions of [●] (a widely circulated english national daily newspaper), [●] editions of [●] (a widely circulated hindi national daily newspaper) and [●] edition of [●] (a widely circulated [●] daily newspaper, [●] being the regional language of chhattisgarh, where our registered office is located), each with wide circulation, at least five Working Days prior to the Bid/Issue Opening Date. The Price Band, along with the relevant financial ratios calculated at the Floor Price and at the Cap Price, shall be pre-filled in the Bid cum Application Forms available at the websites of the Stock Exchanges.

At any given point of time, there shall be only one denomination of Equity Shares.

Compliance with the SEBI ICDR Regulations

Our Company shall comply with all the disclosure and accounting norms as specified by SEBI from time to time.

Rights of the Equity Shareholders

Subject to applicable laws, rules, regulations and guidelines and the Articles of Association, our Shareholders shall have the following rights:

- Right to receive dividends, if declared;
- Right to attend general meetings and exercise voting rights, unless prohibited by law;

- Right to vote on a poll either in person or by proxy, in accordance with the provisions of the Companies Act;

- Right to receive offers for rights shares and be allotted bonus shares, if announced;

- Right to receive surplus on liquidation, subject to any statutory and preferential claim being satisfied;

- Right of free transferability, subject to applicable laws including any RBI rules and regulations; and

- Such other rights, as may be available to a shareholder of a listed public company under the Companies Act, SEBI Listing Regulations and the Articles of Association.

For a detailed description of the main provisions of the Articles of Association of our Company relating to voting rights, dividend, forfeiture and lien, transfer, transmission and/or consolidation/splitting, see "*Main Provisions of Articles of Association*" beginning on page 588.

Market lot and Trading lot

Pursuant to Section 29 of the Companies Act, 2013, the Equity Shares shall be allotted only in dematerialised form. As per the SEBI ICDR Regulations, the trading of the Equity Shares shall only be in dematerialised form. In this context, two agreements have been signed among our Company, the respective Depositories and the Registrar to the Issue:

- Tripartite Agreement dated November 16, 2010 between NSDL, our Company and Registrar to the Issue; and

- Tripartite Agreement dated June 22, 2018 between CDSL, our Company and Registrar to the Issue.

Since trading of the Equity Shares is in dematerialised form, the tradable lot is one Equity Share. Allotment in this Issue will be only in electronic form in multiples of one Equity Share subject to a minimum Allotment of [●] Equity Shares.

Joint Holders

Where two or more persons are registered as the holders of the Equity Shares, they shall be entitled to hold the same as joint holderswith benefits of survivorship.

Jurisdiction

Exclusive jurisdiction for the purpose of the Issue is with the competent courts/authorities in Raipur, Chhattisgarh

Nomination facility to investors

In accordance with Section 72 of the Companies Act, 2013, the sole Bidder, or the first Bidder along with other joint Bidders, may nominate any one person in whom, in the event of the death of sole Bidder or in case of joint Bidders, death of all the Bidders, as the case may be, the Equity Shares Allotted, if any, shall vest, in accordance with Section 72 of the Companies Act, 2013. A person, being a nominee, entitled to the Equity Shares by reason of the death of the original holder(s), shall be entitled to the same advantages to which he or she would be entitled if he or she were the registered holder of the Equity Share(s). Where the nominee is a minor, the holder(s) may make a nomination to appoint, in the prescribed manner, any person to become entitled to Equity Share(s) in the event of his or her death during the minority. A nomination shall stand rescinded upon a sale of Equity Share(s) by the person nominating. A nomination may be cancelled, or varied by nominating any other person in place of the present nominee, by the holder of the Equity Shares who has made the nomination, by giving a notice of such cancellation or variation to our Company in the prescribed form.

Any person who becomes a nominee by virtue of the provisions of Section 72 of the Companies Act, 2013, shall upon the production of such evidence as may be required by the Board, elect either:

a) to register himself or herself as the holder of the Equity Shares; or

b) to make such transfer of the Equity Shares, as the deceased holder could have made.

Further, the Board may, at any time, give notice requiring any nominee to choose either to be registered himself or herself or to transfer the Equity Shares, and if the notice is not complied with within a period of 90 days, the Board may thereafter withhold payment of all dividends, interests, bonuses or other moneys payable in respect of the Equity Shares, until the requirements of the notice have been complied with.

Since the Allotment of Equity Shares in the Issue will be made only in dematerialized form, there is no requirement to make a separate nomination with our Company. Nominations registered with respective depository participant of the Bidder would prevail. If the Bidder wants to change the nomination, they are requested to inform their respective depository participant.

Withdrawal of the Issue

Our Company, in consultation with the BRLMs, reserve the right not to proceed with the Issue after the Bid/Issue Opening Date but before the Allotment. In such an event, our Company would issue a public notice in the newspapers in which the pre-Issue advertisements were published, within two days of the Bid/Issue Closing Date or such other time as may be prescribed by SEBI, providing reasons for not proceeding with the Issue. The Lead Manager, through the Registrar to the Issue, shall notify the SCSBs to unblock the bank accounts of the ASBA Bidders within one Working Day from the date of receipt of such notification and in case the Bid Amount have already been transferred to the Public Issue Account, notify the Public Issue Account Bank and Refund Bank for the purpose of refund in accordance with applicable laws. Our Company shall also inform the same to the Stock Exchanges on which Equity Shares are proposed to be listed.

Notwithstanding the foregoing, this Issue is also subject to obtaining (i) the final listing and trading approvals of the Stock Exchanges, which our Company shall apply for after Allotment, and (ii) the final RoC approval of the Prospectus after the Prospectus is filed with the RoC. If our Company withdraws the Issue after the Bid/ Issue Closing Date and thereafter determines that it will proceed with a public offering of the Equity Shares, our Company shall file a fresh draft red herring prospectus with SEBI.

Bid/Issue Programme

BID/ISSUE OPENS ON	[●]*
BID/ISSUE CLOSES ON	[●]

** Our Company may, in consultation with the BRLMs, consider participation by Anchor Investors. The Anchor Investor Bid/ Issue Period shall be one Working Day prior to the Bid/Issue Opening Date in accordance with the SEBI ICDR Regulations.*

An indicative timetable in respect of the Issue is set out below:

Event	Indicative Date
Finalisation of Basis of Allotment with the Designated Stock Exchange	[●]
Initiation of refunds (if any, for Anchor Investors)/unblocking of funds from ASBA Account	[●]
Credit of Equity Shares to demat accounts of Allottees	[●]
Commencement of trading of the Equity Shares on the Stock Exchanges	[●]

The above timetable, other than the Bid/Issue Closing Date, is indicative and does not constitute any obligation on our Company or the BRLMs.

Whilst our Company shall ensure that all steps for the completion of the necessary formalities for the listing and the commencement of trading of the Equity Shares on the Stock Exchanges are taken within six Working Days of the Bid/Issue Closing Date, the timetable may be extended due to various factors, such as extension of the Bid/Issue Period by our Company, revision of the Price Band or any delay in receiving the final listing and trading approval from the Stock Exchanges. The commencement of trading of the Equity Shares will be entirely at the discretion of the Stock Exchanges and in accordance with the applicable laws.
Submission of Bids (other than Bids from Anchor Investors):

Bid/Issue Period (except the Bid/Issue Closing Date)	
Submission and Revision in Bids	Only between 10.00 a.m. and 5.00 p.m. IST
Bid/Issue Closing Date	
Submission and Revision in Bids*	Only between 10.00 a.m. and 3.00 p.m. IST

***On the Bid/Issue Closing Date, the Bids shall be uploaded until:**

(i) 4.00 p.m. IST in case of Bids by QIBs and Non-Institutional Bidders, and

(ii) until 5.00 p.m. IST or such extended time as permitted by the Stock Exchanges, in case of Bids by Retail Individual Bidders.

On the Bid/Issue Closing Date, extension of time will be granted by Stock Exchanges only for uploading Bids received by Retail Individual Bidders after taking into account the total number of Bids received and as reported by the BRLMs to the Stock Exchanges.

It is clarified that Bids not uploaded on the electronic bidding system or in respect of which the full Bid Amount is not blocked by SCSBs would be rejected.

Due to limitation of time available for uploading the Bids on the Bid/Issue Closing Date, Bidders are advised to submit their Bids one day prior to the Bid/Issue Closing Date. Any time mentioned in this Draft Red Herring Prospectus is IST. Bidders are cautioned that, in the event a large number of Bids are received on the Bid/Issue Closing Date, some Bids may not get uploaded due to lack of sufficient time. Such Bids that cannot be uploaded will not be considered for allocation under this Issue. Bids will be accepted only during Monday to Friday (excluding any public holiday). None among our Company, or any member of the Syndicate is liable for any failure in uploading the Bids due to faults in any software/hardware system or otherwise.

Our Company, in consultation with the BRLMs, reserves the right to revise the Price Band during the Bid/Issue Period. The revision in the Price Band shall not exceed 20% on either side, i.e. the Floor Price can move up or down to the extent of 20% of the Floor Price and the Cap Price will be revised accordingly.

In case of revision in the Price Band, the Bid/Issue Period shall be extended for at least three additional Working Days after such revision, subject to the Bid/Issue Period not exceeding 10 Working Days. Any revision in Price Band, and the revised Bid/Issue Period, if applicable, shall be widely disseminated by notification to the Stock Exchanges, by issuing a press release and also by indicating the change on the terminals of the Syndicate Members.

In case of discrepancy in data entered in the electronic book vis-à-vis data contained in the Bid cum Application Form for a particular Bidder, the details as per the Bid file received from the Stock Exchanges shall be taken as the final data for the purpose of Allotment.

Minimum Subscription

If our Company does not receive (i) the minimum subscription of 90% of the Issue; and (ii) for at least 25% of the post-Issue Equity Share capital of our Company, in terms of Rule 19(2)(b) of the SCRR, including devolvement of Underwriters, if any, within 60 days from the date of Bid/Issue Closing Date, our Company shall forthwith refund the entire subscription amount received. If there is a delay beyond the prescribed time, our Company and every director of our Company who is an officer in default be jointly and severally liable to repay the money with interest as prescribed under the Companies Act, 2013, the SEBI ICDR Regulations and applicable law.

Further, we shall ensure that the number of prospective Allottees to whom the Equity Shares will be allotted shall not be less than 1,000 in compliance with Regulation 26(4) of the SEBI ICDR Regulations.

Arrangement for Disposal of Odd Lots

There are no arrangements for disposal of odd lots.

Restrictions on Transfer and Transmission of Equity Shares

Except for lock-in of the pre-Issue Equity Share capital of our Company, Promoter's minimum contribution and the Anchor Investor lock-in Equity Shares as detailed in "*Capital Structure*" from page 90 and except as provided in the Articles of Association, there are no restrictions on transfer of Equity Shares. Further, there are no restrictions on transmission of Equity Shares and on their consolidation/ splitting, except as provided in the Articles of Association. For details, see "*Main Provisions of the Articles of Association*" beginning on page 588.

ISSUE STRUCTURE

The Issue is of [●] Equity Shares for cash at price of ₹ [●] per Equity Share (including a share premium of ₹ [●] per Equity Share) aggregating to ₹ 5,000 million by our Company. The Issue will constitute [●] % of the post-Issue paidup Equity Share capital of our Company.

The Issue is being made through the Book Building Process.

Particulars	QIBs[1]	Non Institutional Bidders	Retail Individual Bidders
Number of Equity Shares available for Allotment/allocation *[2]	[●] Equity Shares or Issue less allocation to Non-Institutional Bidders and Retail Individual Bidders	Not less than [●] Equity Shares available for allocation.	Not less than [●] Equity Shares available for allocation
Percentage of Issue Size available for Allotment/allocation	Not more than 50% of the Issue size. However, 5% of the QIB Portion (excluding the Anchor Investor Portion) will be available for allocation proportionately to Mutual Funds only. Mutual Funds participating in the Mutual Fund Portion will also be eligible for allocation in the remaining balance QIB Portion. The unsubscribed portion in the Mutual Fund reservation will be added to the QIB Portion (excluding the Anchor Investor Portion).	Not more than 15% of the Issue or the Issue less allocation to QIBs and Retail Individual Bidders.	Not less than 35% of the Issue or Issue less allocation to QIB Bidders and Non-Institutional Bidders.
Basis of Allotment/ allocation if respective category oversubscribed	Proportionate as follows (excluding the Anchor Investor Portion): (a) [●] Equity Shares shall be available for allocated on a proportionate basis to Mutual Funds only; and (b) [●] Equity Shares shall be allotted on a proportionate basis to all QIBs, including Mutual Funds receiving allocation as per (a) above	Proportionate	Proportionate, subject to minimum Bid Lot. For details, see "*Issue Procedure– Part B – Allotment Procedure and Basis of Allotment –* Allotment *to RIBs*" on page 575
Minimum Bid	Such number of Equity Shares that the Bid Amount exceeds ₹ 200,000 and in multiples of [●] Equity Shares thereafter	Such number of Equity Shares that the Bid Amount exceeds ₹ 200,000 and in multiples of [●] Equity Shares thereafter	[●] Equity Shares and in multiples of [●] Equity Shares thereafter
Maximum Bid	Such number of Equity Shares not exceeding the Issue Size, subject to applicable limits	Such number of Equity Shares not exceeding the Issue Size, subject to applicable limits	Such number of Equity Shares so that the Bid Amount does not exceed ₹ 200,000
Bid Lot	[●] Equity Shares and in multiples of [●] Equity Shares thereafter		
Allotment Lot	Minimum of [●] Equity Shares and in multiples of one Equity Share thereafter		
Trading Lot	One Equity Share		
Who can apply[3][4]	Public institutions as specified in Section 2(72) of the Companies	Resident Indian individuals, Eligible	Resident Indian individuals, Eligible

Particulars	QIBs[1]	Non Institutional Bidders	Retail Individual Bidders
	Act, 2013, scheduled commercial banks, mutual funds registered with SEBI, FPIs other than Category III Foreign Portfolio Investors, VCFs, AIFs, state industrial development corporation, insurance company registered with Insurance Regulatory and Development Authority of India, provident fund with minimum corpus of ₹ 250 million, pension fund with minimum corpus of ₹ 250 million, in accordance with applicable law and National Investment Fund set up by the Government of India, insurance funds set up and managed by army, navy or air force of the Union of India, insurance fund set up and managed by the Department of Posts, India and systemically important non-banking financial companies.	NRIs, HUFs (in the name of Karta), companies, corporate bodies, scientific institutions societies and trusts, Category III Foreign Portfolio Investors.	NRIs and HUFs (in the name of Karta)
Terms of Payment	Full Bid Amount shall be blocked by the SCSBs in the bank account of the ASBA Bidders that is specified in the ASBA Form at the time of submission of the ASBA Form. [5]		

** Assuming full subscription in the Issue.*

(1) *Our Company, in consultation with the BRLMs, may allocate up to 60% of the QIB Portion to Anchor Investors on a discretionary basis in accordance with the SEBI ICDR Regulations. One-third of the Anchor Investor Portion shall be reserved for domestic Mutual Funds, subject to valid Bids being received from domestic Mutual Funds at or above the price at which allocation is being made to other Anchor Investors. For details, see "Issue Procedure" on page* 542.

(2) *Subject to valid Bids being received at or above the Issue Price. The Issue is being made in accordance with Rule 19(2)(b) of the SCRR and under Regulation 26(1) of the SEBI ICDR Regulations.*

(3) *In case of joint Bids, the Bid cum Application Form should contain only the name of the first Bidder whose name should also appear as the first holder of the beneficiary account held in joint names. The signature of only such first Bidder would be required in the Bid cum Application Form and such first Bidder would be deemed to have signed on behalf of the joint holders.*

(4) *With respect to restrictions on participation in the Issue, see "Issue Procedure" and "Restrictions on Foreign Ownership of Indian Securities" beginning on pages* 542 *and* 587*, respectively.*

(5) *Bid Amount shall be payable by the Anchor Investors at the time of submission of the Bid cum Application Forms. For details of terms of payment applicable to Anchor Investors, see "Issue Procedure - Part B - Section 7: Allotment Procedure and Basis of Allotment"* on page 575.

Under subscription, if any, in any category except in the QIB Portion, would be met with spill-over from the other categories at the discretion of our Company, in consultation with the BRLMs and the Designated Stock Exchange.

ISSUE PROCEDURE

All Bidders should review the General Information Document for investing in public issues prepared and issued in accordance with the circular (CIR/CFD/DIL/12/2013) dated October 23, 2013 notified by SEBI (the "General Information Document") included below under section " Part B – General Information Document", of this section which highlights the key rules, processes and procedures applicable to public issues in general in accordance with the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, the Securities Contracts (Regulation) Rules, 1957 and the SEBI ICDR Regulations. The General Information Document has been updated with certain changes in applicable laws, to the extent applicable to a public issue. The General Information Document is also available on the websites of the Stock Exchanges and the BRLMs. Please refer to the relevant provisions of the General Information Document which are applicable to the Issue.

Our Company and the BRLMs do not accept any responsibility for the completeness and accuracy of the information stated in this section, and are not liable for any amendment, modification or change in the applicable law which may occur after the date of this Draft Red Herring Prospectus. Bidders are advised to make their independent investigations and ensure that their Bids are submitted in accordance with applicable laws and do not exceed the investment limits or maximum number of the Equity Shares that can be held by them under applicable law or as specified in this Draft Red Herring Prospectus.

PART A

Book Building Procedure

The Issue is being made through the Book Building Process wherein not more than 50% of the Issue shall be Allotted to QIBs on a proportionate basis, provided that our Company in consultation with the BRLMs may allocate up to 60% of the QIB Category to Anchor Investors on a discretionary basis in accordance with the SEBI ICDR Regulations, of which one-third shall be reserved for domestic Mutual Funds, subject to valid Bids being received from them at or above the Anchor Investor Allocation Price. 5% of the QIB Category (excluding the Anchor Investor Portion) shall be available for allocation on a proportionate basis to Mutual Funds only, and the remainder of the QIB Category shall be available for allocation on a proportionate basis to all QIB Bidders (other than Anchor Investors), including Mutual Funds, subject to valid Bids being received at or above the Issue Price. Further, not less than 15% of the Issue shall be available for allocation on a proportionate basis to Non-Institutional Bidders and not less than 35% of the Issue shall be available for allocation to Retail Individual Bidders in accordance with the SEBI ICDR Regulations, subject to valid Bids being received at or above the Issue Price such that, subject to the availability of Equity Shares, each Retail Individual Investor shall be Allotted not less than the minimum Bid Lot, and the remaining Equity Shares, if available, shall be allotted to all Retail Individual Investors on a proportionate basis. The Equity Shares, on Allotment, shall be traded only in the dematerialized segment of the Stock Exchanges.

Investors should note that the Equity Shares will be Allotted to all successful Bidders only in dematerialised form. The Bid cum Application Forms which do not have the details of the Bidders depository account, including DP ID, Client ID and PAN, shall be treated as incomplete and will be rejected. Bidders will not have the option of being Allotted Equity Shares in physical form. Bid cum Application Form

Copies of the ASBA Form and the abridged prospectus will be available with the Designated Intermediaries at the Bidding Centers, and Registered Office of our Company. An electronic copy of the ASBA Form will also be available for download on the websites of the NSE (www.nseindia.com) and the BSE (www.bseindia.com) at least one day prior to the Bid/Issue Opening Date.

All Bidders (other than Anchor Investors) shall mandatorily participate in the Issue only through the ASBA process. ASBA Bidders must provide bank account details and authorisation to block funds in the relevant space provided in the ASBA Form and the ASBA Forms that do not contain such details will be rejected. Anchor Investors are not permitted to participate in the Issue through the ASBA process.

ASBA Bidders shall ensure that the Bids are made on ASBA Forms bearing the stamp of the Designated Intermediary, submitted at the Bidding Centers only (except in case of electronic ASBA Forms) and the ASBA. Forms not bearing such specified stamp are liable to be rejected.

For Anchor Investors, the Anchor Investor Application Form will be available at the offices of the BRLMs.

The prescribed colour of the Bid cum Application Form for the various categories is as follows:

Category	Colour of Bid cum Application Form*
Resident Indians including resident QIBs, Non-Institutional Investors, Retail Individual Investors and Eligible NRIs applying on a non-repatriation basis.*	White
Non-Residents including FPIs and Eligible NRIs, FVCIs and registered bilateral and multilateral development financial institutions applying on a repatriation basis. For restrictions on participation in the Issue, see "*Issue Procedure*" and "*Restrictions on Foreign Ownership of Indian Securities*" beginning on pages 542 and 587, respectively.*	Blue
Anchor Investors	White

* *Excluding electronic Bid cum Application Form*

Designated Intermediaries (other than SCSBs) shall submit/ deliver the ASBA Forms to the respective SCSB, where the Bidder has a bank account and shall not submit it to any non-SCSB bank or any Escrow Collection Bank.

Who can Bid?

In addition to the category of Bidders set forth under the section "*General Information Document for Investing in Public Issues – Category of Investors Eligible to Participate in an Issue*" on page 555, any other persons eligible to Bid in the Issue under the applicable laws, rules, regulations, guidelines, and policies are also eligible to invest in the Equity Shares.

Participation by Promoters, Promoter Group, the BRLMs the Syndicate Members and persons related to the Promoters/Promoter Group/ BRLMs

The BRLMs and the Syndicate Members shall not be allowed to subscribe to the Equity Shares in the Issue in any manner, except towards fulfilling their underwriting obligations. However, the associates and affiliates of the BRLMs and the Syndicate Members may Bid for Equity Shares in the Issue, either in the QIB Portion or in the Non-Institutional Category as may be applicable to such Bidders, where the allocation is on a proportionate basis and such subscription may be on their own account or on behalf of their clients. All categories of investors, including associates or affiliates of BRLMs and Syndicate Members, shall be treated equally for the purpose of allocation to be made on a proportionate basis.

Neither the BRLMs nor any persons related to the BRLMs (other than Mutual Funds sponsored by entities related to the BRLMs), Promoters and Promoter Group and any persons related to our Promoters and Promoter Group can apply in the Issue under the Anchor Investor Portion.

Bids by Mutual Funds

With respect to Bids by Mutual Funds, a certified copy of their SEBI registration certificate must be lodged with the Bid cum Application Form. Failing this, our Company reserves the right to reject any Bid without assigning any reason thereof.

Bids made by asset management companies or custodians of Mutual Funds shall specifically state names of the concerned schemes for which such Bids are made.

In case of a Mutual Fund, a separate Bid can be made in respect of each scheme of the Mutual Fund registered with SEBI and such Bids in respect of more than one scheme of the Mutual Fund will not be treated as multiple Bids provided that the Bids clearly indicate the scheme concerned for which the Bid has been made.

No Mutual Fund scheme shall invest more than 10% of its net asset value in equity shares or equity related instruments of any single company provided that the limit of 10% shall not be applicable for investments in index funds or sector or industry specific funds. No Mutual Fund under all its schemes should own more than 10% of any company's paid-up share capital carrying voting rights.

Bids by Eligible NRIs

Eligible NRIs may obtain copies of Bid cum Application Form from the Designated Intermediaries. Eligible NRI Bidders bidding on a repatriation basis by using the Non-Resident Forms should authorize their SCSB to block their Non-Resident External ("**NRE**") accounts, or Foreign Currency Non-Resident ("**FCNR**") Accounts and eligible NRI Bidders bidding on a non-repatriation basis by using Resident Forms should authorize their SCSB to block their Non-Resident Ordinary ("**NRO**") accounts for the full Bid Amount, at the time of the submission of the Bid cum Application Form.

Eligible NRIs Bidding on non-repatriation basis are advised to use the Bid cum Application Form for residents (white in colour).

Eligible NRIs Bidding on a repatriation basis are advised to use the Bid cum Application Form meant for Non Residents (blue in colour).

Bids by FPIs

In terms of the SEBI FPI Regulations, the issue of Equity Shares to a single FPI or an investor group (which means the same set of ultimate beneficial owner(s) investing through multiple entities) must be below 10% of our post- Issue Equity Share capital. Further, in terms of the FEMA Regulations, the total holding by each FPI shall be below 10% of the total paid-up Equity Share capital of our Company and the total holdings of all FPIs put together shall not exceed 24% of the paid-up Equity Share capital of our Company. The aggregate limit of 24% may be increased up to the sectoral cap by way of a resolution passed by the Board of Directors followed by a special resolution passed by the Shareholders of our Company and subject to prior intimation to RBI. In terms of the FEMA Regulations, for calculating the aggregate holding of FPIs in a company, holding of all registered FPIs shall be included. The existing individual investment limits for an FPI in our Company is 10%. FPIs are permitted to participate in the Issue subject to compliance with conditions and restrictions which may be specified by the Government from time to time.

Subject to compliance with all applicable Indian laws, rules, regulations, guidelines and approvals in terms of Regulation 22 of the SEBI FPI Regulations, an FPI, other than Category III foreign portfolio investor and unregulated broad based funds, which are classified as Category II foreign portfolio investor by virtue of their investment manager being appropriately regulated, may issue, subscribe to or otherwise deal in offshore derivative instruments (as defined under the SEBI FPI Regulations as any instrument, by whatever name called, which is issued overseas by a FPI against securities held by it that are listed or proposed to be listed on any recognised stock exchange in India, as its underlying) directly or indirectly, only in the event (i) such offshore derivative instruments are issued only to persons who are regulated by an appropriate regulatory authority; and (ii) such offshore derivative instruments are issued after compliance with 'know your client' norms. An FPI is also required to ensure that no further issue or transfer of any offshore derivative instrument is made by or on behalf of it to any persons that are not regulated by an appropriate foreign regulatory authority.

An FPI is also required to ensure that any transfer of offshore derivative instrument is made by, or on behalf of it subject to the following conditions:

(a) offshore derivative instruments are transferred to persons subject to fulfilment of SEBI FPI Regulations; and

(b) prior consent of the FPI is obtained for such transfer, except when the persons to whom the offshore derivative instruments are to be transferred to are pre-approved by the FPI.

Bids by SEBI registered VCFs, AIFs and FVCIs

The SEBI FVCI Regulations and the SEBI AIF Regulations *inter-alia* prescribe the investment restrictions on the VCFs, FVCIs and AIFs registered with SEBI.

The holding by any individual VCF or FVCI registered with SEBI in one venture capital undertaking should not exceed 25% of the corpus of the VCF or FVCI. Further, VCFs and FVCIs can invest only up to 33.33% of the investible funds by way of subscription to an initial public offering.

The category I and II AIFs cannot invest more than 25% of the corpus in one Investee Company. A category III AIF cannot invest more than 10% of the corpus in one Investee Company. A venture capital fund registered as a category I AIF, as defined in the SEBI AIF Regulations, cannot invest more than 1/3rd of its corpus by way of subscription to an initial public offering of a venture capital undertaking. Additionally, the VCFs which have not re-registered as an AIF under the SEBI AIF Regulations shall continue to be regulated by the VCF Regulation until the existing fund or scheme managed by the fund is wound up. Our Company, BRLMs will not be responsible for loss, if any, incurred by the Bidder on account of conversion of foreign currency.

All non-resident investors should note that refunds (in case of Anchor Investors), dividends and other distributions, if any, will be payable in Indian Rupees only and net of bank charges and commission.

Bids by limited liability partnerships

In case of Bids made by limited liability partnerships registered under the Limited Liability Partnership Act, 2008, a certified copy of certificate of registration issued under the Limited Liability Partnership Act, 2008, must be attached to the Bid cum Application Form. Failing this, our Company reserves the right to reject any Bid by a limited liability partnership without assigning any reason thereof.

Bids by banking companies

In case of Bids made by banking companies registered with the RBI, certified copies of: (i) the certificate of registration issued by the RBI, and (ii) the approval of such banking company's investment committee are required to be attached to the Bid cum Application Form, failing which, our Company reserve the right to reject any Bid by a banking company without assigning any reason thereof.

The investment limit for banking companies in non-financial services companies as per the Banking Regulation Act, 1949, as amended ("**Banking Regulation Act**"), and the Reserve Bank of India (Financial Services provided by Banks) Directions, 2016, is 10% of the paid-up share capital of the investee company not being its subsidiary engaged in non-financial services or 10% of the banks' own paid-up share capital and reserves, whichever is lower. However, a banking company would be permitted to invest in excess of 10% but not exceeding 30% of the paid up share capital of such investee company if the investee company is engaged in non-financial activities permitted for banks in terms of Section 6(1) of the Banking Regulation Act. A banking company would require a prior approval of RBI to make investment in a non-financial services company in excess of 10% of such investee company's paid up share capital as stated in the Reserve Bank of India (Financial Services provided by Banks) Directions, 2016. Further, the aggregate investment by a banking company in subsidiaries and other entities engaged in financial and non-financial services company cannot exceed 20% of the investee company's paid-up share capital and reserves.

Bids under Power of Attorney

In case of Bids made pursuant to a power of attorney or by limited companies, corporate bodies, registered societies, Eligible FPIs, Mutual Funds, insurance companies and provident funds with a minimum corpus of ₹ 250 million and pension funds with a minimum corpus of ₹ 250 million (in each case, subject to applicable law and in accordance with their respective constitutional documents), a certified copy of the power of attorney or the relevant resolution or authority, as the case may be, along with a certified copy of the memorandum of association and articles of association and/or bye laws, as applicable must be lodged along with the Bid cum Application Form. Failing this, our Company reserves the right to accept or reject any Bid in whole or in part, in either case, without assigning any reasons thereof.

Bids by insurance companies

In case of Bids made by insurance companies registered with the IRDAI, a certified copy of certificate of registration issued by IRDAI must be attached to the Bid cum Application Form. Failing this, our Company reserve the right to reject any Bid without assigning any reason thereof.

The exposure norms for insurers, prescribed under the Insurance Regulatory and Development Authority (Investment) Regulations, 2016 as amended are broadly set forth below:

(a) equity shares of a company: the lower of 10%* of the outstanding equity shares (face value) or 10% of the respective fund in case of life insurer or 10% of investment assets in case of general insurer or reinsurer;

(b) the entire group of the investee company: not more than 15% of the respective fund in case of a life insurer or 15% of investment assets in case of a general insurer or reinsurer or 15% of the investment assets in all companies belonging to the group, whichever is lower; and

(c) the industry sector in which the investee company operates: not more than 15% of the fund of a life insurer or a general insurer or a reinsurer or 15% of the investment asset, whichever is lower.

The maximum exposure limit, in the case of an investment in equity shares, cannot exceed the lower of an amount of 10% of the investment assets of a life insurer or general insurer and the amount calculated under (a), (b) and (c) above, as the case may be.

** The above limit of 10% shall stand substituted as 15% of outstanding equity shares (face value) for insurance companies with investment assets of ₹ 2,500,000 million or more and 12% of outstanding equity shares (face value) for insurers with investment assets of ₹ 500,000 million or more but less than ₹ 2,500,000 million.*

Insurance companies participating in this Issue shall comply with all applicable regulations, guidelines and circulars issued by IRDAI from time to time.

Bids by SCSBs

SCSBs participating in the Issue are required to comply with the terms of the SEBI circulars dated September 13, 2012 and January 2, 2013. Such SCSBs are required to ensure that for making applications on their own account using ASBA, they should have a separate account in their own name with any other SEBI registered SCSBs. Further, such account shall be used solely for the purpose of making application in public issues and clear demarcated funds should be available in such account for such applications.

Bids by provident funds/pension funds

In case of Bids made by provident funds/pension funds, subject to applicable laws, with minimum corpus of ₹ 250 million, a certified copy of certificate from a chartered accountant certifying the corpus of the provident fund/ pension fund must be attached to the Bid cum Application Form. Failing this, our Company reserves the right to reject any Bid, without assigning any reason thereof.

Bids by Systematically Important Non-Banking Financial Companies

In case of Bids made by systematically important non- banking financial companies registered with RBI, certified copy of its last audited financial statements on standalone basis, networth certificate from its auditors based on the last audited financial statements and certificate of registration issued by RBI is required to be attached to the Bid cum Application Form, failing which our Company reserve the right to reject any Bid without assigning any reason. Systemically important non-banking financial companies participating in the Issue shall comply with all applicable regulations, guidelines and circulars issued by RBI from time to time.

Bids by Anchor Investors

For details in relation to Bids by Anchor Investors, see the section entitled "*Issue Procedure – Part B – General Information Document for Investing in Public Issues*" on page 553.

Information for Bidders

In addition to the instructions provided to Bidders set forth in the sub-section titled "*Issue Procedure – Part B – General Information Document for Investing in Public Issues*" on page 553, Bidders are requested to note the following additional information in relation to the Issue.

1. Our Company shall dispatch this / the Red Herring Prospectus and other Issue material including Bid cum Application Forms, to the Stock Exchanges and the Designated Intermediaries.

2. The Price Band will be decided by our Company in consultation with the BRLMs and the minimum Bid Lot for the Issue will be decided by our Company in consultation with the BRLMs and which shall be notified in [●]editions of [●] (a widely circulated english national daily newspaper), [●] editions of [●] (a widely circulated hindi national daily newspaper) and [●] edition of [●] (a widely circulated [●] daily newspaper, [●] being the regional language of chhattisgarh, where our registered office is located) at least five Working Days prior to the Bid Opening Date, with the relevant financial ratios calculated at the Floor Price and at the Cap Price. Such information shall also be disclosed to the Stock Exchanges for dissemination through, and shall be pre-filled in the Bid cum Application Forms available on, the Stock Exchanges websites and Registered Broker terminals.

3. After accepting the ASBA Forms, the Designated Intermediaries shall provide an Acknowledgement Slip to the Bidder and capture and upload the relevant details in the electronic bidding system as specified by the Stock Exchanges. Thereafter, the SCSBs shall begin blocking funds available in the ASBA Account, to the extent of the Bid Amount specified in the ASBA Form submitted to them by the ASBA Bidders. On receipt of ASBA Forms, the members of the Syndicate, Registered Brokers, CDPs and RTAs shall forward a schedule in the format provided in the SEBI Circular CIR/CFD/POLICYCELL/11/2015 dated November 10, 2015 to the Designated SCSB Branches for blocking of funds.

4. Our Company in consultation with the BRLMs, will finalise the Issue Price within the Price Band, without the prior approval of or intimation to the Bidders.

5. In relation to electronic registration of bids, the permission given by the Stock Exchanges to use their network and software of the electronic bidding system should not in any way be deemed or construed to mean that the compliance with various statutory and other requirements by our Company and/or the BRLMs are cleared or approved by the Stock Exchanges; nor does it in any manner warrant, certify or endorse the correctness or completeness of any of the compliance with the statutory and other requirements nor does it take any responsibility for the financial or other soundness of our Company, the management or any scheme or project of our Company; nor does it in any manner warrant, certify or endorse the correctness or completeness of any of the contents of the / this Draft Red Herring Prospectus or this / the Red Herring Prospectus; nor does it warrant that the Equity Shares will be listed or will continue to be listed on the Stock Exchanges.

6. In case of an upward revision in the Price Band, Retail Individual Bidders who had Bid at Cut-off Price could either (i) revise their Bid or (ii) shall make additional payment based on the cap of the revised Price Band (such that the total amount i.e., original Bid Amount plus additional payment does not exceed ₹ 200,000 if the Bidder wants to continue to Bid at Cut-off Price). The revised Bids must be submitted by the ASBA Bidders to the relevant Designated Intermediary to whom the original Bid was submitted. In case the total amount (i.e., original Bid Amount plus additional payment) exceeds ₹ 200,000, the Bid will be considered for allocation under the Non-Institutional Portion. If, however, the Retail Individual Bidder does not either revise the Bid or make additional payment and the Issue Price is higher than the cap of the Price Band prior to revision, the number of Equity Shares Bid for shall be adjusted downwards for the purpose of allocation, such that no additional payment would be required from the Retail Individual Bidder and the Retail Individual Bidder is deemed to have approved such revised Bid at Cut-off Price.

7. In case of a downward revision in the Price Band, Retail Individual Bidders who have bid at Cut-off Price could either revise their Bid or the excess amount blocked at the time of Bidding would be unblocked from the ASBA Account of such Bidder.

8. With respect to the ASBA Bids, if revision of the Bids results in an incremental amount, the SCSBs shall block the additional Bid Amount. In case of Bids, by Anchor Investors, the BRLMs shall collect the payment to be paid on account of the upward revision of the Bid at the time of one or more revisions.

9. Allocation to Non-Residents, including Eligible NRIs and FPIs will be subject to applicable law, rules, regulations, guidelines and approvals.

10. The Allotment and trading of the Equity Shares would be in dematerialised form only for all investors in the demat segment of the Stock Exchanges.

In addition to the information provided in the sub-section titled "*Part B – General Information Document for Investing in Public Issues – Interest and Refunds - Mode of making refunds to (i) Anchor Investors, and (ii) refunds to all Bidders in the event of non-receipt of listing permission from Stock Exchanges*" on page 553, Bidders are requested to note that refunds, on account of our Company not receiving the minimum subscription of 90% of the Issue shall be credited only to the bank account from which the Bid Amount was remitted to the Escrow Bank.

The above information is given for the benefit of the Bidders. Our Company and the BRLMs are not liable for any amendments or modification or changes in applicable laws or regulations, which may occur after the date of this Draft Red Herring Prospectus. Bidders are advised to make their independent investigations and ensure that any single Bid from them does not exceed the applicable investment limits or maximum number of the Equity Shares that can be held by them under applicable law or regulation or as specified in this Draft Red Herring Prospectus.

General Instructions

***Do's*:**

1. Check if you are eligible to apply as per the terms of this / the Red Herring Prospectus and under applicable law, rules, regulations, guidelines and approvals;
2. Ensure that you have Bid within the Price Band;
3. Read all the instructions carefully and complete the Bid cum Application Form in the prescribed form;
4. Ensure that the details about the PAN, DP ID and Client ID are correct and the Bidders depository account is active, as Allotment of the Equity Shares will be in the dematerialised form only;
5. Ensure that you have mentioned the correct ASBA Account number in the Bid cum Application Form;
6. Ensure that your Bid cum Application Form bearing the stamp of a Designated Intermediary is submitted to the Designated Intermediary at the Bidding Center within the prescribed time;
7. Ensure that you have funds equal to the Bid Amount in the ASBA Account maintained with the SCSB before submitting the ASBA Form to any of the Designated Intermediaries;
8. With respect to the ASBA Bids, ensure that the ASBA Form is signed by the account holder in case the applicant is not the ASBA Account holder. In case there are joint holders in ASBA Account, the ASBA Form should be signed by all joint holders in the same sequence as per the bank records. Ensure that you have mentioned the correct ASBA Account number in the ASBA Form;
9. If the first applicant is not the bank account holder, ensure that the Bid cum Application Form is signed by the account holder. Ensure that you have mentioned the correct bank account number in the Bid cum Application Form;
10. Instruct your respective banks to release the funds blocked in accordance with the ASBA process
11. Ensure that you request for and receive a stamped acknowledgement of the Bid cum Application Form for all your Bid options from the concerned Designated Intermediary;
12. Ensure that you submit the revised Bids to the same Designated Intermediary, through whom the original Bid was placed and obtain a revised acknowledgment;
13. Except for Bids (i) on behalf of the Central or State Governments and the officials appointed by the courts, who, in terms of the SEBI circular dated June 30, 2008, may be exempt from specifying their PAN for transacting in the securities market, and (ii) Bids by persons resident in the state of Sikkim, who, in terms of a SEBI circular dated July 20, 2006, may be exempted from specifying their PAN for transacting in the securities market, all Bidders should mention their PAN allotted under the IT Act. The exemption for the Central or the State Government and officials appointed by the courts and for investors residing in the State of Sikkim is subject to (a) the Demographic Details received from the respective depositories confirming the exemption granted to the beneficiary owner by a suitable description in the PAN field and the beneficiary account remaining in "active status"; and (b) in the case of residents of Sikkim, the address as per the Demographic Details evidencing the same. All other applications in which PAN is not mentioned will be rejected;
14. Ensure that thumb impressions and signatures other than in the languages specified in the Eighth Schedule to the Constitution of India are attested by a Magistrate or a Notary Public or a Special Executive Magistrate under official seal;
15. Ensure that the name(s) given in the Bid cum Application Form is/are exactly the same as the name(s) in which the beneficiary account is held with the Depository Participant. In case of joint Bids, the Bid cum Application Form should contain only the name of the First Bidder whose name should also appear as the first holder of the beneficiary account held in joint names. Ensure that the signature of the First Bidder is included in the Bid cum Application Forms;

16. Ensure that you tick the correct investor category and the investor status, as applicable, in the Bid cum Application Form to ensure proper upload of your Bid in the electronic Bidding system of the Stock Exchanges;
17. Ensure that the category and the investor status is indicated;
18. Ensure that in case of Bids under power of attorney or by limited companies, corporates, trust, etc., relevant documents are submitted;
19. Ensure that Bids submitted by any person outside India is in compliance with applicable foreign and Indian laws;
20. Ensure that the depository account is active, the correct DP ID, Client ID and the PAN are mentioned in their Bid cum Application Form and that the name of the Bidder, the DP ID, Client ID and the PAN entered into the online IPO system of the Stock Exchanges by the relevant Designated Intermediary, as applicable, matches with the name, DP ID, Client ID and PAN available in the Depository database;
21. Ensure that the Bid cum Application Forms are delivered by the Bidders within the time prescribed as per the Bid cum Application Form.
22. Ensure that while Bidding through a Designated Intermediary, the ASBA Form is submitted to a Designated Intermediary in a Bidding Centre and that the SCSB where the ASBA Account, as specified in the ASBA Form, is maintained has named at least one branch at that location for the Designated Intermediary to deposit ASBA Forms (a list of such branches is available on the website of SEBI at http://www.sebi.gov.in).
23. Ensure that you have correctly signed the authorisation/undertaking box in the Bid cum Application Form, or have otherwise provided an authorisation to the SCSB via the electronic mode, for blocking funds in the ASBA Account equivalent to the Bid Amount mentioned in the Bid cum Application Form at the time of submission of the Bid; and
24. Ensure that the Demographic Details are updated, true and correct in all respects.

    The Bid cum Application Form is liable to be rejected if the above instructions, as applicable, are not complied with.

    Bids by Eligible NRIs and HUFs for a Bid Amount of less than ₹200,000 would be considered under the Retail Category for the purposes of allocation and Bids for a Bid Amount exceeding ₹200,000 would be considered under the Non-Institutional Category for allocation in the Issue.

Don'ts:

1. Do not Bid for lower than the minimum Bid size;
2. Do not Bid or revise the Bid to less than the Floor Price or higher than the Cap Price;
3. Do not Bid for a Bid Amount exceeding ₹ 200,000 (for Bids by Retail Individual Bidders);
4. Do not pay the Bid Amount in cheques, demand drafts or by cash, money order, postal order or by stock invest;
5. Do not send Bid cum Application Forms by post; instead submit the same to the Designated Intermediary only;
6. Do not Bid at Cut-off Price (for Bids by QIBs and Non-Institutional Bidders);
7. Do not Bid on a physical ASBA Form that does not have the stamp of a Designated Intermediary and not submit the Bid cum Application Forms to the Escrow Collection Bank(s) (assuming that such bank is not an SCSB), the BRLMs or the Registrar to the Issue (assuming that the Registrar to the Issue is not one of the RTAs);
8. Do not instruct your respective banks to release the funds blocked in the ASBA Account under the ASBA process;
9. Do not submit the Bid for an amount more than funds available in your ASBA account;
10. Do not submit Bids on plain paper or on incomplete or illegible Bid cum Application Forms or on Bid cum Application Forms in a colour prescribed for another category of Bidder;
11. Do not submit a Bid in case you are not eligible to acquire Equity Shares under applicable law or your relevant constitutional documents or otherwise;
12. Do not submit the General Index Register number instead of the PAN;
13. Do not submit the Bids without instructions to block funds equivalent to the Bid Amount in the ASBA Account;
14. Do not Bid if you are not competent to contract under the Indian Contract Act, 1872 (other than minors having valid depository accounts as per Demographic Details provided by the depository);
15. Do not fill up the Bid cum Application Form such that the Equity Shares Bid for exceeds the Issue size and/or investment limit or maximum number of the Equity Shares that can be held under the applicable

laws or regulations or maximum amount permissible under the applicable regulations or under the terms of this / the Red Herring Prospectus;

16. Do not submit more than five Bid cum Application Forms per ASBA Account;
17. If you are a QIB, do not submit your Bid after 3.00 p.m. on the QIB Bid/Issue Closing Date;
18. If you are a Non-Institutional Bidder or Retail Individual Bidder, do not submit your Bid after 3.00 p.m. on the Bid/Issue Closing Date;
19. Do not submit ASBA Bids to a Designated Intermediary at a Bidding Centre unless the SCSB where the ASBA Account is maintained, as specified in the ASBA Form, has named at least one branch in the relevant Bidding Centre, for the Designated Intermediary to deposit ASBA Forms (a list of such branches is available on the website of SEBI at http://www.sebi.gov.in);
20. Anchor Investors should not bid through the ASBA process;
21. Do not Bid on another Bid cum Application Form and the Anchor Investor Application Form, as the case may be, after you have submitted a Bid to any of the Designated Intermediaries;
22. Do not submit the GIR number instead of the PAN;
23. Anchor Investors should submit Anchor Investor Application Form only to Syndicate, BRLMs;
24. Do not withdraw your Bid or lower the size of your Bid (in terms of quantity of the Equity Shares or the Bid Amount) at any stage, if you are a QIB or a Non-Institutional Bidder; and
25. Do not submit Bids to a Designated Intermediary at a location other than Specified Locations.

The Bid cum Application Form is liable to be rejected if any of the above instructions or any other condition mentioned in this Draft Red Herring Prospectus, as applicable, is not complied with.

Grounds for Technical Rejections

In addition to the grounds for rejection of Bids on technical grounds as provided in the sub-section titled "*Part B – General Information Document for Investing in Public Issues – Issue Procedure in Book Built Issue – Rejection and Responsibility for Upload of Bids – Grounds for Technical Rejections*" on page 573, Bidders are requested to note that Bids may be rejected on the following additional technical grounds.

1. Bid submitted without instruction to the SCSB to block the entire Bid Amount;
2. Bids which do not contain details of the Bid Amount and the bank account details in the ASBA Form;
3. Bids submitted on a plain paper;
4. Bids by HUFs not mentioned correctly as given in the sub-section titled *"Category of Investors eligible to participate in an issue*" on page 555.
5. ASBA Form submitted to a Designated Intermediary does not bear the stamp of the Designated
6. Intermediary;
7. Bids submitted without the signature of the First Bidder or sole Bidder;
8. The ASBA Form not being signed by the account holders, if the account holder is different from the Bidder;
9. Bids by persons for whom PAN details have not been verified and whose beneficiary accounts are "suspended for credit" in terms of SEBI circular (reference number: CIR/MRD/DP/ 22 /2010) dated July 29, 2010;
10. GIR number furnished instead of PAN;
11. Bids by Retail Individual Bidders Bid Amount for a value of more than ₹200,000;
12. Bids by persons who are not eligible to acquire Equity Shares in terms of all applicable laws, rules,
13. regulations, guidelines and approvals;
14. Bids accompanied by stock invest, money order, postal order or cash;
15. Bids uploaded by QIBs after 4.00 pm on the QIB Bid/ Issue Closing Date and by Non-Institutional Bidders uploaded after 4.00 p.m. on the Bid/ Issue Closing Date, and Bids by Retail Individual Bidders uploaded after 5.00 p.m. on the Bid/ Issue Closing Date, unless extended by the Stock Exchanges.

Payment into Escrow Account for Anchor Investors

Our Company, in consultation with the BRLMs, in its absolute discretion, will decide the list of Anchor Investors to whom the CAN will be sent, pursuant to which the details of the Equity Shares allocated to them in their respective names will be notified to such Anchor Investors. For Anchor Investors, the payment instruments for payment into the Escrow Account should be drawn in favour of:

(a) In case of resident Anchor Investors: "[●]".

(b) In case of Non-Resident Anchor Investors: "[●]".

Pre- Issue Advertisement

Subject to Section 30 of the Companies Act, 2013, our Company shall, after registering this / the Red Herring Prospectus with the RoC, publish a pre-Issue advertisement, in the form prescribed by the SEBI ICDR Regulations, which shall be notified in [●]editions of [●] (a widely circulated english national daily newspaper), [●] editions of [●] (a widely circulated hindi national daily newspaper) and [●] edition of [●] (a widely circulated [●] daily newspaper, [●] being the regional language of chhattisgarh, where our registered office is located) each with wide circulation. In the pre-Issue advertisement, we shall state the Bid Opening Date and the Bid/Issue Closing Date. The advertisement, subject to the provisions of Section 30 of the Companies Act, 2013, shall be in the format prescribed in Part A of Schedule XIII of the SEBI ICDR Regulations.

Signing of the Underwriting Agreement and the RoC Filing

(a) Our Company and the Syndicate intend to enter into an Underwriting Agreement after the finalisation of the Issue Price.

(b) After signing the Underwriting Agreement, an updated Red Herring Prospectus will be filed with the RoC in accordance with applicable law, which then would be termed as the 'Prospectus'. The Prospectus will contain details of the Issue Price, the Anchor Investor Issue Price, Issue size, and underwriting arrangements and will be complete in all material respects.

Impersonation

Attention of the applicants is specifically drawn to the provisions of sub-section (1) of Section 38 of the Companies Act, 2013, which is reproduced below:

"*Any person who:*

(a) *makes or abets making of an application in a fictitious name to a company for acquiring, or subscribing for, its securities; or*

(b) *makes or abets making of multiple applications to a company in different names or in different combinations of his name or surname for acquiring or subscribing for its securities; or*

(c) *otherwise induces directly or indirectly a company to allot, or register any transfer of, securities to him, or to any other person in a fictitious name, shall be liable for action under Section 447.*"

The liability prescribed under Section 447 of the Companies Act, 2013 includes imprisonment for a term which shall not be less than six months extending up to 10 years (provided that where the fraud involves public interest, such term shall not be less than three years) and fine of an amount not less than the amount involved in the fraud, extending up to three times of such amount.

Undertakings by our Company

Our Company undertakes the following:

1. if our Company does not proceed with the Issue after the Bid/Issue Closing Date but prior to Allotment, reasons thereof shall be given as a public notice within two days of Bid/Issue Closing Date or such other time as may be prescribed by SEBI. The public notice shall be issued in the same newspapers where the pre-Issue advertisements were published.

2. adequate arrangements shall be made to collect all Bid cum Application Forms submitted by Bidders. and Anchor Investor Application Form from Anchor Investors.

3. it shall not have any recourse to the proceeds of the Issue until final listing and trading approvals have been received from the Stock Exchanges;

4. the complaints received in respect of the Issue shall be attended to by our Company expeditiously and satisfactorily;

5. all steps for completion of the necessary formalities for listing and commencement of trading at all the Stock Exchanges where the Equity Shares are proposed to be listed are taken within six Working Days of the Bid/Issue Closing Date or such other period as may be prescribed;

6. if Allotment is not made within the prescribed time period under applicable law, the entire subscription amount received will be refunded/unblocked within the time prescribed under applicable law, failing which interest will be due to be paid to the Bidders at the rate prescribed under applicable law for the delayed period;

7. the funds required for making refunds (to the extent applicable) as per the mode(s) disclosed shall be made available to the Registrar to the Issue by our Company;

8. where refunds (to the extent applicable) are made through electronic transfer of funds, a suitable communication shall be sent to the applicant within the time prescribed under applicable law, giving details of the bank where refunds shall be credited along with amount and expected date of electronic credit of refund;

9. intimation of the credit of the securities/refund orders to Eligible NRIs shall be despatched within specified time;

10. no further issue of the Equity Shares shall be made till the Equity Shares offered through this / the Red Herring Prospectus are listed or until the Bid monies are unblocked in ASBA Account/refunded on account of non-listing, under-subscription, etc.

11. the Promoters' contribution in full, if required, shall be brought in advance before the Issue opens for subscription.

12. our Company shall comply with such disclosure and accounting norms as may be specified by SEBI from time to time and;

13. if our Company withdraws the Issue after the Bid/Issue Closing Date, our Company shall be required to file a fresh offer document with the SEBI, in the event our Company subsequently decides to proceed with the Issue;

Utilisation of Net Proceeds

The Board of Directors certify that:

1. all monies received out of the Issue shall be credited/transferred to a separate bank account other than the bank account referred to in sub-section (3) of Section 40 of the Companies Act, 2013;

2. details of all monies utilised out of the Issue shall be disclosed, and continue to be disclosed till the time any part of the Net proceeds remains unutilised, under an appropriate head in the balance sheet of our Company indicating the purpose for which such monies have been utilised;

3. details of all unutilised monies out of the Issue, if any shall be disclosed under an appropriate separate head in the balance sheet indicating the form in which such unutilised monies have been invested;

4. utilisation of monies received under the Promoters' contribution, if any, shall be disclosed, and continue to be disclosed till the time any part of the Net Proceeds remains unutilised, under an appropriate head in the balance sheet of our Company indicating the purpose for which such monies have been utilised; and

5. details of all unutilised monies out of the funds received under the Promoters' contribution, if any, shall be disclosed under a separate head in the balance sheet of our Company indicating the form in which such unutilised monies have been invested.

PART B

General Information Document for Investing in Public Offers

This General Information Document highlights the key rules, processes and procedures applicable to public issues in accordance with the provisions of the Companies Act, the SCRA, the SCRR and the SEBI ICDR Regulations. Bidders / Applicants should not construe the contents of this General Information Document as legal advice and should consult their own legal counsel and other advisors in relation to the legal matters concerning the Issue. For taking an investment decision, the Bidders / Applicants should rely on their own examination of the Issuer and the Issue and should carefully read the Red Herring Prospectus / Prospectus before investing in the Issue.

SECTION 1: PURPOSE OF THE GENERAL INFORMATION DOCUMENT (GID)

This document is applicable to the public issues undertaken through the Book-Building Process as well as to the Fixed Price issue. The purpose of the "General Information Document for Investing in Public Issues" is to provide general guidance to potential Bidders / Applicants in IPOs and FPOs, on the processes and procedures governing IPOs and FPOs, undertaken in accordance with the provisions of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 ("**SEBI ICDR Regulations**").

Bidders / Applicants should note that investment in equity and equity related securities involves risk and Bidder / Applicant should not invest any funds in the Issue unless they can afford to take the risk of losing their investment. The specific terms relating to securities and / or for subscribing to securities in an Issue and the relevant information about the Issuer undertaking the Issue are set out in the Red Herring Prospectus ("**RHP**") / Prospectus filed by the Issuer with the Registrar of Companies ("**RoC**"). Bidders / Applicants should carefully read the entire RHP / Prospectus and the Bid cum Application Form / Application Form and the Abridged Prospectus of the Issuer in which they are proposing to invest through the Issue. In case of any difference in interpretation or conflict and / or overlap between the disclosure included in this document and the RHP / Prospectus, the disclosures in the RHP / Prospectus shall prevail. The RHP / Prospectus of the Issuer is available on the websites of stock exchanges, on the website(s) of the BRLM(s) to the Issue and on the website of Securities and Exchange Board of India ("**SEBI**") at www.sebi.gov.in.

For the definitions of capitalized terms and abbreviations used herein Bidders / Applicants may see "*Glossary and Abbreviations*".

SECTION 2: BRIEF INTRODUCTION TO IPOs / FPOs

2.1 Initial public offer (IPO)

An IPO means an offer of specified securities by an unlisted Issuer to the public for subscription and may include an offer for sale of specified securities to the public by any existing holder of such securities in an unlisted Issuer.

For undertaking an IPO, the Issuer is *inter-alia* required to comply with the eligibility requirements of in terms of either Regulation 26(1) or Regulation 26(2) of the SEBI ICDR Regulations. For details of compliance with the eligibility requirements by the Issuer, Bidders / Applicants may refer to the RHP / Prospectus.

2.2 Further public offer (FPO)

An FPO means an offer of specified securities by a listed Issuer to the public for subscription and may include offer for sale of specified securities to the public by any existing holder of such securities in a listed Issuer.

For undertaking an FPO, the Issuer is *inter-alia* required to comply with the eligibility requirements in terms of Regulation 26 / Regulation 27 of the SEBI ICDR Regulations. For details of compliance with the eligibility requirements by the Issuer, Bidders / Applicants may refer to the RHP / Prospectus.

2.3 Other Eligibility Requirements:

In addition to the eligibility requirements specified in paragraphs 2.1 and 2.2, an Issuer proposing to undertake an IPO or an FPO is required to comply with various other requirements as specified in the SEBI ICDR Regulations, the Companies Act, 2013, the Companies Act, 1956 (to the extent applicable), the Securities Contracts (Regulation) Rules, 1957 ("**SCRR**"), industry-specific regulations, if any, and other applicable laws for the time being in force.

For details in relation to the above Bidders / Applicants may refer to the RHP / Prospectus.

2.4 Types of Public Issues – Fixed Price Issues and Book Built Issues

In accordance with the provisions of the SEBI ICDR Regulations, an Issuer can either determine the Issue Price through the Book Building Process ("**Book Built Issue**") or undertake a Fixed Price Issue ("**Fixed Price Issue**"). AnIssuer may mention Floor Price or Price Band in the RHP (in case of a Book Built Issue) and a Price or Price Band in this Prospectus (in case of a fixed price Issue) and determine the price at a later date before registering the Prospectus with the Registrar of Companies.

The cap on the Price Band should be less than or equal to 120% of the Floor Price. The Issuer shall announce the Price or the Floor Price or the Price Band through advertisement in all newspapers in which the pre-issue advertisement was given at least five Working Days before the Bid / Issue Opening Date, in case of an IPO and at least one Working Day before the Bid / Issue Opening Date, in case of an FPO.

The Floor Price or the Issue price cannot be lesser than the face value of the securities.

Bidders / Applicants should refer to the RHP / Prospectus or Issue advertisements to check whether the Issue is a Book Built Issue or a Fixed Price Issue.

2.5 ISSUE PERIOD

The Issue may be kept open for a minimum of three Working Days (for all category of Bidders / Applicants) and not more than ten Working Days. Bidders / Applicants are advised to refer to the Bid cum Application Form and Abridged Prospectus or RHP / Prospectus for details of the Bid / Issue Period. Details of Bid / Issue Period are also available on the website of the Stock Exchange(s).

In case of a Book Built Issue, the Issuer may close the Bid / Issue Period for QIBs one Working Day prior to the Bid
/ Issue Closing Date if disclosures to that effect are made in the RHP. In case of revision of the Floor Price or Price Band in Book Built Issues the Bid / Issue Period may be extended by at least three Working Days, subject to the total Bid / Issue Period not exceeding 10 Working Days. For details of any revision of the Floor Price or Price Band, Bidders / Applicants may check the announcements made by the Issuer on the websites of the Stock Exchanges, and the advertisement in the newspaper(s) issued in this regard.

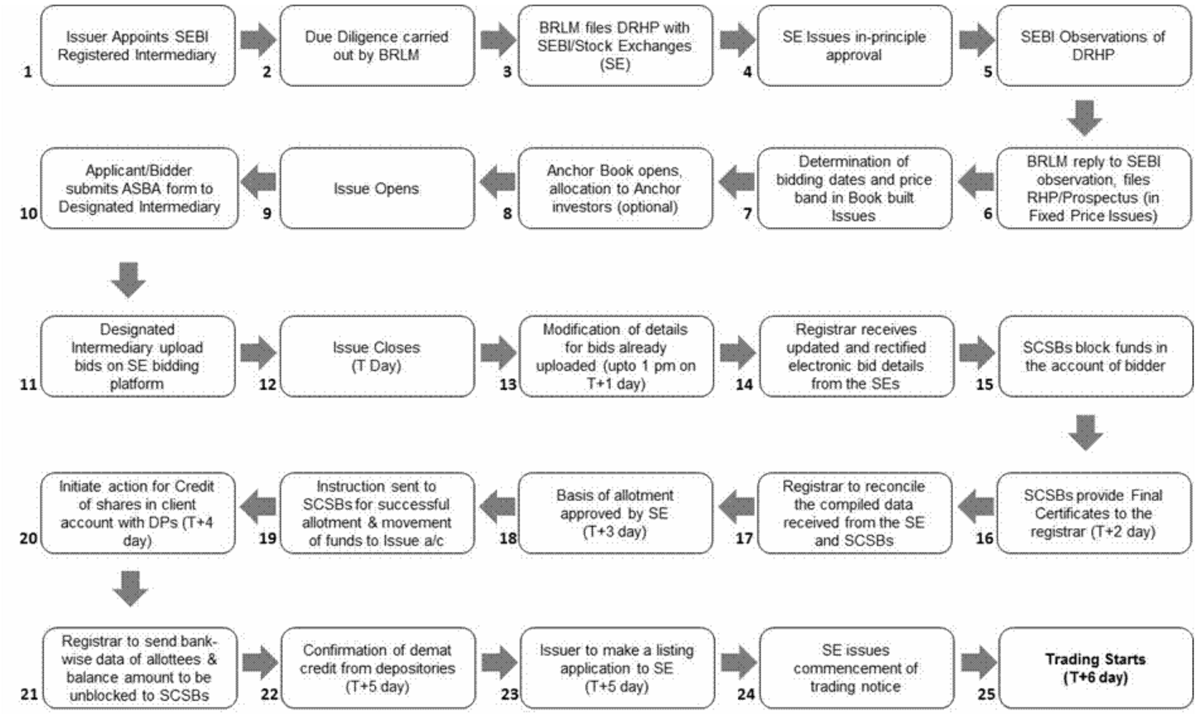
2.6 FLOWCHART OF TIMELINES

A flow chart of process flow in Fixed Price and Book Built Issues is as follows. Bidders / Applicants may note that this is not applicable for Fast Track FPOs:

- In case of Issue other than Book Build Issue (Fixed Price Issue) the process at the following of the below mentioned steps shall be read as:

    i. Step 7 : Determination of Issue Date and Price

    ii. Step 10: Applicant submits ASBA Form with any of the Designated Intermediaries



SECTION 3: CATEGORY OF INVESTORS ELIGIBLE TO PARTICIPATE IN AN ISSUE

Each Bidder / Applicant should check whether it is eligible to apply under applicable law. Furthermore, certain categories of Bidders / Applicants, such as NRIs, FPIs and FVCIs may not be allowed to Bid / Apply in the Issue or to hold Equity Shares, in excess of certain limits specified under applicable law. Bidders / Applicants are requested to refer to the RHP / Prospectus for more details.

Subject to the above, an illustrative list of Bidders / Applicants is as follows:

- Indian nationals resident in India who are competent to contract under the Indian Contract Act, 1872, in single or joint names (not more than three);
- Bids / Applications belonging to an account for the benefit of a minor (under guardianship);
- Hindu Undivided Families or HUFs, in the individual name of the *Karta*. The Bidder / Applicant should specify that the Bid is being made in the name of the HUF in the Bid cum Application Form / Application Form as follows: "Name of sole or first Bidder / Applicant: XYZ Hindu Undivided Family applying through XYZ, where XYZ is the name of the *Karta*". Bids / Applications by HUFs may be considered at par with Bids / Applications from individuals;
- Companies, corporate bodies and societies registered under applicable law in India and authorised to invest in equity shares;
- QIBs;
- NRIs on a on a repatriation basis or on a non-repatriation basis subject to applicable law;
- Indian Financial Institutions, regional rural banks, co-operative banks (subject to RBI regulations and the SEBI ICDR Regulations and other laws, as applicable);
- FPIs other than Category III foreign portfolio investors Bidding under the QIBs category;
- FPIs which are Category III foreign portfolio investors, Bidding under the NIBs category;
- Scientific and / or industrial research organisations authorised in India to invest in the Equity Shares;

- Trusts / societies registered under the Societies Registration Act, 1860, or under any other law relating to trusts / societies and who are authorised under their respective constitutions to hold and invest in equity shares;

- Limited liability partnerships registered under the Limited Liability Partnership Act, 2008;

- Any other person eligible to Bid / Apply in the Issue, under the laws, rules, regulations, guidelines and policies applicable to them and under Indian laws; and

- As per the existing regulations, OCBs are not allowed to participate in an Issue.

SECTION 4: APPLYING IN THE ISSUE

Book Built Issue: Bidders should only use the specified ASBA Form (or in case of Anchor Investors, the Anchor Investor Application Form) bearing the stamp of a Designated Intermediary, as available or downloaded from the websites of the Stock Exchanges. Bid cum Application Forms are available with the book running lead managers, the Designated Intermediaries at the Bidding centres and at the registered office of the Issuer. Electronic Bid cum Application Forms will be available on the websites of the Stock Exchanges at least one day prior to the Bid / Issue Opening Date. For further details, regarding availability of Bid cum Application Forms, Bidders may refer to the RHP / Prospectus.

Fixed Price Issue: Applicants should only use the specified Bid cum Application Form bearing the stamp of the relevant Designated Intermediaries, as available or downloaded from the websites of the Stock Exchanges. Application Forms are available with the Designated Branches of the SCSBs and at the Registered Office of the Issuer. For further details, regarding availability of Application Forms, Applicants may refer to the Prospectus.

Bidders / Applicants should ensure that they apply in the appropriate category. The prescribed colour of the Bid cum Application Form for various categories of Bidders / Applicants is as follows:

Category	Colour of the Bid cum Application Form
Resident Indian, Eligible NRIs applying on a non repatriation basis	White
NRIs, FPIs, on a repatriation basis	Blue
Anchor Investors (where applicable) & Bidders Bidding / applying in the reserved	As specified by the Issuer

Securities issued in an IPO can only be in dematerialized form in compliance with Section 29 of the Companies Act, 2013. Bidders / Applicants will not have the option of getting the Allotment of specified securities in physical form. However, they may get the specified securities rematerialised subsequent to Allotment.

4.1 INSTRUCTIONS FOR FILLING THE BID CUM APPLICATION FORM / APPLICATION FORM

Bidders / Applicants may note that forms not filled completely or correctly as per instructions provided in this GID, the RHP and the Bid cum Application Form / Application Form are liable to be rejected.
Instructions to fill each field of the Bid cum Application Form can be found on the reverse side of the Bid cum Application Form. Specific instructions for filling various fields of the Resident Bid cum Application Form and Non- Resident Bid cum Application Form and samples are provided below.
The samples of the Bid cum Application Form for resident Bidders and the Bid cum Application Form for non-resident Bidders are reproduced below:

APPLICATION FORM FOR RESIDENTS

TEAR HERE

COMMON BID CUM APPLICATION FORM	XYZ LIMITED - INITIAL PUBLIC ISSUE - R Address : .... Contact Details: .... CIN No..............	FOR RESIDENT INDIANS, INCLUDING RESIDENT QIBs AND ELIGIBLE NRIs APPLYING ON A NON-REPATRIATION BASIS

LOGO

TO,
THE BOARD OF DIRECTORS
XYZ LIMITED

BOOK BUILT ISSUE

ISIN : ....

Bid cum Application Form No.

SYNDICATE MEMBER'S STAMP & CODE	BROKER/SCSB/DP/RTA STAMP & CODE
SUB-BROKER'S / SUB-AGENT'S STAMP & CODE	ESCROW BANK/SCSB BRANCH STAMP & CODE
BANK BRANCH SERIAL NO.	SCSB SERIAL NO.

1. NAME & CONTACT DETAILS OF SOLE / FIRST BIDDER

Mr. / Ms.

Address

Email

Tel. No (with STD code) / Mobile

2. PAN OF SOLE / FIRST BIDDER

3. BIDDER'S DEPOSITORY ACCOUNT DETAILS ☐ NSDL ☐ CDSL

For NSDL enter 8 digit DP ID followed by 8 digit Client ID / For CDSL enter 16 digit Client ID

4. BID OPTIONS (ONLY RETAIL INDIVIDUAL BIDDERS CAN BID AT "CUT-OFF")

Bid Options	No. of Equity Shares Bid (In Figures) (Bids must be in multiples of Bid Lot as advertised)	Price per Equity Share (₹) / "Cut-off" (Price in multiples of ₹ 1/- only) (In Figures)			
	8 | 7 | 6 | 5 | 4 | 3 | 2 | 1	Bid Price 3 | 2 | 1	Retail Discount 3 | 2 | 1	Net Price 3 | 2 | 1	"Cut-off" (Please ✓ tick)
Option 1					☐
(OR) Option 2					☐
(OR) Option 3					☐

5. CATEGORY

☐ Retail Individual Bidder
☐ Non-Institutional Bidder
☐ QIB

6. INVESTOR STATUS

☐ Individual(s) - IND
☐ Hindu Undivided Family* - HUF
☐ Bodies Corporate - CO
☐ Banks & Financial Institutions - FI
☐ Mutual Funds - MF
☐ Non-Resident Indians - NRI (Non-Repatriation basis)
☐ National Investment Fund - NIF
☐ Insurance Funds - IF
☐ Insurance Companies - IC
☐ Venture Capital Funds - VCF
☐ Alternative Investment Funds - AIF
☐ Others (Please specify) - OTH

* HUF should apply only through Karta (Application by HUF would be treated on par with Individual)

7. PAYMENT DETAILS PAYMENT OPTION : FULL PAYMENT ☐ PART PAYMENT ☐

Amount paid (₹ in figures) (₹ in words)

ASBA Bank A/c No.

Bank Name & Branch

I/WE (ON BEHALF OF JOINT APPLICANTS, IF ANY) HEREBY CONFIRM THAT I/WE HAVE READ AND UNDERSTOOD THE TERMS AND CONDITIONS OF THIS BID CUM APPLICATION FORM AND THE ATTACHED ABRIDGED PROSPECTUS AND THE GENERAL INFORMATION DOCUMENT FOR INVESTING IN PUBLIC ISSUES ("GID") AND HEREBY AGREE AND CONFIRM THE 'BIDDERS UNDERTAKING' AS GIVEN OVERLEAF. I/WE (ON BEHALF OF JOINT APPLICANTS, IF ANY) HEREBY CONFIRM THAT I/WE HAVE READ THE INSTRUCTIONS FOR FILLING UP THE BID CUM APPLICATION FORM GIVEN OVERLEAF.

8A. SIGNATURE OF SOLE/ FIRST BIDDER	8B. SIGNATURE OF ASBA BANK ACCOUNT HOLDER(S) (AS PER BANK RECORDS)	BROKER / SCSB / DP / RTA STAMP (Acknowledging upload of Bid in Stock Exchange system)
	I/We authorize the SCSB to do all acts as are necessary to make the Application in the Issue	
	1)	
	2)	
Date :	3)	

TEAR HERE

LOGO

XYZ LIMITED INITIAL PUBLIC ISSUE - R	Acknowledgement Slip for Broker/SCSB/ DP/RTA	Bid cum Application Form No.

DPID / CLID

PAN of Sole / First Bidder

Amount paid (₹ in figures)	Bank & Branch	Stamp & Signature of SCSB Branch
ASBA Bank A/c No.		
Received from Mr./Ms.		
Telephone / Mobile	Email	

TEAR HERE

XYZ LIMITED - INITIAL PUBLIC ISSUE - R

	Option 1	Option 2	Option 3
No. of Equity Shares			
Bid Price			
Amount Paid (₹)			

ASBA Bank A/c No.

Bank & Branch

Stamp & Signature of Broker / SCSB / DP / RTA

Name of Sole / First Bidder

Acknowledgement Slip for Bidder

Bid cum Application Form No.

TEAR HERE

PLEASE FILL IN BLOCK LETTERS

APPLICATION FORM FOR NON-RESIDENTS

TEAR HERE

COMMON BID CUM APPLICATION FORM

XYZ LIMITED - INITIAL PUBLIC ISSUE - NR
Address : .... Contact Details: .... CIN No ....

FOR NON-RESIDENTS, INCLUDING ELIGIBLE NRIS, FPIS OR FVCIS, ETC APPLYING ON A REPATRIATION BASIS

LOGO

TO,
THE BOARD OF DIRECTORS
XYZ LIMITED

BOOK BUILT ISSUE
ISIN : ....

Bid cum Application Form No.

SYNDICATE MEMBER'S STAMP & CODE	BROKER/SCSB/DP/RTA STAMP & CODE
SUB-BROKER'S / SUB-AGENT'S STAMP & CODE	**ESCROW BANK/SCSB BRANCH STAMP & CODE**
BANK BRANCH SERIAL NO.	**SCSB SERIAL NO.**

1. NAME & CONTACT DETAILS OF SOLE / FIRST BIDDER

Mr. / Ms.

Address

Email

Tel. No (with STD code) / Mobile

2. PAN OF SOLE / FIRST BIDDER

3. BIDDER'S DEPOSITORY ACCOUNT DETAILS ☐ NSDL ☐ CDSL

For NSDL enter 8 digit DP ID followed by 8 digit Client ID / For CDSL enter 16 digit Client ID

4. BID OPTIONS (ONLY RETAIL INDIVIDUAL BIDDERS CAN BID AT "CUT-OFF")

Bid Options	No. of Equity Shares Bid (In Figures) (Bids must be in multiples of Bid Lot as advertised)	Price per Equity Share (₹)/ "Cut-off" (Price in multiples of ₹ 1/- only) (In Figures) Bid Price	Retail Discount	Net Price	"Cut-off" (Please ✓ tick)
	8 | 7 | 6 | 5 | 4 | 3 | 2 | 1	3 | 2 | 1	3 | 2 | 1	3 | 2 | 1	
Option 1					☐
(OR) Option 2					☐
(OR) Option 3					☐

5. CATEGORY

☐ Retail Individual Bidder
☐ Non-Institutional Bidder
☐ QIB

6. INVESTOR STATUS

NRI	Non-Resident Indian(s) (Repatriation basis)
FII	FII or Sub-account not a Corporate/Foreign Individual
FIISA	FII Sub-account Corporate/Individual
FVCI	Foreign Venture Capital Investor
FPI	Foreign Portfolio Investors
OTH	Others (Please Specify)________

7. PAYMENT DETAILS

PAYMENT OPTION : FULL PAYMENT ☐ PART PAYMENT ☐

Amount paid (₹ in figures) (₹ in words)

ASBA Bank A/c No.

Bank Name & Branch

I/WE (ON BEHALF OF JOINT APPLICANTS, IF ANY) HEREBY CONFIRM THAT I/WE HAVE READ AND UNDERSTOOD THE TERMS AND CONDITIONS OF THIS BID CUM APPLICATION FORM AND THE ATTACHED ABRIDGED PROSPECTUS AND THE GENERAL INFORMATION DOCUMENT FOR INVESTING IN PUBLIC ISSUES ("GID") AND HEREBY AGREE AND CONFIRM THE 'BIDDERS UNDERTAKING' AS GIVEN OVERLEAF. I/WE (ON BEHALF OF JOINT APPLICANTS, IF ANY) HEREBY CONFIRM THAT I/WE HAVE READ THE INSTRUCTIONS FOR FILLING UP THE BID CUM APPLICATION FORM GIVEN OVERLEAF.

8A. SIGNATURE OF SOLE/ FIRST BIDDER	8B. SIGNATURE OF ASBA BANK ACCOUNT HOLDER(S) (AS PER BANK RECORDS)	BROKER / SCSB / DP / RTA STAMP (Acknowledging upload of Bid in Stock Exchange system)
	I/We authorize the SCSB to do all acts as are necessary to make the Application in the Issue	
	1)	
	2)	
Date : ________	3)	

TEAR HERE

LOGO

XYZ LIMITED
INITIAL PUBLIC ISSUE - NR

Acknowledgement Slip for Broker/SCSB/ DP/RTA

Bid cum Application Form No.

DPID / CLID

PAN of Sole / First Bidder

Amount paid (₹ in figures)	Bank & Branch	Stamp & Signature of SCSB Branch
ASBA Bank A/c No.		
Received from Mr./Ms.		
Telephone / Mobile	Email	

TEAR HERE

XYZ LIMITED - INITIAL PUBLIC ISSUE - NR

	Option 1	Option 2	Option 3
No. of Equity Shares			
Bid Price			
Amount Paid (₹)			

ASBA Bank A/c No. ______________________

Bank & Branch ______________________

Stamp & Signature of Broker / SCSB / DP / RTA

Name of Sole / First Bidder

Acknowledgement Slip for Bidder

Bid cum Application Form No.

PLEASE FILL IN BLOCK LETTERS

TEAR HERE

4.1.1 FIELD NUMBER 1: NAME AND CONTACT DETAILS OF THE SOLE / FIRST BIDDER / APPLICANT

(a) Bidders / Applicants should ensure that the name provided in this field is exactly the same as the name in which the Depository Account is held.

(b) **Mandatory Fields**: Bidders / Applicants should note that the name and address fields are compulsory and e- mail and / or telephone number / mobile number fields are optional. Bidders / Applicants should note that the contact details mentioned in the Bid cum Application Form / Application Form may be used to dispatch communications in case the communication sent to the address available with the Depositories are returned undelivered or are not available. The contact details provided in the Bid cum Application Form may be used by the Issuer, the Designated Intermediaries and the Registrar to the Issue only for correspondence(s) related to an Issue and for no other purposes.

(c) **Joint Bids / Applications**: In the case of Joint Bids / Applications, the Bids / Applications should be made in the name of the Bidder / Applicant whose name appears first in the Depository account. The name so entered should be the same as it appears in the Depository records. The signature of only such first Bidder / Applicant would be required in the Bid cum Application Form / Application Form and such first Bidder / Applicant would be deemed to have signed on behalf of the joint holders.

(d) **Impersonation**: Attention of the Bidders / Applicants is specifically drawn to the provisions of sub-section of Section 38 of the Companies Act, 2013 which is reproduced below:

*"*Any person who:

(a) ***makes or abets making of an application in a fictitious name to a company for acquiring, or subscribing for, its securities; or***

(b) ***makes or abets making of multiple applications to a company in different names or in different combinations of his name or surname for acquiring or subscribing for its securities; or***

(c) ***otherwise induces directly or indirectly a company to allot, or register any transfer of, securities to him, or to any other person in a fictitious name,***

***shall be liable for action under Section 447.*"**

The liability prescribed under Section 447 of the Companies Act, 2013 includes imprisonment for a term which shall not be less than six months extending up to 10 years (provided that where the fraud involves public interest, such term shall not be less than three years) and fine of an amount not less than the amount involved in the fraud, extending up to three times of such amount.

(e) **Nomination Facility to Bidder / Applicant:** Nomination facility is available in accordance with the provisions of Section 72 of the Companies Act, 2013. In case of Allotment of the Equity Shares in dematerialized form, there is no need to make a separate nomination as the nomination registered with the Depository may prevail. For changing nominations, the Bidders / Applicants should inform their respective DP.

4.1.2 FIELD NUMBER 2: PAN OF SOLE / FIRST BIDDER / APPLICANT

(a) PAN (of the sole / first Bidder / Applicant) provided in the Bid cum Application Form / Application Form should be exactly the same as the PAN of the person in whose sole or first name the relevant beneficiary account is held as per the Depositories' records.

(b) PAN is the sole identification number for participants transacting in the securities market irrespective of the amount of transaction except for Bids / Applications on behalf of the Central or State Government, Bids / Applications by officials appointed by the courts and Bids /

Applications by Bidders / Applicants residing in Sikkim ("PAN Exempted Bidders / Applicants"). Consequently, all Bidders / Applicants, other than the PAN Exempted Bidders / Applicants, are required to disclose their PAN in the Bid cum Application Form / Application Form, irrespective of the Bid / Application Amount. Bids / Applications by the Bidders / Applicants whose PAN is not available as per the Demographic Details available in their Depository records, are liable to be rejected. A Bid-cum-Application Form without PAN, except in a case of Exempted Bidders / Applicants, is liable to be rejected.

(c) The exemption for the PAN Exempted Bidders / Applicants is subject to (a) the Demographic Details received from the respective Depositories confirming the exemption granted to the beneficiary owner by a suitable description in the PAN field and the beneficiary account remaining in "active status"; and (b) in the case of residents of Sikkim, the address as per the Demographic Details evidencing the same.

(d) Bid cum Application Forms which provide the GIR Number instead of PAN may be rejected.

(e) Bids / Applications by Bidders / Applicants whose demat accounts have been 'suspended for credit' are liable to be rejected pursuant to the circular issued by SEBI on July 29, 2010, bearing number CIR/MRD/DP/22/2010. Such accounts are classified as "Inactive demat accounts" and Demographic Details are not provided by depositories.

4.1.3 FIELD NUMBER 3: BIDDERS / APPLICANTS DEPOSITORY ACCOUNT DETAILS

(a) Bidders / Applicants should ensure that DP ID and the Client ID are correctly filled in the Bid cum Application Form / Application Form. The DP ID and Client ID provided in the Bid cum Application Form / Application Form should match with the DP ID and Client ID available in the Depository database, **otherwise, the Bid cum Application Form is liable to be rejected.**

(b) Bidders / Applicants should ensure that the beneficiary account provided in the Bid cum Application Form / Application Form is active.

(c) Bidders / Applicants should note that on the basis of the DP ID and Client ID as provided in the Bid cum Application Form / Application Form, the Bidder / Applicant may be deemed to have authorized the Depositories to provide to the Registrar to the Issue, any requested Demographic Details of the Bidder / Applicant as available on the records of the depositories. These Demographic Details may be used, among other things, for other correspondence(s) related to an Issue.

(d) Bidders / Applicants are, advised to update any changes to their Demographic Details as available in the records of the Depository Participant to ensure accuracy of records. Any delay resulting from failure to update the Demographic Details would be at the Bidders / Applicants' sole risk.

4.1.4 FIELD NUMBER 4: BID OPTIONS

(a) Price or Floor Price or Price Band, minimum Bid Lot and Discount (if applicable) may be disclosed in the Prospectus / RHP by the Issuer. The Issuer is required to announce the Floor Price or Price Band, minimum Bid Lot and Discount (if applicable) by way of an advertisement in at least one English, one Hindi and one regional newspaper, with wide circulation, at least five Working Days before Bid / Issue Opening Date in case of an IPO, and at least one Working Day before Bid / Issue Opening Date in case of an FPO.

(b) The Bidders may Bid at or above Floor Price or within the Price Band for IPOs / FPOs undertaken through the Book Building Process. In the case of Alternate Book Building Process for an FPO, the Bidders may Bid at Floor Price or any price above the Floor Price (for further details Bidders may refer to Section 5.6 (e)).

(c) **Cut-Off Price:** Retail Individual Bidders or Employees or Retail Individual Shareholders can Bid at the Cut- off Price indicating their agreement to Bid for and purchase the Equity Shares at the Issue Price as determined at the end of the Book Building Process. Bidding at the Cut-off

Price is prohibited for QIBs and NIBs and such Bids from QIBs and NIBs may be rejected.

(d) **Minimum Application Value and Bid Lot**: The Issuer in consultation with the Book Running Lead Managers may decide the minimum number of Equity Shares for each Bid to ensure that the minimum application value is within the range of ₹10,000 to ₹15,000. The minimum Bid Lot is accordingly determined by an Issuer on basis of such minimum application value.

(e) **Allotment:** The Allotment of specified securities to each RIB shall not be less than the minimum Bid Lot, subject to availability of shares in the RIB category, and the remaining available shares, if any, shall be Allotted on a proportionate basis. For details of the Bid Lot, Bidders may to the RHP / Prospectus or the advertisement regarding the Price Band published by the Issuer.

4.1.4.1 Maximum and Minimum Bid Size

(a) The Bidder may Bid for the desired number of Equity Shares at a specific price. Bids by Retail Individual Bidders, Employees and Retail Individual Shareholders must be for such number of shares so as to ensure that the Bid Amount less Discount (as applicable), payable by the Bidder does not exceed ₹200,000.

(b) In case the Bid Amount exceeds ₹200,000 due to revision of the Bid or any other reason, the Bid may be considered for allocation under the Non-Institutional Portion, with it not being eligible for Discount then such Bid may be rejected if it is at the Cut-off Price.

(c) For NRIs, a Bid Amount of up to ₹200,000 may be considered under the Retail Portion for the purposes of allocation and a Bid Amount exceeding ₹200,000 may be considered under the Non-Institutional Portion for the purposes of allocation.

(d) Bids by QIBs and NIBs must be for such minimum number of shares such that the Bid Amount exceeds ₹200,000 and in multiples of such number of Equity Shares thereafter, as may be disclosed in the Bid cum Application Form and the RHP / Prospectus, or as advertised by the Issuer, as the case may be. NIBs and QIBs are not allowed to Bid at Cut-off Price.

(e) RIBs may revise or withdraw their Bids till closure of the bidding period. QIBs and NIBs cannot withdraw or lower their Bids (in terms of quantity of Equity Shares or the Bid Amount) at any stage after bidding and are required to pay the Bid Amount upon submission of the Bid.

(f) In case the Bid Amount reduces to ₹200,000 or less due to a revision of the Price Band, Bids by the NIBs who are eligible for allocation in the Retail Portion would be considered for allocation under the Retail Portion.

(g) For Anchor Investors, if applicable, the Bid Amount shall be least ₹10 crores. One-third of the Anchor Investor Portion shall be reserved for domestic Mutual Funds, subject to valid Bids being received from domestic Mutual Funds at or above the price at which allocation is being done to other Anchor Investors. Bids by various schemes of a Mutual Fund shall be aggregated to determine the Bid Amount. A Bid cannot be submitted for more than 60% of the QIB Portion under the Anchor Investor Portion. Anchor Investors cannot withdraw their Bids or lower the size of their Bids (in terms of quantity of Equity Shares or the Bid Amount) at any stage after the Anchor Investor Bid / Issue Period and are required to pay the Bid Amount at the time of submission of the Bid. In case the Anchor Investor Allocation Price is lower than the Issue Price, the balance amount shall be payable as per the pay-in-date mentioned in the revised CAN. In case the Issue Price is lower than the Anchor Investor Allocation Price, the amount in excess of the Issue Price paid by the Anchor Investors shall not be refunded to them.

(h) A Bid cannot be submitted for more than the Issue size.

(i) The maximum Bid by any Bidder including QIB Bidder should not exceed the investment limits prescribed for them under the applicable laws.

(j) The price and quantity options submitted by the Bidder in the Bid cum Application Form may be treated as optional bids from the Bidder and may not be cumulated. After determination of the Issue Price, the highest number of Equity Shares Bid for by a Bidder at or above the Issue Price may be considered for Allotment and the rest of the Bid(s), irrespective of the Bid Amount may automatically become invalid. This is not applicable in case of FPOs undertaken through Alternate Book Building Process (For details of Bidders may refer to (Section 5.6 (e))

4.1.4.2 Multiple Bids

(a) Bidder should submit only one Bid cum Application Form. Bidder shall have the option to make a maximum of three Bids at different price levels in the Bid cum Application Form and such options are not considered as multiple Bids.

Submission of a second Bid cum Application Form to either the same or to another Designated Intermediary and duplicate copies of Bid cum Application Forms bearing the same application number shall be treated as multiple Bids and are liable to be rejected.

(b) Bidders are requested to note the following procedures may be followed by the Registrar to the Issue to detect multiple Bids:

i. All Bids may be checked for common PAN as per the records of the Depository. For Bidders other than Mutual Funds, Bids bearing the same PAN may be treated as multiple Bids by a Bidder and may be rejected.

ii. For Bids from Mutual Funds, submitted under the same PAN, as well as Bids on behalf of the PAN Exempted Bidders, the Bid cum Application Forms may be checked for common DP ID and Client ID. Such Bids which have the same DP ID and Client ID may be treated as multiple Bids and are liable to be rejected.

(c) The following Bids may not be treated as multiple Bids:

i. Bids by Reserved Categories Bidding in their respective Reservation Portion as well as bids made by them in the Issue portion in public category.

ii. Separate Bids by Mutual Funds in respect of more than one scheme of the Mutual Fund provided that the Bids clearly indicate the scheme for which the Bid has been made.

iii. Bids by Mutual Funds submitted with the same PAN but with different beneficiary account numbers, Client IDs and DP IDs.

iv. Bids by Anchor Investors under the Anchor Investor Portion and the QIB Portion.

4.1.5 FIELD NUMBER 5: CATEGORY OF BIDDERS

(a) The categories of Bidders identified as per the SEBI ICDR Regulations for the purpose of Bidding, allocation and Allotment in the Issue are RIBs, NIBs and QIBs.

(b) Up to 60% of the QIB Portion can be allocated by the Issuer, on a discretionary basis subject to the criteria of minimum and maximum number of Anchor Investors based on allocation size, to the Anchor Investors, in accordance with SEBI ICDR Regulations, with one-third of the Anchor Investor Portion reserved for domestic Mutual Funds subject to valid Bids being received at or above the Issue Price. For details regarding allocation to Anchor Investors, Bidders may refer to the RHP / Prospectus.

(c) An Issuer can make reservation for certain categories of Bidders / Applicants as permitted under the SEBI ICDR Regulations. For details of any reservations made in the Issue, Bidders / Applicants may refer to the RHP / Prospectus.

(d) The SEBI ICDR Regulations, specify the allocation or Allotment that may be made to various categories of Bidders in an Issue depending upon compliance with the eligibility conditions. Details pertaining to allocation are disclosed on reverse side of the Revision Form. For Issue specific details in relation to allocation Bidder / Applicant may refer to the RHP / Prospectus.

4.1.6 FIELD NUMBER 6: INVESTOR STATUS

(a) Each Bidder / Applicant should check whether it is eligible to apply under applicable law and ensure that any prospective Allotment to it in the Issue is in compliance with the investment restrictions under applicable law.

(b) Certain categories of Bidders / Applicants, such as NRIs, FPIs and FVCIs may not be allowed to Bid / Apply in the Issue or hold Equity Shares exceeding certain limits specified under applicable law. Bidders / Applicants are requested to refer to the RHP / Prospectus for more details.

(c) Bidders / Applicants should check whether they are eligible to apply on non-repatriation basis or repatriation basis and should accordingly provide the investor status. Details regarding investor status are different in the Resident Bid cum Application Form and Non-Resident Bid cum Application Form.

(d) Bidders / Applicants should ensure that their investor status is updated in the Depository records.

4.1.7 FIELD NUMBER 7: PAYMENT DETAILS

(a) The full Bid Amount (net of any Discount, as applicable) shall be blocked in the ASBA Account based on the authorisation provided in the ASBA Form. If Discount is applicable in the Issue, RIBs should indicate the full Bid Amount in the Bid cum Application Form and funds shall be blocked for the Bid Amount net of Discount. Only in cases where the RHP / Prospectus indicates that part payment may be made, such an option can be exercised by the Bidder. In case of Bidders specifying more than one Bid Option in the Bid cum Application Form, the total Bid Amount may be calculated for the highest of three options at net price, i.e. Bid price less Discount Offered, if any.

(b) RIBs who Bid at Cut-off Price shall arrange to block the Bid Amount based on the Cap Price.

(c) All Bidders (except Anchor Investors) have to participate in the Issue only through the ASBA mechanism.

(d) Bid Amount cannot be paid in cash, through money order or through postal order.

4.1.7.1 Instructions for Anchor Investors:

(a) Anchor Investors may submit their Bids with a Book Running Lead Manager.

(b) Payments should be made either by direct credit, RTGS or NEFT.

(c) The Escrow Collection Banks shall maintain the monies in the Escrow Account for and on behalf of the Anchor Investors until the Designated Date.

4.1.7.2 Payment instructions for ASBA Bidders

(a) Bidders may submit the ASBA Form either

i. in electronic mode through the internet banking facility Issued by an SCSB authorizing blocking of funds that are available in the ASBA account specified in the Bid cum Application Form, or

ii. in physical mode to any Designated Intermediary.

(b) Bidders must specify the Bank Account number in the Bid cum Application Form. The Bid cum Application Form submitted by Bidder and which is accompanied by cash, demand draft, cheque, money order, postal order or any mode of payment other than blocked amounts in the

ASBA Account maintained with an SCSB, will not be accepted.

(c) Bidders should ensure that the Bid cum Application Form is also signed by the ASBA Account holder(s) if the Bidder is not the ASBA Account holder.

(d) Bidders shall note that for the purpose of blocking funds under ASBA facility clearly demarcated funds shall be available in the account.

(e) From one ASBA Account, a maximum of five Bids cum Application Forms can be submitted.

(f) Bidders should submit the Bid cum Application Form only at the Bidding Centres, i.e. to the respective member of the Syndicate at the Specified Locations, the SCSBs, the Registered Broker at the Broker Centres, the RTA at the Designated RTA Locations or CDP at the Designated CDP Locations.

(g) Bidders bidding through a Designated Intermediary, other than a SCSB, should note that ASBA Forms submitted to such Designated Intermediary may not be accepted, if the SCSB where the ASBA Account, as specified in the Bid cum Application Form, is maintained has not named at least one branch at that location for such Designated Intermediary, to deposit ASBA Forms.

(h) Bidders bidding directly through the SCSBs should ensure that the ASBA Form is submitted to a Designated Branch of a SCSB where the ASBA Account is maintained.

(i) Upon receipt of the ASBA Form, the Designated Branch of the SCSB may verify if sufficient funds equal to the Bid Amount are available in the ASBA Account, as mentioned in the Bid cum Application Form.

(j) If sufficient funds are available in the ASBA Account, the SCSB may block an amount equivalent to the Bid Amount mentioned in the ASBA Form and for application directly submitted to SCSB by investor, may enter each Bid option into the electronic bidding system as a separate Bid.

(k) If sufficient funds are not available in the ASBA Account, the Designated Branch of the SCSB may not accept such Bids and such bids are liable to be rejected.

(l) Upon submission of a completed ASBA Form each Bidder may be deemed to have agreed to block the entire Bid Amount and authorized the Designated Branch of the SCSB to block the Bid Amount specified in the ASBA Form in the ASBA Account maintained with the SCSBs.

(m) The Bid Amount may remain blocked in the aforesaid ASBA Account until finalisation of the Basis of Allotment and consequent transfer of the Bid Amount against the Allotted Equity Shares to the Public Issue Account, or until withdrawal or failure of the Issue, or until withdrawal or rejection of the Bid, as the case may be.

(n) SCSBs bidding in the Issue must apply through an Account maintained with any other SCSB; else their Bids are liable to be rejected.

4.1.7.2.1 Unblocking of ASBA Account

(a) Once the Basis of Allotment is approved by the Designated Stock Exchange, the Registrar to the Issue may provide the following details to the controlling branches of each SCSB, along with instructions to unblock the relevant bank accounts and for successful applications transfer the requisite money to the Public Issue Account designated for this purpose, within the specified timelines: (i) the number of Equity Shares to be Allotted against each Bid, (ii) the amount to be transferred from the relevant bank account to the Public Issue Account, for each Bid, (iii) the date by which funds referred to in (ii) above may be transferred to the Public Issue Account, and (iv) details of rejected Bids, if any, to enable the SCSBs to unblock the respective bank accounts.

(b) On the basis of instructions from the Registrar to the Issue, the SCSBs may transfer the requisite amount against each successful Bidder to the Public Issue Account and may unblock the excess amount, if any, in the ASBA Account.

(c) In the event of withdrawal or rejection of the ASBA Form and for unsuccessful Bids, the Registrar to the Issue may give instructions to the SCSB to unblock the Bid Amount in the relevant ASBA Account within six Working Days of the Bid / Issue Closing Date.

4.1.7.3 Discount (if applicable)

(a) The Discount is stated in absolute rupee terms.

(b) Bidders applying under RIB category, Retail Individual Shareholder and employees are only eligible for discount. For Discounts offered in the Issue, Bidders may refer to the RHP / Prospectus.

(c) The Bidders entitled to the applicable Discount in the Issue may block the Bid Amount less Discount.

Bidder may note that in case the net amount blocked (post Discount) is more than two lakh Rupees, the Bidding system automatically considers such applications for allocation under Non-Institutional Portion. These applications are neither eligible for Discount nor fall under RIB category.

4.1.8 FIELD NUMBER 8: SIGNATURES AND OTHER AUTHORISATIONS

(a) Only the First Bidder / Applicant is required to sign the Bid cum Application Form / Application Form. Bidders / Applicants should ensure that signatures are in one of the languages specified in the Eighth Schedule to the Constitution of India.

(b) If the ASBA Account is held by a person or persons other than the Bidder / Applicant, then the Signature of the ASBA Account holder(s) is also required.

(c) The signature has to be correctly affixed in the authorisation / undertaking box in the Bid cum Application Form / Application Form, or an authorisation has to be provided to the SCSB via the electronic mode, for blocking funds in the ASBA Account equivalent to the Bid Amount mentioned in the Bid cum Application Form / Application Form.

(d) Bidders / Applicants must note that Bid cum Application Form / Application Form without signature of Bidder / Applicant and / or ASBA Account holder is liable to be rejected.

4.1.9 ACKNOWLEDGEMENT AND FUTURE COMMUNICATION

(a) Bidders should ensure that they receive the Acknowledgment Slip duly signed and stamped by the Designated Intermediary, as applicable, for submission of the ASBA Form.

(b) All communications in connection with Bids made in the Issue may be addressed to the Registrar to the Issue with a copy to the relevant Designated Intermediary to whom the Bid cum Application Form was submitted. The Bidder should give full details such as name of the sole or first Bidder / Applicant, Bid cum Application Form number, Bidders' / Applicants' DP ID, Client ID, PAN, date of the submission of Bid cum Application Form, address of the Bidder, number of the Equity Shares applied for and the name and address of the Designated Intermediary where the Bid cum Application Form was submitted by the Bidder.

Further, the investor shall also enclose a copy of the Acknowledgment Slip duly received from the Designated Intermediaries in addition to the information mentioned hereinabove.

For further details, Bidder / Applicant may refer to the RHP / Prospectus and the Bid cum Application Form.

4.2 INSTRUCTIONS FOR FILING THE REVISION FORM

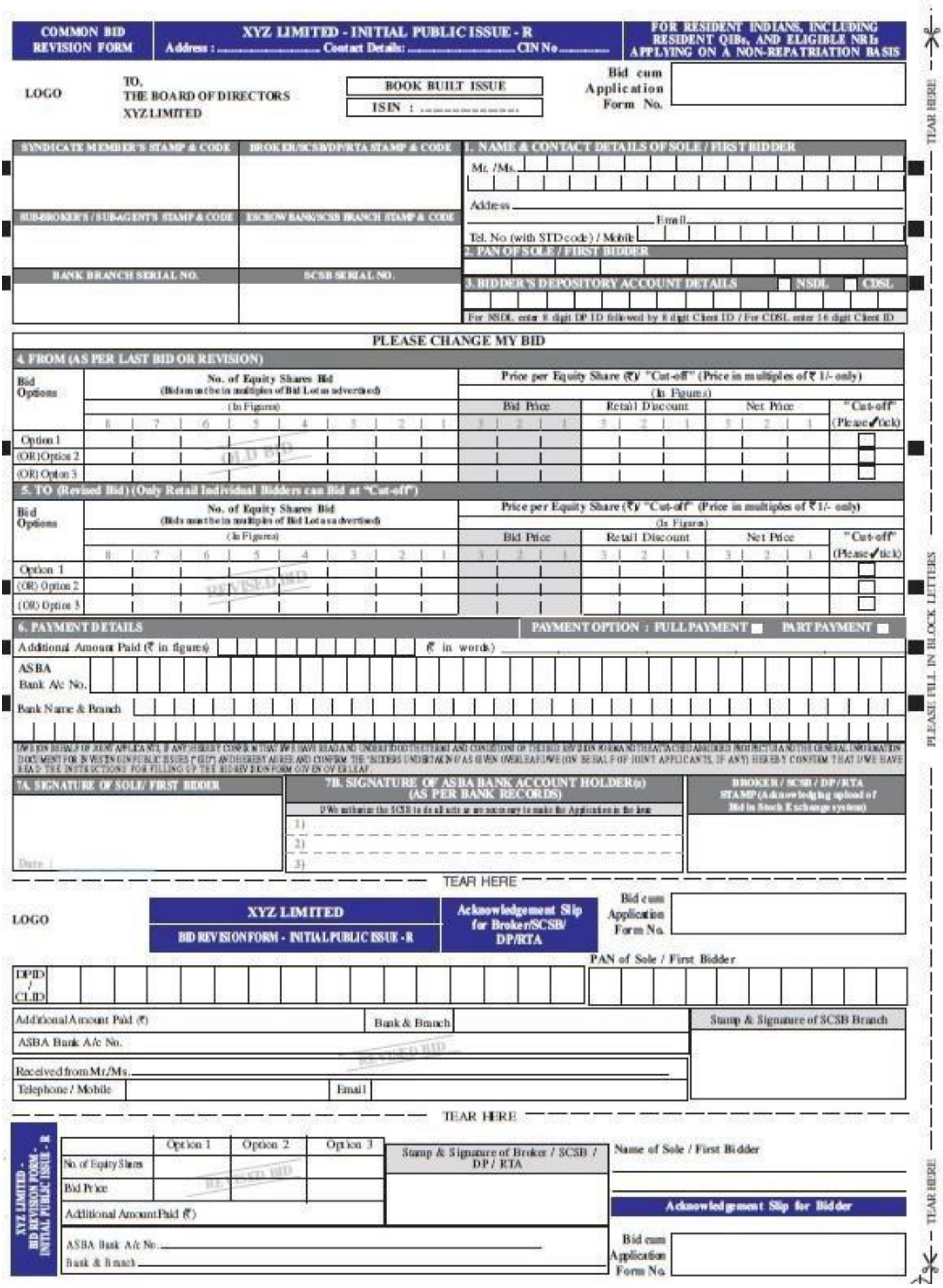
(a) During the Bid / Issue Period, any Bidder / Applicant (other than QIBs and NIBs, who can only revise their bid upwards) who has registered his or her interest in the Equity Shares at a particular price level is free to revise his or her Bid within the Price Band using the Revision Form, which is a part of the Bid cum Application Form.

(b) RIB may revise their bids or withdraw their Bids till the Bid / Issue Closing Date.

(c) Revisions can be made in both the desired number of Equity Shares and the Bid Amount by using the Revision Form.

(d) The Bidder / Applicant can make this revision any number of times during the Bid / Issue Period. However, for any revision(s) in the Bid, the Bidders / Applicants will have to use the services of the same Designated Intermediary through which such Bidder / Applicant had placed the original Bid. Bidders / Applicants are advised to retain copies of the blank Revision Form and the Bid(s) must be made only in such Revision Form or copies thereof.

A sample revision form is reproduced below:


COMMON BID REVISION FORM

XYZ LIMITED - INITIAL PUBLIC ISSUE - R

Address : .... Contact Details: .... CIN No ....

FOR RESIDENT INDIANS, INCLUDING RESIDENT QIBs, AND ELIGIBLE NRIs APPLYING ON A NON-REPATRIATION BASIS

LOGO

TO,
THE BOARD OF DIRECTORS
XYZ LIMITED

BOOK BUILT ISSUE

ISIN : ....

Bid cum Application Form No.

SYNDICATE MEMBER'S STAMP & CODE | BROKER/SCSB/DP/RTA STAMP & CODE

SUB-BROKER'S / SUB-AGENT'S STAMP & CODE | ESCROW BANK/SCSB BRANCH STAMP & CODE

BANK BRANCH SERIAL NO. | SCSB SERIAL NO.

1. NAME & CONTACT DETAILS OF SOLE / FIRST BIDDER

Mr. / Ms.

Address

Email

Tel. No (with STD code) / Mobile

2. PAN OF SOLE / FIRST BIDDER

3. BIDDER'S DEPOSITORY ACCOUNT DETAILS NSDL CDSL

For NSDL enter 8 digit DP ID followed by 8 digit Client ID / For CDSL enter 16 digit Client ID

PLEASE CHANGE MY BID

4. FROM (AS PER LAST BID OR REVISION)

Bid Options	No. of Equity Shares Bid (Bids must be in multiples of Bid Lot as advertised) (In Figures)	Bid Price	Retail Discount	Net Price	"Cut-off" (Please ✓ tick)
	8 7 6 5 4 3 2 1	3 2 1	3 2 1	3 2 1	
Option 1					☐
(OR) Option 2	OLD BID				☐
(OR) Option 3					☐

Price per Equity Share (₹) / "Cut-off" (Price in multiples of ₹ 1/- only) (In Figures)

5. TO (Revised Bid) (Only Retail Individual Bidders can Bid at "Cut-off")

Bid Options	No. of Equity Shares Bid (Bids must be in multiples of Bid Lot as advertised) (In Figures)	Bid Price	Retail Discount	Net Price	"Cut-off" (Please ✓ tick)
	8 7 6 5 4 3 2 1	3 2 1	3 2 1	3 2 1	
Option 1					☐
(OR) Option 2	REVISED BID				☐
(OR) Option 3					☐

Price per Equity Share (₹) / "Cut-off" (Price in multiples of ₹ 1/- only) (In Figures)

6. PAYMENT DETAILS — PAYMENT OPTION : FULL PAYMENT ☐ PART PAYMENT ☐

Additional Amount Paid (₹ in figures) (₹ in words)

ASBA Bank A/c No.

Bank Name & Branch

I/WE (ON BEHALF OF JOINT APPLICANTS, IF ANY) HEREBY CONFIRM THAT I/WE HAVE READ AND UNDERSTOOD THE TERMS AND CONDITIONS OF THIS BID REVISION FORM AND THE ATTACHED ABRIDGED PROSPECTUS AND THE GENERAL INFORMATION DOCUMENT FOR INVESTING IN PUBLIC ISSUES ("GID") AND HEREBY AGREE AND CONFIRM THE "BIDDERS UNDERTAKING" AS GIVEN OVERLEAF. I/WE (ON BEHALF OF JOINT APPLICANTS, IF ANY) HEREBY CONFIRM THAT I/WE HAVE READ THE INSTRUCTIONS FOR FILLING UP THE BID REVISION FORM GIVEN OVERLEAF.

7A. SIGNATURE OF SOLE/ FIRST BIDDER

Date :

7B. SIGNATURE OF ASBA BANK ACCOUNT HOLDER(s) (AS PER BANK RECORDS)

I/We authorize the SCSB to do all acts as are necessary to make the Application in the Issue

1)
2)
3)

BROKER / SCSB / DP / RTA STAMP (Acknowledging upload of Bid in Stock Exchange system)

TEAR HERE

LOGO

XYZ LIMITED

BID REVISION FORM - INITIAL PUBLIC ISSUE - R

Acknowledgement Slip for Broker/SCSB/ DP/RTA

Bid cum Application Form No.

DPID / CLID

PAN of Sole / First Bidder

Additional Amount Paid (₹) | Bank & Branch

ASBA Bank A/c No.

Received from Mr./Ms.

Telephone / Mobile | Email

Stamp & Signature of SCSB Branch

TEAR HERE

XYZ LIMITED - BID REVISION FORM - INITIAL PUBLIC ISSUE - R

	Option 1	Option 2	Option 3
No. of Equity Shares			
Bid Price			
Additional Amount Paid (₹)			

ASBA Bank A/c No.

Bank & Branch

Stamp & Signature of Broker / SCSB / DP / RTA

Name of Sole / First Bidder

Acknowledgement Slip for Bidder

Bid cum Application Form No.

TEAR HERE

PLEASE FILL IN BLOCK LETTERS

Instructions to fill each field of the Revision Form can be found on the reverse side of the Revision Form. Other than instructions already highlighted at paragraph 4.1 above, point wise instructions regarding filling up various fields of the Revision Form are provided below:

4.2.1 FIELDS 1, 2 AND 3: NAME AND CONTACT DETAILS OF SOLE / FIRST BIDDER / APPLICANTS, PAN OF SOLE / FIRST BIDDER / APPLICANT & DEPOSITORY ACCOUNT DETAILS OF THE BIDDER / APPLICANT

Bidders / Applicants should refer to instructions contained in paragraphs 4.1.1, 4.1.2 and 4.1.3.

4.2.2 FIELD 4 & 5: BID OPTIONS REVISION 'FROM' AND 'TO'

(a) Apart from mentioning the revised options in the Revision Form, the Bidder / Applicant must also mention the details of all the bid options given in his or her Bid cum Application Form or earlier Revision Form. For example, if a Bidder / Applicant has Bid for three options in the Bid cum Application Form and such Bidder / Applicant is changing only one of the options in the Revision Form, the Bidder / Applicant must still fill the details of the other two options that are not being revised, in the Revision Form. The Designated Intermediaries may not accept incomplete or inaccurate Revision Forms.

(b) In case of revision, Bid options should be provided by Bidders / Applicants in the same order as provided in the Bid cum Application Form.

(c) In case of revision of Bids by RIBs, Employees and Retail Individual Shareholders, such Bidders / Applicants should ensure that the Bid Amount, subsequent to revision, does not exceed ₹200,000. In case the Bid Amount exceeds ₹200,000 due to revision of the Bid or for any other reason, the Bid may be considered, subject to eligibility, for allocation under the Non-Institutional Portion, not being eligible for Discount (if applicable) and such Bid may be rejected if it is at the Cut-off Price. The Cut-off Price option is given only to the RIBs, Employees and Retail Individual Shareholders indicating their agreement to Bid for and purchase the Equity Shares at the Issue Price as determined at the end of the Book Building Process.

(d) In case the total amount (i.e., original Bid Amount plus additional payment) exceeds ₹200,000, the Bid will be considered for allocation under the Non-Institutional Portion in terms of the RHP / Prospectus. If, however, the RIB does not either revise the Bid or make additional payment and the Issue Price is higher than the cap of the Price Band prior to revision, the number of Equity Shares Bid, where possible. shall be adjusted downwards for the purpose of allocation, such that no additional payment would be required from the RIB and the RIB is deemed to have approved such revised Bid at Cut-off Price.

(e) In case of a downward revision in the Price Band, RIBs and Bids by Employees under the Reservation Portion, who have bid at the Cut-off Price could either revise their Bid or the excess amount paid at the time of Bidding may be unblocked after the allotment is finalised.

4.2.3 FIELD 6: PAYMENT DETAILS

(a) All Bidders / Applicants are required to authorise that the full Bid Amount (less Discount (if applicable) is blocked in the ASBA Account. In case of Bidders / Applicants specifying more than one Bid Option in the Bid cum Application Form, the total Bid Amount may be calculated for the highest of three options at net price, i.e. Bid price less discount offered, if any.

(b) Bidder / Applicants may issue instructions to block the revised amount based on cap of the revised Price Band (adjusted for the Discount (if applicable) in the ASBA Account, to the same Designated Intermediary through whom such Bidder / Applicant had placed the original Bid to enable the relevant SCSB to block the additional Bid Amount, if any.

(c) In case the total amount (i.e., original Bid Amount less discount (if applicable) plus additional payment) exceeds ₹200,000, the Bid may be considered for allocation under the Non-Institutional Portion in terms of the RHP / Prospectus. If, however, the Bidder / Applicant does not either revise the Bid or make additional payment and the Issue Price is higher than the cap of the Price Band prior to revision, the number of Equity Shares Bid for, where possible, may be adjusted downwards for the purpose of Allotment, such that additional amount is required blocked and the Bidder / Applicant is deemed to have approved such revised Bid at the Cut-off Price.

(d) In case of a downward revision in the Price Band, RIBs, Employees and Retail Individual Shareholders, who have bid at the Cut-off Price, could either revise their Bid or the excess amount blocked at the time of Bidding may be unblocked after the finalisation of basis of allotment.

4.2.4 FIELDS 7 SIGNATURES AND ACKNOWLEDGEMENTS

Bidders / Applicants may refer to instructions contained at paragraphs 4.1.8 and 4.1.9 for this purpose.

4.3 INSTRUCTIONS FOR FILING APPLICATION FORM IN ISSUES MADE OTHER THAN THROUGH THE BOOK BUILDING PROCESS (FIXED PRICE ISSUE)

4.3.1 FIELDS 1, 2, 3 NAME AND CONTACT DETAILS OF SOLE / FIRST BIDDER / APPLICANT, PAN OF SOLE / FIRST BIDDER / APPLICANT & DEPOSITORY ACCOUNT DETAILS OF THE BIDDER / APPLICANT

Applicants should refer to instructions contained in paragraphs 4.1.1, 4.1.2 and 4.1.3.

4.3.2 FIELD 4: PRICE, APPLICATION QUANTITY & AMOUNT

(a) The Issuer may mention Issue Price or Price Band in the draft Prospectus. However a prospectus registered with RoC contains one price or coupon rate (as applicable).

(b) **Minimum Application Value and Bid Lot**: The Issuer in consultation with the BRLM may decide the minimum number of Equity Shares for each Bid to ensure that the minimum application value is within the range of ₹10,000 to ₹15,000. The minimum Lot size is accordingly determined by an Issuer on basis of such minimum application value.

(c) Applications by RIBs and Retail Individual Shareholders, must be for such number of shares so as to ensure that the application amount payable does not exceed ₹200,000 and applications by Employees must be for such number of shares so as to ensure that the application amount payable does not exceed ₹ 500,000.

(d) Applications by other investors must be for such minimum number of shares such that the application amount exceeds ₹200,000 and in multiples of such number of Equity Shares thereafter, as may be disclosed in the application form and the Prospectus, or as advertised by the Issuer, as the case may be.

(e) An application cannot be submitted for more than the Issue size.

(f) The maximum application by any Applicant should not exceed the investment limits prescribed for them under the applicable laws.

(g) **Multiple Applications:** An Applicant should submit only one Application Form. Submission of a second Application Form to either the same or other SCSB and duplicate copies of Application Forms bearing the same application number shall be treated as multiple applications and are liable to be rejected.

(h) Applicants are requested to note the following procedures may be followed by the Registrar to the Issue to detect multiple applications:

i. All applications may be checked for common PAN as per the records of the Depository. For Applicants other than Mutual Funds, Applications bearing the same PAN may be treated as multiple applications by an Applicant and may be rejected.

ii. For applications from Mutual Funds, submitted under the same PAN, as well as Applications on behalf of the PAN Exempted Applicants, the Application Forms may be checked for common DP ID and Client ID. In any such applications which have the same DP ID and Client ID, these may be treated as multiple applications and may be rejected.

(i) The following applications may not be treated as multiple Bids:

i. Applications by Reserved Categories in their respective reservation portion as well as that made by them in the Issue portion in public category.

ii. Separate applications by Mutual Funds in respect of more than one scheme of the Mutual Fund provided that the Applications clearly indicate the scheme for which the Bid has been made.

iii. Applications by Mutual Funds submitted with the same PAN but with different beneficiary account numbers, Client IDs and DP IDs.

4.3.3 FIELD NUMBER 5 : CATEGORY OF APPLICANTS

(a) The categories of applicants identified as per the SEBI ICDR Regulations for the purpose of Bidding, allocation and Allotment in the Issue are RIBs, individual applicants other than RIB's and other investors (including corporate bodies or institutions, irrespective of the number of specified securities applied for).

(b) An Issuer can make reservation for certain categories of Applicants permitted under the SEBI ICDR Regulations. For details of any reservations made in the Issue, applicants may refer to the Prospectus.

(c) The SEBI ICDR Regulations specify the allocation or Allotment that may be made to various categories of applicants in an Issue depending upon compliance with the eligibility conditions. Details pertaining to allocation are disclosed on reverse side of the Revision Form. For Issue specific details in relation to allocation applicant may refer to the Prospectus.

4.3.4 FIELD NUMBER 6: INVESTOR STATUS

Applicants should refer to instructions contained in paragraphs 4.1.6.

4.3.5 FIELD 7: PAYMENT DETAILS

(a) All Applicants (other than Anchor Investors) are required to make use of ASBA for applying in the Issue

(b) Application Amount cannot be paid in cash, through money order, cheque, demand draft or through postal order or through stock invest.

4.3.5.1 Payment instructions for Applicants

Applicants should refer to instructions contained in paragraphs 4.1.7.2.

4.3.5.2 Unblocking of ASBA Account

Applicants should refer to instructions contained in paragraphs 4.1.7.2.1.

4.3.5.3 Discount (if applicable)

Applicants should refer to instructions contained in paragraphs 4.1.7.3.

4.3.6 FIELD NUMBER 8: SIGNATURES AND OTHER AUTHORISATIONS & ACKNOWLEDGEMENT AND FUTURE COMMUNICATION

Applicants should refer to instructions contained in paragraphs 4.1.8 & 4.1.9.

4.4 SUBMISSION OF BID CUM APPLICATION FORM / APPLICATION FORM / REVISION FORM

4.4.1 Bidders / Applicants may submit completed Bid cum application form / Revision Form in the following manner:-

Mode of Application	Submission of Bid cum Application Form
Anchor Investors Application Form	1) To the Book Running Lead Managers at the locations mentioned in the Anchor Investors Application Form
ASBA Form	(a) To members of the Syndicate in the Specified Locations or Registered Brokers at the Broker Centres or the RTA at the Designated RTA Location or the DP at the Designated DP Location (b) To the Designated Branches of the SCSBs

(a) Bidders / Applicants should submit the Revision Form to the same Designated Intermediary through which such Bidder / Applicant had placed the original Bid.

(b) Upon submission of the Bid cum Application Form, the Bidder / Applicant will be deemed to have authorized the Issuer to make the necessary changes in the RHP and the Bid cum Application Form as would be required for filing Prospectus with the RoC and as would be required by the RoC after such filing, without prior or subsequent notice of such changes to the relevant Bidder / Applicant.

(c) Upon determination of the Issue Price and filing of the Prospectus with the RoC, the Bid cum Application Form will be considered as the application form.

SECTION 5: ISSUE PROCEDURE IN BOOK BUILT ISSUE

Book Building, in the context of the Issue, refers to the process of collection of Bids within the Price Band or above the Floor Price and determining the Issue Price based on the Bids received as detailed in Schedule XI of SEBI ICDR Regulations. The Issue Price is finalised after the Bid / Issue Closing Date. Valid Bids received at or above the Issue Price are considered for allocation in the Issue, subject to applicable regulations and other terms and conditions.

5.1 SUBMISSION OF BIDS

(a) During the Bid / Issue Period, Bidders / Applicants may approach any of the Designated Intermediaries to register their Bids. Anchor Investors who are interested in subscribing for the Equity Shares should approach the Book Running Lead Manager, to register their Bid.

(b) In case of Bidders / Applicants (excluding NIBs and QIBs) Bidding at Cut-off Price, the Bidders / Applicants may instruct the SCSBs to block Bid Amount based on the Cap Price less discount (if applicable).

(c) For details of the timing on acceptance and upload of Bids in the Stock Exchanges Platform Bidders / Applicants are requested to refer to the RHP.

5.2 ELECTRONIC REGISTRATION OF BIDS

(a) The Designated Intermediary may register the Bids using the on-line facilities of the Stock Exchanges. The Designated Intermediaries can also set up facilities for off-line electronic registration of Bids, subject to the condition that they may subsequently upload the off-line data file into the on-line facilities for Book Building on a regular basis before the closure of the issue.

(b) On the Bid / Issue Closing Date, the Designated Intermediaries may upload the Bids till such time as may be permitted by the Stock Exchanges and as disclosed in the Red Herring Prospectus.

(c) Only Bids that are uploaded on the Stock Exchanges Platform are considered for allocation / Allotment. The Designated Intermediaries are given till 1 p.m. on the next Working Day following the Bid / Issue Closing Date to modify select fields uploaded in the Stock Exchange Platform during the Bid / Issue Period after which the Stock Exchange(s) send the bid information to the Registrar to the Issue for further processing.

5.3 BUILD UP OF THE BOOK

(a) Bids received from various Bidders / Applicants through the Designated Intermediaries may be electronically uploaded on the Bidding Platform of the Stock Exchanges' on a regular basis. The book gets built up at various price levels. This information may be available with the Book Running Lead Managers at the end of the Bid / Issue Period.

(b) Based on the aggregate demand and price for Bids registered on the Stock Exchanges Platform, a graphical representation of consolidated demand and price as available on the websites of the Stock Exchanges may be made available at the Bidding Centres during the Bid / Issue Period.

5.4 WITHDRAWAL OF BIDS

(a) RIBs can withdraw their Bids until Bid / Issue Closing Date. In case a RIB wishes to withdraw the Bid during the Bid / Issue Period, the same can be done by submitting a request for the same to the concerned Designated Intermediary who shall do the requisite, including unblocking of the funds by the SCSB in the ASBA Account.

(b) The Registrar to the Issue shall give instruction to the SCSB for unblocking the ASBA Account upon or after the finalisation of basis of allotment. QIBs and NIBs can neither withdraw nor lower the size of their Bids at any stage.

5.5 REJECTION & RESPONSIBILITY FOR UPLOAD OF BIDS

(a) The Designated Intermediaries are individually responsible for the acts, mistakes or errors or omission in relation to:

i. the Bids accepted by the Designated Intermediary,

ii. the Bids uploaded by the Designated Intermediary, and

iii. the Bid cum application forms accepted but not uploaded by the Designated Intermediary.

Any RIB whose Bid has not been considered for Allotment, due to failures on the part of the SCSB may seek redressal from the concerned SCSB within three months of the listing date in accordance with the circular SEBI/HO/CFD/DIL2/CIR/P/2018/22 dated February 15, 2018.

(b) The Book Running Lead Managers and their affiliate Syndicate Members, as the case may be, may reject Bids if all information required is not provided and the Bid cum Application Form is incomplete in any respect.

(c) The SCSBs shall have no right to reject Bids, except in case of unavailability of adequate funds in the ASBA account or on technical grounds.

(d) In case of QIB Bidders, only the (i) SCSBs (for Bids other than the Bids by Anchor Investors); and (ii) Book Running Lead Managers and their affiliate Syndicate Members (only in the Specified Locations) have the right to reject bids. However, such rejection shall be made at the time of receiving the Bid and only after assigning a reason for such rejection in writing.

(e) All bids by QIBs, NIBs & RIBs Bidders can be rejected on technical grounds listed herein.

5.5.1 GROUNDS FOR TECHNICAL REJECTIONS

Bid cum Application Forms / Application Forms can be rejected on the below mentioned technical grounds either at the time of their submission to any of the Designated Intermediaries, or at the time of finalisation of the Basis of Allotment. Bidders / Applicants are advised to note that the Bids / Applications are liable to be rejected, which have been detailed at various places in this GID:-

(a) Bids / Applications accompanied by cash, demand draft, cheque, money order, postal order or any mode of payment other than blocked amounts in the ASBA Accounts maintained with an SCSB;

(b) Bid / Application by persons not competent to contract under the Indian Contract Act, 1872, as amended, (other than minors having valid Depository Account as per Demographic Details provided by Depositories);

(c) Bids / Applications by OCBs;

(d) In case of partnership firms, Bid / Application for Equity Shares made in the name of the firm. However, a limited liability partnership can apply in its own name;

(e) DP ID and Client ID not mentioned in the Bid cum Application Form / Application Form;

(f) In case of Bids / Applications under power of attorney or by limited companies, corporate, trust, etc., relevant documents are not being submitted along with the Bid cum application form;

(g) Bids / Applications by persons prohibited from buying, selling or dealing in the shares directly or indirectly by SEBI or any other regulatory authority;

(h) Bids / Applications by any person outside India if not in compliance with applicable foreign and Indian laws;

(i) PAN not mentioned in the Bid cum Application Form / Application Forms except for Bids / Applications by or on behalf of the Central or State Government and officials appointed by the court and by the investors residing in the State of Sikkim, provided such claims have been verified by the Depository Participant;

(j) In case no corresponding record is available with the Depositories that matches the DP ID, the Client ID and the PAN;

(k) Bids / Applications for lower number of Equity Shares than the minimum specified for that category of investors;

(l) Bids / Applications at a price less than the Floor Price & Bids / Applications at a price more than the Cap Price;

(m) Bids / Applications at Cut-off Price by NIBs and QIBs;

(n) The amounts mentioned in the Bid cum Application Form / Application Forms do not tally with the amount payable for the value of the Equity Shares Bid / Applied for;

(o) Bids / Applications for amounts greater than the maximum permissible amounts prescribed by the regulations;

(p) Submission of more than five ASBA Forms / Application Forms per ASBA Account;

(q) Bids / Applications for number of Equity Shares which are not in multiples Equity Shares as specified in the RHP;

(r) Multiple Bids / Applications as defined in this GID and the RHP / Prospectus;

(s) Bids not uploaded in the Stock Exchanges bidding system.

(t) Bid cum Application Form / Application Forms are not delivered by the Bidders / Applicants within the time prescribed as per the Bid cum Application Form / Application Form, Bid / Issue Closing Date Advertisement;

(u) Inadequate funds in the bank account to block the Bid / Application Amount specified in the ASBA Form / Application Form at the time of blocking such Bid / Application Amount in the bank account;

(v) Where no confirmation is received from SCSB for blocking of funds;

(w) Bids / Applications by Bidders (other than Anchor Investors) not submitted through ASBA process;

(x) Bids / Applications not uploaded on the terminals of the Stock Exchanges;

(y) Bids / Applications submitted to Designated Intermediaries at locations other than the Bidding Centres or to the Escrow Collecting Banks (assuming that such bank is not a SCSB where the ASBA Account is maintained), to the Issuer or the Registrar to the Issue;

(z) Bids / Applications by SCSBs wherein a separate account in its own name held with any other SCSB is not mentioned as the ASBA Account in the Bid cum Application Form / Application Form.

5.6 BASIS OF ALLOCATION

(a) The SEBI ICDR Regulations specify the allocation or Allotment that may be made to various categories of Bidders / Applicants in an Issue depending on compliance with the eligibility conditions. Certain details pertaining to the percentage of Issue size available for allocation to each category is disclosed overleaf of the Bid cum Application Form and in the RHP / Prospectus. For details in relation to allocation, the Bidder / Applicant may refer to the RHP / Prospectus.

(b) Under-subscription in any category (except QIB Portion) is allowed to be met with spill-over from any other category or combination of categories at the discretion of the Issuer in consultation with the Book Running Lead Managers and the Designated Stock Exchange and in accordance with the SEBI ICDR Regulations. Unsubscribed portion in QIB Portion is not available for subscription to other categories.

(c) In case of under subscription in the Issue, spill-over to the extent of such under-subscription may be permitted from the Reserved Portion to the Issue. For allocation in the event of an under-subscription applicable to the Issuer, Bidders / Applicants may refer to the RHP.

(d) Illustration of the Book Building and Price Discovery Process

Bidders should note that this example is solely for illustrative purposes and is not specific to the Issue*; it also excludes Bidding by Anchor Investors.*

Bidders can bid at any price within the price band. For instance, assume a price band of ₹20 to ₹24 per share, issue size of 3,000 equity shares and receipt of five bids from bidders, details of which are shown in the table below. The illustrative book given below shows the demand for the equity shares of the issuer company at various prices and is collated from bids received from various investors.

Bid Quantity	Bid Price (₹)	Cumulative Quantity	Subscription
500	24	500	16.70%
1,000	23	1,500	50.00%
1,500	22	3,000	100.00%

Bid Quantity	Bid Price (₹)	Cumulative Quantity	Subscription
2,000	21	5,000	166.70%
2,500	20	7,500	250.00%

The price discovery is a function of demand at various prices. The highest price at which the issuer is able to issue the desired number of equity shares is the price at which the book cuts off, *i.e.*, ₹22.00 in the above example. The issuer in consultation with the book running lead managers, will finalise the issue price at or below such cut-off price, *i.e.*, at or below ₹22.00. All bids at or above this issue price and cut-off bids are valid bids and are considered for allocation in the respective categories.

(e) Alternate Method of Book Building

In case of FPOs, Issuers may opt for an alternate method of Book Building in which only the Floor Price is specified for the purposes of Bidding ("**Alternate Book Building Process**").

The Issuer may specify the Floor Price in the RHP or advertise the Floor Price at least one Working Day prior to the Bid / Issue Opening Date. QIBs may Bid at a price higher than the Floor Price and the Allotment to the QIBs is made on a price priority basis. The Bidder with the highest Bid Amount is allotted the number of Equity Shares Bid for and then the second highest Bidder is Allotted Equity Shares and this process continues until all the Equity Shares have been allotted. RIBs, NIBs and Employees are Allotted Equity Shares at the Floor Price and Allotment to these categories of Bidders is made proportionately. If the number of Equity Shares Bid for at a price is more than available quantity then the Allotment may be done on a proportionate basis. Further, the Issuer may place a cap either in terms of number of specified securities or percentage of issued capital of the Issuer that may be Allotted to a single Bidder, decide whether a Bidder be allowed to revise the bid upwards or downwards in terms of price and / or quantity and also decide whether a Bidder be allowed single or multiple bids.

SECTION 6: ISSUE PROCEDURE IN FIXED PRICE ISSUE

Applicants may note that there is no Bid cum Application Form in a Fixed Price Issue. As the Issue Price is mentioned in the Fixed Price Issue therefore on filing of the Prospectus with the RoC, the Application so submitted is considered as the application form.

Applicants may only use the specified Application Form for the purpose of making an Application in terms of the Prospectus which may be submitted through the Designated Intermediary.

Applicants may submit an Application Form either in physical form to the any of the Designated Intermediaries or in the electronic form to the SCSB or the Designated Branches of the SCSBs authorising blocking of funds that are available in the bank account specified in the Application Form only ("ASBA Account"). The Application Form is also made available on the websites of the Stock Exchanges at least one day prior to the Bid / Issue Opening Date.

In a fixed price issue, allocation in the net Issue to the public category is made as follows: minimum fifty per cent to Retail Individual Bidders; and remaining to (i) individual investors other than Retail Individual Bidders; and (ii) other Applicants including corporate bodies or institutions, irrespective of the number of specified securities applied for. The unsubscribed portion in either of the categories specified above may be allocated to the Applicants in the other category.

For details of instructions in relation to the Application Form, Bidders / Applicants may refer to the relevant section of the GID.

SECTION 7: ALLOTMENT PROCEDURE AND BASIS OF ALLOTMENT

The Allotment of Equity Shares to Bidders / Applicants other than Retail Individual Bidders and Anchor Investors may be on proportionate basis. For Basis of Allotment to Anchor Investors, Bidders / Applicants may refer to RHP / Prospectus. No Retail Individual Bidder will be Allotted less than the minimum Bid Lot subject to availability of shares in Retail Individual Bidder Category and the remaining available shares, if any will be Allotted on a proportionate basis. The Issuer is required to receive a minimum subscription of 90% of the Net

Issue.

7.1 ALLOTMENT TO RIBs

Bids received from the RIBs at or above the Issue Price may be grouped together to determine the total demand under this category. If the aggregate demand in this category is less than or equal to the Retail Portion at or above the Issue Price, full Allotment may be made to the RIBs to the extent of the valid Bids. If the aggregate demand in this category is greater than the allocation to in the Retail Portion at or above the Issue Price, then the maximum number of RIBs who can be Allotted the minimum Bid Lot will be computed by dividing the total number of Equity Shares available for Allotment to RIBs by the minimum Bid Lot ("**Maximum RIB Allottees**"). The Allotment to the RIBs will then be made in the following manner:

(a) In the event the number of RIBs who have submitted valid Bids in the Issue is equal to or less than Maximum RIB Allottees, (i) all such RIBs shall be Allotted the minimum Bid Lot; and (ii) the balance available Equity Shares, if any, remaining in the Retail Portion shall be Allotted on a proportionate basis to the RIBs who have received Allotment as per (i) above for the balance demand of the Equity Shares Bid by them (i.e. who have Bid for more than the minimum Bid Lot).

(b) In the event the number of RIBs who have submitted valid Bids in the Issue is more than Maximum RIB Allottees, the RIBs (in that category) who will then be Allotted minimum Bid Lot shall be determined on the basis of draw of lots.

7.2 ALLOTMENT TO NIBS

Bids received from NIBs at or above the Issue Price may be grouped together to determine the total demand under this category. The Allotment to all successful NIBs may be made at or above the Issue Price. If the aggregate demand in this category is less than or equal to the Non-Institutional Portion at or above the Issue Price, full Allotment may be made to NIBs to the extent of their demand. In case the aggregate demand in this category is greater than the Non- Institutional Portion at or above the Issue Price, Allotment may be made on a proportionate basis up to a minimum of the Non-Institutional Portion.

7.3 ALLOTMENT TO QIBs

For the Basis of Allotment to Anchor Investors, Bidders / Applicants may refer to the SEBI ICDR Regulations or RHP / Prospectus. Bids received from QIBs Bidding in the QIB Portion (net of Anchor Portion) at or above the Issue Price may be grouped together to determine the total demand under this category. The QIB Portion may be available for Allotment to QIBs who have Bid at a price that is equal to or greater than the Issue Price. Allotment may be undertaken in the following manner:

(a) In the first instance allocation to Mutual Funds for up to 5% of the QIB Portion may be determined as follows:

(i) In the event that Bids by Mutual Fund exceeds 5% of the QIB Portion, allocation to Mutual Funds may be done on a proportionate basis for up to 5% of the QIB Portion; (ii) In the event that the aggregate demand from Mutual Funds is less than 5% of the QIB Portion then all Mutual Funds may get full Allotment to the extent of valid Bids received above the Issue Price; and (iii) Equity Shares remaining unsubscribed, if any and not allocated to Mutual Funds may be available for Allotment to all QIBs as set out at paragraph 7.4(b) below;

(b) In the second instance, Allotment to all QIBs may be determined as follows: (i) In the event of oversubscription in the QIB Portion, all QIBs who have submitted Bids above the Issue Price may be Allotted Equity Shares on a proportionate basis for up to 95% of the QIB Portion; (ii) Mutual Funds, who have received allocation as per (a) above, for less than the number of Equity Shares Bid for by them, are eligible to receive Equity Shares on a proportionate basis along with other QIBs; and (iii) Under-subscription below 5% of the QIB Portion, if any, from Mutual Funds, may be included for allocation to the remaining QIB Bidders on a proportionate basis.

7.4 ALLOTMENT TO ANCHOR INVESTOR (IF APPLICABLE)

(a) Allocation of Equity Shares to Anchor Investors at the Anchor Investor Issue Price will be at the discretion of the issuer in consultation with the Book Running Lead Managers, subject to compliance with the following requirements:

i. not more than 60% of the QIB Portion will be allocated to Anchor Investors;

ii. one-third of the Anchor Investor Portion shall be reserved for domestic Mutual Funds, subject to valid Bids being received from domestic Mutual Funds at or above the price at which allocation is being done to other Anchor Investors; and

iii. allocation to Anchor Investors shall be on a discretionary basis and subject to:

- a maximum number of two Anchor Investors for allocation up to ₹100 million;

- a minimum number of two Anchor Investors and maximum number of 15 Anchor Investors for allocation of more than ₹100 million and up to ₹2,500 million subject to minimum Allotment of ₹50 million per such Anchor Investor; and

- a minimum number of five Anchor Investors and maximum number of 15 Anchor Investors for allocation of more than ₹2,500 million, and an additional 10 Anchor Investors for every additional ₹2,500 million or part thereof, subject to minimum Allotment of ₹50 million per such Anchor Investor.

(b) An Anchor Investor shall make an application of a value of at least ₹100 million in the Issue.

(c) A physical book is prepared by the Registrar on the basis of the Anchor Investor Application Forms received from Anchor Investors. Based on the physical book and at the discretion of the Issuer in consultation with the Book Running Lead Managers, selected Anchor Investors will be sent a CAN and if required, a revised CAN.

(d) **In the event that the Issue Price is higher than the Anchor Investor Allocation Price**: Anchor Investors will be sent a revised CAN within one day of the Pricing Date indicating the number of Equity Shares allocated to such Anchor Investor and the pay-in date for payment of the balance amount. Anchor Investors are then required to pay any additional amounts, being the difference between the Issue Price and the Anchor Investor Allocation Price, as indicated in the revised CAN within the pay-in date referred to in the revised CAN. Thereafter, the Allotment Advice will be issued to such Anchor Investors.

(e) **In the event the Issue Price is lower than the Anchor Investor Allocation Price:** Anchor Investors who have been Allotted Equity Shares will directly receive Allotment Advice.

7.5 BASIS OF ALLOTMENT FOR QIBs (OTHER THAN ANCHOR INVESTORS), NIBs AND RESERVED CATEGORY IN CASE OF OVER-SUBSCRIBED ISSUE

In the event of the Issue being over-subscribed, the Issuer may finalise the Basis of Allotment in consultation with the Designated Stock Exchange in accordance with the SEBI ICDR Regulations.

The allocation may be made in marketable lots, on a proportionate basis as explained below:

(a) Bidders may be categorized according to the number of Equity Shares applied for;

(b) The total number of Equity Shares to be Allotted to each category as a whole may be arrived at on a proportionate basis, which is the total number of Equity Shares applied for in that category (number of Bidders in the category multiplied by the number of Equity Shares applied for) multiplied by the inverse of the over- subscription ratio;

(c) The number of Equity Shares to be Allotted to the successful Bidders may be arrived at on a proportionate basis, which is total number of Equity Shares applied for by each Bidder in that category multiplied by the inverse of the over-subscription ratio;

(d) In all Bids where the proportionate Allotment is less than the minimum Bid Lot decided per Bidder, the Allotment may be made as follows: the successful Bidders out of the total Bidders for a category may be determined by a draw of lots in a manner such that the total number of Equity Shares Allotted in that category is equal to the number of Equity Shares calculated in accordance with (b) above; and each successful Bidder may be Allotted a minimum of such Equity Shares equal to the minimum Bid Lot finalised by the Issuer;

(e) If the proportionate Allotment to a Bidder is a number that is more than the minimum Bid lot but is not a multiple of one (which is the marketable lot), the decimal may be rounded off to the higher whole number if that decimal is 0.5 or higher. If that number is lower than 0.5 it may be rounded off to the lower whole number. Allotment to all Bidders in such categories may be arrived at after such rounding off; and

(f) If the Equity Shares allocated on a proportionate basis to any category are more than the Equity Shares Allotted to the Bidders in that category, the remaining Equity Shares available for Allotment may be first adjusted against any other category, where the Allotted Equity Shares are not sufficient for proportionate Allotment to the successful Bidders in that category. The balance Equity Shares, if any, remaining after such adjustment may be added to the category comprising Bidders applying for minimum number of Equity Shares.

7.6 DESIGNATED DATE AND ALLOTMENT OF EQUITY SHARES

(a) **Designated Date:** On the Designated Date, the Escrow Collection Banks shall transfer the funds represented by allocation of Equity Shares to Anchor Investors from the Escrow Account, as per the terms of the Escrow Agreement, into the Public Issue Account with the Banker to the Issue. The balance amount after transfer to the Public Issue Account shall be transferred to the Refund Account. Payments of refund to the Bidders applying in the Anchor Investor Portion shall be made from the Refund Account as per the terms of the Escrow Agreement and the RHP. On the Designated Date, the Registrar to the Issue shall instruct the SCSBs to transfer funds represented by allocation of Equity Shares from ASBA Accounts into the Public Issue Account.

(b) **Issuance of Allotment Advice:** Upon approval of the Basis of Allotment by the Designated Stock Exchange, the Registrar shall upload the same on its website. On the basis of the approved Basis of Allotment, the Issuer shall pass necessary corporate action to facilitate the Allotment and credit of Equity Shares. Bidders / Applicants are advised to instruct their Depository Participant to accept the Equity Shares that may be allotted to them pursuant to the Issue.

Pursuant to confirmation of such corporate actions, the Registrar will dispatch Allotment Advice to the Bidders / Applicants who have been Allotted Equity Shares in the Issue.

(c) The dispatch of Allotment Advice shall be deemed a valid, binding and irrevocable contract.

(d) Issuer will ensure that: (i) the Allotment of Equity Shares; and (ii) credit of shares to the successful Bidders / Applicants Depository Account will be completed within six Working Days of the Bid / Issue Closing Date.

SECTION 8: INTEREST AND REFUNDS

8.1 COMPLETION OF FORMALITIES FOR LISTING & COMMENCEMENT OF TRADING

The Issuer shall ensure that all steps for the completion of the necessary formalities for listing and commencement of trading at all the Stock Exchanges are taken within six Working Days of the Bid / Issue Closing Date. The Registrar to the Issue may initiate corporate action for credit to Equity Shares the beneficiary account with Depositories, within six Working Days of the Bid / Issue Closing Date.

8.2 GROUNDS FOR REFUND

8.2.1 NON RECEIPT OF LISTING PERMISSION

An Issuer makes an application to the Stock Exchange(s) for permission to deal in / list and for an official quotation of the Equity Shares. All the Stock Exchanges from where such permission is sought are disclosed in RHP / Prospectus. The Designated Stock Exchange may be as disclosed in the RHP / Prospectus with which the Basis of Allotment may be finalised.

If the Issuer fails to make application to the Stock Exchange(s) or obtain permission for listing of the Equity Shares, in accordance with the provisions of Section 40 of the Companies Act, 2013, the Issuer shall be punishable with a fine which shall not be less than ₹5 lakhs but which may extend to ₹50 lakhs and every officer of the Issuer who is in default shall be punishable with imprisonment for a term which may extend to one year or with fine which shall not be less than ₹50,000 but which may extend to ₹3 lakhs, or with both.

If the permissions to deal in and an official quotation of the Equity Shares are not granted by any of the Stock Exchange(s), the Issuer may forthwith take steps to refund, without interest, all moneys received from Bidders / Applicants in pursuance of RHP / Prospectus.

If such money is not refunded to the Bidders / Applicants within the prescribed time after the Issuer becomes liable to repay it, then the Issuer and every director of the Issuer who is an officer in default may, on and from such expiry of such period, be liable to repay the money, with interest at such rate, as disclosed in the RHP / Prospectus.

8.2.2 NON RECEIPT OF MINIMUM SUBSCRIPTION

If the Issuer does not receive a minimum subscription of 90% of the Issue, including devolvement to the Underwriters, the Issuer may forthwith, take steps to unblock the entire subscription amount received within six Working Days of the Bid / Issue Closing Date and repay, without interest, all moneys received from Anchor Investors.

If there is a delay beyond the prescribed time after the Issuer becomes liable to pay the amount received from Bidders, then the Issuer and every director of the Issuer who is an officer in default may on and from expiry of 15 Working Days or such other period as may be prescribed, be jointly and severally liable to repay the money, with interest at the rate of 15% per annum or such other interest as may be prescribed in accordance with the Companies (Prospectus and Allotment of Securities) Rules, 2014, as amended.

8.2.3 MINIMUM NUMBER OF ALLOTTEES

The Issuer may ensure that the number of prospective Allottees to whom Equity Shares may be Allotted may not be less than 1,000 failing which the entire application monies may be refunded forthwith.

8.2.4 IN CASE OF ISSUES MADE UNDER COMPULSORY BOOK BUILDING

In case an Issuer not eligible under Regulation 26(1) of the SEBI ICDR Regulations comes for an Issue under Regulation 26(2) of SEBI (ICDR) Regulations, 2009 but fails to Allot at least 75% of the Issue to QIBs, in such case full subscription money is to be refunded.

8.3 MODE OF REFUND

(a) **In case of ASBA Bids:** Within six Working Days of the Bid / Issue Closing Date, the Registrar to the Issue may give instructions to SCSBs for unblocking the amount in ASBA Accounts for unsuccessful Bids or for any excess amount blocked on Bidding.

(b) **In case of Anchor Investors:** Within six Working Days of the Bid / Issue Closing Date, the Registrar to the Issue may dispatch the refund orders for all amounts payable to unsuccessful Anchor Investors.

(c) In case of Anchor Investors, the Registrar to the Issue may obtain from the depositories the Bidders' bank account details, including the MICR code, on the basis of the DP ID, Client ID and PAN provided by the Anchor Investors in their Anchor Investor Application Forms for refunds. Accordingly, Anchor Investors are advised to immediately update their details as appearing on the records of their depositories. Failure to do so may result in delays in dispatch of refund orders or refunds through electronic transfer of funds, as applicable, and any such delay may be at the Anchor Investors' sole risk and neither the Issuer, the Registrar to the Issue, the Escrow Collection Banks, or the Syndicate, may be liable to compensate the Anchor Investors for any losses caused to them due to any such delay, or liable to pay any interest for such delay. Please note that refunds shall be credited only to the bank account from which the Bid Amount was remitted to the Escrow Bank.

8.3.1 Electronic mode of making refunds for Anchor Investors

The payment of refund, if any, may be done through various electronic modes as mentioned below:

(a) **NACH –** National Automated Clearing House which is a consolidated system of ECS. Payment of refund would be done through NACH for Applicants having an account at one of the centres specified by the RBI, where such facility has been made available. This would be subject to availability of complete bank account details including Magnetic Ink Character Recognition (MICR) code wherever applicable from the depository. The payment of refund through NACH is mandatory for Applicants having a bank account at any of the centres where NACH facility has been made available by the RBI (subject to availability of all information for crediting the refund through NACH including the MICR code as appearing on a cheque leaf, from the depositories), except where applicant is otherwise disclosed as eligible to get refunds through NEFT or Direct Credit or RTGS.

(b) **NEFT**—Payment of refund may be undertaken through NEFT wherever the branch of the Anchor Investors' bank is NEFT enabled and has been assigned the Indian Financial System Code ("**IFSC**"), which can be linked to the MICR of that particular branch. The IFSC may be obtained from the website of RBI as at a date prior to the date of payment of refund, duly mapped with MICR numbers. Wherever the Anchor Investors have registered their nine-digit MICR number and their bank account number while opening and operating the demat account, the same may be duly mapped with the IFSC of that particular bank branch and the payment of refund may be made to the Anchor Investors through this method. In the event NEFT is not operationally feasible, the payment of refunds may be made through any one of the other modes as discussed in this section;

(c) **RTGS**—Anchor Investors having a bank account at any of the centres notified by SEBI where clearing houses are managed by the RBI, may have the option to receive refunds, if any, through RTGS.

(d) **Direct Credit**—Anchor Investors having their bank account with the Refund Banker may be eligible to receive refunds, if any, through direct credit to such bank account;

Please note that refunds through the abovementioned modes shall be credited only to the bank account from which the Bid Amount was remitted by the Anchor Investor to the Escrow Bank.

For details of levy of charges, if any, for any of the above methods, Anchor Investors may refer to RHP / Prospectus.

8.4 INTEREST IN CASE OF DELAY IN ALLOTMENT OR REFUND

The Issuer may pay interest at the rate of 15% per annum or such other rate as may be prescribed if Allotment is not made and the refund instructions have not been given to the clearing system in the disclosed manner / instructions for unblocking of funds in the ASBA Account are not dispatched within six working days of the Bid / Issue Closing Date.

The Issuer may pay interest at 15% per annum for any delay beyond 15 days from the Bid / Issue Closing Date, if Allotment is not made.

SECTION 9: GLOSSARY AND ABBREVIATIONS

Unless the context otherwise indicates or implies, certain definitions and abbreviations used in this document may have the meaning as provided below. References to any legislation, act or regulation may be to such legislation, act or regulation as amended from time to time. In case of any inconsistency between the definitions given in "Definitions and Abbreviations" beginning at page 1, and the definitions contained below, the definitions given in "Definitions and Abbreviations" shall prevail.

Term	Description
Allotment / Allot / Allotted	The allotment of Equity Shares pursuant to the Issue to successful Bidders / Applicants
Allotment Advice	Note or advice or intimation of Allotment sent to the Bidders / Applicants who have been Allotted Equity Shares after the Basis of Allotment has been approved by the designated Stock Exchanges
Allottee	An Bidder / Applicant to whom the Equity Shares are Allotted
Anchor Investor	A Qualified Institutional Buyer, applying under the Anchor Investor Portion in accordance with the requirements specified in SEBI ICDR Regulations and the Red Herring Prospectus.
Anchor Investor Application Form	The form used by an Anchor Investor to make a Bid in the Anchor Investor Portion and which will be considered as an application for Allotment in terms of the Red Herring Prospectus and Prospectus
Anchor Investor Portion	Up to 60% of the QIB Portion which may be allocated by the Issuer in consultation with the Book Running Lead Managers, to Anchor Investors on a discretionary basis. One-third of the Anchor Investor Portion is reserved for domestic Mutual Funds, subject to valid Bids being received from domestic Mutual Funds at or above the price at which allocation is being done to Anchor Investors
Application Supported by Blocked Amount / ASBA	An application, whether physical or electronic, used by ASBA Bidders / Applicants, to make a Bid and authorising an SCSB to block the Bid Amount in the specified bank account maintained with such SCSB
Application Supported by Blocked Amount Form / ASBA Form	An application form, whether physical or electronic, used by ASBA Bidders / Applicants, which will be considered as the application for Allotment in terms of the Red Herring Prospectus and the Prospectus
ASBA Account	Account maintained with an SCSB which may be blocked by such SCSB to the extent of the Bid Amount of the ASBA Bidder
ASBA Bidder	All Bidders / Applicants except Anchor Investors
Banker(s) to the Issue / Escrow Collection Bank(s) / Collecting Banker	The banks which are clearing members and registered with SEBI as Banker to the Issue with whom the Escrow Account for Anchor Investors may be opened, and as disclosed in the RHP / Prospectus and Bid cum Application Form of the Issuer
Basis of Allotment	The basis on which the Equity Shares may be Allotted to successful Bidders / Applicants under the Issue
Bid	An indication to make an Issue during the Bid / Issue Period by a prospective Bidder pursuant to submission of Bid cum Application Form or during the Anchor Investor Bid / Issue Period by the Anchor Investors, to subscribe for or purchase the Equity Shares of the Issuer at a price within the Price Band, including all revisions and modifications thereto. In case of issues undertaken through the fixed price process, all references to a Bid should be construed to mean an Application
Bid Amount	The highest value of the optional Bids indicated in the Bid cum Application Form and payable by the Bidder upon submission of the Bid (except for Anchor Investors), less discounts (if applicable). In case of issues undertaken through the fixed price process, all references to the Bid Amount should be construed to mean the Application Amount
Bid cum Application Form	The Anchor Investor Application Form or the ASBA Form, as the context requires
Bid / Issue Closing Date	Except in the case of Anchor Investors (if applicable), the date after which the Designated Intermediaries may not accept any Bids for the Issue, which may be notified in an English national daily, a Hindi national daily and a regional language newspaper at the place where the registered office of the

Term	Description
	Issuer is situated, each with wide circulation. Bidders / Applicants may refer to the RHP / Prospectus for the Bid / Issue Closing Date
Bid / Issue Opening Date	The date on which the Designated Intermediaries may start accepting Bids for the Issue, which may be the date notified in an English national daily, a Hindi national daily and a regional language newspaper at the place where the registered office of the Issuer is situated, each with wide circulation. Bidders / Applicants may refer to the RHP / Prospectus for the Bid / Issue Opening Date
Bid / Issue Period	Except in the case of Anchor Investors (if applicable), the period between the Bid / Issue Opening Date and the Bid / Issue Closing Date inclusive of both days and during which prospective ASBA Bidders / Applicants can submit their Bids, inclusive of any revisions thereof. The Issuer may consider closing the Bid / Issue Period for QIBs one working day prior to the Bid / Issue Closing Date in accordance with the SEBI ICDR Regulations. Bidders / Applicants may refer to the RHP / Prospectus for the Bid / Issue Period
Bidder / Applicant	Any prospective investor who makes a Bid / Application pursuant to the terms of the RHP / Prospectus and the Bid cum Application Form. In case of issues undertaken through the fixed price process, all references to a Bidder / Applicants should be construed to mean an Applicant
Book Built Process / Book Building Process / Book Building Method	The book building process as provided under SEBI ICDR Regulations, in terms of which the Issue is being made
Broker Centres	Broker centres notified by the Stock Exchanges, where Bidders / Applicants can submit the ASBA Forms to a Registered Broker. The details of such broker centres, along with the names and contact details of the Registered Brokers are available on the websites of the Stock Exchanges.
BRLM(s) / Book Running Lead Manager(s) / Lead Manager / LM	The Book Running Lead Manager to the Issue as disclosed in the RHP / Prospectus and the Bid cum Application Form of the Issuer. In case of issues undertaken through the fixed price process, all references to the Book Running Lead Manager should be construed to mean the Lead Manager or LM
Business Day	Monday to Saturday (except 2nd and 4th Saturday of a month and public holidays)
CAN / Confirmation of Allocation Note	Notice or intimation of allocation of the Equity Shares sent to Anchor Investors, who have been allocated the Equity Shares, after the Anchor Investor Bid / Issue Period
Cap Price	The higher end of the Price Band, above which the Issue Price and the Anchor Investor Issue Price may not be finalised and above which no Bids may be accepted
Client ID	Client Identification Number maintained with one of the Depositories in relation to demat account
Collecting Depository Participant or CDPs	A depository participant as defined under the Depositories Act, 1996, registered with SEBI and who is eligible to procure Bids at the Designated CDP Locations in terms of circular no. CIR/CFD/POLICYCELL/11/2015 dated November 10, 2015 issued by SEBI
Companies Act	Companies Act, 1956 and Companies Act, 2013, as applicable
Cut-off Price	Issue Price, finalised by the Issuer in consultation with the Book Running Lead Manager(s), which can be any price within the Price Band. Only RIBs, Retail Individual Shareholders and employees are entitled to Bid at the Cut-off Price. No other category of Bidders / Applicants are entitled to Bid at the Cut- off Price
DP	Depository Participant
DP ID	Depository Participant's Identification Number
Depositories	National Securities Depository Limited and Central Depository Services (India) Limited
Demographic Details	Details of the Bidders / Applicants including the Bidder / Applicant's address, name of the Applicant's father / husband, investor status, occupation and bank account details
Designated Branches	Such branches of the SCSBs which may collect the Bid cum Application

Term	Description
	Forms used by Bidders / Applicants (excluding Anchor Investors) and a list of which is available on http://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognised=yes
Designated CDP Locations	Such locations of the CDPs where Bidders can submit the ASBA Forms to Collecting Depository Participants. The details of such Designated CDP Locations, along with names and contact details of the Collecting Depository Participants eligible to accept ASBA Forms are available on the respective websites of the Stock Exchanges (www.bseindia.com and www.nseindia.com)
Designated Date	The date on which funds are transferred by the Escrow Collection Bank(s) from the Escrow Account and the amounts blocked by the SCSBs are transferred from the ASBA Accounts, as the case may be, to the Public Issue Account or the Refund Account, as appropriate, after the Prospectus is filed with the RoC, following which the board of directors may Allot Equity Shares to successful Bidders / Applicants in the Issue.
Designated Intermediaries	Syndicate, sub-syndicate / agents, SCSBs, Registered Brokers, CDPs and RTAs, who are authorized to collect ASBA Forms from the ASBA Bidders, in relation to the Issue
Designated RTA Locations	Such locations of the RTAs where Bidders can submit the ASBA Forms to RTAs. The details of such Designated RTA Locations, along with names and contact details of the RTAs eligible to accept ASBA Forms are available on the respective websites of the Stock Exchanges (www.bseindia.com and www.nseindia.com)
Designated Stock Exchange	The designated stock exchange as disclosed in the RHP / Prospectus of the Issuer
Discount	Discount to the Issue Price that may be provided to Bidders / Applicants in accordance with the SEBI ICDR Regulations.
Draft Prospectus	The draft prospectus filed with SEBI in case of Fixed Price Issues and which may mention a price or a Price Band
Employees	Employees of an Issuer as defined under SEBI ICDR Regulations and including, in case of a new company, persons in the permanent and full time employment of the promoting companies excluding the promoters and immediate relatives of the promoters. For further details, Bidder / Applicant may refer to the RHP / Prospectus
Equity Shares	Equity Shares of the Issuer
Escrow Account	Account opened with the Escrow Collection Bank(s) and in whose favour the Anchor Investors may transfer money through NEFT/RTGS/direct credit in respect of the Bid Amount when submitting a Bid
Escrow Agreement	Agreement to be entered into among the Issuer, the Registrar to the Issue, the Book Running Lead Manager(s), the Escrow Collection Bank(s) and the Refund Bank(s) for collection of the Bid Amounts from Anchor Investors and where applicable, remitting refunds of the amounts collected to the Anchor Investors on the terms and conditions thereof
Escrow Collection Bank(s)	Refer to definition of Banker(s) to the Issue
FCNR Account	Foreign Currency Non-Resident Account
First Bidder / Applicant	The Bidder / Applicant whose name appears first in the Bid cum Application Form or Revision Form
Fixed Price Issue / Fixed Price Process / Fixed Price Method	The Fixed Price process as provided under SEBI ICDR Regulations, in terms of which the Issue is being made
Floor Price	The lower end of the Price Band, at or above which the Issue Price and the Anchor Investor Issue Price may be finalised and below which no Bids may be accepted, subject to any revision thereto
FPIs	Foreign Portfolio Investors as defined under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014
FPO	Further public offering
Foreign Venture Capital Investors or FVCIs	Foreign Venture Capital Investors as defined and registered with SEBI under the SEBI (Foreign Venture Capital Investors) Regulations, 2000
IPO	Initial public offering

Term	Description
Issuer / Company	The Issuer proposing the initial public offering / further public offering as applicable
Maximum RIB Allottees	The maximum number of RIBs who can be Allotted the minimum Bid Lot. This is computed by dividing the total number of Equity Shares available for Allotment to RIBs by the minimum Bid Lot.
MICR	Magnetic Ink Character Recognition - nine-digit code as appearing on a cheque leaf
Mutual Fund	A mutual fund registered with SEBI under the SEBI (Mutual Funds) Regulations, 1996
Mutual Funds Portion	5% of the QIB Portion (excluding the Anchor Investor Portion) available for allocation to Mutual Funds only, being such number of equity shares as disclosed in the RHP / Prospectus and Bid cum Application Form
NACH	National Automated Clearing House
NEFT	National Electronic Fund Transfer
NRE Account	Non-Resident External Account
NRI	NRIs from such jurisdictions outside India where it is not unlawful to make an offer or invitation under the Issue and in relation to whom the RHP / Prospectus constitutes an invitation to subscribe to or purchase the Equity Shares
NRO Account	Non-Resident Ordinary Account
Non Institutional Bidders or NIBs	All Bidders / Applicants registered with SEBI which are foreign corporates or foreign individuals and FPIs which are Category III foreign portfolio investors, that are not QIBs or RIBs and who have Bid for Equity Shares for an amount of more than ₹200,000 (but not including NRIs other than Eligible NRIs)
Non-Institutional Portion	The portion of the Issue being such number of Equity Shares available for allocation to NIBs on a proportionate basis and as disclosed in the RHP / Prospectus and the Bid cum Application Form
Non-Resident	A person resident outside India, as defined under FEMA Regulations and includes Eligible NRIs, FPIs and FVCIs registered with SEBI
OCB / Overseas Corporate Body	A company, partnership, society or other corporate body owned directly or indirectly to the extent of at least 60% by NRIs including overseas trusts, in which not less than 60% of beneficial interest is irrevocably held by NRIs directly or indirectly and which was in existence on October 3, 2003 and immediately before such date had taken benefits under the general permission granted to OCBs under FEMA
Other Investors	Investors other than Retail Individual Bidders in a Fixed Price Issue. These include individual applicants other than Retail Individual Bidders and other investors including corporate bodies or institutions irrespective of the number of specified securities applied for
Issue Price	The final price, less discount (if applicable) at which the Equity Shares may be Allotted to Bidders other than Anchor Investors, in terms of the Prospectus. Equity Shares will be Allotted to Anchor Investors at the Anchor Investor Issue Price The Issue Price may be decided by the Issuer in consultation with the Book Running Lead Manager(s)
PAN	Permanent Account Number allotted under the Income Tax Act, 1961
Price Band	Price Band with a minimum price, being the Floor Price and the maximum price, being the Cap Price and includes revisions thereof. The Price Band and the minimum Bid lot size for the Issue will be decided by our Company in consultation with the Book Running Lead Managers and advertised, at least five working days in case of an IPO and one working day in case of FPO, prior to the Bid / Issue Opening Date, in English national daily, Hindi national daily and regional language at the place where the registered office of the Issuer is situated, newspaper each with wide circulation
Pricing Date	The date on which the Issuer in consultation with the Book Running Lead Manager(s), finalise the Issue Price
Prospectus	The prospectus to be filed with the RoC in accordance with Section 26 of the Companies Act, 2013 after the Pricing Date, containing the Issue Price, the size of the Issue and certain other information
Public Issue Account	A Bank account opened with the Banker to the Issue to receive monies from

Term	Description
	the Escrow Account and from the ASBA Accounts on the Designated Date
QIB Portion	The portion of the Issue being such number of Equity Shares to be Allotted to QIBs on a proportionate basis
Qualified Institutional Buyers or QIBs	As defined under SEBI ICDR Regulations
RTGS	Real Time Gross Settlement
Red Herring Prospectus / RHP	The Red herring prospectus issued in accordance with Section 32 of the Companies Act, 2013, which does not have complete particulars of the price at which the Equity Shares are issued and the size of the Issue. The RHP may be filed with the RoC at least three days before the Bid / Issue Opening Date and may become a Prospectus upon filing with the RoC after the Pricing Date. In case of issues undertaken through the fixed price process, all references to the RHP should be construed to mean the Prospectus
Refund Account	The account opened with Refund Bank, from which refunds to Anchor Investors, if any, of the whole or part of the Bid Amount may be made
Refund Bank	Refund bank as disclosed in the RHP / Prospectus and Bid cum Application Form of the Issuer
Registrar and Share Transfer Agents or RTAs	Registrar and share transfer agents registered with SEBI and eligible to procure Bids at the Designated RTA Locations in terms of circular no. CIR/CFD/POLICYCELL/11/2015 dated November 10, 2015 issued by SEBI
Registered Broker	Stock Brokers registered with the Stock Exchanges having nationwide terminals, other than the members of the Syndicate
Registrar to the Issue / RTO	The Registrar to the Issue as disclosed in the RHP / Prospectus and Bid cum Application Form
Reserved Category / Categories	Categories of persons eligible for making application / Bidding under reservation portion
Reservation Portion	The portion of the Issue reserved for such category of eligible Bidders / Applicants as provided under the SEBI ICDR Regulations
Retail Individual Bidders / RIBs	Investors who applies or bids for a value of not more than ₹200,000.
Retail Individual Shareholders	Shareholders of a listed Issuer who applies or bids for a value of not more than ₹200,000.
Retail Portion	The portion of the Issue being such number of Equity Shares available for allocation to RIBs which shall not be less than the minimum Bid Lot, subject to availability in RIB category and the remaining shares to be Allotted on proportionate basis.
Revision Form	The form used by the Bidders in an issue through Book Building Process to modify the quantity of Equity Shares and / or bid price indicated therein in any of their Bid cum Application Forms or any previous Revision Form(s)
RoC	The Registrar of Companies
SEBI	The Securities and Exchange Board of India constituted under the Securities and Exchange Board of India Act, 1992
SEBI ICDR Regulations	The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009
Self Certified Syndicate Bank(s) or SCSB(s)	A bank registered with SEBI, which offers the facility of ASBA and a list of which is available on http://www.sebi.gov.in/cms/sebi_data/attachdocs/1316087201341.html
Specified Locations	Refer to definition of Broker Centres
Stock Exchanges / SE	The stock exchanges as disclosed in the RHP / Prospectus of the Issuer where the Equity Shares Allotted pursuant to the Issue are proposed to be listed
Syndicate	The Book Running Lead Manager(s) and the Syndicate Member
Syndicate Agreement	The agreement to be entered into among the Issuer, and the Syndicate in relation to collection of ASBA Forms by Syndicate Members
Syndicate Member(s) / SM	The Syndicate Member(s) as disclosed in the RHP / Prospectus
Underwriters	The Book Running Lead Manager(s) and the Syndicate Member(s)
Underwriting Agreement	The agreement among the Issuer, and the Underwriters to be entered into on or after the Pricing Date
Working Day	"Working Day" means all days, other than second and fourth Saturday of the

Term	Description
	month, Sunday or a public holiday, on which commercial banks in Mumbai are open for business; provided however, with reference to (a) announcement of Price Band; and (b) Bid / Issue Period, "Working Day" shall mean all days, excluding all Saturdays, Sundays or a public holiday, on which commercial banks in Mumbai are open for business; and with reference to the time period between the Bid / Issue Closing Date and the listing of the Equity Shares on the Stock Exchanges, "Working Day" shall mean all trading days of Stock Exchanges, excluding Sundays and bank holidays, as per the SEBI Circular SEBI/HO/CFD/DIL/CIR/P/2016/26 dated January 21, 2016

RESTRICTIONS ON FOREIGN OWNERSHIP OF INDIAN SECURITIES

Foreign investment in Indian securities is regulated through the Industrial Policy, 1991 of the Government of India and FEMA. While the Industrial Policy, 1991 prescribes the limits and the conditions subject to which foreign investment can be made in different sectors of the Indian economy, FEMA regulates the precise manner in which such investment may be made. The Union Cabinet, as provided in the Cabinet Press Release dated May 24, 2017, has given its approval for phasing out the FIPB. Accordingly, the process for foreign direct investment ("**FDI**") and approval from the Government of India will now be handled by the concerned ministries or departments, in consultation with the Department of Industrial Policy and Promotion, Ministry of Commerce and Industry, Government of India ("**DIPP**"), Ministry of Finance, Department of Economic Affairs, FIPB section, through a memorandum dated June 5, 2017 has notified the specific ministries handling relevant sectors.

The Government of India has from time to time made policy pronouncements on FDI through press notes and press releases.

The DIPP issued the Consolidated Foreign Direct Investment Policy notified by the D/o IPP F. No. 5(1)/2017-FC-1 dated August 28, 2017 which with effect from August 28, 2017 (the "**FDI Policy**"), consolidates and supersedes all previous press notes, press releases and clarifications on FDI issued by the DIPP that were in force and effect prior to August 28, 2017. The Government of India proposes to update the consolidated circular on FDI Policy once every year and therefore, the FDI Policy will be valid until the DIPP issues an updated circular.

The transfer of shares between an Indian resident and a non-resident does not require the prior approval of the RBI, provided that (i) the activities of the investee company are under the automatic route under the foreign direct investment policy and transfer does not attract the provisions of the Takeover Regulations; (ii) the non-resident shareholding is within the sectoral limits under the FDI policy; and (iii) the pricing is in accordance with the guidelines prescribed by the SEBI/RBI.

As per the existing policy of the Government of India, OCBs cannot participate in this Issue.

The above information is given for the benefit of the Bidders. Our Company, the BRLMs are not liable for any amendments or modification or changes in applicable laws or regulations, which may occur after the date of this Draft Red Herring Prospectus. Bidders are advised to make their independent investigations and ensure that the number of Equity Shares Bid for do not exceed the applicable limits under laws or regulations.

SECTION VIII: MAIN PROVISIONS OF ARTICLES OF ASSOCIATION

Capitalized terms used in this section have the meaning that has been given to such terms in the Articles of Association of our Company. Pursuant to Schedule I of the Companies Act, 2013 and the SEBI ICDR Regulations, the main provisions of the Articles of Association of our Company are detailed below:

Share Capital

Article 3 provides that "The Authorised Share Capital of the Company shall be such amount and be divided into such shares as may, from time to time, be provided in Clause V of Memorandum of Association with power to increase or reduce the Capital in accordance with the Company's Regulations and legislative provisions for the time being in force on that behalf with the power to divide the share Capital, whether original or increased or decreased into several classes and attach thereto respectively such ordinary, preferential or special rights and condition in such manner as may for the time being be provided by the Regulation of the Company and allowed by Law."

Article 5 provides that " Subject to the provisions of the Act and these Articles, the Board may issue and allot shares in the capital of the Company on payment or part payment for any property or asset of any kind whatsoever sold or transferred, goods or machinery supplied or for services rendered to the Company in the conduct of its business and any shares which may be so allotted may be issued as fully paid-up or partly paid-up otherwise than for cash, and if so issued, shall be deemed to be fully paid-up or partly paid-up shares, as the case may be."

Commission for placing shares, debentures, etc.

Article 10 provides that:

(a) "The Company may exercise the powers of paying commissions conferred by the act, to any person in connection with the subscription to securities, provided that the rate percent or the amount of commission paid or agreed to be paid shall be disclosed in the manner required by the act and the rules.
(b) The rate or amount of commission shall not exceed the rates or amount prescribed in the rules.
(c) The commission may be satisfied by the payment of cash or the allotment of fully or partly paid Shares or partly in the one way and partly in the other."

Calls on shares:

Article 22 provides that:

"(1) The Board may, from time to time make calls upon the members in respect of any monies unpaid on their Shares (whether on account of the nominal value of the Shares or by way of premium) and not by the conditions of allotment thereof made payable at fixed times.

(2) Each member shall, subject to receiving of at least 14 (fourteen) days' notice specifying the time or times and place of payment, pay to the Company, at the time or times and place so specified, the amount called on his Shares.

(3) The Board may, from time to time, at its discretion, extend the time fixed for the payment of any call in respect of one or more members as the Board may deem appropriate in any circumstances.

(4) A call may be revoked or postponed at the discretion of the Board of Directors."

Article 23 provides that "A call shall be deemed to have been made at the time when the resolution of the Board of Directors authorizing the call was passed and may be required to be paid by installments."

Transfer of shares

Article 32 provides that:

(1) "The instrument of transfer of any Share in the Company shall be executed by or on behalf of both the transferor and transferee.

(2) The transferor shall be deemed to remain a holder of the Share until the name of the transferee is entered in the register of Members in respect thereof."

Article 33 provides that "The Board of Directors may, subject to the right of appeal conferred by the Act, decline to register-

(a) the transfer of a Share, not being a fully paid Share, to a person of whom they do not approve; or

(b) any transfer of Shares on which the Company has a lien."

Provided that registration of transfer shall not be refused on the ground of the transferor being either alone or jointly with any other person or persons indebted to the Issuer on any account whatsoever except when the Company has a lien on the Shares.

Article 34 provides that "In case of shares held in physical form, the Board of Directors may decline to recognize any instrument of transfer unless-

(a) the instrument of transfer is duly executed and is in the form as prescribed in rules made under the Act,

(b) the instrument of transfer is accompanied by the certificate of the Shares to which it is relates, and such other evidence as the Board of Directors may reasonably require to show the right of the transferor to make the transfer; and

(c) the instrument of transfer is in respect of only one class of Shares."

(3) The company shall use a common form of transfer.

Transmission of shares

Article 37 provides that:

(1) "On the death of a Member, the survivor or survivors where then Member was a joint holder, and his nominee or nominees or legal representatives where he was a sole holder, shall be the only persons recognized by the Company as having any title to his interest in the Shares.

(2) Nothing in clause shall release the estate of a deceased joint holder from any liability in respect of any Share which had been jointly held by him with other persons."

Article 38 provides that:

(1) " Any person becoming entitled to a Share in consequence of the death or insolvency of a Member may, upon such evidence being produced as may from time to time properly be required by the Board and subject as hereinafter provided, elect, either

(a) To be registered himself as holder of the Share; or

(b) To make such transfer of the Share as the deceased or insolvent Member could have made.

(2) The Board shall, in either case, have the same right to decline or suspend registration as it would have had, if the deceased or insolvent Member had transferred the Share before his death or insolvency.

(3) The Company shall be fully indemnified by such person from all liability, if any, by actions taken by the board to give effect to such registration or transfer."

Article 39 provides that:

(1) "If the person so becoming entitled shall elect to be registered as holder of the Share himself, he shall deliver or send to the Company a notice in writing signed by him stating that he so elects.

(2) If the person aforesaid shall elect to transfer the Share, he shall testify his election by executing a transfer of the Share.

(3) All the limitations, restrictions and provisions of these articles relating to the right to transfer and the registration of transfers of Shares shall be applicable to any such notice or transfer as aforesaid as if the death or insolvency of the Member had not occurred and the notice or transfer were a transfer signed by that Member."

Article 40 provides that: "A person becoming entitled to a share by reason of the death or insolvency of the holder shall be entitled to the same dividends and other advantages to which he would be entitled if he were the registered holder of the Share, except that he shall not, before being registered as a Member in respect of the share, be entitled in respect of it to exercise any right conferred by membership in relation to meetings of the Company:

Provided that the Board may, at any time, give notice requiring any such person to elect either to be registered himself or to transfer the share, and if the notice is not complied with within ninety days, the Board may thereafter withhold payment of all dividends, bonuses or other monies payable in respect of the share, until the requirements of the notice have been complied with."

Article 41 provides that "The provisions of these Articles relating to transmission by operation of law shall mutatis mutandis apply to any other securities including debentures of the Company."

Forfeiture

Article 42 provides that " If a Member fails to pay any call, or installment of a call or any money due in respect of any share, on the day appointed for payment thereof, the Board may, at any time thereafter during such time as any part of the call or installment remains unpaid or a judgment or decree in respect thereof remains unsatisfied in whole or in part, serve a notice on him requiring payment of so much of the call or installment or other money as is unpaid, together with any interest which may have accrued and all expenses that may have been incurred by the Company by reason of non-payment."

Article 43 provides that:

"The Notice aforesaid shall-

(a) name a further day (not being earlier than the expiry of fourteen days from the date of service of the notice) on or before which the payment required by the notice is to be made; and

(b) state that, in the event of non-payment on or before the day so named, the Shares in respect of which the call was made shall be liable to be forfeited."

Alteration of Capital

Article 56 provides that:

"Subject to the provisions of the Act, the Company may, by Ordinary Resolution-

(a) Increase the share capital by such sum, to be divided into shares of such amount as it thinks expedient;

(b) Consolidate and divide all or any of its share capital into Shares of larger amount than its existing Shares:

Provided that any consolidation and division which result in changes in the voting percentage of members shall require applicable approvals under the act;

(c) Convert all or any of its fully paid-up Shares into stock, and reconvert that stock into fully paid-up Shares of any denomination;

(d) Sub-divide its existing Shares or any of them into Shares of smaller amount than is fixed by the Memorandum;

(e) Cancel any Shares which, at the date of the passing of the resolution, have not been taken or agreed to be taken by any person."

Article 58 provides that:

" The Company may, by resolution as prescribed by the Act, reduce in any manner and with, and subject to, any incident authorized and consent required by law.-

(a) its share capital; and/or

(b) any capital redemption reserve account; and/or

(c) any securities premium account; and/or

(d) any other reserve in the nature of share capital.

Capitalisation of Profits

Article 60 provides that:

(1) "The Company by resolution as prescribed by the Act in general meeting may, upon the recommendation of the Board of Directors, resolve-

(a) that it is desirable to capitalise any part of the amount for the time being standing to the credit of any of the Company's reserve accounts, or to the credit of the profit and loss account, or otherwise available for distribution; and

(b) that such sum be accordingly set free for distribution in the manner specified in clause (2) below amongst the Members who would have been entitled thereto, if distributed by way of Dividend and in the same

(2) The sum aforesaid shall not be paid in cash but shall be applied, subject to the applicable provisions contained in clause (3) below, either in or towards-

(a) paying up any amounts for the time being unpaid on any Shares held by such Members respectively;

(b) paying up in full, unissued Shares of the Company to be allotted and distributed, credited as fully paid-up, to and amongst such Members in the proportions aforesaid;

(c) partly in the way specified in sub-clause (a) and partly in that specified in sub-clause (b);

(3) A securities premium account and a capital redemption reserve account or any permissible reserve account may, for the purposes of this Article, be applied in the paying up of unissued Shares to be issued to Members of the Company as fully paid bonus Shares;

(4) The Board shall give effect to the resolution passed by the Company in pursuance of this Article proportions."

General Meeting

Article 63 provides that "All General meetings other than annual general meeting shall be called extraordinary general meeting. "

Article 64 provides that "The Board may, whenever it thinks fit, call an extraordinary general meeting."

Vote of Members

Article 74 provides that "Subject to any rights or restrictions for the time being attached to any class or classes of Shares,-

(a) on a show of hands, every Member present in person shall have one vote; and

(b) on a poll, the voting rights of Members shall be in proportion to his share in the paid-up equity share capital of the Company."

Article 75 provides that "A Member may exercise his vote at a meeting by electronic means in accordance with the Act and shall vote only once."

Article 76 provides that:

(1) "In the case of joint holders, the vote of the senior who tenders, a vote, whether in person or by proxy, shall be accepted to the exclusion of the votes of the other joint holders.

(2) For this purpose, seniority shall be determined by the order in which the names stand in the register of Members."

Proxies

Article 83 provides that

(1) "Any member entitled to attend and vote at a general meeting may do so either personally or through his constituted attorney or through his constituted attorney or through another person as a proxy an his behalf, for that meeting.

(2) The instrument appointing a proxy and the power-of-attorney or other authority, if any, under which it is signed or a notarized copy of that power a authority, shall be deposited at the registered office of the Company not less than 48 hours before the time for holding the meeting or adjourned meeting at which the person named in the instrument proposes to vote, or, in the case of a poll, not less than 24 hours before the time appointed for the taking of the poll; and in default the instrument of proxy shall not be treated as valid."

Board of Directors

Article 86 provides that "Subject to the applicable provisions of the Act, the number of Directors of the Company shall not be less than 3 (three) and not more than 15 (fifteen). The Company shall also comply with the provisions of the Companies (Appointment and Qualification of Directors) Rules, 2014 and the provisions of the SEBI Listing Regulations. The Board shall have an optimum combination of executive and Independent Directors with at least 1 (one) woman Director, as may be prescribed by Law from time to time."

Article 92 provides that "At the Annual General Meeting of the Company to be held in every year, one third of such of the Directors as are liable to retire by rotation for time being, or, if their number is not three or a multiple of three then the number nearest to one third shall retire from office, and they will be eligible for reelection. Provided nevertheless that the managing Director or whole-time Director(s), appointed or the Directors appointed as a Debenture Director, or the Directors appointed as Independent Director(s) under Articles hereto shall not retire by rotation under this Article nor shall they be included in calculating the total number of Directors of whom one third shall retire from office under this Article."

Borrowing Power

Article 96 provides that "Subject to the provisions of the Act ,Rules and Regulations as may be applicable, the Board may from time to time at its discretion by a resolution passed at a meeting of the Board, raise or borrow, either from directors or from elsewhere either in advance of calls or otherwise and generally raise or borrow or secure the payment of any sum or sums or money for the purposes of the Company and may in this regard mortgage or otherwise encumber all or any part of its undertaking, property or uncalled capital, Provided, however, where the moneys to be borrowed together with the moneys already borrowed (apart from temporary loans obtained from the Company's bankers in the ordinary course of business) shall not exceed the aggregate of the paid up capital of the Company and its free reserves (reserves not set apart for any specific purposes) the Board shall not borrow such money without the consent of the Company in General Meeting."

Article 98 provides that "Any debentures, debenture stock or other debt securities may be issued at discount, premium or otherwise and subject to the provisions of the Act may be issued on condition that they shall be convertible into shares of any denomination and with any privileges or conditions as to redemption, surrender, drawing, allotment of shares and attending (but not voting) at general meetings, appointment of directors and otherwise debentures with the right to conversion into or allotment of shares shall be issued only with the consent of the Company in General Meeting."

Proceedings of the Boards

Article 100 provides that:

(1) "The Board of Directors may meet for the conduct of business, adjourn and otherwise regulate its meetings, as it thinks fit.

(2) The Chairperson or any one Director with the previous consent of the Chairperson may, or the Company Secretary on the direction of the Chairperson shall, at any time, summon a meeting of the Board.

(3) The quorum for a Board Meeting shall be as provided in the Act.

(4) The participation of directors in a meeting of the Board may be either in person or through video conferencing or audio visual means, as may be prescribed by the Rules or permitted under law."

Article 101 provides that:

(1) "Save as otherwise expressly provided in the Act, questions arising at any meeting of the Board of Directors shall be decided by a majority of votes.

(2) In case of an equality of votes, the Chairperson of the Board, if any, shall have a second or casting vote."

Indemnity and Insurance

Article 125 provides that:

(a) "Subject to the provisions of the Act, every director, managing director, whole-time director, manager, company secretary and other officer of the Company shall be indemnified by the Company out of the funds of the Company, to pay all costs, losses and expenses (including travelling expense) which such director, manager, company secretary and officer may incur or become liable for by reason of any contract entered into or act or deed done by him in his capacity as such director, manager, company secretary or officer or in any way in the discharge of his duties in such capacity including expenses.

(b) Subject as aforesaid, every director, managing director, manager, company secretary or other officer of the Company shall be indemnified against any liability incurred by him in defending any proceeding, whether civil or criminal in which judgment is given in favour or in which he is acquitted or discharged or in connection with any application under applicable provision of the Act in which relief is given to him by the Court.

(c) The Company may take and maintain any insurance as the Board may think fit on behalf of its present and/or former directors and key managerial personnel for indemnifying all or any of them against any liability for any acts in relation to the Company for which they may be liable but have acted honestly and reasonably.

(d) Subject to the provisions of the Act, no Director, Key Managerial Personnel or other Officer of the Company shall be liable for the acts, receipts, neglects or defaults of any other Director or Officer or for joining in any receipt or other act for the sake of conformity or for any loss or expense happening to the Company through insufficiency or deficiency of title to any property acquired by order of the Director for or on behalf of the Company, or for the insufficiency or deficiency of any security in or upon which any of the moneys of the Company shall be invested or for any loss or damage arising to the bankruptcy, insolvency or tortuous act of any person, Company or Corporation with whom any money, securities or effects shall be entrusted or deposited or for any loss occasioned by an error or judgement or oversight on his or their part or for any other loss or damage or misfortune whatever, which shall happen in the execution of the duties of his or their office or in relation thereto unless the same happens through his own dishonesty."

SECTION IX: OTHER INFORMATION

MATERIAL CONTRACTS AND DOCUMENTS FOR INSPECTION

The copies of the following documents and contracts which have been entered or are to be entered into by our Company (not being contracts entered into in the ordinary course of business carried on by our Company or contracts entered into more than two years before the date of the Draft Red Herring Prospectus) which are or may be deemed material will be attached to the copy of the Red Herring Prospectus which will be delivered to the RoC for registration. Copies of the abovementioned contracts and also the documents for inspection referred to hereunder, may be inspected at the Registered Office between 10 a.m. and 5 p.m. on all Working Days from the date of the Red Herring Prospectus until the Bid/ Issue Closing Date.

Any of the contracts or documents mentioned in this Draft Red Herring Prospectus may be amended or modified at any time if so required in the interest of our Company or if required by the other parties, without reference to the shareholders, subject to compliance of the provisions contained in the Companies Act and other applicable law.

A. Material Contracts for the Issue

1. Issue Agreement dated September 12, 2018 entered into among our Company and the BRLMs.
2. Registrar Agreement dated September 7, 2018 entered into among our Company and the Registrar to the Issue.
3. Cash Escrow Agreement dated [●] entered into among our Company, the Registrar to the Issue, BRLMs, the Escrow Collection Bank(s) and the Refund Bank(s).
4. Syndicate Agreement dated [●] entered into among our Company, BRLMs, and the Syndicate Members.
5. Underwriting Agreement dated [●] entered into among our Company and the Underwriters.
6. Monitoring Agency Agreement dated [●] entered into between our Company and [●].

B. Material Documents

1. Certified copies of the Memorandum of Association and Articles of Association of our Company, as amended.
2. Certificate of incorporation dated July 25, 2002 under the name of 'Shri Bajrang Power and Ispat Limited'.
3. Certificate for commencement of business dated February 5, 2004, issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh.
4. Certificate of registration of order of high court on scheme of amalgamation of companies dated December 7, 2011 issued at Gwalior, by the Registrar of Companies, Madhya Pradesh and Chhattisgarh.
5. Resolution of our Board dated September 2, 2018 in relation to the Issue and other related matters.
6. Resolution of our Shareholders dated September 3, 2018 in relation to the Issue and other related matters.
7. Copies of annual reports of our Company for the last five years.
8. Examination reports on the Restated Standalone Financial Statements and Restated Consolidated Financial Statements both dated September 2, 2018, of our Statutory Auditors, included in this Draft Red Herring Prospectus.
9. Consent letter dated September 12, 2018 from our Statutory Auditors for inclusion of their name as experts.
10. The statement of tax benefits dated September 12, 2018 from our Statutory Auditors.

11. Resolutions passed at the meetings of our Board on September 2, 2018 and Shareholders on September 3, 2018 in relation to the terms of appointment of our Executive Director and Chairman, Suresh Goel.

12. Resolutions passed at the meetings of our Board on September 2, 2018 and Shareholders on September 3, 2018 in relation to the terms of appointment of our Managing Director, Narendra Goel.

13. Consents of the Directors, BRLMs, Statutory Auditors, Legal Counsel to our Company, Registrar to the Issue, Bankers to our Company, Chief Financial Officer, Company Secretary and Compliance Officer, as referred to in their specific capacities.

14. Power Purchase Agreements of our Company with Chhattisgarh State Power Distribution Company Limited with respect to Unit I, Unit II and Unit III of our Company dated June 23, 2017. Application dated June 5, 2018 made by the Company for renewal of the power purchase agreements.

15. Report titled "Industry Overview: Iron and Steel" dated August 30, 2018 prepared and issued by ICRA Limited.

16. Consent letter dated August 30, 2018 from ICRA Limited for inclusion of the contents or any part thereof from the ICRA Report in this DRHP.

17. Consent of Er. Shreyansh Agrawal (Chartered Engineer) dated August 1, 2018 to include his name in this DRHP.

18. Shareholder's agreement dated August 6, 2007, between our Company, GPIL, IEL, SNIL and VGL to develop Coal Blocks.

19. Scheme of amalgamation between our Company and Shri Bajrang Metallics & Power Limited approved by the High Court of Chhattisgarh, by an order dated November 14, 2011.

20. Due Diligence Certificate dated September 12, 2018 addressed to SEBI from the BRLMs.

21. In-principle listing approvals dated [●] and [●] issued by BSE and NSE, respectively.

22. Tripartite agreement dated November 16, 2010 among our Company, NSDL and the Registrar to the Issue.

23. Tripartite agreement dated June 22, 2018 among our Company, CDSL and the Registrar to the Issue.

24. SEBI final observations letter no. [●] dated [●].

DECLARATION

We hereby certify and declare that all relevant provisions of the Companies Act and the regulations, rules or guidelines issued by the Government or the regulations or guidelines issued by SEBI, established under Section 3 of the SEBI Act, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the SCRA, the SEBI Act or rules or regulations made or guidelines issued thereunder, as the case may be. We further certify that all disclosures made in this Draft Red Herring Prospectus are true and correct.

SIGNED BY ALL THE DIRECTORS OF OUR COMPANY

Suresh Goel
(Executive Director and Chairman)

Hemendra Nath
(Independent Director)

Rajendra Goel
(Executive Director)

Anshul Dave
(Independent Director)

Narendra Goel
(Managing Director)

Ravinder Singh Rajput
(Independent Director)

Anand Goel
(Executive Director)

Hema Thakur
(Independent Director)

Shravan Kumar Goyal
(Whole-time Director)

Rakesh Bhargava
(Independent Director)

SIGNED BY THE CHIEF FINANCIAL OFFICER OF OUR COMPANY

Sandeep Goel
(Chief Financial Officer)

Place: Raipur

Date: September 12, 2018