



ASSAM CARBON PRODUCTS LIMITED

ANNUAL REPORT

2021-22

Corporate Information

ASSAM CARBON PRODUCTS LIMITED
CIN: L23101AS1963PLC001206
ANNUAL REPORT 2021-2022

BOARD OF DIRECTORS

Mr. Rakesh Himatsingka (DIN: 00632156) - Chairman
Mr. Kali Krishna Bhattacharya (DIN: 07011241) - Managing Director
Mrs. Anita Himatsingka (DIN: 01201879)
Ms. Maalika Himatsingka (DIN: 07811394)
Mr. Susheel Kumar Sharma (DIN: 01636111)
Mrs. Rupanjana De (DIN: 01560140) - Independent Director
Mr. Avinash Kumar Gupta (DIN: 08763153) - Independent Director
Mr. Sanjay Kumar Lhila (DIN: 01383460) - Independent Director
Mr. Jnyan Prasad Deuri (DIN: 09084570) - AIDC NOMINEE

CHIEF FINANCIAL OFFICER

Mr. Pijush Bysack

COMPANY SECRETARY

Ms. Parinita Goenka
(appointed w.e.f 1st October, 2021)

REGISTERED OFFICE

Birkuchi, Narengi Chandrapur Road,
Narengi, Guwahati- 781 026, Assam.
Ph: 0361 -2640262/ 2640630, Fax: 0361 – 2640368
E Mail: acplghy@ascarbon.com
Website: <http://www.assamcarbon.in>

CORPORATE OFFICE

6, Old Post Office Street,
Temple Chambers, 5th Floor,
Kolkata- 700001

AUDITORS

- D. Basu & Co., Chartered Accountants, Statutory Auditors
- BSS & Associates, Cost Accountants, Cost Auditors
- J. Kumar Jain & Associates, Chartered Accountants, Internal Auditors
- Mahata Agarwal & Associates, Practicing Company Secretaries, Secretarial Auditors

REGISTRARS & SHARE TRANSFER AGENTS

C B Management Services (P) Ltd
P-22 Bondel Road, Kolkata – 700 019
Phone No.: 40116700/17/18
Fax No.: (033) 4011 6739, E-mail: rta@cbmsl.com

BANKERS

Axis Bank

CONTENTS	Page No.
1. Notice	2
2. Directors' Report & its Annexures	12
3. Management Discussion & Analysis Report	43
4. Auditors' Report	47
5. Balance Sheet	54
6. Profit & Loss Statement	55
7. Cash Flow Statement	56
8. Statement of Changes in Equity	57
9. Notes to Financial Statements	58

WORKS

Plant I:

Narengi Chandrapur Road,
Birkuchi, Narengi, Guwahati,
Pin – 781 026,
Assam

Plant II:

Plot No. 2, I.D.A, Phase-I
Patancheru – 502 319
Dist – Medak, Telangana,
Pin: 502319

Notice

NOTICE TO MEMBERS

NOTICE is hereby given that the 59th Annual General Meeting of the Members of Assam Carbon Products Limited ('the Company'), will be held on **Monday, the 29th day of August, 2022 at 11:00 A.M. (IST)**, through Video Conferencing ("VC") or Other Audio Visual Means ("OAVM"), to transact the following businesses:

ORDINARY BUSINESS:

To consider and, if thought fit, to pass, with or without modification(s), the following resolutions as ordinary resolutions:

1. Adoption of Financial Statements:

To consider and adopt the Audited Financial Statements of the Company for the Financial Year ended 31st March, 2022, together with the Reports of the Board of Directors and the Auditors thereon.

2. Re-Appointment of Mr. Rakesh Himatsingka as a Director, liable to retire by rotation:

To appoint Director, in place of Mr. Rakesh Himatsingka, (DIN: 00632156), who retires by rotation and being eligible, offers himself for reappointment.

3. Re-Appointment of Mrs. Anita Himatsingka as a Director, liable to retire by rotation:

To appoint Director, in place of Mrs. Anita Himatsingka, (DIN: 01201879), who retires by rotation and being eligible, offers herself for reappointment.

SPECIAL BUSINESS:

4. Ratification of Remuneration of the Cost Auditors:

To consider and, if thought fit, to pass with or without modification(s) the following resolution as an Ordinary Resolution:

"RESOLVED THAT pursuant to the provisions of Section 148 read with Section 141 of the Companies Act, 2013 and the Companies (Audit and Auditors) Rules, 2014 [including any statutory modification(s) or re-enactment thereof for the time being in force], the remuneration payable to M/s. BSS & Associates, Cost Accountants (Firm Regd. No.: 001066), appointed by the Board of Directors, on the recommendation of the Audit Committee, as the Cost Auditors of the Company, to conduct the audit of the cost accounting records maintained by the Company for the Products(s) / Services(s) for the financial year ending on 31st March, 2023, at a remuneration of Rs. 20,000/- (Rupees Twenty Thousand only), plus applicable taxes and incidental expenses, if any, be and is hereby ratified and confirmed".

5. To Approve the Payment of Commission to Mr. Rakesh Himatsingka, Non-Executive Chairman of the Company:

To consider and, if thought fit, to pass with or without modification(s) the following resolution as a Special Resolution:

"RESOLVED THAT pursuant to Sections 197, 198, Schedule V and other applicable provisions, if any, of the Companies Act, 2013 and the rules framed thereunder and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, including any statutory modification(s) or re-enactment(s) thereof for the time being in force, the consent of the Shareholders be and is hereby accorded for payment of commission upto 1% of the net profits of the Company, computed in the manner laid down in Section 198 of the Companies Act, 2013, from the financial year 2021-2022 and onwards until otherwise repudiated by the Board of Directors, to Mr. Rakesh Himatsingka, (DIN: 00632156) Non-Executive Chairman of the Board, in addition to the sitting fees for attending the meeting of the Board of Directors/Committees thereof and any other expenses incurred for official/business purposes only."

By Order of the Board

Sd/-

Rakesh Himatsingka
Chairman
(DIN: 00632156)

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Notice (Contd.)

NOTES:

1. In view of the massive outbreak of the COVID-19 pandemic, social distancing is a norm to be followed and pursuant to the Circular No. 14/2020 dated April 08, 2020, Circular No.17/2020 dated April 13, 2020 issued by the Ministry of Corporate Affairs followed by Circular No. 20/2020 dated May 05, 2020 and Circular No. 02/2021 dated January 13, 2021 and all other relevant circulars issued from time to time, physical attendance of the Members to the AGM venue is not required and general meeting be held through video conferencing (VC) or other audio visual means (OAVM). Hence, Members can attend and participate in the ensuing AGM through VC/OAVM.
2. The Ministry of Corporate Affairs (MCA) vide General Circular No. 2/2022 dated May 5, 2022 and SEBI vide Circular No. SEBI/HO/CFD/CMD2/CIR/P/2022/62 dated May 13, 2022 granted relaxation from dispatching physical copies of Annual Reports to the Shareholders by those listed entities who may conduct their Annual General Meetings (AGM) through electronic mode. Hence, in view of COVID-19 pandemic, kindly note that no physical copy of Annual Report 2021-22 will be sent to the members/ shareholders.
3. Pursuant to the Circular No. 14/2020 dated April 08, 2020, issued by the Ministry of Corporate Affairs, the facility to appoint proxy to attend and cast vote for the members is not available for this AGM. However, the Body Corporates are entitled to appoint authorised representatives to attend the AGM through VC/OAVM and participate there at and cast their votes through e-voting.
4. The Members can join the AGM in the VC/OAVM mode 15 minutes before and after the scheduled time of the commencement of the Meeting by following the procedure mentioned in the Notice. The facility of participation at the AGM through VC/OAVM will be made available for 1000 members on first come first served basis. This will not include large Shareholders (Shareholders holding 2% or more shareholding), Promoters, Institutional Investors, Directors, Key Managerial Personnel, the Chairpersons of the Audit Committee, Nomination and Remuneration Committee and Stakeholders Relationship Committee, Auditors etc. who are allowed to attend the AGM without restriction on account of first come first served basis.
5. The attendance of the Members attending the AGM through VC/OAVM will be counted for the purpose of reckoning the quorum under Section 103 of the Companies Act, 2013.
6. Pursuant to the provisions of Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (as amended) and Regulation 44 of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 (as amended), and the Circulars issued by the Ministry of Corporate Affairs dated April 08, 2020, April 13, 2020 and May 05, 2020 the Company is providing facility of remote e-Voting to its Members in respect of the business to be transacted at the AGM. For this purpose, the Company has entered into an agreement with National Securities Depository Limited (NSDL) for facilitating voting through electronic means, as the authorized agency. The facility of casting votes by a member using remote e-Voting system as well as venue voting on the date of the AGM will be provided by NSDL.
7. In line with the Ministry of Corporate Affairs (MCA) Circular No. 17/2020 dated April 13, 2020, the Notice calling the AGM has been uploaded on the website of the Company at www.assamcarbon.in. The Notice can also be accessed from the websites of The Calcutta Stock Exchange Ltd at www.cse-india.com and the AGM Notice is also available on the website of NSDL (agency for providing the Remote e-Voting facility) i.e. www.evoting.nsdl.com.
8. AGM has been convened through VC/OAVM in compliance with applicable provisions of the Companies Act, 2013 read with MCA Circular No. 14/2020 dated April 08, 2020 and MCA Circular No. 17/2020 dated April 13, 2020, MCA Circular No. 20/2020 dated May 05, 2020 and MCA Circular No. 2/2021 dated January 13, 2021.
9. The Company is listed on The Calcutta Stock Exchange Ltd. and the Scrip Code is **10011403** and the ISIN of the Company's shares in dematerialized mode is **INE496C01018**. There are no arrears of Listing Fees.
10. The Register of Members and Share Transfer Books of the Company will remain closed from 23rd August, 2022 to 29th August, 2022 (both days inclusive).

THE INSTRUCTIONS FOR MEMBERS FOR REMOTE E-VOTING AND JOINING GENERAL MEETING ARE AS UNDER:-

The remote e-voting period begins on Friday, 26th August, 2022 at 9:00 A.M. and ends on Sunday, 28th August, 2022 at 5:00 P.M. The remote e-voting module shall be disabled by NSDL for voting thereafter. The Members, whose names appear in the Register of Members / Beneficial Owners as on the record date (cut-off date) i.e. Monday, 22nd August, 2022 may cast their vote electronically. The voting right of shareholders shall be in proportion to their share in the paid-up equity share capital of the Company as on the cut-off date, being 22nd August, 2022.

How do I vote electronically using NSDL e-Voting system?

The way to vote electronically on NSDL e-Voting system consists of "Two Steps" which are mentioned below:


Step 1: Access to NSDL e-Voting system

- A) Login method for e-Voting and joining virtual meeting for Individual shareholders holding securities in demat mode

Notice (Contd.)

In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Login method for Individual shareholders holding securities in demat mode is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in demat mode with NSDL.	<ol style="list-style-type: none"> Existing IDeAS user can visit the e-Services website of NSDL Viz. https://eservices.nsdl.com either on a Personal Computer or on a mobile. On the e-Services home page click on the “Beneficial Owner” icon under “Login” which is available under ‘IDeAS’ section, this will prompt you to enter your existing User ID and Password. After successful authentication, you will be able to see e-Voting services under Value added services. Click on “Access to e-Voting” under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider i.e. NSDL and you will be re-directed to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. If you are not registered for IDeAS e-Services, option to register is available at https://eservices.nsdl.com. Select “Register Online for IDeAS Portal” or click at https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com/ either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon “Login” which is available under ‘Shareholder/Member’ section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. Shareholders/Members can also download NSDL Mobile App “NSDL Speede” facility by scanning the QR code mentioned below for seamless voting experience. 
Individual Shareholders holding securities in demat mode with CDSL	<ol style="list-style-type: none"> Existing users who have opted for Easi / Easiest, they can login through their user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are https://web.cdslindia.com/myeasi/home/login or www.cdslindia.com and click on New System Myeasi. After successful login of Easi/Easiest the user will be also able to see the E Voting Menu. The Menu will have links of e-Voting service provider i.e. NSDL. Click on NSDL to cast your vote. If the user is not registered for Easi/Easiest, option to register is available at https://web.cdslindia.com/myeasi/Registration/EasiRegistration

Notice (Contd.)

	4. Alternatively, the user can directly access e-Voting page by providing demat Account Number and PAN No. from a link in www.cdslindia.com home page. The system will authenticate the user by sending OTP on registered Mobile & Email as recorded in the demat Account. After successful authentication, user will be provided links for the respective ESP i.e. NSDL where the e-Voting is in progress.
Individual Shareholders (holding securities in demat mode) login through their depository participants	You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. upon logging in, you will be able to see e-Voting option. Click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.

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

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

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

B) Login Method for e-Voting and joining virtual meeting for shareholders other than Individual shareholders holding securities in demat mode and shareholders holding securities in physical mode.

How to Log-in to NSDL e-Voting website?

1. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <https://www.evoting.nsdl.com/> either on a Personal Computer or on a mobile.
2. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/ Member' section.
3. A new screen will open. You will have to enter your User ID, your Password/OTP and a Verification Code as shown on the screen.

Alternatively, if you are registered for NSDL eservices i.e. IDEAS, you can log-in at <https://eservices.nsdl.com/> with your existing IDEAS login. Once you log-in to NSDL eservices after using your log-in credentials, click on e-Voting and you can proceed to Step 2 i.e. Cast your vote electronically.

4. Your User ID details are given below:

Manner of holding shares i.e. Demat (NSDL or CDSL) or Physical	Your User ID is:
a) For Members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID For example if your DP ID is IN300*** and Client ID is 12***** then your user ID is IN300***12*****.
b) For Members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID For example if your Beneficiary ID is 12***** then your user ID is 12*****.
c) For Members holding shares in Physical Form.	EVEN Number followed by Folio Number registered with the company For example if folio number is 001*** and EVEN is 101456 then user ID is 101456001***

Notice (Contd.)

5. Password details for shareholders other than Individual shareholders are given below:
 - a) If you are already registered for e-Voting, then you can use your existing password to login and cast your vote.
 - b) If you are using NSDL e-Voting system for the first time, you will need to retrieve the 'initial password' which was communicated to you. Once you retrieve your 'initial password', you need to enter the 'initial password' and the system will force you to change your password.
 - c) How to retrieve your 'initial password'?
 - (i) If your email ID is registered in your demat account or with the company, your 'initial password' is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a .pdf file. Open the .pdf file. The password to open the .pdf file is your 8 digit client ID for NSDL account, last 8 digits of client ID for CDSL account or folio number for shares held in physical form. The .pdf file contains your 'User ID' and your 'initial password'.
 - (ii) If your email ID is not registered, please follow steps mentioned below in **process for those shareholders whose email ids are not registered**.
6. If you are unable to retrieve or have not received the "Initial password" or have forgotten your password:
 - a) Click on "**Forgot User Details/Password?**" (If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com.
 - b) **Physical User Reset Password?** (If you are holding shares in physical mode) option available on www.evoting.nsdl.com.
 - c) If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.co.in mentioning your demat account number/folio number, your PAN, your name and your registered address etc.
 - d) Members can also use the OTP (One Time Password) based login for casting the votes on the e-Voting system of NSDL.
7. After entering your password, tick on Agree to "Terms and Conditions" by selecting on the check box.
8. Now, you will have to click on "Login" button.
9. After you click on the "Login" button, Home page of e-Voting will open.

Step 2: Cast your vote electronically and join General Meeting on NSDL e-Voting system.

How to cast your vote electronically and join General Meeting on NSDL e-Voting system?

1. After successful login at Step 1, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle and General Meeting is in active status.
2. Select "EVEN" of company for which you wish to cast your vote during the remote e-Voting period and casting your vote during the General Meeting. For joining virtual meeting, you need to click on "VC/OAVM" link placed under "Join General Meeting".
3. Now you are ready for e-Voting as the Voting page opens.
4. Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on "Submit" and also "Confirm" when prompted.
5. Upon confirmation, the message "Vote cast successfully" will be displayed.
6. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.
7. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

General Guidelines for shareholders

1. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail to kashliwalanant@yahoo.in with a copy marked to evoting@nsdl.co.in. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) can also upload their Board Resolution / Power of Attorney / Authority Letter etc. by clicking on "**Upload Board Resolution / Authority Letter**" displayed under "**e-Voting**" tab in their login.
2. Any person holding shares in physical form and non-individual shareholders, who acquires shares of the Company and becomes member of the Company after the notice is sent through e-mail and holding shares as of the cut-off date

Notice (Contd.)

- i.e. 22nd August, 2022, may obtain the login ID and password by sending a request at evoting@nsdl.co.in or Issuer/RTA. However, if you are already registered with NSDL for remote e-voting, then you can use your existing user ID and password for casting your vote. If you forgot your password, you can reset your password by using “Forgot User Details/Password” or “Physical User Reset Password” option available on www.evoting.nsdl.com or call on toll free no. **1800 1020 990 and 1800 22 44 30**. In case of Individual Shareholders holding securities in demat mode who acquires shares of the Company and becomes a Member of the Company after sending of the Notice and holding shares as of the cut-off date i.e. 22nd August, 2022 may follow steps mentioned in the Notice of the AGM under Step 1: “Access to NSDL e-Voting system” (Above).
- It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the “Forgot User Details/Password?” or “Physical User Reset Password?” option available on www.evoting.nsdl.com to reset the password.
 - In case of any queries, you may refer the Frequently Asked Questions (FAQs) for Shareholders and e-voting user manual for Shareholders available at the download section of www.evoting.nsdl.com or call on toll free no.: 1800 1020 990 and 1800 22 44 30 or send a request to Ms. Pallavi Mhatre, Manager at evoting@nsdl.co.in

Process for those shareholders whose email ids are not registered with the depositories for procuring user id and password and registration of e mail ids for e-voting for the resolutions set out in this notice:

- In case shares are held in physical mode please provide Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) by email to acpl.compliance@gmail.com
- In case shares are held in demat mode, please provide DPID-CLID (16 digit DPID + CLID or 16 digit beneficiary ID), Name, client master or copy of Consolidated Account statement, PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) to acpl.compliance@gmail.com. If you are an Individual shareholders holding securities in demat mode, you are requested to refer to the login method explained at **step 1 (A) i.e. Login method for e-Voting and joining virtual meeting for individual shareholders holding securities in demat mode**.
- Alternatively shareholder/members may send a request to evoting@nsdl.co.in for procuring user id and password for e-voting by providing above mentioned documents.
- In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are required to update their mobile number and email ID correctly in their demat account in order to access e-Voting facility.

THE INSTRUCTIONS FOR MEMBERS FOR e-VOTING ON THE DAY OF THE AGM ARE AS UNDER:-

- The procedure for e-Voting on the day of the AGM is same as the instructions mentioned above for remote e-voting.
- Only those Members/ shareholders, who will be present in the AGM through VC/OAVM facility and have not casted their vote on the Resolutions through remote e-Voting and are otherwise not barred from doing so, shall be eligible to vote through e-Voting system in the AGM.
- Members who have voted through Remote e-Voting will be eligible to attend the AGM. However, they will not be eligible to vote at the AGM.
- The details of the person who may be contacted for any grievances connected with the facility for e-Voting on the day of the AGM shall be the same person mentioned for Remote e-voting.

INSTRUCTIONS FOR MEMBERS FOR ATTENDING THE AGM THROUGH VC/OAVM ARE AS UNDER:

- Member will be provided with a facility to attend the AGM through VC/OAVM through the NSDL e-Voting system. Members may access by following the steps mentioned above for **Access to NSDL e-Voting system**. After successful login, you can see link of “VC/OAVM link” placed under “**Join General meeting**” menu against company name. You are requested to click on VC/OAVM link placed under Join General Meeting menu. The link for VC/OAVM will be available in Shareholder/Member login where the EVEN of Company will be displayed. Please note that the members who do not have the User ID and Password for e-Voting or have forgotten the User ID and Password may retrieve the same by following the remote e-Voting instructions mentioned in the notice to avoid last minute rush.
- Members are encouraged to join the Meeting through Laptops for better experience.
- Further Members will be required to allow Camera and use Internet with a good speed to avoid any disturbance during the meeting.

Notice (Contd.)

4. Please note that Participants Connecting from Mobile Devices or Tablets or through Laptop connecting via Mobile Hotspot may experience Audio/Video loss due to Fluctuation in their respective network. It is therefore recommended to use Stable Wi-Fi or LAN Connection to mitigate any kind of aforesaid glitches.
5. Shareholders who would like to express their views/ask questions during the meeting may register themselves as a speaker may send their request mentioning their name, demat account number/folio number, email id, mobile number at acpl.compliance@gmail.com 10 days before the date appointed for AGM.
6. Shareholders who would like to express their views/have questions may send their questions in advance mentioning their name demat account number/folio number, email id, mobile number at acpl.compliance@gmail.com 10 days before the date appointed for AGM. The same will be replied by the company suitably.
7. Those shareholders who have registered themselves as a speaker will only be allowed to express their views/ask questions during the meeting.
8. When a pre-registered speaker is invited to speak at the meeting but he / she does not respond, the next speaker will be invited to speak. Accordingly, all speakers are requested to get connected to a device with a video/ camera along with good internet speed.
9. The Company reserves the right to restrict the number of questions and number of speakers, as appropriate, for smooth conduct of the AGM.
10. Members who need assistance before or during the AGM, can contact Ms. Pallavi Mhatre, Manager, NSDL at evoting@nsdl.co.in or call 1800 1020 990 / 1800 22 44 30.

Explanatory Statement pursuant to Section 102 of the Companies Act, 2013 ("Act"), the following explanatory statement sets out all material facts relating to business mentioned under Item Nos. 4 to 6 of the accompanying Notice:

Re: Item 4

As per Section 148 of the Companies Act, 2013, the Companies (Audit and Auditors) Rules, 2014, the Companies (Cost Records and Audit) Rules, 2014, as may be amended from time to time, and any changes/ modifications in the Act, Rules, Circulars, Notifications thereafter, the Audit Committee has made a recommendation to the Board for the appointment of M/s. BSS & Associates, Cost Accountants (Firm Regd. No.: 001066) as the Cost Auditors of the Company for the financial year ending 31st March 2023, at a remuneration of Rs 20,000/- (Rupees Twenty Thousand only) plus applicable taxes and incidental expenses, if any.

The Board based on the recommendations of the Audit Committee, appointed M/s BSS & Associates, Cost Accountants as Cost Auditor of the Company for the financial year ending 31st March 2023. As per Rule 14 of the Companies (Audit and Auditors) Rules, 2014 (as amended or re-enacted from time to time) the remuneration as mentioned above, payable to the Cost Auditors is required to be ratified by the Members of the Company. Accordingly, the Members are requested to ratify the remuneration payable to the Cost Auditors, for the financial year ending March 31, 2023, as set out in the Ordinary Resolution, for the aforesaid services to be rendered by them.

The Board of Directors recommends the Ordinary Resolution, as set out at Item No.4 of the Notice, for approval by the Members.

Memorandum of Interest:

None of the Directors of the Company and / or Key Managerial Personnel and their relatives are in any way concerned or interested in the aforesaid resolution as set out at Item No. 4 of the Notice, except to the extent of their shareholding(s), if any, in the Company.

Re: Item 5

Pursuant to a Share Purchase Agreement dated 12.04.2016 the erstwhile Promoters of the Company i.e., Morgan Advanced Materials PLC had sold their entire shareholdings to Mr. Rakesh Himatsingka ('Acquirer').

Subsequently the Acquirer along with Mr. Shaurya Veer Himatsingka, Mrs. Anita Himatsingka and Miss. Maalika Himatsingka made an Open Offer under SEBI (SAST) Regulations, 2011 and has effected change in control and management in their favour and have been designated as the new Promoters of the Company resulting in a complete change, in the control of the Company.

Mr. Rakesh Himatsingka has been associated with the Company since 1974, as a Director on the Board as well as a management trainee. Subsequently, from 1975 to 1977, Mr. Himatsingka was with the Company's Financial & Technological JV partners Morganite Electrical Carbon Ltd., and was instrumental in the safe and timely transfer of technology from Morgans to the Company.

Notice (Contd.)

Subsequently, upon his return to India in 1977, Mr. Himatsingka was appointed as the Deputy Managing Director, and in around 1981 as the Joint Managing Directors.

Mr. Himatsingka continued in this role till 1982, when he moved out of executive responsibilities remaining only as a member of the Board.

Keeping in mind Mr. Himatsingka's vast Technical knowledge of our industry, when our JV partners Morgans, took majority control of the Company towards end 1991, Mr. Himatsingka was appointed on the Board of MECL, Swansea, UK, Morgans Flagship Carbon Company, and he continued till 2003, when the Board of MECL was dissolved.

Since, taking over with his very vast knowledge of our Carbon technology and under his dynamic leadership and guidance our Company has totally turned around and has been achieving profits successively year after year.

Under his able leadership balancing of Plant and Machineries, refurbishing old equipment and addition of new equipments and machineries with a view to optimizing production through modernization, modernization of Plants, was undertaken on top priority basis and so was production planning and optimization of raw materials procurement and stocks.

Since, then valued contribution are continuously being made by Mr. Rakesh Himatsingka, Non-Executive Chairman of the Board and through his active participation, the Company has been progressing over the years. The rich experience of Mr. Rakesh Himatsingka in engineering, business, management and administration has led to the company taking bold and well planned decisions furthering the growth and profitability.

Hence, it is appropriate that the services being rendered by him to the Company are being recognized by way of remuneration. In accordance with the provisions of Section 197 of the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, remuneration by way of commission up to 1% of the net profits, may be paid to Mr. Rakesh Himatsingka, subject to the approval of the Shareholders of the Company.

Based on the recommendations received from the Nomination & Remuneration Committee, the Board of Directors at their meeting held on 23rd May, 2022, had unanimously approved the payment of remuneration, to Mr. Rakesh Himatsingka, by way of commission up to 1% of the net profits, which amounts to Rs.8,80,000/-, which exceeds fifty per cent of the total annual remuneration payable to all non-executive directors of the Company.

The Board of Directors recommends the Special Resolution, as set out at Item No.5 of the Notice, for approval by the Members.

Memorandum of Interest:

Concerned Director is interested in the resolution being related to his own payment. Apart from him, Ms. Maalika Himatsingka, Director (DIN: 07811394) being the daughter of Mr. Rakesh Himatsingka (DIN: 00632156) and Mrs. Anita Himatsingka, Director (DIN: 01201879) being the spouse of Mr. Rakesh Himatsingka may be considered as interested parties in this resolution. Mr. Shaurya Veer Himatsingka, one of the Promoters and shareholders of the Company, being the Son of Mr. Rakesh Himatsingka may also be treated as interested party in this resolution. Other than the aforesaid, none of the Directors of the Company and / or Key Managerial Personnel and their relatives are in any way concerned or interested in the aforesaid resolution as set out at Item No. 5 of the Notice, except to the extent of their shareholding(s), if any, in the Company.

By Order of the Board

Sd/-

Rakesh Himatsingka
Chairman
(DIN: 00632156)

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Notice (Contd.)

Annexure to the Notice dated 23rd May 2022

BRIEF PARTICULARS OF DIRECTORS RETIRING BY ROTATION / SEEKING APPOINTMENT / RE-APPOINTMENT

Name of the Director	Mr. Rakesh Himatsingka	Mrs. Anita Himatsingka
Date of Birth	4 th November, 1951	15 th September, 1953
Date of Appointment	25 th May 2016	25 th May 2016
Expertise in specific functional areas & Justification for choosing the appointees for appointment / re-appointment	Carbon Technologist	Business Management
Qualifications	B.E. (Hons.), Mechanical	B. A. (Honours) in English from Delhi University
List of outside Directorship held	<ol style="list-style-type: none"> 1. India Carbon Limited 2. APL Holdings & Investments Ltd. 3. Shree Shyam Orchid Estates Ltd. 4. Goneril Investment & Trading Co. Ltd. 5. Prabhushil Group Investment Ltd. 6. Khatu Investment & Trading Company Ltd. 7. New Look Investment (Bengal) Limited 8. Nilgiri Niketan Private Limited 9. Saket Cement Products Private Limited 10. Subarna Plantation & Trading Co. Ltd. 11. Subhag Properties Private Limited 	<ol style="list-style-type: none"> 1. Assam Plywood Limited 2. APL Holdings & Investments Ltd. 3. Shree Shyam Orchid Estates Ltd. 4. APL Investments Limited 5. Tower Investment & Trading Co. Ltd. 6. Budge Budge Carbon Limited 7. Goneril Investment & Trading Co. Ltd. 8. Prabhushil Group Investment Ltd. 9. Sunray Vanijya Pvt. Ltd. 10. Jyotsana Investment Co. Ltd.
Chairman/Member of the Committee of other Companies in which he/she is a Director		
a) Audit Committee	<ol style="list-style-type: none"> 1. India Carbon Limited (Member) 2. Khatu Investment & Trading Co. Ltd. (Member) 3. New Look Investment (Bengal) Ltd. (Member) 4. Subarna Plantation & Trading Co. Ltd. (Member) 	<ol style="list-style-type: none"> 1. Goneril Investment & Trading Co. Ltd. (Member) 2. Jyotsana Investment Co. Ltd. (Member) 3. Tower Investment & Trading Co. Ltd. (Member)
b) Stakeholders Relationship Committee	<ol style="list-style-type: none"> 1. India Carbon Limited (Member) 2. Khatu Investment & Trading Co. Ltd. (Member) 3. New Look Investment (Bengal) Ltd. (Member) 4. Subarna Plantation & Trading Co. Ltd. (Member) 	<ol style="list-style-type: none"> 1. Goneril Investment & Trading Co. Ltd. (Member) 2. Jyotsana Investment Co. Ltd. (Member) 3. Tower Investment & Trading Co. Ltd. (Member)
c) Nomination and Remuneration Committee	<ol style="list-style-type: none"> 1. Khatu Investment & Trading Co. Ltd. (Member) 2. New Look Investment (Bengal) Ltd. (Member) 3. Subarna Plantation & Trading Co. Ltd. (Member) 	<ol style="list-style-type: none"> 1. Goneril Investment & Trading Co. Ltd. (Member) 2. Jyotsana Investment Co. Ltd. (Member) 3. Tower Investment & Trading Co. Ltd. (Member)

Notice (Contd.)

Name of the Director	Mr. Rakesh Himatsingka	Mrs. Anita Himatsingka
Shareholding in the Company as on 31.03.2022	796452	188025
Disclosure of relationship between Directors inter-se	Spouse of Mrs. Anita Himatsingka and Father of Ms. Maalika Himatsingka	Spouse of Mr. Rakesh Himatsingka and Mother of Ms. Maalika Himatsingka
Terms and Conditions of appointment/re-appointment along with details of remuneration sought to be paid and remuneration last drawn by such person (including sitting fees)	<p>As per the resolution at item no. 2 of the Notice convening Annual General Meeting on August 29, 2022.</p> <p>Terms and Conditions of appointment or re-appointment are as per the Remuneration and Nomination Policy of the Company as displayed on the Company's website i.e. www.assamcarbon.in</p> <p>Commission drawn for the F.Y. 2020-21: Rs. 5,40,000/-</p> <p>Commission to be paid for the F.Y. 2021-2022: Rs. 8,80,000/-</p> <p>Sitting Fees last drawn from the Company for the F.Y. 2021-2022: Rs. 1,29,000/-</p>	<p>As per the resolution at item no. 3 of the Notice convening Annual General Meeting on August 29, 2022.</p> <p>Terms and Conditions of appointment or re-appointment are as per the Remuneration and Nomination Policy of the Company as displayed on the Company's website i.e. www.assamcarbon.in</p> <p>Sitting Fees last drawn from the Company for the F.Y. 2021-2022: Rs. 1,01,000/-</p>

Note:

- CM –Chairman of the Committee.
- M – Member of the Committee.
- Directorship in Foreign Co.'s & Companies U/s 8 of the Companies Act, 2013 are excluded.

Chairmanship/Membership of the Audit Committee, Stakeholders Relationship Committee and Nomination & Remuneration Committee alone has been considered. CSR Committee

<p align="center">CERTIFICATE FROM COMPANY SECRETARY IN PRACTICE REGARDING NON-DISQUALIFICATION OF DIRECTORS</p> <p>(As per clause C of Schedule V of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015 read with regulation 34(3) of the said Listing Regulations)</p> <p>To The Members, Assam Carbon Products Limited, Birkuchi, Guwahati, Assam – 781026</p> <p>As required by item 10(i) of Part C of Schedule V of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015, I hereby certify that none of the Directors on the Board of Assam Carbon Products Limited (CIN: L23101AS1963PLC001206) having its registered office at Birkuchi, Guwahati, Assam – 781026, have been debarred or disqualified from being appointed or continuing as Directors of Companies by the SEBI/Ministry of Corporate Affairs or any such statutory authority.</p> <p>Place: Kolkata Date: 17th May, 2022</p>		<p align="right">Dipa Agarwal Practising Company Secretary C P No.: 24448 ACS No.: 65249 UDIN: A065249D000334091</p>
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Directors' Report

To the Members,

Your Directors have pleasure in presenting the 59th Annual Report on the business and operations of the Company along with the Audited Financial Accounts for the financial year ended 31st March, 2022.

1. CORPORATE OVERVIEW

Your Company is the market leader in Electrical, Mechanical & Specialty Carbon Products, with two Factories, at Guwahati and Patancheru, near Hyderabad.

The Company at its Guwahati factory is primarily engaged in the manufacturing of various types and grades of Carbon & Graphitised Blocks and Blanks for the Electrical & Mechanical Carbon application. For the Electrical Carbon applications, the Blocks & Blanks are used for fabrication of Electrical Carbon Brushes for the Railways and all types of Industries, from Steel Plants, Sugar Mills, Paper Mills, Motor & Generator manufacturers, Mining, Power Plants etc and for Mechanical Carbon applications. The Blocks & Blanks are sent to Company's Patancheru factory, which is primarily a State of the art, fabrication and precision machining set up, alongwith Carbon Brushes, the Company manufactures a complete range of other Railway Traction products, such as, Pantograph, Current Collectors & Silver Impregnated Graphite Railways Signaling Contacts.

The Mechanical Carbon Division, also at Patancheru fabricates Carbon Seals, Bearings, Vanes and Thrust Pads using the latest state-of-the-art machines to offer customers product as per their specific requirement to the highest level of tolerance and surface finish.

The Specialty Graphite Division, also at Patancheru offers solutions to the Diamond Tool Industry, Optical Fibre manufacturing, Hard metal sintering and Electronics industry.

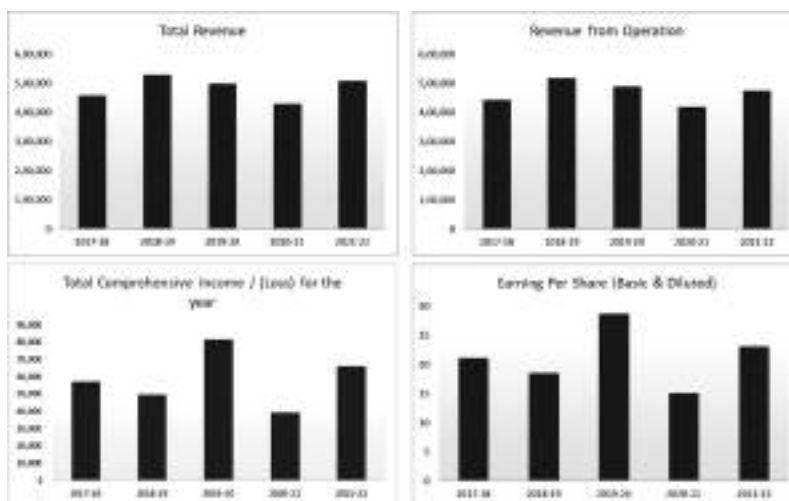
In addition, the Company also manufactures various kinds of Graphite products Viz., Hi-Temp Insulator, Fuel Cells, Heating Elements, Casting Dyes, Lubricating Blocks and other such items as per the need of the Customers. Aegis – the world's most effective shaft grounding brush is also fabricated by the Company.

Your Company continues to maintain its commitment to meet the highest levels of quality, superior after sales service, product innovation and development and technology upgradation.

2. FINANCIAL RESULTS

(INR'000 except EPS Figure)

Particulars	2017-18	2018-19	2019-20	2020-21	2021-22
Total Revenue	4,52,932	5,24,784	4,95,285	4,25,374	5,04,174
Revenue from Operation	4,39,299	5,12,700	4,84,429	4,14,092	4,70,454
Total Comprehensive Income / (Loss) for the year	56,553	49,192	80,954	38,669	65,407
Earning Per Share (Basic & Diluted)	20.97	18.33	28.48	14.88	22.88



Directors' Report (Contd.)

3. OPERATIONS AND STATE OF COMPANY'S AFFAIRS

During the year under review, revenue from operations of the Company increased to Rs. 4704.54 Lacs as compared to Rs. 4140.92 Lacs in the previous year. The year 2021-22 was yet another challenging year for all of us. The severe second wave of the Covid-19 pandemic had a significant humanitarian and economic impact. We witnessed socio-political unrest in several parts of the world, resulting in the disruption of supply chains and unprecedented volatility in input costs. In this uncertain operating environment, our focus remained on the health and safety of our people, ensuring uninterrupted supply of our products, meeting the evolving demand of our consumers, caring for the communities, safeguarding the environment and protecting our business model.

Our sales and profitability were adversely impacted due to the current global pandemic as demand has slowed down and prices are under pressure. In addition, costs have gone up on all fronts, as well as directly on account of necessary arrangements to tackle COVID-19.

With the increased Turnover, the Company was able to close the year with a profit of Rs. 882.77 Lacs (before provision of tax) as against a previous year's profit of INR 542.19 Lacs.

During the year, your Company incurred a forex gain of Rs. 3.31 Lacs only as compared to a forex gain of Rs. 0.91 Lacs in the previous year, basically as a result of better management of the forex transactions, in spite of relative instability in the forex market in this financial year.

During the year, your Company achieved an export sales of Rs. 59.83 Lacs as against Rs. 63.10 Lacs in the previous year. However, the management has taken strong initiative and is confident that exports will pick-up in the coming years.

During the year, your Company has further worked actively towards rationalizing its business and product portfolio, whilst adding new product lines, to better utilise the available talent and resources and stay abreast of the market dynamics in new products.

Exercise commenced three years back for cost cutting, savings in power and fuel as well as improving efficiency and productivity continued relentlessly and is helping the Company reap rich dividends.

Balancing of Plant and Machineries, refurbishing old equipment and addition of new equipments and machineries with a view to optimizing production through modernization, was undertaken on top priority as was production planning and optimization of raw materials procurement and stocks, which continued this year too.

4. FUTURE OUTLOOK

The year 2021-22 was yet another challenging year for all of us. The severe second wave of the Covid-19 pandemic had a significant humanitarian and economic impact. We witnessed socio-political unrest in several parts of the world, resulting in the disruption of supply chains and unprecedented volatility in input costs. In this uncertain operating environment, our focus remained on the health and safety of our people, ensuring uninterrupted supply of our products, meeting the evolving demand of our consumers, caring for the communities, safeguarding the environment and protecting our business model.

Our sales and profitability were adversely impacted due to the current global pandemic as demand has slowed down and prices are under pressure. In addition, costs have gone up on all fronts, as well as directly on account of necessary arrangements to tackle COVID-19.

Indian Railways have prepared a 'National Rail Plan (NRP) for India – 2030'. The Plan is to create a 'Future Ready' Railway system by 2030. The NRP is aimed to formulate strategies based on both operational capacities and commercial policy initiatives to increase modal share of the Railways in freight to 45%. The objective of the Plan is to create capacity ahead of demand, which in turn would also cater to future growth in demand right up to 2050 and also increase the modal share of Railways to 45% in freight traffic and to continue to sustain it.

The key objectives of the National Rail Plan are :

- Formulate strategies based on both operational capacities and commercial policy initiatives to increase modal share of the Railways in freight to 45%.
- Reduce transit time of freight substantially by increasing average speed of freight trains to 50Kmph.
- As part of the National Rail Plan, Vision 2024 has been launched for accelerated implementation of certain critical projects by 2024 such as 100% electrification, multi-tracking of congested routes, upgradation of speed to 160 kmph on Delhi-Howrah and Delhi-Mumbai routes, upgradation of speed to 130kmph on all other Golden Quadrilateral-Golden Diagonal (GQ/GD) routes and elimination of all Level Crossings on all GQ/GD route.
- Assess Locomotive requirement to meet twin objectives of 100% electrification (Green Energy) and increasing freight modal share.

Directors' Report (Contd.)

- 58 Super critical Projects of a total length of 3750 kms costing ₹39,663 Crore and 68 Critical Projects of a total length of 6913 kms costing ₹75,736 Crore, have been identified for completion by 2024.

However, this has come about at a very high cost for the Company as the Indian Railways have tremendously accelerated the phasing out of the DC Locomotives (Brush users) by AC Locomotives (Brushless Motors). This shall make a dent of over 40%~50% to the Company's Business.

However, anticipating such a move, New Business Opportunities with significant potential for growth, have been identified and new customers inducted, which will contribute significantly to the top and bottom line of the Company going forward.

Further, in view of the substantial addition to the ongoing business, Company's expansion in Mechanical Carbons, especially for Radial Bearings & Vanes was moving rapidly and for which several new high precision machines have and are being acquired. Some machines have already been bought, both domestically as well as imported and this will be an ongoing process, to keep up with the rapidly growing demand.

5. DIVIDEND

The Company since the last couple of years has been passing through a very turbulent phase due to the ongoing Pandemic. In fact, even prior to the pandemic, Company's main customer, viz., the Indian Railways took a decision to drastically cut down their offtake and the pandemic further exaggerated the situation. The Indian Railways in the last year have cut their off take by nearly 60% of the company's product, resulting in a huge shortfall in the turnover and profitability. As against a forecast turnover for year ending Mar. 22 of around Rs.54.86 Crores, the company with max efforts was able to achieve a turnover of Rs. 47.04 crores, and correspondingly a massive drop in profits.

The Company has now no other alternative but to rapidly change its product portfolio requiring significant Capital Expenditure. There has also been massive loss of productive manhours at both the factories due to the pandemic induced lockdowns as well as illness of a number of persons, and continuing till date, resulting in massive loss of production. In spite of the same, the company has paid its workmen their full salaries and has spent additional Lakhs of Rupees in Covid precautions protocol, and continues to do so.

In view of the above, the Board of Directors decided not to declare any Dividend payment for the Financial year 2021-22 in order to conserve Cash.

6. GENERAL RESERVE

The Company has not transferred any amount to the General Reserve during the financial year ended March 31, 2022.

7. PUBLIC DEPOSIT

The Company has not accepted / renewed any public deposit under Section 73 of the Companies Act, 2013, read with Companies (Acceptance of Deposits) Rules, 2014 (including any Statutory modifications or re-enactment thereof for the time being in force), during the year.

8. STATUTORY AUDITORS' AND THEIR REPORT

M/s. D. Basu & Co., Chartered Accountants (Regd. No.: 301111E) was already appointed as the Statutory Auditors of the Company at its 57th Annual General Meeting held on 29.09.2020 for a tenure of 5 (five) years pursuant to the provisions of Section 139(2) and the Companies (Audit & Auditors) Rules, 2014 (including any Statutory modifications or re-enactment thereof for the time being in force). Their tenure ends at the Annual General Meeting of the Company to be held in the year 2025.

The observations made in the Auditors' Report read together with relevant notes thereon are self-explanatory and therefore, do not call for any further explanations or comments.

Statutory Auditors of the Company has drawn attention under Key Audit Matters to Note 26(A)(iii) to the Ind AS Financial Statements as a key Audit matter, wherein it is stated that the Company has not established a provision for employee wages and benefits, for the lock out period at the Company's Guwahati Factory from 7 December 2010 to 8 March 2012, on the principle of 'No Work No Pay'. They had further stated that as the matter is currently subjudice and hence the impact, if any, in terms of provision of employee wages and employee benefits and its resultant impact on profit for the year ended 31 March 2022, reserves and surplus and current liabilities, cannot currently be determined.

With regard to the Statutory Auditor's opinion under Key Audit Matters in Note 26(A)(iii) to the Ind AS Financial Statements, in the opinion of the Management, the issue of payment of back wages during the period of strike / lock-out at the Company's Guwahati Unit employees effective from 7th December 2010 to 8th March 2012 has been referred to appropriate authorities. However, the Company, on the principle of 'No Work No Pay', has neither ascertained nor made any provision for payment of such wages and other employee benefits for the period of strike and lock out. The matter is

Directors' Report (Contd.)

currently subjudice.

9. DIRECTORS

The Board of your Company consists of the following Directors:

NAME OF DIRECTORS	DESIGNATION	DIN
Mr. Rakesh Himatsingka	Chairman and Non-Executive Director	00632156
Mr. Kali Krishna Bhattacharya	Managing Director	07011241
Mrs. Anita Himatsingka	Non-Executive Woman Director	01201879
Ms. Maalika Himatsingka	Non-Executive Woman Director	07811394
Mrs. Rupanjana De	Non-Executive Independent Woman Director	01560140
Mr. Jnyan Prasad Deuri	Nominee Director of Assam Industrial Development Corporation Ltd. (appointed w.e.f 29 th June, 2021)	09084570
Mr. Sanjay Kumar Lhila	Non-Executive Independent Director	01383460
Mr. Susheel Kumar Sharma	Non-Executive Director (w.e.f. 1 st May, 2019)	01636111
Mr. Avinash Kumar Gupta	Non-Executive Independent Director (w.e.f. 25 th June, 2020)	08763153

The Board of Directors of your Company, based on the recommendations of Nomination and Remuneration Committee ("NRC"), approved the following appointments and re-appointments on the Board of the Company:

Mr. Rakesh Himatsingka (DIN: 00632156) and Mrs. Anita Himatsingka (DIN: 01201879), Directors (Non-Executive), retires by rotation and being eligible, offers themselves for re-appointment. The Board recommends their re-appointment.

Mr. Jnyan Prasad Deuri has been appointed in place of Mr. Amitav Saikia as the Nominee Director by and on behalf of M/s Assam Industrial Development Corporation Ltd. on the Board of Directors of M/s Assam Carbon Products Limited w.e.f 29th June, 2021.

Appropriate Resolutions for confirming the above appointment(s) and re-appointment(s), forms part of the Notice convening the 59th Annual General Meeting ('AGM') scheduled to be held on 29th August, 2022.

As per the disclosure received from the Directors, none of the Directors are disqualified from being appointed as Directors, as specified in Section 164(2) of the Companies Act, 2013.

10. KEY MANAGERIAL PERSONNEL

Pursuant to Section 203 of the Companies Act, 2013, following are the Key Managerial Personnel of the Company:

1. Mr. Kali Krishna Bhattacharya, Managing Director,
2. Mr. Pijush Bysack, Chief Financial Officer,
3. Ms. Parinita Goenka, Company Secretary and Compliance Officer

During the year under review, Ms. Parinita Goenka, Company Secretary and Compliance Officer has been appointed w.e.f from 1st October, 2021 and Mr. Subhendu Chakraborty, Company Secretary and Compliance Officer has resigned w.e.f from 20th March, 2021.

11. INDEPENDENT DIRECTORS' DECLARATION

The Company has received declarations pursuant to Section 149(7) of the Companies Act, 2013 from all the Independent Directors of the Company, confirming that they meet the criteria of independence as prescribed under sub-section (6) of Section 149 of the Companies Act, 2013 as well as the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 [including any statutory modification(s) or re-enactment thereof for the time being in force], in respect of their position as an "Independent Director" of Assam Carbon Products Ltd. and are independent of the Management. In terms of Section 150 read with Rule 6 of the Companies (Appointment and Qualification of Directors) Rules, 2014, Independent Directors of the Company have undertaken requisite steps towards the inclusion of their names in the data bank of Independent Directors maintained with the Indian Institute of Corporate Affairs.

12. INTERNAL FINANCIAL CONTROL SYSTEM

The Company has an Internal Financial Control System, commensurate with the size, scale and complexity of its operations. The Internal Audit functionary is done by independent Chartered Accountants, whose reports are being placed in the Audit Committee and Board for their review. Their objective is to ensure efficient usage and protection of the Company's resources, accuracy in financial reporting and due compliance of statutes and procedures. The internal control structure showed no reportable material weaknesses. The Company's Internal Financial Control system is commensurate with

Directors' Report

current best practices and effectively addresses emerging challenges of its business. The Company has a process in place to continuously identify gaps and implement newer and / or improved controls wherever the effect of such gaps would have a material effect on the Company's operation.

13. RISK MANAGEMENT POLICY

The Company's Risk Management Policy is well defined to identify and evaluate business risks across all businesses. It assesses all risks at both pre and post-mitigation levels and looks at the actual or potential impact that a risk may have on the business together with an evaluation of the probability of the same occurring. Risk mapping exercises are carried out with a view to regularly monitor and review the risks, identify ownership of the risk, assessing monetary value of such risk and methods to mitigate the same. The Policy for the same is hosted on its website at <https://www.assamcarbon.in/> under the Heading About Us → Investor Relations → Board Policies.

14. GOING CONCERN STATUS

Regulators or Courts or Tribunals passed no orders during the year affecting the Company's going concern status and its future operations.

15. SHARE CAPITAL

The Company has neither issued any class of shares nor was there any buy-back of shares during the year under review. Further, the Company does not have any stock option scheme for its employees.

16. EVALUATION OF BOARD PERFORMANCE

The Board carried out an annual evaluation of its own performance, of each Board Member individually, as well as the working of its Committees in compliance with the provisions of the Act and Listing Regulations.

The Board works with the nomination and remuneration committee to lay down the evaluation criteria for the performance of executive / non-executive / independent directors.

Pursuant to the provisions of Section 149(8) of the Companies Act, 2013 read with Schedule IV thereto, an exclusive meeting of the Independent Directors of the Company was duly convened and held between themselves on 4th February, 2022 during the Financial Year 2021-2022.

17. NUMBER OF BOARD MEETINGS

A tentative calendar of Board Meetings is prepared and intimated to the Board Members in advance. A minimum of four Board Meetings are held annually. Additional Board Meetings are convened by giving appropriate notice to address the Company's specific needs, if any. In case of business exigencies or urgency of matters, resolutions are passed by circulation. The Company has held at least one Board Meeting in every quarter and the maximum time gap between any two consecutive meetings have always been less than one hundred and twenty days.

The Board of Directors met 4 (four) times during the financial year 2021-22, namely, on 29th June, 2021, 7th August, 2021, 3rd November, 2021 and 4th February, 2022 respectively.

18. VIGIL MECHANISM / WHISTLE BLOWER POLICY

The Company has a vigil mechanism named Vigil Mechanism and Whistle Blower Policy to deal with instance of fraud and mismanagement, if any, as per the provisions of the Companies Act, 2013 which is hosted on its website at <https://www.assamcarbon.in/> under the Heading About Us → Investor Relations → Board Policies.

19. AUDIT COMMITTEE

The Audit Committee as on 31st March, 2022 comprises of 4 (Four) members out of which, 3 (Three) Non-Executive Independent Directors and 1 (one) Non-Executive Director respectively namely, Mr. S K Lhila, (Chairman), Mrs. Rupanjana De (Member), Mr. Avinash Kumar Gupta (Member) and Mr. Rakesh Himatsingka (Member). The Company Secretary is the Secretary of the Committee. The Chief Financial Officer and the Managing Director are the invitees to the Meetings along with the various Auditors.

During the year ended 31st March 2022, the Audit Committee met 4 (four) times on 29th June, 2021, 7th August, 2021, 3rd November, 2021 and 4th February, 2022 respectively. The maximum gap between any two consecutive meetings was less than one hundred and twenty days. All the recommendations of the Audit Committee were duly accepted by the Board.

20. NOMINATION AND REMUNERATION COMMITTEE AND POLICY

The Committee as on 31st March 2022 comprises 4 (Four) members out of which, 2 (two) Non-Executive Independent Directors and 2 (Two) Non-Executive Directors respectively namely, Mr. S K Lhila (Chairman), Mrs. Rupanjana De (Member), Mr. Rakesh Himatsingka (Member) and Mr. Susheel Kumar Sharma (Member).

Directors' Report

During the year ended 31st March 2022, the Committee met 2 (two) times on 29th June, 2021 and 3rd November, 2021.

The Company's Nomination and Remuneration Policy has been prepared in accordance with Section 178(3) of the Act and is available at the website <https://www.assamcarbon.in/> under the Heading About Us → Investor Relations → Board Policies.

21. STAKEHOLDERS RELATIONSHIP COMMITTEE

During the year under review, this committee comprises 4 (Four) members out of which, 2 (Two) Non-Executive Independent Directors and 2 (two) Non-Executive Directors, namely, Mr. S K Lhila (Chairman), Mr. Avinash Kumar Gupta (Member), Mr. Rakesh Himatsingka (Member) and Mrs. Anita Himatsingka (Member) respectively.

During the year ended 31st March 2022, the Committee met twice on 7th August, 2021 and 4th February, 2022.

22. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS

Your Company has not given any loan or guarantees covered under the provisions of Section 186 of the Companies Act, 2013, nor have made any investment under the Companies Act, 2013.

23. RELATED PARTY TRANSACTIONS

In line with the requirements of the Companies Act, 2013 and amendment to the Listing Regulations, your Company has formulated a revised 'Policy on Related Party Transactions', which is also available on the Company's website at www.assamcarbon.in. The Policy intends to ensure that proper reporting, approval and disclosure processes are in place for all transactions between the Company and Related Parties.

All Related Party Transactions and subsequent material modifications are placed before the Audit Committee for review and approval. Omnibus approval is obtained before the commencement of the financial year, for the transactions which are repetitive in nature and also for the transactions which are not foreseen (subject to financial limit).

All Related Party Transactions entered during the year were in Ordinary Course of the Business and at Arm's Length basis. A statement of all related party transactions is presented before the Audit Committee on a quarterly basis, specifying the nature, value, and terms and conditions of the transactions.

In accordance with Section 134 of the Companies Act, 2013 and Rule 8 of the Companies (Accounts) Rules, 2014, the particulars of the contract or arrangement entered into by the Company with related parties referred to in section 188(1) in Form AOC-2 is attached as Annexure A of this report.

24. HOLDING COMPANY

The Company does not have any Holding Company as on 31st March, 2022.

25. OBLIGATION OF THE COMPANY UNDER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

In order to prevent sexual harassment of women at work place your Company has followed adequate Policy for prevention, prohibition and redressal of Sexual Harassment of Women at workplace and has set up a Committee for implementation of the said policy. During the year ended 2022, the Company has not received any complaint at any of its Units. The Policy for the same is hosted on its website at <https://www.assamcarbon.in/> under the Heading About Us → Investor Relations → Board Policies.

26. COST AUDITORS

Pursuant to Section 148 of the Companies Act, 2013 ('the Act') read with the Companies (Cost Records and Audit) Rules, 2014, as amended from time to time, the Company is required to maintain cost records and have the audit of its cost records conducted by a Cost Accountant. Cost records are made and maintained by the Company as required under Section 148 (1) of the Act. The Board, upon recommendation from the Audit Committee appointed M/s. BSS & Associates, Cost Accountants (FRN: 001066) as Cost Auditors of the Company, to Audit the cost accounting records maintained by the Company for the financial year ended 31st March, 2022 at a remuneration of Rs.20,000/- (Rupees Twenty Thousand only) plus applicable taxes and incidental expenses, if any. Accordingly, a resolution seeking ratification of the remuneration payable to the Cost Auditors, has been included as a part of the Notice convening the 59th Annual General Meeting.

27. CORPORATE GOVERNANCE

Your Company is exempted from compliance with the Corporate Governance provisions under Regulation 15 of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015, since the Company's share capital was less than the specified threshold limit as on the last day of the previous financial year.

Directors' Report (Contd.)

28. CODE OF CONDUCT

Pursuant to the provisions of Regulation 17(5) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company has in place a Code of Conduct for the Board of Directors, Senior Managers and all other Employees of the Company. The code of conduct is hosted on its website at <https://www.assamcarbon.in/> under the Heading About Us → Investor Relations → Board Policies.

The Managing Director's Certificate under Regulation 34(3) read with Part D of Schedule V to the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, relating to Compliance with the Code of Conduct for the year ended 31st March 2022, forms a part of this Report enclosed as "Annexure B".

29. CEO/CFO CERTIFICATION

The Managing Director & Chief Financial Officer have certified to the Board in accordance with Regulation 17(8) read with Part B of Schedule II to the Listing Regulations pertaining to CEO/CFO certification for the year ended March 31, 2022 that the Financial Statements for the year ended March 31, 2022 do not contain any untrue statement and that these statements represent a true and fair view of the Company's affairs and other matters as specified thereunder.

30. CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

In accordance with the requirements of SEBI (Prohibition of Insider Trading) Regulations, 2015 including amendments thereof, the Company has adopted a comprehensive Code of Conduct for Prohibition of Insider Trading and procedures for fair disclosure of Unpublished Price Sensitive Information for its designated employees.

31. MANAGEMENT DISCUSSION AND ANALYSIS

The Management Discussion and Analysis for the year under review as stipulated under Regulation 34(2) and Schedule V of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the Listing Regulations), is presented in a separate section forming part of this Annual Report.

32. SECRETARIAL AUDIT

During the year, the Company has complied with the mandatorily applicable Secretarial Standards issued by the Institute of Company Secretaries of India.

The Secretarial Audit report along with the Secretarial Compliance Report for the financial year 2021-2022 are annexed herewith as "Annexure C" and forms part of this report. There are no qualifications in the Report.

33. INTERNAL AUDITORS

Based on the recommendation of the Audit Committee M/s. J. Kumar Jain & Associates, Chartered Accountants, are the Internal Auditors of the Company.

34. DETAILS OF FRAUD REPORTED BY THE AUDITORS

As per Auditors' Report, no fraud u/s 143(12) was reported by the auditors.

35. EXTRACT OF ANNUAL RETURN

The extract of annual return in Form MGT 9 as required under Section 92(3) of the Companies Act, 2013 and Rule 12 of the Companies (Management and Administration) Rules, 2014 is enclosed as "Annexure D" and the same is available within the annual report in the website of the Company at <https://www.assamcarbon.in/> under the Heading About Us → Investor Relations → Annual Reports & Annual General Meetings.

36. INDUSTRIAL RELATIONS

With respect to our Patancheru Unit, there are no IR issues in our Patancheru factory as on date. With respect to our Guwahati Unit, overall Industrial Relation is cordial. No untoward incidence is reported from any quarters during this period. New COD is due from 01.03.2021. Negotiation is on and expected to be finalized soon.

37. CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTGO

Information on Conservation of Energy, Technological Absorption and Foreign Exchange earnings and outgo is appended as "Annexure E" in this report.

38. EMPLOYEES/ MANAGERIAL REMUNERATION

The statement containing the disclosure as required in accordance with the provisions of Section 197(12) of the Companies Act, 2013 read with rule 5 (1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 is annexed as "Annexure - F" and forms a part of the Board Report.

Further, none of the employees of the Company are in receipt of remuneration exceeding the limit prescribed under Rule 5 (2) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014. Statement pursuant

Directors' Report (Contd.)

to Section 197(12) of the Companies Act 2013 read with rule 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 also forms part of this report and is appended as "Annexure F".

39. DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to Section 134 (5) of the Companies Act, 2013, the Directors confirm:

- i) that in preparation of the annual accounts, the applicable accounting standards have been followed along with the proper explanation relating to material departures;
- ii) that such accounting policies have been selected and applied consistently and such judgments and estimates have been made that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year ended 31st March, 2022 and of the profit of the Company for the year ended on that date;
- iii) that proper and sufficient care was taken for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;
- iv) that the annual accounts have been prepared on a going concern basis;
- v) that proper internal financial controls are in place and the internal financial controls are adequate and operating effectively;
- vi) that proper system to ensure compliance with the provisions of all applicable laws including applicable Secretarial Standards are in place and such systems are adequate and operating effectively.

40. CORPORATE SOCIAL RESPONSIBILITY (CSR)

The brief outline of the Corporate Social Responsibility (CSR) Policy of the Company and the initiatives undertaken by the Company on CSR activities along with composition of CSR Committee with detail particulars of CSR meeting held during the year are set out in "Annexure – G" of this report. The policy is available at the website of the Company at the website <https://www.assamcarbon.in/> under the Heading About Us → Investor Relations → Board Policies.

41. MATERIAL CHANGES & COMMITMENTS AFFECTING FINANCIAL POSITION OF THE COMPANY, OCCURRING AFTER BALANCE SHEET DATE

No material changes and commitments affecting the financial position of the Company occurred between the end of the financial year to which this financial statement related and on the date of this report.

42. NOTE OF APPRECIATION

The Directors expressed their gratitude for the assistance and co-operation that the Company has received from the Central Government, State Governments of Assam and Telangana, other State Governments, Statutory Authorities, Regulatory Bodies, Customers, Bankers, Suppliers and Shareholders. Your Directors also wish to place on record their appreciation for the services by the executives, staff and workers of the Company.

For and on behalf of the Board

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Kali Krishna Bhattacharya

Managing Director

(DIN: 07011241)

Rakesh Himatsingka

Chairman

(DIN: 00632156)

“Annexure A” to the Board of Directors’ Report

FORM NO. AOC -2

[Pursuant to clause (h) of sub-section (3) of Section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014]

Form for Disclosure of particulars of contracts/ arrangements entered into by the company with related parties referred to in sub section (1) of Section 188 of the Companies Act, 2013 including certain arms length transaction under third proviso thereto.

1. Details of contracts or arrangements or transactions not at Arm’s length basis.

There were no contracts or arrangements or transaction entered into during the year ended 31st March, 2022, which was not at Arm Length basis.

2. Details of contracts or arrangements or transactions at Arm’s length basis for the year ended 31.03.2022 are as follows:

Name(s) of the Related party & Nature of Relationship	Nature of Contracts/ arrangements/ Transactions	Duration of Contracts/ arrangements/ transactions	Salient Terms of the Contracts or arrangements or transactions including the value, if any	Justification for entering into such Contracts or arrangements or transactions	Date(s) of approval by the Board	Amount in Rs.
India Carbon Ltd Mr. Rakesh Himatsingka, Non-Executive Director and Chairman of the Board, is interested.	Sale and Purchase of Goods Rent and Re-imbursement of expenses	April 1 st , 2021- March 31 st , 2022	Omnibus approval accorded for Sale, Purchase or supply of any goods or material and avail or render any service not exceeding Rs.5.00 Crore for the FY 2021-22	Purchase of raw material which is to be used in production process Rent for office space and re-imbursement of expenses	25.06.20, 14.08.20, 12.11.20, 04.02.21	Purchase of Rs.1.67 Lacs and sale of Rs. 0.11 Lacs Rent payment of Rs. 2.83 Lacs and expenses of 0.80 Lacs

For and on behalf of the Board

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Kali Krishna Bhattacharya

Managing Director

(DIN: 07011241)

Rakesh Himatsingka

Chairman

(DIN: 00632156)

“Annexure B” to the Board of Directors’ Report

MANAGING DIRECTOR’S CERTIFICATE ON COMPLIANCE WITH THE CODE OF CONDUCT

As required under Regulation 34(3) read with Part D of Schedule V of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, I hereby declare that all the Board Members and Senior Management Personnel of the Company have complied with the Code of Conduct of the Company for the year ended 31st March 2022.

For and on behalf of the Board of Director
Sd/-

Kali Krishna Bhattacharya
Managing Director
DIN: 07011241

Kolkata
Date: 23rd May, 2022

“Annexure C” to the Board of Directors’ Report

Form No. MR-3

SECRETARIAL AUDIT REPORT

For The Financial Year Ended 31st March, 2022

[Pursuant to section 204(1) of the Companies Act, 2013 and Rule No. 9 of the Companies (Appointment and Remuneration Personnel) Rules, 2014]

To
The Members,
Assam Carbon Products Limited,
Birkuchi, Guwahati, Assam-781026

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by ASSAM CARBON PRODUCTS LTD (hereinafter called the Company). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the ASSAM CARBON PRODUCTS LTD's books, papers, minute books, forms and returns filed and other records maintained by the company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on 31st March, 2022, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by ASSAM CARBON PRODUCTS LTD (“the Company”) for the financial year ended on 31st March, 2022, according to the provisions of:

- (i) The Companies Act, 2013/ the Companies (Amendment) Act, 2017 (the Act) and the rules made there under as amended from time to time;
- (ii) The Securities Contracts (Regulation) Act, 1956(“SCRA”), rules made there under and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India(“SEBI”) as may be amended from time to time;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under and as may be amended from time to time;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made there under as may be amended from time to time to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings and as may be amended from time to time;
- (v) The following Regulations, Circulars, Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (‘SEBI Act’) (as may be amended from time to time): -
 - (a) The Securities and Exchange Board of India (Listing Obligations And Disclosure Requirements) Regulations, 2015 (as amended from time to time);
 - (b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (as amended from time to time);
 - (c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (as amended from time to time);
 - (d) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (as may be amended from time to time); - Not Applicable as there was no reportable event;
 - (e) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999/ Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (as may be amended from time to time); - Not Applicable as there was no reportable event;
 - (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 as may be amended from time to time; - Not Applicable as there was no reportable event;
 - (g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

“Annexure C” to the Board of Directors’ Report *(Contd.)*

- regarding the Companies Act and dealing with client (as may be amended from time to time); - Not Applicable as there was no reportable event;
- (h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (as may be amended from time to time) ; - Not Applicable as there was no reportable event;
 - (i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (as may be amended from time to time); - Not Applicable as there was no reportable event;
 - (j) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (as may be amended from time to time); - Not Applicable as there was no reportable event; and
 - (k) Any other Regulations/ Rules/Notifications/ Circulars/ Amendments etc. as issued by the Securities and Exchange Board of India from time to time;
- (vi) Other laws/acts/rules as may be applicable specifically to the company:
- (a) Payment of Bonus Act, 1965 as may be amended from time to time;
 - (b) Payment of Gratuity Act, 1972 as may be amended from time to time;
 - (c) Payment of Wages Act, 1936 as may be amended from time to time;
 - (d) Trade Unions Act, 1926 as may be amended from time to time;
 - (e) Workmen’s Compensation Act, 1923 as may be amended from time to time;
 - (f) Employees’ Provident Funds and Miscellaneous Provisions Act, 1952 as may be amended from time to time;
 - (g) Employees’ State Insurance Act, 1948 as may be amended from time to time;
 - (h) Minimum Wages Act, 1948 and its Rules as may be amended from time to time;
 - (i) The Factories Act, 1948 & its allied State Laws & Rules and as may be amended from time to time;
 - (j) The Company covered under Assam Fire Service Act, 1985
 - (k) The Company has complied under the provisions of Factory Insurance;
 - (l) Assam Weight & Measurement Enforcement Act, 1958;
 - (m) Pollution Control Board Clearance as may be amended from time to time;
 - (n) Air (Prevention and Control of Pollution) Act, 1981 and the rules and standards made thereunder.
 - (o) Water (Prevention and Control of Pollution) Act, 1974 and Water (Prevention and Control of Pollution) Rules, 1975
 - (p) Environment Protection Act, 1986 and the rules, notifications issued thereunder.
 - (q) Central Excise Act, 1944 and its Rules as may be amended from time to time;
 - (r) Income Tax Act, 1961 and its Rules as may be amended from time to time;
 - (s) Central Sales Tax Act, 1956 and its Rules as may be amended from time to time;
 - (t) VAT Act and its Rules as may be amended from time to time;
 - (u) Profession Tax and its Rules as may be amended from time to time;
 - (v) Shops and Establishments Act and its Rules as may be amended from time to time;
 - (w) Industrial Disputes Act 1947 and its Rules as may be amended from time to time;
 - (x) Service Tax Act and its Rules as may be amended from time to time;
 - (y) Contract Labor (Regulation and Abolition) Act, 1970 as may be amended from time to time.
 - (z) Central Goods and Services Tax Act, 2017 & its Rules / the Integrated Goods and Services Tax Act, 2017 & its Rules there under including any Circulars/ Notifications issued from time to time.

I have also examined the required licenses specific to the Company and found them duly up to date/applied for renewal, as the case may be.

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

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India with respect to Board and General Meetings.
- (ii) The Listing Agreements entered into by the Company with the Calcutta Stock Exchange Limited read with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines,

“Annexure C” to the Board of Directors’ Report *(Contd.)*

Standards, etc. mentioned above.

I further report that:

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors, Independent Directors and Women Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

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

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

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

I further report that Company has passed a special resolution pursuant to Section 197, 198, Schedule V and other applicable provisions, if any, of the Companies Act, 2013 and the Rules framed thereunder, including any statutory modification(s) or re-enactment(s) thereof for the time being in force and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and had obtained the consent of the Shareholders for payment of commission up to 1% of the net profits of the Company, computed in the manner laid down in Section 198 of the Companies Act, 2013, from the financial year 2020-2021 and onwards until otherwise repudiated by the Board of Directors, to Mr. Rakesh Himatsingka, (DIN: 00632156) Non-Executive Chairman of the Board, in addition to the sitting fees for attending the meeting of the Board of Directors/ Committees thereof and any other expenses incurred for official/ business purposes only.

I further report that the Company has complied with all applicable provisions and rules and appointed Ms. Parinita Goenka as the Company Secretary and Compliance Officer with effect from 01st October, 2021 in place of the erstwhile Company Secretary of the Company, who stepped down from his position with effect from 20th March, 2021.

Place: Kolkata
Date: 17th May, 2022

Sd/-
Dipa Agarwal
Practicing Company Secretary
C P No.: 24448
ACS No.: 65249
UDIN: A065249D000334056

“Annexure C” to the Board of Directors’ Report (Contd.)

Secretarial Compliance Report of

Assam Carbon Products Limited,
Birkuchi, Guwahati, Assam-781026

for the year ended 31st March, 2022

We, Mahata Agarwal & Associates, Practicing Company Secretaries, have examined:

- all the documents and records made available to us and explanation provided by Assam Carbon Products Limited (“the listed entity”),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity which is <http://www.assamcarbon.in/>
- all other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2022 (“Review Period”), in respect of compliance with the provisions of:
- the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- All other regulations as may be applicable and circulars/ guidelines issued thereunder;

And based on the above examination, I hereby report that, during the Review Period:

- The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations / Circulars/ Guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

- The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action Taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/remarks of the Practicing Company Secretary, (if any)
NIL				

“Annexure C” to the Board of Directors’ Report *(Contd.)*

(c) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2022	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Place: Kolkata
Date: 17th May, 2022

Sd/-
Dipa Agarwal
Practicing Company Secretary
C P No.: 24448
ACS No.: 65249
UDIN: A065249D000334056

CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS

(As per clause C of Schedule V of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015 read with Regulation 34(3) of the said Listing Regulations)

To
The Members,
Assam Carbon Products Limited,
Birkuchi, Guwahati, Assam – 781026

As required by item 10(i) of Part C of Schedule V of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015, I hereby certify that none of the Directors on the Board of Assam Carbon Products Limited (CIN: L23101AS1963PLC001206) having its registered office at Birkuchi, Guwahati, Assam – 781026, have been debarred or disqualified from being appointed or continuing as Directors of Companies by the SEBI/ Ministry of Corporate Affairs or any such statutory authority.

Place: Kolkata
Date: 17th May, 2022

Sd/-
Dipa Agarwal
Practicing Company Secretary
C P No.: 24448
ACS No.: 65249
UDIN: A065249D000334056

“Annexure D” to the Board of Directors’ Report

Form No. MGT-9
EXTRACT OF ANNUAL RETURN
as on the financial year ended on
31st March, 2022

[Pursuant to Section 92(3) of the Companies Act, 2013 and Rule 12(1) of the
Companies (Management and Administration) Rules, 2014, as amended from time to time]

I. REGISTRATION & OTHER DETAILS:

1.	CIN	L23101AS1963PLC001206
2.	Registration Date	17 th April 1963
3.	Name of the Company	ASSAM CARBON PRODUCTS LTD
4.	Category/Sub-category of the Company	Company Limited by Shares
5.	Address of the Registered office & contact details	BIRKUCHI, GUWAHATI, ASSAM INDIA – 781026
6.	Whether listed company	Yes
7.	Name, Address & contact details of the Registrar & Transfer Agent, if any.	CB Management Services (P) Ltd., P-22, Bondel Road, Kolkata- 700 019 Phone No.: 40116700/17/18. Fax No.: (033) 4011 6739, E mail: rta@cbmsl.com

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY (All the business activities contributing 10 % or more of the total turnover of the company shall be stated)

Sl. No.	Name and Description of main products / services	NIC Code of the Product/ service	% to total turnover of the company
1	CARBON BLOCKS	NA	6%
2	CARBON BRUSH	NA	35%
3	MECHANICAL AND SPECIAL CARBON COMPONENTS	NA	59%

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

Sl No.	Name and Address of the Company	Company Number	Holding/Subsidiary/ Associate	% of shares held	Applicable Section
1	NIL	NA	NA	NA	NA

SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

Category-wise Share Holding

Category of Shareholder	Number of shares held at the beginning of the year				Number of shares held at the end of the year				% change during the year
	Demat	Physical	Total	% of total shares	Demat	Physical	Total	% of total shares	
A. Promoters									
(1) Indian									
(a) Individual/ HUF	1943300	0	1943300	70.52	1943300	0	1943300	70.52	0.00
(b) Central Government	0	0	0	0.00	0	0	0	0.00	0.00
(c) State Government(s)	0	0	0	0.00	0	0	0	0.00	0.00
(d) Bodies Corporate	0	0	0	0.00	0	0	0	0.00	0.00
(e) Banks/FI	0	0	0	0.00	0	0	0	0.00	0.00
(f) Any Other	0	0	0	0.00	0	0	0	0.00	0.00
Sub Total(A)(1)	1943300	0	1943300	70.52	1943300	0	1943300	70.52	0.00.

“Annexure D” to the Board of Directors’ Report (Contd.)

Category of Shareholder	Number of shares held at the beginning of the year				Number of shares held at the end of the year				% change during the year
	Demat	Physical	Total	% of total shares	Demat	Physical	Total	% of total shares	
(2) Foreign									
(a) NRIs-Individuals	0	0	0	0.00	0	0	0	0.00	0.00
(b) Other - Individuals	0	0	0	0.00	0	0	0	0.00	0.00
(c) Bodies Corporate	0	0	0	0.00	0	0	0	0.00	0.00
(d) Banks/FI	0	0	0	0.00	0	0	0	0.00	0.00
(e) Any Other	0	0	0	0.00	0	0	0	0.00	0.00
Sub Total(A)(2)	0	0	0	0.00	0	0	0	0.00	0.00
Total Shareholding of Promoter (A)= (A)(1)+(A)(2)	1943300	0	1943300	70.52	1943300	0	1943300	70.52	0.00
B. Public shareholding									
1. Institutions									
(a) Mutual Funds	0	0	0	0.00	0	0	0	0.00	0.00
(b) Banks/FI	50	100050	100100	3.63	50	100050	100100	3.63	0.00
(c) Central Government	0	0	0	0.00	0	0	0	0.00	0.00
(d) State Government(s)	0	0	0	0.00	0	0	0	0.00	0.00
(e) Venture Capital Funds	0	0	0	0.00	0	0	0	0.00	0.00
(f) Insurance Companies	0	0	0	0.00	0	0	0	0.00	0.00
(g) FIs	0	0	0	0.00	0	0	0	0.00	0.00
(h) Foreign Venture Capital Funds	0	0	0	0.00	0	0	0	0.00	0.00
(i) Other (specify)	0	0	0	0.00	0	0	0	0.00	0.00
Sub-Total (B)(1)	50	100050	100100	3.63	50	100050	100100	3.63	0.00
2. Non-institutions									
(a) Bodies Corporate									
(i) Indian	138951	950	139901	5.08	131556	950	132506	4.01	-0.27
(ii) Overseas	0	0	0	0.00	0	0	0	0.00	0.00
(b) Individuals									
(i) Individual shareholders holding nominal share capital up to Rs 1 lakh	241908	125602	367510	13.34	249184	120351	369535	13.41	0.07
(ii) Individual shareholders holding nominal share capital in excess of Rs. 1 lakh	161623	0	161623	5.87	166623	0	166623	6.05	0.18
(c) Others (specify)									
(c-i) Non-Resident Individuals	2375	200	2575	0.09	2545	200	2745	0.10	0.01
(c-ii) Trust	150	0	150	0.01	350	0	350	0.01	0.01
(c-iii) IEPF	40441	0	40441	1.47	40441	0	40441	1.47	0.00
Sub-Total (B)(2)	585448	126752	712200	25.85	590699	121501	712200	25.85	0.00
Total Public Shareholding (B)= (B)(1)+(B)(2)	585498	226802	812300	29.48	590749	221551	812300	29.48	0.00
C. Shares held by Custodians for GDRs & ADRs	0	0	0	0.00	0	0	0	0.00	0.00
GRAND TOTAL (A)+(B)+(C)	2528798	226802	2755600	100.00	2534049	221551	2755600	100.00	0.00

“Annexure D” to the Board of Directors’ Report (Contd.)

B) Shareholding of Promoters:

Sl. No.	Shareholder’s Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total Shares of the Company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the Company	% of Shares Pledged / encumbered to total shares	
1	Mr. Rakesh Himatsingka	796452	28.90	NIL	796452	28.90	NIL	0.00
2	Mr. Shaurya Veer Himatsingka	868823	31.53	NIL	868823	31.53	NIL	0.00
3	Mrs. Anita Himatsingka	188025	6.82	NIL	188025	6.82	NIL	0.00
4	Ms. Maalika Himatsingka	90000	3.27	NIL	90000	3.27	NIL	0.00

C) Change in Promoters’ Shareholding (please specify, if there is no change)

Sl. No.	Particulars	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
1.	MR. RAKESH HIMATSINGKA				
	At the beginning of the year	796452	28.90	796452	28.90
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	Nil	Nil	Nil	Nil
	At the end of the year	-	-	796452	28.90
2.	MR. SHAURYA VEER HIMATSINGKA				
	At the beginning of the year	868823	31.53	868823	31.53
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	Nil	Nil	Nil	Nil
	At the end of the year	-	-	868823	31.53
3.	MRS. ANITA HIMATSINGKA				
	At the beginning of the year	188025	6.82	188025	6.82
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	Nil	Nil	Nil	Nil
	At the end of the year	-	-	188025	6.82
4.	MS. MAALIKA HIMATSINGKA				
	At the beginning of the year	90000	3.27	90000	3.27
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	Nil	Nil	Nil	Nil
	At the end of the year	-	-	90000	3.27

“Annexure D” to the Board of Directors’ Report (Contd.)

D) Shareholding Pattern of top ten Shareholders:

(Other than Directors, Promoters and Holders of GDRs and ADRs):

Sl. No.	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
1.	Progressive Star Finance Private Limited				
	At the beginning of the year	106000	3.85	106000	3.85
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	-	-	-	-
	At the end of the year	-	-	106000	3.85
2.	Assam Industrial Development Corporation Ltd.				
	At the beginning of the year	100000	3.63	100000	3.63
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	-	-	-	-
	At the end of the year	-	-	100000	3.63
3.	Mahendra Girdharilal				
	At the beginning of the year	65549	2.38	65549	2.38
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	-	-	-	-
	At the end of the year	-	-	65549	2.38
4.	P P Zibi Jose				
	At the beginning of the year	55150	2.00	55150	2.00
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.): Increase/ Buy/ Transfer on 25.06.2021	4000	0.15	59150	2.15
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.): Increase/ Buy/ Transfer on 24.12.2021	1000	0.04	60150	2.18
	At the end of the year	-	-	60150	2.18
5.	Prem Chand Goenka				
	At the beginning of the year	25924	0.94	25924	0.94
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	-	-	-	-
	At the end of the year	-	-	25924	0.94
6.	Gobindsingh Dhawda HUF				
	At the beginning of the year	15000	0.54	15000	0.54
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	-	-	-	-
	At the end of the year	-	-	15000	0.54
7.	Raja Kakati				
	At the beginning of the year	10000	0.36	10000	0.36
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	-	-	-	-
	At the end of the year	-	-	10000	0.36

“Annexure D” to the Board of Directors’ Report (Contd.)

Sl. No.	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
8.	Shri Parasram Industries Pvt. Ltd.				
	At the beginning of the year	9870	0.36	9870	0.36
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.): Decrease/ Sale/ Transfer on 11.02.2022	(2941)	(0.11)	6929	0.25
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.): Decrease/ Sale/ Transfer on 25.02.2022	(1235)	(0.04)	5694	0.21
	At the end of the year	-	-	5694	0.21
9.	Shri Parasram Commodities Pvt. Ltd.				
	At the beginning of the year	8250	0.30	8250	0.30
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	-	-	-	-
	At the end of the year	-	-	8250	0.30
10.	Lenus Finvest Private Limited				
	At the beginning of the year	8200	0.30	8200	0.30
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.): Decrease/ Sale/ Transfer on 11.06.2021	(5000)	0.18	3200	0.12
	At the end of the year	-	-	3200	0.12
11.	SunilKumar Vinubhai Gohel				
	At the beginning of the year	0	0	0	0
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.): Increase/ Buy/ Transfer on 25.02.2022	5425	0.20	5425	0.20
	At the end of the year	-	-	5425	0.20

E) Shareholding of Directors and Key Managerial Personnel:

Sl. No.	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
1	Mr. Rakesh Himatsingka- Chairman				
	At the beginning of the year	796452	28.90	796452	28.90
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	-	-	796452	28.90
2	Mr. K K Bhattacharya- Managing Director				
	At the beginning of the year	0	0	0	0

“Annexure D” to the Board of Directors’ Report (Contd.)

Sl. No.	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	0	0	0	0
3	Mrs. Anita Himatsingka- Director				
	At the beginning of the year	188025	6.82	188025	6.82
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	-	-	188025	6.82
4	Ms. Maalika Himatsingka- Director				
	At the beginning of the year	90000	3.27	90000	3.27
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	-	-	90000	3.27
5	Mr. S K Lhila- Independent Director				
	At the beginning of the year	0	0	0	0
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	0	0	0	0
6	Mrs. Rupanjana De- Independent Director				
	At the beginning of the year	0	0	0	0
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	0	0	0	0
7	Mr. Jnyan Prasad Deuri- Nominee Director for and on behalf of Assam Industrial Development Corporation Ltd.				
	At the beginning of the year	100000	3.63	100000	3.63
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	-	-	100000	3.63
8	Mr. Avinash Kumar Gupta- Independent Director				
	At the beginning of the year	0	0	0	0
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	0	0	0	0

“Annexure D” to the Board of Directors’ Report (Contd.)

Sl. No.	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
9	Mr. Susheel Kumar Sharma - Director				
	At the beginning of the year	2120	0.08	2120	0.08
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	-	-	2120	0.08
10	Mr. Pijush Bysack - Chief Financial Officer				
	At the beginning of the year	0	0	0	0
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	0	0	0	0
11	Ms. Parinita Goenka - Company Secretary (Appointed w.e.f 1 st October, 2021)				
	At the beginning of the year	0	0	0	0
	Date wise Increase / (Decrease) in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	0	0	0	0
	At the end of the year	0	0	0	0

V) INDEBTEDNESS - Indebtedness of the Company including interest outstanding/accrued but not due for payment

(In Rs. '000)

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	Nil	32500	Nil	32500
ii) Interest due but not paid	Nil	Nil	Nil	Nil
iii) Interest accrued but not due	Nil	1142	Nil	1142
Total (i+ii+iii)	Nil	33642	Nil	33642
Change in Indebtedness during the financial year	Nil	Nil	Nil	Nil
Addition	Nil	1707	Nil	1707
Reduction	Nil	35349	Nil	35349
Net Change	Nil	33642	Nil	33642
Indebtedness at the end of the financial year				
i) Principal Amount	Nil	Nil	Nil	Nil
ii) Interest due but not paid	Nil	Nil	Nil	Nil
iii) Interest accrued but not due	Nil	Nil	Nil	Nil
Total (i+ii+iii)	Nil	Nil	Nil	Nil

“Annexure D” to the Board of Directors’ Report (Contd.)

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL:

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

(In Rs.)

Sl. No.	Particulars of Remuneration	Name of MD/WTD/ Manager	Total Amount (in Rs.)
		Mr K K Bhattacharya (in Rs.)	
1	Gross salary		
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	5,28,000	5,28,000
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	7,32,168	7,32,168
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	NIL	NIL
2	Stock Option	NIL	NIL
3	Sweat Equity	NIL	NIL
4	Commission - as % of profit - others, specify...	NIL	NIL
5	Others, please specify	NIL	NIL
	Total (A)	12,60,168	12,60,168
	Ceiling as per the Act	Remuneration is within the limits as laid down under the Companies Act, 2013 & its Corresponding Rules & Schedules.	

B. Remuneration to other Directors (In Rs.)

Sl. No.	Name of Directors	Particulars of Remuneration			Total Amount (in Rs.)
		Fee for attending Board/ Committee Meetings (in Rs.)	Commission	Others, please specify	
Independent Directors					
1	Mrs. Rupanjana De	1,43,000	NIL	NIL	1,43,000
2	Mr. Avinash Kumar Gupta	1,22,000	NIL	NIL	1,22,000
3	Mr. Sanjay Kumar Lhila	1,36,000	NIL	NIL	1,36,000
Non-Executive Directors					
4	Mr. Rakesh Hitamsingka	1,29,000	8,80,000	NIL	10,09,000
5	Mrs. Anita Himatsingka	1,01,000	NIL	NIL	1,01,000
6	Ms. Maalika Himatsingka	80,000	NIL	NIL	80,000
7	Mr. Susheel Kumar Sharma	94,000	NIL	NIL	94,000
	Total Managerial Remuneration to other Directors	8,05,000	8,80,000	NIL	16,85,000
	Overall Ceiling as per the Act	Remuneration is within the limits as laid down under the Companies Act, 2013 & its Corresponding Rules & Schedules.			

“Annexure D” to the Board of Directors’ Report (Contd.)

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

(In Rs.)

Sl. No.	Particulars of Remuneration	Key Managerial Personnel			
		CS (*)	CFO	CEO	Total
1	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	2,90,106	17,19,635	NIL	20,09,741
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	NIL	NIL	NIL	NIL
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	NIL	NIL	NIL	NIL
2	Stock Option	NIL	NIL	NIL	NIL
3	Sweat Equity	NIL	NIL	NIL	NIL
4	Commission	NIL	NIL	NIL	NIL
	- as % of profit	NIL	NIL	NIL	NIL
	others, specify...	NIL	NIL	NIL	NIL
5	Others, please specify	NIL	NIL	NIL	NIL
	Total	2,90,106	17,19,635	NIL	20,09,741

(*) Joined on 01.10.2021

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

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

For and on behalf of the Board

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Kali Krishna Bhattacharya

Managing Director

(DIN: 07011241)

Rakesh Himatsingka

Chairman

(DIN: 00632156)

“Annexure E” to the Board of Directors’ Report *(Contd.)*

A. Conservation of Energy

(a) Energy Conservation Measures:

The Company is very conscious about Energy Conservation which occupies an important place, while choosing new plant and machineries.

The Company is also rapidly moving towards all LED fixtures to save energy.

B. Technology Absorption

Research and Development (R&D)

1. Specific areas in which R&D carried out by the Company

- (i) Indigenization of raw materials started in the earlier years, continued during the year.
- (ii) Indigenization of raw consumables such as crucibles.
- (iii) Development of new grades of basic material for new businesses.

2. Benefits derived as a result of the above R&D

Benefits is being derived in terms of better quality.

3. Future plan of action

- Continued Indigenization of imported raw materials;
- Development of New Material for New Business Areas, such as for Radial Bearings, Auto Sector etc;
- Improve existing Grades to meet more demanding Operational conditions.

4. Expenditure on R & D

(Rs. In lacs)

a. Capital	-
b. Recurring	19.94
c. Total	₹19.94
d. Total R & D expenditure as a percentage of total turnover	0.42

Technology absorption, adaptation and innovation

The Company has fully absorbed the technology on existing product line.

C. Foreign exchange earnings and outgo:

- a. Activities relating to exports; initiatives taken to increase exports; development of new export markets for products and services; and export plans: -

During the year, exports were made to Europe and the Far East, for Mechanical Carbon Products as well as Electrical Carbon products. Efforts to increase exports are ongoing.

- b. Total foreign exchange used and earned

(Rs. In Lacs)

Total Foreign Exchange used	4.03
Total Foreign Exchange earned	59.83

For and on behalf of the Board

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Kali Krishna Bhattacharya

Managing Director

(DIN: 07011241)

Rakesh Himatsingka

Chairman

(DIN: 00632156)

“Annexure F” to the Board of Directors’ Report

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

- i) The percentage increase in remuneration of each Director, Chief Financial Officer and Company Secretary during the financial year 2021-22, ratio of remuneration of each Director to the median remuneration of each Key Managerial Personnel (KMP) against the performance of the Company are as under:

Sl. No.	Name of the Director/KMP and Designation	Remuneration of Director/ KMP for F.Y 2021-22 (in Rs.)	% increase in Remuneration Of each Director/ KMP in the Financial Year 2021-22	Ratio of remuneration of each Director/ KMP to median remuneration of employees
1.	Mr. Rakesh Himatsingka, Non-Executive Chairman	10,09,000	52.41%	2.21:1
2.	Mr. K K Bhattacharya, MD	12,60,168	7.5%	2.77:1
3.	Mrs. Anita Himatsingka, Non-Executive Director	1,01,000	Same as last year	0.22:1
4.	Ms. Maalika Himatsingka, Non-Executive Director	80,000	Same as last year	0.18:1
5.	Mr. Susheel Kumar Sharma, Non-Executive Director	94,000	8.04%	0.21:1
6.	Mrs. Rupanjana De, Non-Executive & Independent	1,43,000	5.15%	0.31:1
7.	Mr. Avinash Kumar Gupta, Non- Executive & Independent	1,22,000	6.08%	0.27:1
8.	Mr. Sanjay Kumar Lhila, Non-Executive & Independent	1,36,000	5.43%	0.30:1
9.	Ms. Parinita Goenka, CS	2,90,106	Joined on 01.10.2021	0.63:1
10.	Mr. Pijush Bysack, CFO	17,19,635	-8.83%	3.78:1

Notes:

- Calculation of median is taken on the figures as at the end of Financial Year.
- The Median Remuneration of Employees as on March 31st, 2022 was Rs. 4,54,754 and as on March 31st, 2021 was Rs 4,60,707.
 - The percentage decrease in the median remuneration of employees was 1.29% during the financial year.
 - There were 210 permanent employees on the rolls of Company as on March 31, 2022.
 - The Company has earned a profit after tax during the financial year 2021-22 amounting of Rs. 654.07 Lacs compared to a profit of Rs 386.69 Lacs during the financial year 2020-21.
 - Average percentage increase made in the salaries of employees other than the managerial personnel in the last financial year was 2.9%, whereas the average percentage increase made in the salaries of managerial personnel is 2.42%. Further there was no exceptional increase in the salary during the Financial Year ended 31.03.2022 as compared above.
 - It is hereby affirmed that the remuneration paid during the year ended 31st Day of March, 2022 is as per the Remuneration Policy of the Company.

“Annexure F” to the Board of Directors’ Report *(Contd.)*

- i) Information on employees’ particulars as on 31st March, 2022 as per Rule 5(2) and Rule 5(3) of the Companies (Appointment and Remuneration of Management Personnel) Rules, 2014, as may be amended from time to time, is provided hereunder. Particulars of the same shall also be made available to any shareholder on a specific request made by him/her in writing before the date of this Annual General Meeting. In case of request received even after the date of completion of Annual General Meeting, such particulars shall also be made available to the Shareholders.

Sl. No.	Name of employee	Designation of employee	Remuneration received (Amount in Rs.)	Nature of employment, whether contractual or otherwise	Qualification and experience of the employee	Date of commencement of employment	The age of such employee	The last employment held by such employee before joining the company	The percentage of equity shares held by the employee in the company within the meaning of clause(iii) of sub-rule (2)	Whether any such employee is a relative of any director or manager of the company and if so, name of such director or manager
1	Jayant Kumar	GM(O)	30,64,518	Permanent	BTCH – Mech, MBA – Marketing	26.08.1991	58	NA	NA	NA
2	Dr. Kumar Amarnath	GM (Works)	19,01,844	Permanent	MSC – Physics, Phd in Physics	14.02.2022	48	Carbon Resources Pvt Ltd		
3	Pijush Bysack	CFO	17,19,635	Permanent	B.Com, CA – Inter	01.02.2011	51	Sahara India	NA	NA
4	Aaviinash Nimckar	Zonal Head - West	15,43,056	Permanent	BE- Mech	28.09.2012	50	Spraying Systems Pvt Ltd	NA	NA
5	K.C. Joshi	Advisor - Accounts	15,14,400	Consultant	B.Com, LLB, C.A (Inter) Group I	01/06/1982 & 01/04/2014	67	NA	0.003	NA
6	Jyotirmay Goswami	Chief General Manager – Technology & Operations	14,61,600	Consultant	B.E chemical	04/07/1973 & 01/04/2013	71	NA	0.007	NA
7	S.M. Madan Kumar	Zonal Head - South	12,48,000	Consultant	DEE	01.10.2007	59	Mersen India P. Ltd	NA	NA
8	Anuj Pratap Singh Chauhan	AGM – Maintenance	11,69,964	Permanent	Diploma (Mech) AIME (Mech)	21.02.2019	49	MS Bhushan Power & Steel Ltd	NA	NA
9	P Ramalingeswara Rao	Manager – P&A	10,90,284	Permanent	B.Com, IRPM	10.06.2010	50	JETL, Hyderabad	NA	NA

“Annexure F” to the Board of Directors’ Report (Contd.)

Sl. No.	Name of employee	Designation of employee	Remuneration received (Amount in Rs.)	Nature of employment, whether contractual or otherwise	Qualification and experience of the employee	Date of commencement of employment	The age of such employee	The last employment held by such employee before joining the company	The percentage of equity shares held by the employee in the company within the meaning of clause(iii) of sub-rule (2)	Whether any such employee is a relative of any director or manager of the company and if so, name of such director or manager
10	Pranjal Baruah	Head - Quality	10,67,352	Permanent	BTech – Bio Technology	01.12.2017	39	Godrej Consumer Product Ltd	NA	NA

(*) Remuneration includes fixed pay, retirement benefits and the perquisites exercised during the reporting period.

For and on behalf of the Board

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Kali Krishna Bhattacharya

Managing Director

(DIN: 07011241)

Rakesh Himatsingka

Chairman

(DIN: 00632156)

“Annexure G” to the Board of Directors’ Report

REPORT ON CORPORATE SOCIAL RESPONSIBILITY (CSR) INITIATIVES

1. A brief outline of the Company’s CSR policy including Overview of projects / programs undertaken:

The Company has framed Corporate Social Responsibility (CSR) Policy in accordance with the provisions of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility) Rules, 2014. It enumerates the list of activities for channelizing the amount of expenditure towards Corporate Social Responsibility by the Company. The Company fully recognizes its commitment to the fulfillment of its social responsibilities. Programmes to benefit society in general and those living in the vicinity of its facilities in particular have been consistently implemented over the years.

The CSR Policy of the Company as approved by the Board of Directors is available on the Company’s website at www.assamcarbon.in

2. The composition of the CSR Committee is as under:

Sl. No.	Name	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
1	Mrs. Rupanjana De	Non- Executive Independent Director	2	2
2	Mrs. Anita Himatsingka	Non- Executive Non-Independent Director	2	2
3	Mr. Kali Krishna Bhattacharya	Managing Director	2	2

3. Provide the web-link where Composition of CSR Committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company: www.assamcarbon.in
4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, if applicable (attach the report): Not applicable
5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any: Not applicable

Sl. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs.)	Amount required to be set-off for the financial year, if any (in Rs.)

6. Average net profit of the company as per section 135(5): Rs.761.83 Lacs
7. (a) Two percent of average net profit of the company as per section 135(5): Rs. 15.24 Lacs
(b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years: NA
(c) Amount required to be set off for the financial year, if any: NA
(d) Total CSR obligation for the financial year (7a+7b-7c): Rs. 15.24 Lacs
8. (a) CSR amount spent or unspent for the financial year:

Total Amount Spent for the Financial Year (in Lacs)	Amount Unspent (in Rs.)				
	Total Amount transferred to Unspent CSR Account as per Section 135(6)		Amount transferred to any fund Specified under Schedule VII as per second proviso to Section 135 (5)		
	Amount	Date of transfer.	Name of the Fund	Amount	Date of transfer.
Rs. 16.00	0	0	0	0	0

“Annexure G” to the Board of Directors’ Report (Contd.)

b) Details of CSR amount spent against ongoing projects for the financial year:

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	(9)	(10)	(11)	
Sl. No.	Name of the Project.	Item from the list of activities in Schedule VII to the Act.	Local area (Yes/ No)	Location of the project		Project duration	Amount allocated for the project (in Lacs.)	Amount spent in the current financial Year (in Lacs)	Amount transferred to Unspent CSR Account for the project as per Section 135(6) (in Rs.)	Mode of Implementation -Direct(Yes/ No)	Mode of Implementation - ThroughImplementing Agency	
				State.	Dis-trict.							
-	-	-	-	-	-	-	-	-	-	-	-	-
	Total											

(c) Details of CSR amount spent against other than ongoing projects for the financial year:

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	
Sl. No.	Name of the Project	Item from the list of activities in schedule VII to the Act	Local area (Yes/ No)	Location of the project		Amount spent for the project (in Lacs)	Mode of implementation on - Direct (Yes/No)	Mode of implementation - Through implementing agency	
				State	District			Name	District
1.	Renovation of Anganwadi Centres	Education	Yes	West Bengal	Kolkata	Rs. 16.00	No	The We Foundation	Kolkata, West Bengal

(d) Amount spent in Administrative Overheads

(e) Amount spent on Impact Assessment, if applicable

(f) Total amount spent for the Financial Year

(8b+8c+8d+8e)

(g) Excess amount for set off, if any

Sl. No	Particular	Amount (in Rs.)
(i)	Two percent of average net profit of the company as per section 135(5)	---
(ii)	Total amount spent for the Financial Year	---
(iii)	Excess amount spent for the financial year [(ii)-(i)]	---
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	---
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	---

“Annexure G” to the Board of Directors’ Report (Contd.)

9. (a) Details of Unspent CSR amount for the preceding three financial years:

Sl. No.	Preceding Financial Year.	Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.)	Amount spent in the reporting Financial Year (in Rs.)	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any			Amount remaining to be spent in succeeding financial years. (in Rs.)
				Name of the Fund	Amount (in Rs.)	Date of transfer.	
1.		NIL					
	TOTAL						

- (b) Details of CSR amount spent in the financial year for ongoing projects of the preceding financial year(s):

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Sl. No.	Project ID.	Name of the Project	Financial Year in which the project was commenced.	Project duration.	Total amount allocated for the project (in Rs.).	Amount spent on the project in the reporting Financial Year (in Rs.).	Cumulative amount spent at the end of reporting Financial Year. (in Rs.)	Status of the project - Completed / Ongoing
	TOTAL							

10. In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year (asset-wise details).
- (a) Date of creation or acquisition of the capital asset(s).
- (b) Amount of CSR spent for creation or acquisition of capital asset.
11. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5): NA

For and on behalf of the Board

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Kali Krishna Bhattacharya

Managing Director

(DIN: 07011241)

Rakesh Himatsingka

Chairman

(DIN: 00632156)

Management Discussion and Analysis Report

INDUSTRY STRUCTURE & DEVELOPMENT

Assam Carbon Products Limited continues to be one of the biggest long-term sustainable business opportunities that our country offers in the field of Electrical & Mechanical Carbon Material and Components and the product range includes various kinds of Blocks & Blanks produced from Carbon, Metal and Graphite. From these blocks and blanks, the Company is fabricating industrial products such as, Carbon Brushes, Current Collectors for the Railways, City Metros, Carbon and Graphite Seals, Bearings and several other Mechanical and Speciality Carbon Materials for other industrial applications across all sorts of industries from Steel to Cement, Aluminium, Power Plants, Sugar Mills, Paper Plants, Mining, Chemical Plants, Agricultural machinery, etc

Another major product range represents the Electric Current Collectors which are used by Electric Locomotives to carry electrical power from overhead lines used on intercity rail network or electrical third rails to the electrical equipment of the vehicles, used for the Metro/ underground rail network within the cities.

On the other hand Mechanical Carbon products are suitable for high temperature, lubrication, chemical inertness, dimensional stability / impermeability and the product range includes Radial Bearings, Thrust Bearings, Mechanical Seals, Piston Rings, Packing and Vanes.

The operating environment this year continued to remain volatile and challenging. India witnessed a devastating second wave of Covid-19 during the June quarter with a significant humanitarian and economic impact. In this uncertain operating environment, our focus remained on the health and safety of our people, ensuring uninterrupted supply of our products, meeting the evolving demand of our consumers, caring for the communities, safeguarding the environment and protecting our business model.

Our sales and profitability were adversely impacted due to the current global pandemic as demand has slowed down and prices are under pressure. In addition, costs have gone up on all fronts, as well as directly on account of necessary arrangements to tackle COVID-19.

OPPORTUNITIES & THREATS

Your Company constantly examines the opportunities and threats that exist in its business and already has plans to exploit the opportunity available going forward as well as equipped to handle threats.

Opportunities

The Company's product range includes Electrical Carbon Materials, Mechanical Carbon Materials, Current Collectors and other Speciality Carbon Products.

Indian Railways have prepared a 'National Rail Plan (NRP) for India – 2030'. The Plan is to create a 'Future Ready' Railway system by 2030. The NRP is aimed to formulate strategies based on both operational capacities and commercial policy initiatives to increase modal share of the Railways in freight to 45%. The objective of the Plan is to create capacity ahead of demand, which in turn would also cater to future growth in demand right up to 2050 and also increase the modal share of Railways to 45% in freight traffic and to continue to sustain it.

The key objectives of the National Rail Plan are :

- Formulate strategies based on both operational capacities and commercial policy initiatives to increase modal share of the Railways in freight to 45%.
- Reduce transit time of freight substantially by increasing average speed of freight trains to 50Kmph.
- As part of the National Rail Plan, Vision 2024 has been launched for accelerated implementation of certain critical projects by 2024 such as 100% electrification, multi-tracking of congested routes, upgradation of speed to 160 kmph on Delhi-Howrah and Delhi-Mumbai routes, upgradation of speed to 130kmph on all other Golden Quadrilateral-Golden Diagonal (GQ/GD) routes and elimination of all Level Crossings on all GQ/GD route.
- Assess Locomotive requirement to meet twin objectives of 100% electrification (Green Energy) and increasing freight modal share.
- 58 Super critical Projects of a total length of 3750 kms costing ₹39,663 Crore and 68 Critical Projects of a total length of 6913 kms costing ₹75,736 Crore, have been identified for completion by 2024.

This augurs very well for the Company, as this investment will reflect the increase in the operation of the Indian Railways, which will directly result in significant increase in the demand for the Company's product. With the revamped plant and cost effective production, the Company is expected to achieve a higher turnover and profitability in the years to come.

Management Discussion and Analysis Report

Threats

1. The COVID-19 pandemic will directly impact the revenue for the current financial year since the operation of the Indian Railways are under total suspension and several other industries have lost between 15 and 40 % of their output.
2. The Indian Railways have tremendously accelerated the phasing out of the DC Locomotives (Brush users) by AC Locomotives (Brushless Motors). This shall make a dent of over 40%~50% of the Companies Business.
3. Rapid transaction from DC Motors (using Brushes) to Brushless AC motors across all industries.
4. Price war for tender business.

SEGMENT-WISE/PRODUCT-WISE PERFORMANCE

Company has achieved a gross revenue from operation amounting to Rs.47.05 Crore as against Rs.41.41 Crore in the last financial year, a increase of 13.62% as compared to the previous financial year.

Sale of Electrical segment has contributed 41% to the top line as against 45% in the previous fiscal, whilst the Mechanical & Speciality Carbon segment witnessed a share of 59% as against 55% in the previous year. This is as per Company's planning as the electrical Carbon segment globally is slowing down, and in the years ahead the Company will be more and more concentrating upon the mechanical and specialty segments.

Performance of the Company continues to improve due to various cost saving measures and operational efficiency measures initiated by the management, as well as rationalization of sales price, strict control on credit sales and staying away from loss making accounts.

OUTLOOK

The outlook for the Company continues to be optimistic based on the growth in the demand for the Company's products. The Company has already completed its first phase of upgradation and Modernization of its two factories, but with the fast paced change in our customers requirements this will be a continuous exercise. The Company is also exploring new growth opportunities as well as optimum utilization of its available resources, as well as constantly working towards improved productivity through further upgradation of Plant & Machinery where required, training of workmen, etc.

Constant efforts are on towards achieving savings, improving operational efficiency, increasing market share, optimum utilization of production capacities and customer's satisfaction.

The Management is optimistic about the growth and profitability of the Company.

RISKS & CONCERNS

Unforeseen/unmitigated technology obsolescence, the emergence of competing technologies would impact the Company's business and its ability to deliver on its strategic goals.

The advanced technological nature of the Company requires people with highly differentiated skill sets. Any inability to recruit, retain and develop the right people would impact the Company's ability to achieve its strategic goals.

Supplying into critical applications, the quality of the Company's contracts must match the quality and nature of its products. Ineffective contract risk management could result in significant liabilities for the Company and damage customer relationships.

Further, massive and unpredicted increase in the Raw Material price and volatility in the consumables prices have significantly reduced the profit margin of the Company.

INTERNAL CONTROL SYSTEM & THEIR ADEQUACY

The Company has proper and adequate internal control system commensurate with its size and nature of business. It ensures that all assets are safeguarded and protected against improper use and that transactions are authorized, recorded and reported correctly.

Internal Audit is conducted by independent auditing firm at all locations of the Company. The internal audit reports are reviewed by the Audit Committee and adequate remedial measures are taken in time.

FINANCIAL PERFORMANCE WITH RESPECT TO OPERATIONAL PERFORMANCE

During the year under review, revenue from operations of the Company closed at Rs. 4704.54 Lacs as compared to Rs. 4140.92 Lacs in the previous year which is a 13.61% increase.

Despite several challenges issue faced by your Company such as low productivity, absenteeism, global economic slowdown, cut throat internal competition due to dumping from China and reduction in the prices due to price war, your Company has been able to continue towards maintaining a decent profit. Further, massive and unpredicted increase in the Raw Material price and volatility in the consumables prices have also significantly reduced the profit margin of the Company. The situation have

Management Discussion and Analysis Report

further aggravated due to weakening rupee against foreign currency which have resulted into increased input cost of some of the major raw materials.

HUMAN RESOURCES/INDUSTRIAL RELATIONS

The Company has always given prime importance to Human Resources. Continued efforts towards optimum manpower utilization are being made for reduction of cost and optimization of productivity. The Company continues to provide thrust on regular training programmes for upgradation of job knowledge and other related skills amongst its employees.

The total number of people employed in the organization as on 31.03.2022 was 210 as compared to 222 as on 31.03.2021.

Details of significant changes in key financial ratios, along with detailed explanations:

Financial Ratios for standalone financials

Particulars	Formula	UoM	Yead Ended 31 Mar 2022	Yead Ended 31 Mar 2021	Variation %	Reason
Current Ratio	Current Assets / Current Liabilities	Times	2.38	1.71	39.18	Pay off of CL
Debt-Equity Ratio	Total Debts / Equity	Times	0.06	0.23	-73.91	Pay off of Debt
Debt Service Coverage Ratio	Earnings Available for Debt Service / Debt Service	Times	16.90	8.57	97.20	Increase in Net Earnings
Return on Equity Ratio	Net Earnings After Tax/ Average Shareholders Equity	Percentage	19.80	15.40	28.57	Increase in Net Earnings
Inventory Turnover ratio	Sales / Average Inventory	Times	2.90	2.19	32.42	Increase in Sales
Trade Receivables Turnover Ratio	Net Sales / Average Accounts Receivable	Times	3.99	3.58	11.45	---
Trade Payables Turnover Ratio	Net Purchases / Average Trade Payables	Times	4.25	2.55	66.67	Reduction in payables
Net Capital Turnover Ratio	Net Sales / Working Capital	Times	2.12	2.60	-18.46	---
Net Profit Ratio	Net Profit / Net Sales	Percentage	13.40	9.90	35.35	Increase in Net Profit
Return on Capital Employed	Earning before Interest & Tax / Capital Employed	Percentage	25.45	18.12	40.45	Increase in Earnings
Return on Investment	$(*) \frac{MV(T1) - MV(T0) - \text{Sum}[C(t)]}{(MV(T0) + \text{Sum}[W(t) * C(t)])}$	Percentage	The shares of the Company is listed only with Calcutta Stock Exchange, hence market quote / value is not available.			

(*) T1 = End of time period, T0 = Beginning of time period, t = Specific date falling between T1 and T0, MV(T1) = Market Value at T1, MV(T0) = Market Value at T0, C(t) = Cash inflow, cash outflow on specific date, W(t) = Weight of the net cash flow (i.e. either net inflow or net outflow) on day 't', calculated as $[T1 - t] / T1$

CAUTIONARY STATEMENT

Statement in the "Management's Discussion and Analysis" describing the Company's objectives, projections, estimates, expectations or predictions may be "forward looking statements" within the meaning of applicable securities laws and regulations. Actual results could differ materially from those expressed or implied in this report. Important factors that would make a difference to the Company's operations include global and Indian demand/supply conditions, raw materials prices, feed stock availability and prices, cyclical demand and pricing in the Company's principal markets, changes in Government regulations/policies, tax regimes, economic developments within the country and other factors such as litigation and labour negotiations. The Company assumes no responsibility to modify or revise any forward-looking statements on the basis of any future events or new information. Actual results may differ from those mentioned in the report.

For and on behalf of the Board

Date: 23rd May, 2022

Place: Kolkata

Registered Office:

Birkuchi, Guwahati, Assam- 781026

CIN: L23101AS1963PLC001206

Kali Krishna Bhattacharya

Managing Director

(DIN: 07011241)

Rakesh Himatsingka

Chairman

(DIN: 00632156)

FINANCIAL ACCOUNTS

Independent Auditors Report

**To the Members of
Assam Carbon Products Limited**

Report on the Audit of the Financial Statements

Opinion

We have audited the accompanying financial statements of Assam Carbon Products Limited ('the Company'), which comprise the Balance Sheet as at March 31, 2022, and the Statement of Profit and Loss (including Other Comprehensive Income), and Cash Flow Statement and the Statement of changes in Equity for the year then ended and a summary of significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements, give the information required by the Act, in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India including the IND AS, of the state of affairs as at March 31, 2022 and its Profit including other comprehensive income, its Cash Flow and changes in equity for the year ended on that date.

Basis of Opinion

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

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. We have determined the matters described below to be the key audit matters to be communicated in our report.

Sl.	Key Audit Matter	Auditor's Response
1.	Litigation – Contingencies Provision for employee wages and benefits for the lockout period at the factories of the company was not made based on the principles of 'No Work No Pay'. This might have an impact on the results, if the potential exposures were to materialise. The labour matter of Company's Guwahati factory is subjudice. Refer note 26A(iii).	Principal Audit Procedures Our audit approach was a combination of test of internal controls and substantive procedures. Supporting documentation are tested for the positions taken by the management.

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

- The Company's Board of Directors is responsible for the other information. The other information comprises the information included in the shareholder information and Report of the Board of Directors & Management Discussion and Analysis, but does not include the financial statements and our auditor's report thereon.
- Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.
- In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated.
- If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Management's Responsibility for the Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134 (5) of the Companies Act, 2013 ("the Act")

Independent Auditors Report *(Contd.)*

with respect to the preparation of these IND AS financial statements that give a true and fair view of the financial position, financial performance (including other comprehensive income), cash flows and changes in equity of the Company in accordance with the Accounting principles generally accepted in India, including the Indian Accounting Standards (IND AS) specified under section 133 of the act read with rule 7 of the Companies (Accounts) Rules 2014. This responsibility also includes the maintenance of adequate accounting records in accordance with the provisions of the act for safeguarding the assets of the company and for preventing and detecting the frauds and other irregularities; selection and application of appropriate accounting policies; making judgment and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial control, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of IND AS financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

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

Auditor's Responsibility for the Audit of the Financial Statements

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

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

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

Materiality is the magnitude of misstatements in the financial statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the financial statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the financial statements.

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

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to

Independent Auditors Report (Contd.)

bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditor's Report) Order 2020 ("the Order") as amended, issued by Central Government of India in terms of subsection(11) of Section 143 of the act, we give in the 'Annexure A', a statement on the matters specified in paragraphs 3 & 4 of the order.
2. As required by section 143(3) of the Act, based on our audit we report that:
 - (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit;
 - (b) In our opinion proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books;
 - (c) The Balance Sheet, the Statement of Profit & Loss including other comprehensive income, Cash Flow Statement and statement of changes in equity dealt with by this report are in agreement with the books of account;
 - (d) In our opinion the aforesaid IND AS financial statements comply with the Accounting Standards specified under section 133 of the act.
 - (e) On the basis of written representations received from the directors as on March 31,2022, and taken on record by the Board of Directors, none of the directors is disqualified as on March 31,2022, from being appointed as a director in terms of sub section (2) of section 164 of the Act.
 - (f) With respect to the adequacy of the Internal Financial Controls over financial reporting of the company and operating effectiveness of such controls, refer to our separate Report in "Annexure B". Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company's internal financial controls over financial reporting.
 - (g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197 (16) of the Act, as amended:

In our opinion and to the best of our information and according to the explanation given to us, the remuneration paid by the company to its director during the year is in accordance with the provisions of section 197 of the act.
 - (h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies(Audit & Auditors) Rules 2014, in our opinion and to the best of our information and according to the explanations given to us:
 - i) The Company has disclosed the impact of pending litigation on its financial position in its Ind AS financial statements in accordance with the generally accepted accounting practice – Refer Note 26 to the Ind As financial statements.
 - ii) The Company did not have any long term contracts including derivative contracts for which there were any material foreseeable losses.
 - iii) There were no amounts which were required to be transferred to the Investor's Education and Protection Fund by the company.

for **D.Basu & Co.**
Chartered Accountants
Firm's Registration No.: 301111E

Place: Kolkata
Date : 23rd May 2022

[Ashish Ranjan Maitra]
Partner
Membership No : 056520
UDIN : 22056520AJLTVT4107

Annexure 'A' to the Independent Auditors Report

(Referred to in our report of even date)

The Annexure referred to in Independent Auditors' Report to the members of the Company on the standalone Ind AS financial statements for the year ended 31 March 2022, we report that:

- (i) (a) The Company has maintained proper records showing full particulars, including quantitative details and situation of Property, Plant & Equipment and also with respect to Intangible Assets.
- (b) The Company has a regular programme of physical verification of its fixed assets by which all the fixed assets are verified in a phased manner over a period of two years. In our opinion, the periodicity of physical verification is reasonable having regard to the size of the Company and the nature of its fixed assets. No material discrepancies were noticed on such verification.
- (c) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the title deeds of immovable properties are held in the name of the Company. The Company doesn't hold any Immovable Property which are not in Company's name.
- (d) The Company have not revalued any of its Property, Plant & Equipment & Intangible Assets during the year.
- (e) The Company doesn't hold any benami property and no proceedings have been initiated under the Benami Transactions (Prohibition) Act, 1985.
- (ii) (a) The inventory, except for goods in transit has been physically verified by the management during the year. In our opinion, the frequency of such verification is reasonable. The discrepancies noticed on verification between the physical stocks and the book records were not material.
- (b) The Company have availed working capital facility from bank and the fund withdrawn against the facility have been utilized for the purpose as stipulated in the terms of the facility and there has been no diversion thereof. The Company is regularly filing the required details, statements with the concerned Bank, which are in agreement with the books of accounts. The Company is not a willful defaulter. The limit of the working capital facility have not exceeded Rupees Five Crore.
- (iii) According to the information and explanation given to us and based on our examination of the records of the company, the Company has not granted any loans, secured or unsecured, to companies, firms, Limited Liability Partnerships or other parties. Accordingly, paragraphs 3(iii)(a) to 3(iii)(f) of the Order are not applicable to the Company.
- (iv) According to the information and explanation given to us and based on our examination of the records of the company, the Company has not made any loans, investment, guarantees, and securities to others during the year.
- (v) The Company has not accepted any deposits during the year as per the directives issued by the Reserve Bank of India under the provisions of section 73 to 76 or any other relevant provisions of the Act and the rules framed thereunder. Accordingly, paragraphs 3(v) of the Order is not applicable to the Company.
- (vi) The Central Government has not prescribed the maintenance of cost records under sub-section (1) of section 148 of the Companies Act, 2013 for any of the products manufactured by the Company.
- (vii) (a) According to the information and explanations given to us and on the basis of our examination of the records of the company, amounts deducted/accrued in the books of account in respect of undisputed statutory dues including Goods and Services Tax, provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess and other statutory dues have generally been regularly deposited during the year by the Company with the appropriate authorities.
According to the information and explanations given to us, no undisputed amounts payable in respect of Goods and Services Tax, provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess and other statutory dues were in arrears as at 31 March 2022 for a period of more than six months from the date they became payable.
- (b) According to the information and explanations given to us, there are no dues of Goods and Services Tax, provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess and other statutory dues which have not been deposited with the appropriate authorities on account of any dispute.
- (viii) According to the information and explanations given to us, there are no such transactions which have not been recorded in the books of account which have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (43 of 1961).
- (ix) (a) The Company has not defaulted in repayment of loans or other borrowings or in the payment of interest thereon to any lender.

Annexure 'A' to the Independent Auditors Report (Contd.)

- (b) The Company has not been declared as a willful defaulter by any bank of financial institution or other lender.
- (c) The Company has not availed any term loan during the year and there is no outstanding balance as on the balance sheet date.
- (d) The Company has not raised any funds on short-term basis which have been utilised for long-term purposes.
- (e) The Company has not taken any funds from any entity or person on account of or to meet the obligations of its subsidiaries, associates or joint ventures.
- (f) The Company has not raised any loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies.
- (x) The Company did not raised any money by way of initial public offer or further public offer (including debt instruments) and preferential allotment or private placement of shares or convertible debentures (fully, partially or optionally convertible) during the year. Accordingly, paragraphs 3(x) of the Order is not applicable.
- (xi) According to the information and explanations given to us, no fraud by the Company or on the Company by its officers or employees has been noticed or reported during the course of our audit. Accordingly, paragraphs 3(xi)(b) of the Order is not applicable.
There has been no whistle-blower complaints received by the Company during the year.
- (xii) In our opinion and according to the information and explanations given to us, the Company is not a nidhi Company. Accordingly, paragraphs 3(xii) of the Order is not applicable.
- (xiii) The Company have properly disclosed all the transactions with the related parties which are in compliance with section 177 and 188 of Companies Act wherever applicable and all such transactions have been properly disclosed in the financial statements as required by the applicable accounting standards,
- (xiv) (a) The Company has proper internal audit system commensurate with the size and nature of its business;
(b) We have verified the internal audit report and there are no major issues which require attention.
- (xv) According to the information and explanations given to us, and based on our examination of the records of the Company, the Company has not entered into any non-cash transactions with directors or persons connected with him. Accordingly, paragraphs 3(xv) of the Order is not applicable.
- (xvi) (a) The Company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934.
(b) The Company have not conducted any Non-Banking Financial or Housing Finance activities which require a valid Certificate of Registration (CoR) from the Reserve Bank of India as per the Reserve Bank of India Act, 1934.
(c) The company is not a Core Investment Company (CIC) as defined in the regulations made by the Reserve Bank of India.
(d) The group doesn't have any Core Investment Company (CIC).
- (xvii) The company have not incurred cash losses in the financial year and in the immediately preceding financial year.
- (xviii) There has been no resignation by any Statutory Auditor during the year.
- (xix) According to the information and explanations given to us and on the basis of the financial ratios, ageing and expected dates of realisation of financial assets and payment of financial liabilities, other information accompanying the financial statements, our knowledge of the Board of Directors and management plans, we are of the opinion that there exists no material uncertainty as on the date of the audit report and the company is capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date.
- (xx) (a) According to the information and explanations given to us and on the basis of examination of the related documents, there is no unspent amount with respect to second proviso to sub-section (5) of section 135 of the Act. Accordingly, paragraphs 3(xx)(b) of the Order is not applicable.
- (xxi) The company doesn't have any subsidiary accordingly paragraphs 3(xxi) of the order is not applicable.

for **D.Basu & Co.**
Chartered Accountants
Firm's Registration No.: 301111E

[Ashis Ranjan Maitra]
Partner
Membership No : 056520
UDIN : 22056520AJLTVT4107

Place: Kolkata
Date : 23rd May 2022

Annexure 'B' to the Independent Auditors Report

Annexure - B to the Independent Auditors' Report of even date on the Ind AS financial statements of Assam Carbon Products Limited

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

We have audited the internal financial controls over financial reporting of Assam Carbon Products Limited ("the Company") as of 31 March 2022 in conjunction with our audit of the Ind AS financial statements of the Company for the year ended on that date.

Management's Responsibility for Internal Financial Controls

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

Auditors' Responsibility

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

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

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

Meaning of Internal Financial Controls over Financial Reporting

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

Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

Annexure 'B' to the Independent Auditors Report

Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31 March 2022, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

for **D.Basu & Co.**
Chartered Accountants
Firm's Registration No.: 301111E

[Ashis Ranjan Maitra]
Partner
Membership No : 056520
UDIN : 22056520AJLTVT4107

Place: Kolkata
Date : 23rd May 2022

Balance Sheet as at 31st March, 2022

(Amount in Rupees thousand)

	Note	31 Mar 2022	31 Mar 2021
ASSETS			
Non Current Assets			
(a) Property, Plant & Equipments	3	1,30,530	1,28,837
(b) Other Intangible Assets	3	167	223
(c) Capital Work in Progress	3	-	994
(d) Other Financial Assets	4	11,479	11,630
(e) Deferred Tax Assets	28	3,282	14,006
		1,45,458	1,55,690
Current Assets			
(a) Inventories	5	1,53,463	1,71,449
(b) Financial Assets			
(i) Investments	6	3,853	3,721
(ii) Trade Receivables	7	1,23,208	1,12,733
(iii) Cash & Cash Equivalents	8	12,377	15,122
(iv) Other Bank Balances	9	39,489	25,198
(v) Other Financial Assets	4	24,318	24,573
(c) Other Current Assets	10	23,346	27,097
(d) Current Tax Assets (Net)	18	2,228	4,469
		3,82,282	3,84,362
TOTAL ASSETS		5,27,740	5,40,052
EQUITY AND LIABILITIES			
Equity			
(a) Equity Share Capital	11	27,556	27,556
(b) Other Equity	12	3,23,502	2,58,095
		3,51,058	2,85,651
Non Current Liabilities			
(a) Provisions	14	16,339	29,395
		16,339	29,395
Current Liabilities			
(a) Financial Liabilities			
(i) Borrowings	13	20,476	65,132
(ii) Trade Payables	15		
Total outstanding dues to MSME		13,899	5,862
Total outstanding dues to other creditors		17,289	22,014
(iii) Other Liabilities	16	85,518	1,11,615
(b) Provisions	14	22,727	18,687
(c) Other Current Liabilities	17	434	1,696
		1,60,343	2,25,006
TOTAL EQUITY AND LIABILITIES		5,27,740	5,40,052
Significant accounting policies	1B		

The notes referred to above form an integral part of the financial statements

As per our report of even date attached

For **D. Basu & Co.**

Chartered Accountants

Firm Registration No.: 301111E

Ashis Ranjan Maitra

Partner

Membership No.: 056520

UDIN : 22056520AJLTVT4107

Place: Kolkata

Date: 23.05.2022

For and on behalf of the Board of Directors of
Assam Carbon Products Limited

Rakesh Himatsingka

Chairman

(DIN : 00632156)

K. K. Bhattacharya

Managing Director

(DIN : 07011241)

S. K. Lhila

Director

(DIN : 01383460)

Pijush Bysack

Chief Financial Officer

Parinita Goenka

Company Secretary

Statement of Profit & Loss for the year ended 31st March, 2022

(Amount in Rupees thousand)

	Note	31 Mar 2022	31 Mar 2021
I. Revenue from Operations	19	4,70,454	4,14,092
II. Other income	20	33,720	11,282
III. Total Income (I + II)		5,04,174	4,25,374
IV. Expenses			
(a) Cost of materials consumed	21	1,18,982	78,397
(b) Purchase of stock in trade	22	320	201
(c) Changes in inventories of finished goods, work in progress & stock in trade	23	25,527	27,831
(d) Employee benefits expenses	24	1,15,775	1,20,803
(e) Finance cost		6,283	9,334
(f) Depreciation and Amortisation expenses	3	11,647	16,451
(g) Other Expenses	25	1,37,363	1,18,138
Total Expenses (IV)		4,15,897	3,71,155
V. Profit / (Loss) before exceptional items and tax (III - IV)		88,277	54,219
VI. Exceptional Items		-	-
VII. Profit / (Loss) before tax (V - VI)		88,277	54,219
VIII. Tax Expense / (Credit)			
(a) Current tax		15,424	9,473
(b) Deferred tax		9,812	3,745
Total Tax Expenses / (Credit)		25,236	13,218
IX. Profit / (Loss) for the year from continuing operations (VII - VIII)		63,041	41,001
X. Other Comprehensive Income / (Loss)			
(a) Items that will not be reclassified to profit or Loss			
- Remeasurement gains and (losses) on defined benefit obligation		3,278	(3,258)
(b) Income-tax (expense)/credit relating to items that will not be reclassified to profit or loss		912	(926)
Total Other Comprehensive Income / (Loss), net of taxes		2,366	(2,332)
XI. Total Comprehensive Income / (Loss) for the year (IX + X)		65,407	38,669
XII. Earnings per share			
Basic & Diluted	29	22.88	14.88
Significant accounting policies	1B		

The notes referred to above form an integral part of the financial statements

As per our report of even date attached

For **D. Basu & Co.**

Chartered Accountants

Firm Registration No.: 301111E

Ashis Ranjan Maitra

Partner

Membership No.: 056520

UDIN : 22056520AJLTVT4107

Place: Kolkata

Date: 23.05.2022

For and on behalf of the Board of Directors of
Assam Carbon Products Limited

Rakesh Himatsingka

Chairman

(DIN : 00632156)

Pijush Bysack

Chief Financial Officer

K. K. Bhattacharya

Managing Director

(DIN : 07011241)

Parinita Goenka

Company Secretary

S. K. Lhila

Director

(DIN : 01383460)

Cash Flow Statement for the year ended 31st March, 2022

(Amount in Rupees thousand)

	31 Mar 2022	31 Mar 2021
A. Cash flow from operating activities		
Profit/ (Loss) before tax	88,277	54,219
Adjustments for :		
Depreciation and amortisation	11,647	16,451
Allowance for doubtful receivables	-	-
Advances written off	-	303
Finance cost	6,283	9,334
Interest income	(1,870)	(148)
Dividend	(97)	(54)
Provisions and Liabilities no longer required written back	(2,402)	(3,075)
Loss in Reinstatement of Investment	(40)	(68)
Loss/ (profit) on sale / discard of fixed asset	(20)	(175)
	13,501	22,568
Operating cash flow before working capital changes	1,01,778	76,787
Adjustments for :		
Trade receivables, loans and advances and other current assets	(4,254)	(6,910)
Inventories	17,986	35,495
Trade payable, provisions and other liabilities	(27,383)	(45,087)
	88,127	60,285
Less : Direct Taxes paid	(14,630)	(19,296)
Net Cash provided by/ (used in) operating activities	73,497	40,989
B. Cash flow from investing activities		
Purchase of fixed assets (including net movement in capital WIP)	(12,629)	(11,570)
Proceeds from disposal of fixed assets	359	500
Investment in Mutual funds	(172)	-
(Investment)/Maturity in term deposit with bank (net)	(14,731)	(25,072)
Interest received	1,870	148
Net cash provided by/ (used in) investing activities	(25,303)	(35,994)
C. Cash flow from financing activities		
Borrowings	(44,656)	5,632
Finance cost paid	(6,283)	(9,334)
Net cash provided by/ (used in) financing activities	(50,939)	(3,702)
Net increase in cash and cash equivalents (A+B+C)	(2,745)	1,293
Cash and cash equivalents - opening balance	15,122	13,829
Cash and cash equivalents - closing balance	12,377	15,122
	(2,745)	1,293
	31 Mar 2022	31 Mar 2021
Cash and cash equivalents as at the year end comprises of:		
Cash on hand	101	147
Balances with banks in current accounts	12,276	14,975
	12,377	15,122

The notes referred to above form an integral part of the financial statements

As per our report of even date attached

For **D. Basu & Co.**

Chartered Accountants

Firm Registration No.: 301111E

Ashis Ranjan Maitra

Partner

Membership No.: 056520

UDIN : 22056520AJLTVT4107

Place: Kolkata

Date: 23.05.2022

For and on behalf of the Board of Directors of
Assam Carbon Products Limited

Rakesh Himatsingka

Chairman

(DIN : 00632156)

Pijush Bysack

Chief Financial Officer

K. K. Bhattacharya

Managing Director

(DIN : 07011241)

Parinita Goenka

Company Secretary

S. K. Lhila

Director

(DIN : 01383460)

Statement of changes in Equity as at 31st March, 2022

(Amount in Rupees thousand)

A Equity Share Capital

Balance as at 1 April 2021	27,556
Changes in equity share capital during the year	-
Balance as at 31 March 2022	27,556

B Other Equity

	Attributable to shareholders of Assam Carbon Products Limited					
	Capital Reserve	Capital Redemption Reserve	General Reserve	Retained Earnings	Other items of Other Comprehensive Income	Total Other Equity
Balance as at 1 April 2021	3,586	2,244	4,144	2,49,366	(1,245)	2,58,095
Profit / (Loss) for the year	-	-	-	63,041	-	63,041
Other Comprehensive Income / (loss) for the year	-	-	-	-	2,366	2,366
Total Comprehensive Income / (loss) for the year	-	-	-	63,041	2,366	65,407
Balance as at 31 March 2022	3,586	2,244	4,144	3,12,407	1,121	3,23,502
Balance as at 1 April 2020	3,586	2,244	4,144	2,08,365	1,087	2,19,426
Profit / (Loss) for the year	-	-	-	41,001	-	41,001
Other Comprehensive Income / (loss) for the year	-	-	-	-	(2,332)	(2,332)
Total Comprehensive Income / (loss) for the year	-	-	-	41,001	(2,332)	38,669
Balance as at 31 March 2021	3,586	2,244	4,144	2,49,366	(1,245)	2,58,095

Nature and Purpose of each reserve

Capital Redemption Reserve : The Act requires that where a Company redeems its Preference Shares, a sum equal to the nominal value of the shares so redeemed shall be transferred to a Capital Redemption Reserve. This can be applied by the Company in issuing fully paid Bonus Shares.

General Reserve : Under the erstwhile Indian Companies Act, 1956 a General Reserve was created through an annual transfer of net profit at a specified percentage in accordance with applicable regulations. Consequent to the introduction of the Companies Act, 2013 these requirement has been withdrawn.

Retained Earnings: This reserve represents the cumulative profits of the Company. This reserve can be utilised in accordance with the provisions of the Companies Act, 2013.

Items of Other Comprehensive Income: This represents the effects of remeasurement of defined benefit obligations and fair value of equity instruments through OCI.

Significant accounting policies

The notes referred to above form an integral part of the financial statements

As per our report of even date attached

For **D. Basu & Co.**

Chartered Accountants

Firm Registration No.: 301111E

Ashis Ranjan Maitra

Partner

Membership No.: 056520

UDIN : 22056520AJLTVT4107

For and on behalf of the Board of Directors of
Assam Carbon Products Limited

Rakesh Himatsingka

Chairman

(DIN : 00632156)

K. K. Bhattacharya

Managing Director

(DIN : 07011241)

S. K. Lhila

Director

(DIN : 01383460)

Place: Kolkata

Date: 23.05.2022

Pijush Bysack

Chief Financial Officer

Parinita Goenka

Company Secretary

Notes to the Financial Statements for the year ended 31st March, 2022

1.A. ABOUT THE COMPANY

Assam Carbon Products Limited is a public company. It is incorporated under the Companies Act, 1956 and its shares are listed on the Calcutta Stock Exchange Limited. The Company is primarily engaged in manufacture of carbon products.

1.B. SIGNIFICANT ACCOUNTING POLICIES

i. Basis of preparation of financial statements

These financial statements have been prepared in accordance with Indian Accounting Standards (referred to as 'Ind AS') as per the Companies (Indian Accounting Standards) Rules, 2015, notified under Section 133 of the Companies Act, 2013 ('the Act') and other accounting principles generally accepted in India, to the extent applicable.

The financial statements are presented in Indian Rupees, which is the Company's functional and presentation currency and all the amounts are rounded off to nearest thousand (Rs. 000) except as stated otherwise.

ii. Use of estimates

The preparation of the financial statements in conformity with IND AS requires management to make estimates, judgments and assumptions. These estimates, judgements and assumptions affect the application of accounting policies and the reported amounts of assets and liabilities, the disclosures of contingent assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the period. Accounting estimates could change from period to period. Actual results could differ from those estimates. Appropriate changes in estimates are made as management becomes aware of changes in circumstances surrounding the estimates. Differences between the actual results and estimates are recognised in the year in which the results are known / materialized and, if material, their effects are disclosed in the notes to the financial statements.

Key sources of estimation uncertainty

The following are the key assumptions concerning the future and other key sources of estimation uncertainty at the end of the reporting period that may have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year.

1. Useful lives of property, plant and equipment

As described in the significant accounting policies, the Company reviews the estimated useful lives of property, plant and equipment at the end of each reporting period.

2. Fair value measurements and valuation processes

Some of the Company's assets and liabilities are measured at fair value for financial reporting purposes. In estimating the fair value of an asset or a liability, the Company uses market-observable data to the extent it is available. Where Level 1 inputs are not available, the Company engages third party valuers, where required, to perform the valuation. Information about the valuation techniques and inputs used in determining the fair value of various assets, liabilities are disclosed in the notes to the financial statements.

3. Claims, Provisions and Contingent Liabilities

In case of any ongoing dispute / litigation, where an outflow of funds is believed to be probable and a reliable estimate of the outcome of the dispute can be made based on management's assessment of specific circumstances of each dispute and relevant external advice, management provides for its best estimate of the liability. Such accruals are by nature complex and can take number of years to resolve and can involve estimation uncertainty.

4. Actuarial Valuation

The determination of Company's liability towards defined benefit obligation to employees is made through independent actuarial valuation including determination of amounts to be recognised in the Statement of Profit and Loss and in other comprehensive income. Such valuation depend upon assumptions determined after taking into account inflation, seniority, promotion and other relevant factors such as supply and demand factors in the employment market. Information about such valuation is provided in notes to the financial statements.

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

iii Current – non current classification

All assets and liabilities have been classified as current or non-current as per the Company's normal operating cycle and other criteria set out in the Schedule III to the Companies Act, 2013. Based on the nature of operations, the Company has ascertained its operating cycle for the purpose of current – non current classification of assets and liabilities as 12 months.

All assets and liabilities are classified into current and non-current.

Assets

An asset is classified as current when it satisfies any of the following criteria:

- a. it is expected to be realised in, or is intended for sale or consumption in, the company's normal operating cycle;
- b. it is held primarily for the purpose of being traded;
- c. it is expected to be realised within 12 months after the reporting date; or
- d. it is cash or cash equivalent unless it is restricted from being exchanged or used to settle a liability for at least 12 months after the reporting date.

Current assets include the current portion of non-current financial assets.

All other assets are classified as non-current.

Liabilities

A liability is classified as current when it satisfies any of the following criteria:

- a. it is expected to be settled in the company's normal operating cycle;
- b. it is held primarily for the purpose of being traded;
- c. it is due to be settled within 12 months after the reporting date; or
- d. the company does not have an unconditional right to defer settlement of the liability for at least 12 months after the reporting date. Terms of a liability that could, at the option of the counterparty, result in its settlement by the issue of equity instruments do not affect its classification.

Current liabilities include current portion of non-current financial liabilities.

All other liabilities are classified as non-current.

iv. Fair Value Measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date under current market conditions.

The Company categorizes assets and liabilities measured at fair value into one of three levels depending on the ability to observe inputs employed in their measurement which are described as follows:

- a. Level 1 inputs are quoted prices (unadjusted) in active markets for identical assets or liabilities
- b. Level 2 inputs are inputs that are observable, either directly or indirectly, other than quoted prices included within level 1 for the asset or liability.
- c. Level 3 inputs are unobservable inputs for the asset or liability.

v. Property Plant and Equipment

Freehold land is carried at historical cost. All other items of Properties plant and equipment are stated at their cost of acquisition (net of input credit) or construction and are net of accumulated depreciation. The cost comprises purchase price, borrowing cost if capitalization criteria are met and directly attributable cost of bringing the asset to its working condition for the intended use. When significant parts of plant and equipment are required to be replaced at intervals, the Company depreciates them separately based on their specific useful lives. All other repair and maintenance costs are recognised in statement of profit or loss as incurred.

An item of property, plant and equipment and any significant part initially recognised is derecognized upon

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on de-recognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the statement of profit and loss when the asset is derecognized.

Spares that can be used only with particular items of plant and machinery and such usage is expected to be irregular are capitalised.

Fixed assets under construction are disclosed as capital work in progress.

Depreciation

Depreciation on property plant and equipment commences when the assets are ready for their intended use. Depreciation on tangible fixed assets is provided under straight line method over useful lives of fixed assets, as estimated by the management. Useful lives so estimated are in line with the useful lives indicated by Schedule II to the Companies Act, 2013. Depreciation on additions/ deletions is provided on pro rata basis in the year of purchase/ disposal.

The residual values, useful lives and method of depreciation of are reviewed at each financial year end and adjusted prospectively, if appropriate.

vi. Intangible fixed assets

Intangible assets are stated at their cost of acquisition net of amortisation. The cost comprises purchase price, borrowing cost if capitalization criteria are met and directly attributable cost of bringing the asset to its working condition for the intended use.

Application software is amortised over the estimated economic useful life of 6 years.

The amortization period and the amortization method are reviewed at least at each financial year end. If the expected useful life of the asset is significantly different from previous estimates, the amortization period is changed accordingly.

vii. Impairment of non-financial Assets

The Company assesses at each balance sheet date whether there is any indication that an asset may be impaired. If any such indication exists, the Company estimates the recoverable amount of the asset. If such recoverable amount of the asset or the recoverable amount of the cash generating unit to which the asset belongs is less than its carrying amount, the carrying amount is reduced to its recoverable amount. The reduction is treated as an impairment loss and is recognized in the statement of profit and loss.

An impairment loss is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the assets carrying amount does not exceed the carrying amount that would have been determined net of depreciation or amortisation, if no impairment loss had been recognised.

viii. Financial Instruments

a. Financial Assets

Financial assets, where applicable are recognised when the Company becomes a party to the contractual provisions of the financial instrument and are measured initially at fair value adjusted for transaction costs.

Classification

Management determines the classification of an asset at initial recognition depending on the purpose for which the assets were acquired. The subsequent measurement of financial assets depends on such classification.

The financial assets are classified as those measured at:

1. amortised cost, where the financial assets are held solely for collection of cash flows arising from payments of principal and / or interest.
2. fair value through other comprehensive income (FVTOCI), where the financial assets are held not

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

only for collection of cash flows arising from payments of principal and interest but also from the sale of such assets. Such assets are subsequently measured at fair value, with unrealised gains and losses arising from changes in the fair value being recognised in other comprehensive income.

3. fair value through profit or loss (FVTPL), where the assets are managed in accordance with an approved investment strategy that triggers purchase and sale decisions based on their fair value of such assets. Such assets are subsequently measured at fair value, with unrealised gains and losses arising from changes in the fair value being recognised in the Statement of Profit and Loss in the period in which they arise.

Trade receivables, advances, security deposits, cash and cash equivalents etc. are classified for measurement at amortised cost while investments may fall under any of the aforesaid classes. However, in respect of particular investments in equity instruments that would otherwise be measured at fair value through profit or loss, an irrevocable election at initial recognition may be made to present subsequent changes in fair value through other comprehensive income.

Impairment

The Company assesses at each reporting date whether a financial asset (or a group of financial assets) such as investments, trade receivables, advances and security deposits held at amortised cost and financial assets that are measured at fair value through other comprehensive income are tested for impairment based on evidence or information that is available without undue cost or effort. Expected credit losses are assessed and loss allowances recognised if the credit quality of the financial asset has deteriorated significantly since initial recognition.

De-recognition

A financial asset is primarily de-recognised when the rights to receive cash flows from the asset have expired or the Company has transferred its rights to receive cash flows from the asset.

b. Financial Liabilities

All financial liabilities are recognised initially at fair value and transaction cost that is attributable to the acquisition of the financial liabilities is also adjusted. These liabilities are classified as amortised cost

Subsequent to initial recognition, these liabilities are measured at amortised cost using the effective interest method. These liabilities include borrowings and deposits.

De-recognition of financial liabilities

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

c. Offsetting Financial Instruments

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

ix. **Inventories**

Raw materials, stores and spare parts are valued at the lower of cost and net realizable value. Cost includes purchase price, duties and taxes, freight and other expenditure incurred in bringing such inventories to their present location and condition. In determining cost, weighted average method is used. The carrying amounts of raw materials, stores and spare parts are appropriately written down when there is a decline in replacement cost of such materials and the finished products, in which they will be incorporated, are expected to be sold below cost.

Work in progress and finished goods are valued at the lower of cost and net realisable value. Cost comprises of direct material, labour expenses and an appropriate portion of production overheads incurred in bringing the inventory to their present location and condition. Fixed production overheads are allocated on the basis of

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

normal capacity of the production facilities.

Traded finished goods are valued at the lower of cost and net realisable value.

x. Revenue

Revenue from sale of goods is recognised when significant control of ownership in the goods are transferred to customers and it is not unreasonable to expect ultimate collection of the sale consideration that is being recognised as revenue.

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

Interest income is recognised on a time proportion basis taking into account the amount outstanding and the interest rate applicable.

xi. Income from Government Grant

The Company may receive government grants that require compliance with certain conditions related to the Company's operating activities or are provided to the Company by way of financial assistance on the basis of certain qualifying criteria.

Government grants are recognised when there is reasonable assurance that the grant will be received, and the Company will comply with the conditions attached to the grant.

Accordingly, government grants:

- a. related to or used for assets are included in the Balance Sheet as deferred income and recognised as income over the useful life of the assets.
- b. related to incurring specific expenditures are taken to the Statement of Profit and Loss on the same basis and in the same periods as the expenditures incurred.
- c. by way of financial assistance on the basis of certain qualifying criteria are recognised as they become receivable.

In the unlikely event that a grant previously recognised is ultimately not received, it is treated as a change in estimate and the amount cumulatively recognised is expensed in the Statement of Profit and Loss.

xii. Foreign exchange transactions

Transactions in foreign currencies are translated into the functional currency at the exchange rates prevailing on the date of the transactions. Foreign currency monetary assets and liabilities at the year-end are translated at the year-end exchange rates.

Non-monetary items which are carried in terms of historical cost denominated in a foreign currency, are reported using the exchange rate at the date of transaction. The loss or gain thereon and also on the exchange differences on settlement of the foreign currency transactions during the year are recognized as income or expense in the statement of profit and loss.

Foreign exchange gain/loss to the extent considered as an adjustment to Interest Cost are considered as part of borrowing cost.

xiii. Employee benefits

The Company's obligations towards various employee benefits have been recognised as follows:

Short term benefits

Employee benefits payable wholly within twelve months of receiving employee services are classified as short-term employee benefits. These benefits include salaries and wages, bonus and ex-gratia. The undiscounted amount of short-term employee benefits to be paid in exchange for employee services is recognised as an expense as the related service is rendered by employees.

Post-employment benefits

- a) Monthly contributions to Provident Funds which are in the nature of defined benefit schemes are charged to Statement of Profit and Loss and deposited with the Provident Fund administered through the Company's trust on a monthly basis.

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

- b) The administration of the gratuity scheme which is in the nature of defined benefit plan, has been entrusted to Life Insurance Corporation of India ('LIC'). Annual charge is recognised on the basis of actuarial valuation at the Balance Sheet date, conducted by an independent actuary appointed by the Company and payments are made to LIC on the basis of annual demand received from them. The Company recognizes all actuarial gains and losses in the Statement of Profit and Loss.

Other long term benefits

Cost of long term benefit by way of accumulating compensated absences are recognised when the employees render the service that increases their entitlement to future compensated absences. Such costs are recognised based on actuarial valuation of the Company's year end obligation in this regard by an independent actuary.

Termination benefits

Costs of termination benefits have been recognised only when the Company has a present obligation as a result of a past event, it is probable that an outflow of resources will be required to settle such obligation and the amount of the obligation can be reliably estimated.

xiv. Income taxes

Income-tax expense comprises current tax (i.e. amount of tax for the period determined in accordance with the income-tax law) and deferred tax charge or credit (reflecting the tax effects of timing differences between accounting income and taxable income for the period).

- a. Current tax is measured at the amount expected to be paid to (recovered from) the taxation authorities, using the applicable tax rates and tax laws.
- b. Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities and the amounts used for taxation purposes (tax base), at the tax rates and tax laws enacted or substantively enacted by the end of the reporting period.

Deferred tax assets are recognised for the future tax consequences to the extent it is probable that future virtual certainty will be available against which the deductible temporary differences can be utilised.

Income tax, in so far as it relates to items disclosed under other comprehensive income or equity, are disclosed separately under other comprehensive income or equity, as applicable.

Deferred tax assets and liabilities are offset when there is legally enforceable right to offset current tax assets and liabilities and when the deferred tax balances related to the same taxation authority. Current tax assets and tax liabilities are offset where the entity has a legally enforceable right to offset and intends either to settle on net basis, or to realize the asset and settle the liability simultaneously.

Deferred tax assets are reviewed as at each balance sheet date and written down or written-up to reflect the amount that is reasonably certain (as the case may be) to be realised.

xv. Dividend Distribution

Dividends paid is recognised in the period in which the interim dividends are approved by the Board of Directors, or in respect of the final dividend when approved by shareholders.

xvi. Provisions and Contingent liabilities

Provisions are recognized only when there is a present obligation, as a result of past events, and when a reliable estimate of the amount of obligation can be made at the reporting date. These estimates are reviewed at each reporting date and adjusted to reflect the current best estimates.

Contingent liability is disclosed for:

- Possible obligations which will be confirmed only by future events not wholly within the control of the Company or
- Present obligations arising from past events where it is not probable that an outflow of resources will be required to settle the obligation or a reliable estimate of the amount of the obligation cannot be made.

xvii. Operating leases

Lease payments on operating lease agreements are recognised as an expense on a straight-line basis over the

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

lease term unless the payments are structured to increase in line with expected general inflation to compensate for the lessor's expected inflationary cost increases. Associated costs, such as maintenance and insurance, are expensed as incurred.

xviii. Operating Segments

Operating segments are reported in a manner consistent with the internal reporting provided to the chief operating decision-maker (CODM). The CODM who is responsible for allocating resources and assessing performance of the operating segments, has been identified as the Board of Directors of the Company.

xix. Earnings per share

Basic earnings per share is calculated by dividing the net profit or loss for the period attributable to equity shareholders (after deducting attributable taxes) by the weighted average number of equity shares outstanding during the period. The weighted average number of equity shares outstanding during the period is adjusted for events including a bonus issue.

For the purpose of calculating diluted earnings per share, the net profit or loss for the period attributable to equity shareholders and the weighted average number of shares outstanding during the period are adjusted for the effects of all dilutive potential equity shares.

2. FINANCIAL RISK MANAGEMENT

The Company's business activities are exposed to a variety of risks including liquidity risk, credit risk and market risk. The Company seeks to minimize potential adverse effects of these risks by managing them through a structured process of identification, assessment and prioritization of risks followed by coordinated efforts to monitor, minimize and mitigate the impact of such risks on its financial performance and capital. For this purpose, the Company has laid comprehensive risk assessment and minimization/mitigation procedures, which are reviewed by the Audit Committee and approved by the Board from time to time. These procedures are reviewed to ensure that executive management controls risks by way of properly defined framework. The Company does not enter into derivative financial instruments for speculative purposes. The following table explains the sources of risk and how the entity manages the risk in its financial statements. The management reviews the status of all principal risks with a significant potential impact. Additionally, the Audit Committee carried out focused risk reviews of each Plant and divisions. These reviews included an analysis of both the principal risks, and the controls, monitoring and assurance processes established to mitigate those risks to acceptable levels. As a result of these reviews, a number of actions were identified to continue to improve internal controls and the management of risk.

Risk	Exposure arising from	Measurement	Management
Credit Risk	Cash and cash equivalents, trade receivables, financial assets measured at amortised cost	Ageing analysis, Credit analysis	Credit limits and letters of credit
Liquidity Risk	Borrowings and other liabilities	Cash Flow forecasts	Credit facilities
Market Risk – foreign exchange	Recognised financial assets and liabilities not denominated in INR	Cash Flow forecasts	Monitoring of currency movement.
Market Risk – interest rate	Long Term Borrowings/Liabilities	...	Monitoring of interest rate movements
Market Risk – security prices	Investment in Securities	...	Portfolio Management

a. Credit Risk

Credit risk arises from the possibility that the counter party may not be able to settle their obligations as agreed. Credit risk arises from cash and cash equivalents, investment carried at amortised cost, deposit with banks and financing institutions as well as credit exposure to customer and other parties.

For banks and financial institutions, only high rated banks/institutions are accepted. For other financial assets, the entity assesses and manages credit risk based on internal credit evaluation. It monitors party-wise exposure and based on evaluation credit rating is allotted for each party. Thereafter a credit limit is assigned to each party depending on the solvency of the said party.

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

The entity considers the probability of default on ongoing basis and at each reporting period. Micro-economic information is incorporated as part of internal rating model.

In general, it is presumed that credit risk has significantly increased since initial recognition if the payments are more than 180 days past due.

The ageing of Trade receivables i.e. receivables which are past due (net of allowances / provisions) are given below :

Age of receivables	31 Mar 2022	31 Mar 2021
1 – 30 days past dues	20,825	20,650
31 – 60 days past dues	8,673	6,058
61 – 90 days past dues	1,915	1,268
91 – 180 days past dues	7,271	5,119
More than 180 days past dues	3,697	1,581

As per the policy, any trade receivables overdue for more than 365 days, equivalent provision / allowance are provided in the books of accounts on the relevant date.

b. Liquidity Risk

The company objective is to at all times maintain optimum level of liquidity to meet its cash and collateral requirement at all times. The Company relies on Borrowing to meet its additional need for fund. The current committed lines of credit are sufficient to meet its short to medium term expansion needs and hence evaluates the concentration of risk with respect to liquidity as low. The Company monitors rolling forecasts of its liquidity requirements to ensure it has sufficient cash to meet operational needs while maintaining headroom on its undrawn committed borrowing facilities at all times so that Company does not breach borrowing limits or covenants (where applicable) on any of its borrowing facilities.

The company is required to maintain debt equity ratio as mentioned in the loan agreements at specified levels. In the event to meet any ratios these become callable at the option of the lenders, except where exception is provided by lender.

c. Market Risk

Market risk is the risk that the fair value of future cash flow of financial instruments may fluctuate because of changes in market conditions. Market risk broadly comprises three types of risks namely currency risk, interest rate risk and price risk (for commodities or equity instruments).

- (i) Foreign Exchange Risk - The company operates only in India and has not entered in to any foreign exchange or commodity derivative contracts. Accordingly there in no significant exposure to market risk.
- (ii) Interest Rate Risk - Interest rate exposure of the Company is mainly on Borrowing from Bank/FI, which is linked to their prime lending rate and the Company does not foresee any risk on the same.
- (iii) Security Price Risk – The Management invests its surplus funds in mutual funds operated by only high rated banks/institutions. These investments are generally short-term and accordingly there in no significant exposure.

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

3 PROPERTY, PLANT & EQUIPMENTS

	Owned Assets						
	Freehold Land	Buildings	Plant and Machineries	Furniture & Fittings	Office Equipments	Vehicles	Total
Gross carrying amount							
Original cost as at 1 Apr 2020	1,853	38,297	3,32,682	4,438	17,507	5,588	4,00,365
Additions	-	-	1,101	-	632	-	1,733
Disposals	-	-	3,571	-	-	-	3,571
Closing Gross carrying amount as at 31 Mar 2021	1,853	38,297	3,30,212	4,438	18,139	5,588	3,98,527
Accumulated depreciation as at 1 Apr 2020	-	24,241	2,08,062	3,960	16,024	4,254	2,56,541
Depreciation for the Year	-	720	14,897	72	371	335	16,395
Accumulated depreciation on Disposals	-	-	3,246	-	-	-	3,246
Accumulated depreciation as at 31 Mar 2021	-	24,961	2,19,713	4,032	16,395	4,589	2,69,690
Net Carrying amount as at 1 April 2020	1,853	14,056	1,24,620	478	1,483	1,334	1,43,824
Net Carrying amount as at 31 March 2021	1,853	13,336	1,10,499	406	1,744	999	1,28,837
Gross carrying amount							
Original cost as at 1 Apr 2021	1,853	38,297	3,30,212	4,438	18,139	5,588	3,98,527
Additions	-	-	13,364	24	235	-	13,623
Disposals	-	-	6,191	-	31	601	6,823
Closing Gross carrying amount as at 31 Mar 2022	1,853	38,297	3,37,385	4,462	18,343	4,987	4,05,327
Accumulated depreciation as at 1 Apr 2021	-	24,961	2,19,713	4,032	16,395	4,589	2,69,690
Depreciation for the Year	-	720	9,775	73	757	266	11,591
Accumulated depreciation on Disposals	-	-	5,883	-	29	572	6,484
Accumulated depreciation as at 31 Mar 2022	-	25,681	2,23,605	4,105	17,123	4,283	2,74,797
Net Carrying amount as at 31 Mar 2022	1,853	12,616	1,13,780	357	1,220	704	1,30,530

3 CAPITAL WORK IN PROGRESS

Balance as at 1 Apr 2020	-	Balance as at 1 Apr 2021	994
Addition	994	Addition	-
Assets capitalised during the year	-	Assets capitalised during the year	994
Balance as at 31 Mar 2021	994	Balance as at 31 Mar 2022	-

The Capital Work in Progress as on the reporting date are less than 1 year category.

3 INTANGIBLE FIXED ASSETS - COMPUTER SOFTWARE

COST		COST	
As at 1 Apr 2020	6,632	As at 1 Apr 2021	6,632
Additions	-	Additions	-
Disposals	-	Disposals	-
As at 31 Mar 2021	6,632	As at 31 Mar 2022	6,632
ACCUMULATED DEPRECIATION		ACCUMULATED DEPRECIATION	
As at 1 Apr 2020	6,353	As at 1 Apr 2021	6,409
Depreciation for the Year	56	Depreciation for the Year	56
Accumulated depreciation on Disposals	-	Accumulated depreciation on Disposals	-
As at 31 Mar 2021	6,409	As at 31 Mar 2022	6,465
Net Carrying amount as at 31 Mar 2021	223	Net Carrying amount as at 31 Mar 2022	167

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

4 OTHER FINANCIAL ASSETS

At amortised cost	Non-current		Current	
	31 Mar 2022	31 Mar 2021	31 Mar 2022	31 Mar 2021
To parties other than related parties				
Security deposits				
Unsecured, considered good	11,119	11,130	6,787	6,684
	11,119	11,130	6,787	6,684
Other loans and advances				
<i>Unsecured considered good, unless otherwise stated</i>				
Interest accrued on deposits	10	-	-	-
Bank deposits due to mature after 12 months from the reporting date (Refer note 9) - Held as margin money	350	500	-	-
Others receivable	-	-	1,702	2,060
Refund of Excise Incentive under protest	-	-	15,829	15,829
	11,479	11,630	24,318	24,573

The company has not given any loan or advance to it's Promoter, Director, Key managerial Person or Related Parties and no amount is due from them.

5 INVENTORIES

Particulars	31st March 2022	31st March 2021
(Valued at lower of cost or net realizable value)		
Raw materials and components	36,546	30,048
Raw materials in Transit	10,705	10,748
Stores and spares parts	10,480	9,394
Work-in-progress	77,495	1,00,518
Finished goods		
- Manufactured	17,710	20,207
- Traded	527	534
	1,53,463	1,71,449

6 CURRENT INVESTMENT

Particulars	31st March 2022	31st March 2021
Non-trade investment		
Investment in Mutual Funds (at fair value through Profit & Loss)		
ICICI Equity Arbitrage Fund	3,853	3,721
2,74,263.789 units with NAV at Rs. 14.0491		
(31 March 2021 - 2,67,340.624 units with NAV at Rs. 13.9177)		
	3,853	3,721

Refer Note 1.B for information about fair value measurements and Note 2 for credit risk and market risk in investments.

7 TRADE RECEIVABLES

Particulars	31st March 2022	31st March 2021
Unsecured, considered good	1,23,208	1,12,733
Unsecured, considered doubtful	5,792	7,818
	1,29,000	1,20,551
Less: Allowance for doubtful receivables	5,792	7,818
	1,23,208	1,12,733

Refer Note 2 for information about credit risk and market risk on receivables.

There are no unbilled dues as on the reporting date.

Outstanding for following periods from due date of payment:

Particulars	Undisputed Receivables		Disputed Receivables	
	Considered Good	Considered Doubtful	Considered Good	Considered Doubtful
Less than 6 Months	1,19,555	-	-	-
6 Months to 1 Year	3,653	-	-	-
1 Year to 2 Years	-	743	-	-
2 Years to 3 Years	-	246	-	-
More than 3 Years	-	4,803	-	-
Total	1,23,208	5,792	-	-

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

8 CASH AND BANK BALANCES

Particulars	31st March 2022	31st March 2021
Cash and cash equivalents		
Balance with banks:		
Current accounts	12,276	14,975
Cash on hand	101	147
	12,377	15,122

9 OTHER BANK BALANCES

Particulars	31st March 2022	31st March 2021
On Term Deposits (under Lien)	38,913	25,107
(with maturity exceeding three months but not exceeding twelve months)		
Interest accrued on deposits	28	42
Bank deposits due for maturity exceeding three months but not exceeding twelve months from reporting date	548	49
	39,489	25,198

10 OTHER CURRENT ASSETS

	Non-current		Current	
	31 Mar 2022	31 Mar 2021	31 Mar 2022	31 Mar 2021
Unsecured considered good, unless otherwise stated				
Advances to employees	-	-	442	539
Balance with sale tax authorities	-	-	822	951
Deposit with Registrar, District Judges Court	-	-	3,071	3,071
Prepaid expenses	-	-	4,376	2,899
Advance for Capital Goods	-	-	389	10,042
Advances recoverable in cash or in kind or for value to be received				
Considered good	-	-	14,246	9,595
Considered doubtful	-	-	-	-
	-	-	23,346	27,097

11 Equity Share capital

	31 Mar 2022		31 Mar 2021	
	No of shares	Amount	No of shares	Amount
Equity Share capital				
Authorised shares				
Equity shares of Rs. 10 each	98,00,000	98,000	98,00,000	98,000
	98,00,000	98,000	98,00,000	98,000
Issued, subscribed and fully paid up equity shares of Rs.10 each	27,55,600	27,556	27,55,600	27,556

Reconciliation of the shares outstanding at the beginning and at the end of the reporting period				
Equity shares of Rs. 10 each fully paid up				
At the commencement and at the end of the year	27,55,600	27,556	27,55,600	27,556

Terms attached to equity shares

Each holder of equity shares is entitled to one vote per share with a right to receive per share dividend declared by the Company. In the event of liquidation, the equity shareholders are entitled to receive remaining assets of the Company (after distribution of all preferential amounts) in the proportion of equity shares held by the shareholders. The dividend if proposed by the Board of Directors are subject to the approval of the shareholders in the ensuing Annual General Meeting

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

Particulars of Shareholders holding more than 5% shares of the Company:

	31 Mar 2022		31 March 2021	
	No of shares	% of holding	No of shares	% of holding
Equity shares of Rs. 10 each fully paid up held by				
Mr. Rakesh Himatsingka	7,96,452	28.90%	7,96,452	28.90%
Mr. S V Himatsingka	8,68,823	31.53%	8,68,823	31.53%
Mrs. Anita Himatsingka	1,88,025	6.82%	1,88,025	6.82%

12 OTHER EQUITY

	31 Mar 2022		31 Mar 2021	
Capital Reserve		3,586		3,586
Capital Redemption Reserve		2,244		2,244
General Reserve		4,144		4,144
Retained Earnings :				
As per last financial statements	2,49,366		2,08,365	
Add : Adjustment for Deferred Tax	-		-	
Add : Profit / (Loss) for the year	63,041	3,12,407	41,001	2,49,366
Other Comprehensive Income :				
Remeasurement of Defined Benefit Plan	1,553		(1,725)	
Less : Income tax thereon	432	1,121	(480)	(1,245)
		3,23,502		2,58,095

13 BORROWINGS

	Non-current		Current	
	31 Mar 2022	31 Mar 2021	31 Mar 2022	31 Mar 2021
Secured (at amortised cost)				
Banks				
Cash Credits (repayable on demand)	-	-	20,476	32,632
Unsecured (at amortised cost)				
Related Parties	-	-	-	12,500
Others	-	-	-	20,000
	-	-	20,476	65,132

Secured

Secured Loans from Banks are secured by way of hypothecation of Current Assets both present and future alongwith Term Deposit receipt kept as collateral security. Cash Credit is repayable on demand and carries floating interest @ 7.5% per annum. The Company has satisfied all the covenants prescribed in the terms of borrowings and there is no deviation.

All the returns, statements and other details in compliance of the laid down norms has been timely submitted to Banks and there is no default in this regard.

Unsecured

The balance carries an interest rate of 12%.

The Company's Authorised capital includes 20,000 (31 March 2021 - 20,000) Cumulative Convertible Preference shares of Rs.100/- each. No amount is outstanding against such Preference shares.

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

14 PROVISIONS

	Non-current		Current	
	31 Mar 2022	31 Mar 2021	31 Mar 2022	31 Mar 2021
Provision for employee benefits				
Gratuity (refer note 30)	9,162	19,776	9,336	5,428
Compensated absences	7,177	9,619	1,203	1,071
Provision for contingencies	-	-	10,000	10,000
Provision for warranties	-	-	2,188	2,188
	16,339	29,395	22,727	18,687

Movement of Provisions :

	Provision for contingencies		Provision for warranties	
	31 Mar 2022	31 Mar 2021	31 Mar 2022	31 Mar 2021
Opening Balance	10,000	10,000	2,188	2,188
Add: Provision during the year	-	-	-	-
Less: Utilised during the year	-	-	-	-
Closing Balance	10,000	10,000	2,188	2,188

a) Provision for contingencies

The Company had entered into a memorandum of settlement with workers of Guwahati factory in the earlier years pursuant to which the Company had agreed to pay a certain amount to workers on achievement of desired productivity norms. Based on the agreement and as estimated by the management, the Company has set aside Rs. 10,000 as provision for future contingencies on account of various personnel costs which may result in possible outflow of resources.

b) Provision for warranties

Cost of free replacement of materials was provided in the earlier years based on the estimate of total costs to be incurred with respect to free replacement of defective materials sold to various customers. The closing balance of provision represents the probable replacement due at a future date.

15 TRADE PAYABLES

Particulars	31st March 2022	31st March 2021
Outstanding dues of creditor other than micro enterprises and small enterprises	17,289	22,014
Outstanding dues of micro enterprises and small enterprises (*)	13,899	5,862
	31,188	27,876

Identification of micro & small entrepreneurs are done on the basis of information received from vendors.

Details of dues to Micro and Small Enterprises as per Micro, Small and Medium Enterprise Development Act, 2006 (MSMED):

Particulars	31st March 2022	31st March 2021
The amounts remaining unpaid to micro and small suppliers as at the end of the year		
- Principal	13,722	5,685
- Interest	177	177
Interest paid by the Company in terms of Section 16 of the Micro, Small and Medium Enterprises Development Act, 2006, along with the amount of the payment made to the supplier beyond the appointed day	-	-

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

Interest due and payable for the period of delay in making payment (which have been paid but beyond the appointed day during the period) but without adding interest specified under the Micro, Small and Medium Enterprises Act, 2006	-	-
Interest accrued and remaining unpaid	177	177
Interest remaining due and payable even in the succeeding years, until such date when the interest dues as above are actually paid to the small enterprises	177	177

(*) The amount includes a Principal amount of Rs. 1760 and interest of Rs. 177 which is subjudice against which an amount of Rs.3071 has been deposited with Registrar, District Judges Court.

Age-wise disclosure of trade payable

Particulars	Outstanding for following periods from due date of payment				
	Less than 1 Year	1 ~ 2 Years	2 ~ 3 Years	More than 3 Years	Total
Undisputed Dues					
MSME	11,962	-	-	-	11,962
Others	11,139	1,130	1,767	3,253	17,289
Disputed Dues					
MSME	-	-	-	1,937	1,937
Others	-	-	-	-	-
	23,101	1,130	1,767	5,190	31,188

16 OTHER LIABILITIES

Particulars	31st March 2022	31st March 2021
Interest accrued but not due	-	1,142
Creditor for capital goods	781	760
Outstanding Liabilities for Expenses	14,350	14,834
Payable under Assignment Agreement	34,190	54,190
Employee liabilities	12,826	15,089
Statutory dues payable	5,128	7,357
Education cess & higher education cess on excise incentive refundable	2,414	2,414
Subjudice Part Refund of Excise Incentive against furnishing Solvent Surety	15,829	15,829
	85,518	1,11,615

17 OTHER CURRENT LIABILITIES

Particulars	31st March 2022	31st March 2021
Advance from customer	434	1,696
	434	1,696

18 CURRENT TAX (ASSETS)/LIABILITIES

Particulars	31st March 2022	31st March 2021
Provision for tax (net)	(2,228)	(4,469)
	(2,228)	(4,469)

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

19 REVENUE FROM OPERATIONS

Particulars	31st March 2022	31st March 2021
Sale of products		
Own manufactured	4,62,155	4,13,437
Traded	740	411
Sale of products (*)	4,62,895	4,13,848
Other operating income		
Scrap sales	7,559	244
Total	4,70,454	4,14,092
(*) Sale of products		
Manufactured		
EG, HC, NG and RB carbon blocks	17,364	18,520
MG and SG carbon blocks	9,924	8,005
Electrical carbon brushes	1,61,476	1,60,163
Mechanical and Special Carbon components	2,61,701	2,19,080
ISO Graphite components	11,229	6,969
Others	461	700
	4,62,155	4,13,437
Traded		
Carbon Brushes	24	103
Commutator Maintenance Accessories	716	308
	740	411

20 OTHER INCOME

Particulars	31st March 2022	31st March 2021
Interest income	1,870	148
Dividend Income	97	54
Budgetary support under GST Regime	6,368	7,648
Provision and liabilities no longer required written back	2,402	3,075
Profit on sale / discard of fixed assets	20	175
Profit on reinstatement of investment	40	68
Gain on foreign exchange fluctuation (net)	331	91
Excise duty refund received	22,519	-
Miscellaneous income	73	23
	33,720	11,282

21 COST OF MATERIALS CONSUMED

Particulars	31st March 2022	31st March 2021
Opening Stock	40,796	44,107
Add : Purchases	1,25,437	75,086
	1,66,233	1,19,193
Less : Closing Stock	47,251	40,796
	1,18,982	78,397
Break up of cost of material consumed		
Lamp black, carbon black, coke, natural & synthetic graphite, pitch etc	17,081	15,275

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

Particulars	31st March 2022	31st March 2021
Non ferrous metals, copper sheets, brass sheets, flexible wires, tubes etc	39,987	27,143
Copper sheets, brass sheets, flexible wires, tubes, rods etc	12,155	9,669
Carbon brush components	13,821	9,133
ISO graphite & carbon blocks, blanks etc	31,422	12,165
Others	4,516	5,012
	1,18,982	78,397
Breakup of inventory - materials		
Lamp black, carbon black, coke, natural & synthetic graphite, pitch etc	19,710	19,307
Non ferrous metals, copper sheets, brass sheets, flexible wires, tubes etc	12,830	10,223
Copper sheets, brass sheets, flexible wires, tubes, rods etc	4,613	3,787
Carbon brush components	6,554	3,277
ISO graphite & carbon blocks, blanks etc	2,137	2,521
Others	1,407	1,681
	47,251	40,796

22 PURCHASES OF STOCK IN TRADE

Particulars	31st March 2022	31st March 2021
Carbon brushes and accessories	320	201
	320	201

23 CHANGES IN INVENTORIES OF FINISHED GOODS, WORK IN PROGRESS AND STOCK-IN-TRADE

Particulars	31st March 2022	31st March 2021
Opening inventory		
Work-in-progress	1,00,518	1,26,975
Finished goods		
- Manufactured	20,207	21,439
- Traded	534	676
	1,21,259	1,49,090
Less :		
Closing inventory		
Work-in-progress	77,495	1,00,518
Finished goods		
- Manufactured	17,710	20,207
- Traded	527	534
Net increase	25,527	27,831

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

24 EMPLOYEE BENEFITS

Particulars	31st March 2022	31st March 2021
Salaries, wages and bonus	92,523	97,520
Contribution to Provident and other funds	11,161	11,841
Workmen staff welfare expense	12,091	11,442
	1,15,775	1,20,803

25 OTHER EXPENSES

Particulars	31st March 2022	31st March 2021
Stores and spares parts consumed	27,981	19,071
Power and fuel	41,836	35,303
Fabrication costs	24,915	21,414
Repairs to:		
- building	1,320	1,055
- plant and machinery	2,073	3,447
- others	1,951	1,652
Insurance	1,403	1,389
Rent	2,235	1,376
Commission - others	-	1,888
Corporate social responsibility expenditure (refer note 41)	1,600	1,685
Packing and freight	5,782	4,707
Travelling expenses	6,180	4,271
Allowance for doubtful trade receivables	-	-
Advances & other receivables written off	-	303
	C.Y.	P.Y.
Bad Debts written off	1,204	9,600
Less : Adjusted against allowance	1,204	9,600
	-	-
Rates and taxes	1,281	895
Legal and professional fees	6,730	3,750
Auditors' remuneration (refer note 37)	220	475
Non executive directors' commission and fees	1,685	1,310
Postage and telephone	859	983
Security charges	4,484	4,091
Bank charges	266	157
Miscellaneous expenses	4,562	8,916
	1,37,363	1,18,138

26 CONTINGENT LIABILITY & CAPITAL COMMITMENTS

Particulars	31st March 2022	31st March 2021
(A) Contingent liability not provided for:		
(i) DGFT matters under appeal	1,145	-
(ii) Bank Guarantee (against which equivalent FDR has been lodged with bank)	898	548

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

(iii) The issue of payment of back wages during the period of strike / lock-out at the Company's Guwahati Unit employees effective from 7 December 2010 to 8 March 2012 has been referred to appropriate authorities. However, the Company, on the principle of 'No Work No Pay', has neither ascertained nor made any provision for payment of such wages and other employee benefits for the period of strike and lock out. The labour matter is currently subjudice.		
(B) Capital and other commitments (to the extent not provided for)		
(i) Estimated amount of contracts (net of advances) remaining to be executed on Capital account and not provided for	-	460
(ii) Other Commitments	-	-

27 The Company has no significant foreign currency exposure as at the year end for which hedging is required.

28 DEFERRED TAX

Particulars	31st March 2022	31st March 2021
Deferred tax assets		
Provision for doubtful receivables and advances	1,611	2,175
Provision for employee benefits (Through PL)	5,578	6,532
Provision for Leave Encashment / Compensated Absences	2,331	2,974
Provision for employee benefits (Through OCI)	-	480
Provision for Workmen Contingencies	2,782	2,782
Provision for warranties	609	609
Tax Credit	3,956	10,794
Total	16,867	26,346
Deferred tax liabilities		
Difference between written down value of fixed assets as per books of accounts and for tax purposes	12,915	12,139
Investment in Mutual Fund	237	201
Provision for employee benefits (Through OCI)	433	-
Total	13,585	12,340
Deferred tax asset / (liability) [net]	3,282	14,006

29 EARNINGS PER SHARE

Particulars	31st March 2022	31st March 2021
(a) Weighted average number of equity shares outstanding during the year	27,55,600	27,55,600
(b) Net profit / (loss) after tax attributable to equity shareholders (Rs. '000)	63,041	41,001
(c) Basic and diluted profit / (loss) per equity share of face value Rs. 10 (Rs.)	22.88	14.88

30 EMPLOYEE BENEFITS

I. Post Employment Defined Benefit Plans :

(A) Gratuity (Funded)

The Company provides for gratuity, a defined benefit retirement plan covering eligible employees. As per the plan,

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

the Gratuity Fund Trusts, administered and managed by the Trustees and funded primarily with Life Insurance Corporation of India (LIC), make payment to vested employees at retirement, death, incapacitation or termination of employment, of an amount based on the respective employee's salary and the tenure of employment. Vesting occurs upon completion of five years of service. The Trustees are responsible for the overall governance of the plan and to act in accordance with the provisions of the trust deed and rules in the best interests of the plan participants. Each year an Asset-Liability matching study is performed in which the consequences of the strategic investment policies are analysed in terms of risk and return profiles. Investment and contribution policies are integrated within this study. Liabilities with regard to the Gratuity Plan are determined by actuarial valuation as set out in Note 1B(ii) (4) based upon which, the Company makes contributions to the Employees' Gratuity Funds.

The following table sets forth the particulars in respect of the Gratuity Plan (Funded) of the Company:

	31 March 2022	31 March 2021
(a) Reconciliation of opening and closing balances of the present value of the Defined Benefit Obligation :		
Present value of obligation at the beginning of the year	56,579	58,640
Current service cost	2,488	2,766
Interest cost	3,811	3,653
<u>Remeasurement Losses</u>		
Actuarial losses arising from changes in financial assumptions	(638)	(1,256)
Actuarial losses arising from changes in experience adjustments	(2,847)	4,153
Benefits paid	(5,810)	(11,377)
Present value of obligation at the end of the year	53,583	56,579
(b) Reconciliation of opening and closing balances of the fair value of Plan Assets		
Fair value of plan assets at the beginning of the year	31,375	34,719
Interest income	2,228	2,395
<u>Remeasurement Gains</u>		
Return on plan assets	(207)	(362)
Contribution from employer	7,500	6,000
Benefits paid	(5,810)	(11,377)
Fair value of plan assets at the end of the year	35,086	31,375
(c) Reconciliation of the present value of the defined benefit obligation and the fair value of plan assets		
Present value of obligation at the end of the year	53,583	56,579
Fair value of plan assets at the end of the year	35,086	31,375
Liabilities recognised in the balance sheet	18,497	25,204
(d) Actual Return on plan assets	2,022	2,033
(e) Expense recognised in the other comprehensive income		
Remeasurement losses / gain	(3,278)	3,259
(f) Expenses recognised in Profit or Loss		
Service and Interest cost	4,071	4,024
(g) Category of plan assets		
Funded with LIC	100%	100%
(h) Maturity profile of defined benefit obligation		

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

	31 March 2022	31 March 2021
Within 1 year	9,662	5,616
1-2 years	13,279	15,499
2-5 years	19,852	20,460
(i) Principal actuarial assumptions		
Discount Rate	7.10%	6.90%
Salary growth rate	8%	8%

Assumptions regarding future mortality experience are based on mortality tables of 'Indian Assured Lives Mortality (2006-2008) Ultimate published by the Institute of Actuaries of India.

The estimate of future salary increases takes into account inflation, seniority, promotion and other relevant factors, such as demand and supply in the employment market.

	Changes in assumption	Impact on defined benefit obligation 31 March 2022	Impact on defined benefit obligation 31 March 2021
(j) Sensitivity analysis			
Discount rate	Increase by 0.5 %	Decrease by Rs. 1,535	Decrease by Rs. 1,712
	Decrease by 0.5 %	Increase by Rs. 1,621	Increase by Rs. 1,810
Salary growth rate	Increase by 0.5 %	Increase by Rs. 1,593	Increase by Rs. 1,775
	Decrease by 0.5 %	Decrease by Rs. 1,523	Decrease by Rs. 1,696
<p>The above sensitivity analyses are based on a change in an assumption while holding all other assumptions constant. In practice, this is unlikely to occur, and changes in some of the assumptions may be correlated. When calculating the sensitivity of the defined benefit obligation to significant actuarial assumptions, the same method (present value of the defined benefit obligation calculated with the projected unit credit method at the end of the reporting period) has been applied as when calculating the defined benefit obligation recognised in the Balance Sheet.</p> <p>The methods and types of assumptions used in preparing the sensitivity analysis did not change compared to the prior periods.</p>			
(k)	The company expects to contribute Rs. 7,500 the funded gratuity plan during the next financial year.		

(B) Provident fund

Contributions towards provident funds are recognised as expense for the year. The Company has set up Provident Fund Trusts in respect of certain categories of employees which are administered by Trustees. Both the employees and the Company make monthly contributions to the Funds at specified percentage of the employee's salary and aggregate contributions along with interest thereon are paid to the employees/nominees at retirement, death or cessation of employment. The Trusts invest funds following a pattern of investments prescribed by the Government. The interest rate payable to the members of the Trusts is not lower than the rate of interest declared annually by the Government under The Employees' Provident Funds and Miscellaneous Provisions Act, 1952 and shortfall, if any, on account of interest is to be made good by the Company.

In view of the Company's obligation to meet shortfall, if any, on account of interest, Provident Fund trusts set up by the Company are treated as defined benefit plans.

During the year, the Company's contribution of Rs. 6,215 (Previous year – Rs. 6,785) to the Provident Fund Trusts has been expensed under the 'Contribution to Provident and Other Funds' in Note 24.

II. Post Employment Defined Contribution Plans

Superannuation Fund

Certain categories of employees of the Company participate in superannuation, a defined contribution plan administered by the Trustees. The Company makes quarterly contributions based on a specified percentage of each covered employee's salary. The Company has no further obligations under the plan beyond its annual contributions.

III. Leave Obligations

The Company provides for accumulation of leave by certain categories of its employees. These employees can carry forward a portion of the unutilised leave balances and utilise it in future periods or receive cash (only in case of earned

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

leave) in lieu thereof as per the Company's policy. The Company records a provision for leave obligations in the period in which the employee renders the services that increases this entitlement.

The total provision recorded by the Company towards this obligation was Rs.8,380 (as at 31 March, 2021 Rs. 10,690). The amount of the provision is current, since the Company does not have an unconditional right to defer settlement for any of these obligations. However, based on past experience, the Company does not expect all employees to take the full amount of accrued leave or require payment within the next 12 months. Rs. 7,178 (as at 31 March, 2021 Rs. 9,619) is not expected to be taken or paid within the next 12 months and shown under Non-current portion.

IV. Risk Exposure

Through its defined benefit plans, the Company is exposed to some risks, the most significant of which are detailed below:

Discount Rate Risk

The Company is exposed to the risk of fall in discount rate. A fall in discount rate will eventually increase the ultimate cost of providing the above benefit thereby increasing the value of the liability.

Salary Growth Risks

The present value of the defined benefit plan liability is calculated by reference to the future salaries of plan participants. An increase in the salary of the plan participants will increase the plan liability.

Demographic Risk

In the valuation of the liability, certain demographic (mortality and attrition rates) assumptions are made. The Company is exposed to this risk to the extent of actual experience eventually being worse compared to the assumptions thereby causing an increase in the benefit cost.

31 RELATED PARTY DISCLOSURES :

(a) Related parties (where control exists)

None

(b) Persons having significant influence over the Company

Mr. Rakesh Himatsingka, Chairman

Mrs. Anita Himatsingka

Ms. Maalika Himatsingka

Mr. Shaurya Veer Himatsingka

(c) Key Management Personnel

Mr. K. K. Bhattacharya, Managing Director

Mr. Pijush Bysack, Chief Financial Officer

Mrs. Parinita Goenka, Company Secretary & Compliance Office [Joined w.e.f. 01.10.2021]

(d) Company / Entity in which Director is interested as Director / Partner

India Carbon Limited

Assam Plywood Limited

BudgeBudge Carbon Limited

M H Realty

Manav Kalyan Trust

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

(e) Related parties and Key Management Personnel with whom there have been transactions during the year:

Name of the party	Nature of relationship	Commission	Remuneration paid	Interest	Sitting Fees	Receivable/ (payable) at year end
Mr. Rakesh Himatsingka	Chairman	880	-	-	129	(34,982)
Mrs. Anita Himatsingka	Director	-	-	-	101	-
Ms. Maalika Himatsingka	Director	-	-	-	80	-
Mr. K. K. Bhattacharjee	Key management personnel	-	1,260	-	-	-
Mr. Pijush Bysack	Key management personnel	-	1,720	-	-	-
Mrs. Parinita Goenka (*)	Key management personnel	-	290	-	-	-
Assam Plywood Limited	Related Company	-	-	675	-	-
Total		880	3,270	675	310	---

(*) joined on 01.10.2021

Related parties and Key Management Personnel with whom there have been transactions during the previous year:

Name of the party	Nature of relationship	Commission	Remuneration paid	Interest	Sitting Fees	Receivable/ (payable) at year end
Mr. Rakesh Himatsingka	Chairman	540	-	-	122	(54,676)
Mrs. Anita Himatsingka	Director	-	-	-	101	-
Ms. Maalika Himatsingka	Director	-	-	-	80	-
Mr. K. K. Bhattacharjee	Key management personnel	-	1,172	-	-	-
Mr. Pijush Bysack	Key management personnel	-	1,886	-	-	-
Mr. Subhendu Chakraborty (\$)	Key management personnel	-	655	-	-	-
Assam Plywood Limited	Related Company	-	-	2,677	-	(13,085)
BudgeBudge Carbon Limited	Related Company	-	-	2,038	-	-
Total		540	3,713	4,715	303	---

(\$) till 20.03.2021

- (f) The Company has purchased raw materials from India Carbon Limited amounting to Rs. 167 (Previous Year - Rs. NIL) and sold finished products of Rs. 11 (Previous Year - Rs. NIL). The Company has further provided an amount of Rs. 283 (Previous Year - Rs. 322) on account Rent for office space and Expenses of Rs. 80 (Previous Year - Rs. 30) The balance outstanding as at 31 Mar 2022 was Rs. Nil (As at 31 Mar 2021 - Rs. NIL).
- (g) The Company has provided an amount of Rs. 1500 (Previous Year - Rs. 625) on account Rent for office space paid to M H Realty. The balance outstanding as at 31 Mar 2022 was Rs. 112 (As at 31 Mar 2021 - Rs. NIL).

32 DETAILS OF INVENTORIES OF FINISHED GOODS

Class of goods	31st March 2022	31st March 2021
MG and SG carbon blocks	260	74
Electrical carbon brushes	13,002	13,691
Machined and special carbon components	4,344	6,338
ISO-Graphite components	104	104
Total	17,710	20,207

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

33 DETAILS OF INVENTORIES OF TRADED GOODS

Class of goods	31st March 2022	31st March 2021
Trading Brush	94	83
Commutator maintenance accessories	433	451
Total	527	534

34 CAPITAL MANAGEMENT

For the purposes of the Company's capital management, capital includes issued capital, all other equity reserves and long term as well as short term borrowed capital less reported cash and cash equivalents.

The primary objective of the Company's capital management is to maintain an efficient capital structure to reduce the cost of capital, support the corporate strategy and to maximise shareholder's value.

The Company's original policy is to manage the liquidity primarily out of internal accruals. The Company also maintains certain fund based and non-fund based facilities to provide additional liquidity. These facilities, together with cash generated from operations are utilised for operations of the Company.

The Company monitors capital on the basis of cost of capital.

35 CATEGORIES OF FINANCIAL INSTRUMENTS

Set out below, is a comparison by class of the carrying amounts and fair value of the Company's financial instruments :

	31-Mar-22		31-Mar-21	
	Carrying Value	Fair Value	Carrying Value	Fair Value
A. Financial Assets				
a. Measured at amortised cost				
Cash & Cash Equivalents	12,377	12,377	15,122	15,122
Other Bank Balances	39,489	39,489	25,107	25,107
Trade Receivables	1,23,208	1,23,208	1,12,733	1,12,733
Other Financial assets	35,797	35,797	36,294	36,294
Sub Total	2,10,871	2,10,871	1,89,256	1,89,256
b. Measured at fair value through Profit & Loss				
Investment in Mutual Fund	3,853	3,853	3,721	3,721
Sub Total	3,853	3,853	3,721	3,721
Total Financial Assets	2,14,724	2,14,724	1,92,977	1,92,977
B. Financial Liabilities				
a. Measured at amortised cost				
Borrowings	20,476	20,476	65,132	65,132
Trade Payables	31,188	31,188	27,876	27,876
Other Financial Liabilities	85,518	85,518	1,11,615	1,11,615
Sub Total	1,37,182	1,37,182	2,04,623	2,04,623
Total Financial Liabilities	1,37,182	1,37,182	2,04,623	2,04,623

The management assessed that cash and cash equivalents, trade receivables, trade payables, other financial assets and other financial liabilities approximate their carrying amounts largely due to the short-term maturities of these instruments.

36 FAIR VALUE HIERARCHY

The following table provides an analysis of financial instruments that are measured subsequent to initial recognition at fair

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

value, grouped into Level 1 to Level 3, as described below:

Quoted prices in an active market (Level 1): This level of hierarchy includes financial assets that are measured by reference to quoted prices (unadjusted) in active markets for identical assets or liabilities. This category consists of investment in quoted equity shares, and mutual fund investments.

Valuation techniques with observable inputs (Level 2): This level of hierarchy includes financial assets and liabilities, measured using inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (i.e., as prices) or indirectly (i.e., derived from prices). This level of hierarchy does not include any instrument.

Valuation techniques with significant unobservable inputs (Level 3): This level of hierarchy includes financial assets and liabilities measured using inputs that are not based on observable market data (unobservable inputs). Fair values are determined in whole or in part, using a valuation model based on assumptions that are neither supported by prices from observable current market transactions in the same instrument nor are they based on available market data.

	31-Mar-22		31-Mar-21	
	Level I	Level III	Level I	Level III
A. Financial Assets				
Cash & Cash Equivalents	-	12,377	-	15,122
Other Bank Balances	-	39,489	-	25,107
Trade Receivables	-	1,23,208	-	1,12,733
	31-Mar-22		31-Mar-21	
	Level I	Level III	Level I	Level III
Other Financial Assets	-	35,797	-	36,294
Investment in Mutual Funds	3,853	-	3,721	-
Total Financial Assets	3,853	2,10,871	3,721	1,89,256
B. Financial Liabilities				
Borrowings	-	20,476	-	65,132
Trade Payables	-	31,188	-	27,876
Other Financial Liabilities	-	85,518	-	1,11,615
Total Financial Liabilities	-	1,37,182	-	2,04,623

37 AUDITORS' REMUNERATION INCLUDES:

	31 Mar 2022	31 Mar 2021
(a) Statutory audit fees	120	375
(b) Limited Reviews	30	30
(c) Certification and Other assignments	70	70
	220	475

38. Incentive declared by the Government of India to eligible Industrial units of North East States under Central Excise towards refund of excise duty paid through PLA (Current Account) on finished products vide Notification No. 32/1999-CE dated 8 July 1999 (as amended) was reduced from 100% refund of duty paid through PLA to 36% for Chapter heading 8487, 31% for chapter heading 8545 & 15% for chapter heading 7406, during 2008. Being aggrieved by such reduction in the Excise benefit, some of the beneficiaries approached the Court of Law. Thereafter Hon'ble Gauhati High Court had passed judgment for full refund of excise duty in terms of the original notification. Aggrieved by the above Order of the Hon'ble Gauhati High Court, the Union of India moved to the Hon'ble Supreme Court against which in pursuance of interim Order dated 7th December, 2015 of the Apex Court, adhoc refund of 50% of the differential amount, which comes to Rs. 1,58,29,451/-, was received by the Company on furnishing solvent surety. The Hon'ble Supreme Court vide its Order dated 22nd April, 2020 has decided the cases in favour of the Union of India by setting aside the judgement of the Gauhati High Court. As per the

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

said judgment of the Hon'ble Supreme Court it has also been made clear that the pending refund applications shall be decided as per the subsequent notifications/industrial policies which were impugned before the respective High Courts. The Company has refunded Rs.1,58,29,451/- under protest on 25.01.2021 which is presented as 'Refund of Excise Incentive under protest' under 'Other Financial Assets' (Note 4). Thus, till the final conclusion is drawn, 50% of the differential amount received, as above, will continue to be treated as 'Other Financial Liabilities' and cost, if any, associated with the said refund will be considered in these accounts on finality. (Note 16).

39. Hon'ble Supreme Court vide its Judgement dated 06th December,2019 in another case held that when a particular kind of duty is exempted, other types of duty or cess imposed by different legislation for a different purpose cannot be said to have been exempted and therefore, has over ruled its earlier Judgement dated 10th November,2017. Pursuant to this judgement the Company during the financial year 2019-20 recognized liability of Rs.24,14,295/- on account of Education Cess and Higher Education Cess, which was earlier refunded during the financial year 2018-19 and 2019-20 by reversal of Income and charging it off as expense in the financial year 2019-20. On 28th July, 2020 and 21st September,2020 the Assistant Commissioner, Central Goods & Service Tax, Guwahati Division II, issued Demand cum Show Cause Notices asking the Company to show cause as to why the Education Cess and Secondary and Higher Education Cess refunded to the Company shall not be demanded back along with interest. On 10th September,2020 and 12th October,2020 the Company filed two Writ Petitions before the Hon'ble Gauhati High Court challenging the said Demand cum Show Cause Notices, which was allowed by the Court on 22nd September,2020 and 21st October,2020 by setting aside the aforesaid Demand cum Show Cause Notice. Being aggrieved by the judgments of Hon'ble Gauhati High Court, the Department filed Appeals before the Division Bench of the High Court challenging the aforesaid judgments, which the Division Bench has dismissed on 08th October,2021. In the situation, the matter is still considered sub-judice and other costs associated with this, being indeterminate, will be considered in these accounts on finality.

40. The year 2021-22 was yet another challenging year for all of us. The severe second wave of the Covid-19 pandemic had a significant humanitarian and economic impact. We witnessed socio-political unrest in several parts of the world, resulting in the disruption of supply chains and unprecedented volatility in input costs. In this uncertain operating environment, our focus remained on the health and safety of our people, ensuring uninterrupted supply of our products, meeting the evolving demand of our consumers, caring for the communities, safeguarding the environment and protecting our business model.

Our sales and profitability were adversely impacted due to the current global pandemic as demand has slowed down and prices are under pressure. In addition, costs have gone up on all fronts, as well as directly on account of necessary arrangements to tackle COVID-19.

In light of the current global pandemic, the Company has considered the possible effects that may result from COVID-19 on the carrying amounts of financial assets, inventory, receivables, advances, property plant and equipment, Intangibles, etc. as well as liabilities accrued. Having reviewed the underlying data and based on current estimates, the Company expects the carrying amount of these assets will be recovered and there is no significant impact on liabilities accrued. The impact of COVID-19 on the Company's financial statements may differ from that estimated as at the date of approval of these financial statements and the Company will continue to closely monitor any material changes to future economic conditions.

41 EXPENDITURE ON CORPORATE SOCIAL RESPONSIBILITY (CSR) :

	For the year ended 31 Mar 2022	For the year ended 31 Mar 2021
(a) Gross amount required to be spent	1,524	1,650
(b) Amount spent :		
(i) Construction / acquisition of any asset	-	-
(ii) On purpose other than (i) above	1,600	1,685
(c) Administrative Expenses	-	-
(d) Shortfall for the current year	-	-
(e) Total of previous year shortfall	-	-
(f) Nature of CSR Activities	Renovation of Anganwadi Centres	Promotion of Education

Notes to the Financial Statements for the year ended 31st March, 2022 (Contd.)

(Amount in Rupees thousand)

42. There is no charges or satisfaction which are yet to be registered with RoC beyond the statutory period.

43. FINANCIAL RATIOS FOR STANDALONE FINANCIALS :

Particulars	Formula	UoM	Yead Ended 31 Mar 2022	Yead Ended 31 Mar 2021	Variation %	Reason
Current Ratio	Current Assets / Current Liabilities	Times	2.38	1.71	39.18	Pay off of CL
Debt-Equity Ratio	Total Debts / Equity	Times	0.06	0.23	-73.91	Pay off of Debt
Debt Service Coverage Ratio	Earnings Available for Debt Service / Debt Service	Times	16.90	8.57	97.20	Increase in Net Earnings
Return on Equity Ratio	Net Earnings After Tax / Average Shareholders Equity	Percentage	19.80	15.40	28.57	Increase in Net Earnings
Inventory turnover ratio	Sales / Average Inventory	Times	2.90	2.19	32.42	Increase in Sales
Trade Receivables Turnover Ratio	Net Sales / Average Accounts Receivable	Times	3.99	3.58	11.45	---
Trade Payables Turnover Ratio	Net Purchases / Average Trade Payables	Times	4.25	2.55	66.67	Reduction in payables
Net capital turnover ratio	Net Sales / Working Capital	Times	2.12	2.60	-18.46	---
Net profit ratio	Net Profit / Net Sales	Percentage	13.40	9.90	35.35	Increase in Net Profit
Return on Capital employed	Earning before Interest & Tax / Capital Employed	Percentage	25.45	18.12	40.45	Increase in Earnings
Return on investment	(*) $MV(T1) - MV(T0) - \text{Sum}[C(t)] / (MV(T0) + \text{Sum}[W(t) * C(t)])$	Percentage	The shares of the Company is listed only with Calcutta Stock Exchange, hence market quote / value is not available.			

(*) T1 = End of time period, T0 = Beginning of time period, t = Specific date falling between T1 and T0, MV(T1) = Market Value at T1, MV(T0) = Market Value at T0, C(t) = Cash inflow, cash outflow on specific date, W(t) = Weight of the net cash flow (i.e. either net inflow or net outflow) on day 't', calculated as $[T1 - t] / T1$

44. THE INCOME - TAX EXPENSES FOR THE YEAR CAN BE RECONCILED TO THE ACCOUNTING PROFIT AS FOLLOWS :

	For the year ended 31 Mar 2022	For the year ended 31 Mar 2021
Profit before tax	88,277	54,219
Income tax expenses calculated @ 27.82% (2021 - 27.82%)	24,559	15,084
Impact of Depreciation Difference between Income-tax and Accounts	(525)	26
Impact of employee benefit provisions, not funded	(1,671)	(1,188)
Impact of Bad Debt provisions and bad debts written off	(351)	(2,796)
Impact of Bonus provisions and payments	1,547	1,627
Impact of MAT credit taken	(8,165)	(3,351)
Impact of Other Adjustments	30	71
Total	15,424	9,473

	For the year ended 31 Mar 2022	For the year ended 31 Mar 2021
Adjustment recognised in the current year in relation to the deferred tax	9,812	3,745
Income tax recognised in Profit & Loss	25,236	13,218

45. The Company has neither traded nor invested in Crypto currency or Virtual Currency during the financial year.

46. Figures of the previous year have been re-arranged / re-grouped wherever necessary in order to conform to the current year's classifications.

As per our report of even date attached

For and on behalf of the Board of Directors of
Assam Carbon Products Limited

For **D. Basu & Co.**

Chartered Accountants

Firm Registration No.: 301111E

Rakesh Himatsingka
Chairman
(DIN : 00632156)

K. K. Bhattacharya
Managing Director
(DIN : 07011241)

S. K. Lhila
Director
(DIN : 01383460)

Ashis Ranjan Maitra

Partner

Membership No.: 056520

UDIN : 22056520AJLTVT4107

Pijush Bysack
Chief Financial Officer

Parinita Goenka
Company Secretary

Place: Kolkata

Date: 23.05.2022

Annual Report 2021-2022

Notes

[illegible]



ASSAM CARBON PRODUCTS LTD.

CIN: L23101AS1963PLC001206

Birkuchi, Narengi Chandrapur Road,
Narengi, Guwahati- 781 026, Assam

or

6, Old Post Office Street,
Temple Chambers, 5th Floor, Kolkata- 700001