

***CRIMSON METAL ENGINEERING COMPANY LIMITED***

***Annual Report  
and Accounts for the year ended  
31st March 2019***

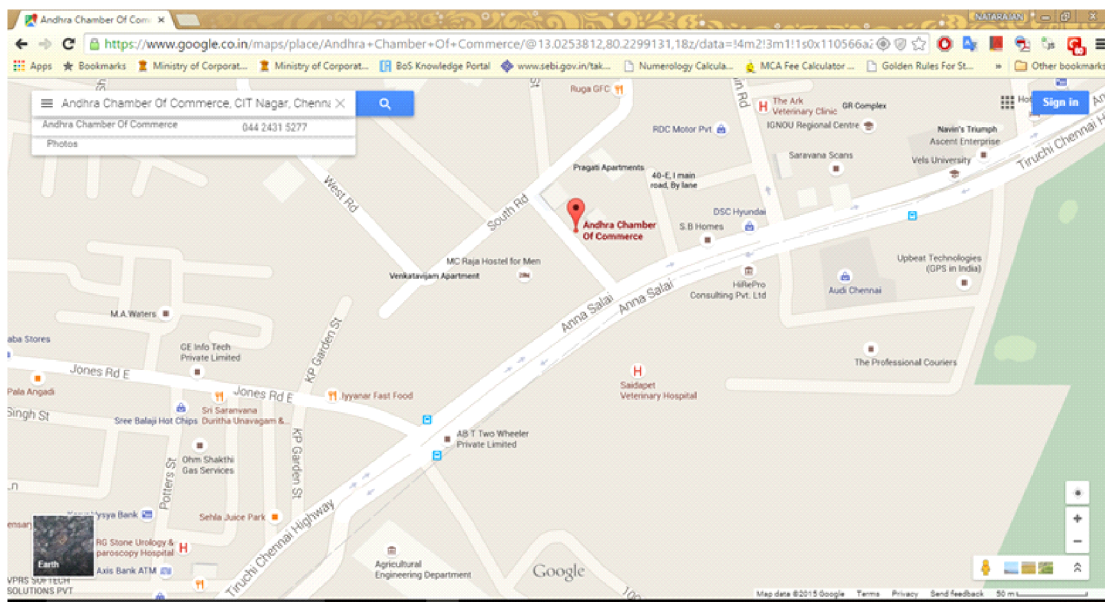
**35**

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

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**ROUTE MAP OF THE AGM VENUE**



**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

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**CIN No. L27105TN1985PLC011566**

**BOARD OF DIRECTORS**

Shri. Vinay Goyal (Managing Director)  
Smt. R.Uma (Whole - Time Director)  
Shri. Chandrakesh Pal (Whole Time Director)  
Shri. KanhaiyaLal(Independent Director)w.e.f 18.09.2018  
Shri. Krishan Chand Batra (Independent Director)  
Shri. Naresh Sharma (Independent Director)

Company Secretary &  
Compliance Officer

Shri. Manish Kumar Rai

Chief Financial Officer

Smt. Sivagami

**AUDITORS**

M/s. Jain Vishal & Co.,  
Chartered Accountants,  
G-05, Parth Kristal Apartments, DevarajMudaliar Road,  
Near Shree Complex, St.John's Road,  
Bangaluru -560042

**SECRETARIALAUDITORS**

M/S.LAKSHMMI SUBRAMANIAN & ASSOCIATES  
PRACTISING COMPANY SECRETARIES  
81, MNO COMPLEX,  
GREAMS ROAD  
THOUSAND LIGHTS,  
CHENNAI 600006

**REGISTERED OFFICE**

"K Sons Complex"  
163/1,Prakasam Road,II Floor,Chennai - 600 108

**WORKS - TUBE MILL DIVISION**

Sedarpet Industrial Estate  
Mailam Road, Pondicherry 605 111.

**WORKS - FLAT PRODUCTS DIVISION**

Karasur Village, Villianur Commune, Pondicherry.

**STOCK EXCHANGE**

Bombay Stock Exchange  
P.J.Towers, 25th Floor, Dalal Street, Mumbai-400 001  
Scrip Code: 526977

**SHARE TRANSFER AGENTS**

M/s. Cameo Corporate Services Ltd.,  
"Subramanian Building"1, Club House Road,Chennai - 600 002.  
Ph : 28460390, 28460391Fax : 044-28460129

**BOARD COMMITTEES**

Audit Committee Members

Shri. Krishan Chand Batra (Independent Director)  
Shri. Naresh Sharma (Independent Director)  
Shri. KanhaiyaLal(Independent Director)

Nomination & Remuneration  
Committee Members

Shri. Naresh Sharma (Independent Director)  
Shri. Krishan Chand Batra (Independent Director)  
Shri. KanhaiyaLal(Independent Director)

Stakeholders Relationship Committee

Shri. Krishan Chand Batra (Independent Director)  
Shri. Chandrakesh Pal (Whole Time Director)  
Smt. R.Uma (Whole - Time Director)

# CRIMSON METAL ENGINEERING COMPANY LIMITED

CIN : L27105TN1985PLC011566

163/1 PRAKASAM ROAD, BROADWAY, CHENNAI.600 108

Notice is hereby given that the 35th Annual General Meeting of the Company will be held on Monday, the 30th September 2019 at Andhra Chamber of Commerce Velagapudi Ramakrishna Building, 23, Third Cross Street, West C.I.T Nagar, Nandhanam, Chennai- 600 035 at 10.30 a.m. to transact the following business.

## ORDINARY BUSINESS

1. To receive, consider and adopt the Financial Statements for the financial year ended 31<sup>st</sup> March, 2019 together with the Reports of Board of Directors and Auditors thereon.
2. To appoint a Director in the place of Ms.R Uma(DIN: 07029264) who retires by rotation and being eligible, offers herself for re-appointment.

## SPECIAL BUSINESS:

### 3. RATIFICATION OF PAYMENT OF REMUNERATION TO MANAGING DIRECTOR

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

“RESOLVED THAT pursuant to provisions of Sections 197, 198 read with Schedule V and other applicable provisions, if any, of the Companies Act 2013, (including any statutory modifications or re-enactment(s) thereof, for the time being in force) the Shareholders of the company do ratify the excess payment of remuneration paid to Shri.Vinay Kumar Goyal, Managing Director of the Company during the year ended 31.03.2019 over and above the remuneration already approved by the Shareholders at their Annual General Meeting held on 28.09.2016 as detailed in the explanatory statement attached herewith.”

“FURTHER RESOLVED THAT the Board of Directors be and are hereby severally authorized to include the above item of business in the ensuing General Meeting and to do all acts, deeds and things in order to bring effect to the above resolution.

### 4. RE-APPOINTMENT OF MANAGING DIRECTOR

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

“RESOLVED THAT pursuant to provisions of Sections 196, 197, 198 and 203 read with Schedule V and other applicable provisions, if any, of the Companies Act 2013, (including any statutory modifications or re-enactment(s) thereof, for the time being in force), and subject to such other consents

and permission as may be necessary, and subject to such modifications, variations as may be approved and acceptable to the appointee, the consent of the members be and is hereby accorded to the board for the re-appointment of Mr. Vinay Kumar Goyal (DIN 00134026) as Managing Director of the Company for a period of three years from 01.08.2018 to 31.07.2021 on the following terms and conditions as recommended by the Remuneration Committee and approved by the Board of Directors at their respective meetings held on 30.05.2019.”

## I. REMUNERATION

### (a) SALARY

Rs. 3,00,000 (Rupees Three lakhs only) per month.

## II. PERQUISITES

### (a) MEDICAL INSURANCE PREMIUM

Payment of Medical Insurance Premium for self and family members not exceeding a sum of Rs.10,00,000/- per annum. For the above purpose, “Family” includes spouse, dependent children and parents.

### (b) CLUB MEMBERSHIP FEES.

Payment of Club Membership Fees for self and family members not exceeding a sum of Rs.24,00,000/- per annum. For the above purpose, “Family” includes spouse, dependent children and parents.

### (c) CONTRIBUTION TO PROVIDENT FUND AND SUPERANNUATION FUND

Contribution to Provident Fund and Superannuation Fund, as per Rules of the Company, to the extent these, either singly or put together, are not taxable under the Income Tax Act, 1961.

### (d) LEAVE AND ENCASHMENT OF LEAVE

As per Rules of the Company.

### (e) GRATUITY AND / OR CONTRIBUTION TO GRATUITY FUND

As per Rules of the Company.

### (f) USE OF CAR AND TELEPHONE

Company maintained car with driver for use on Company's business, telephone at residence and cellular phone provided by the Company will not be considered as perquisite. However, personal long distance calls and use of car for private purposes shall be borne by the Director.

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**(g) REIMBURSEMENT OF EXPENSES**

Reimbursement of entertainment, travelling and all other expenses incurred for the business of the Company, as per Rules of the Company.

**III. REMUNERATION IN THE EVENT OF LOSS OR INADEQUACY OF PROFITS**

Where in any financial year, the Company has no profits or its profits are inadequate, the foregoing amount of remuneration and benefits shall be paid, subject to the limits laid down under the provisions of Schedule V to the Companies Act, 2013.

RESOLVED FURTHER THAT the Board of Directors of the Company/Committee of the Board be and is hereby authorized to alter, amend or vary the terms and conditions of appointment including remuneration structure as may be agreed to between the Board of Directors and Mr. Vinay Kumar Goyal subject to the limits within such guidelines or amendments as may be made to the Companies Act, 2013.

RESOLVED FURTHER THAT the Board be and is hereby authorised to do all such acts, deeds, matters and things as may be deemed necessary to give effect to above resolution.”

**5. APPOINTMENT OF INDEPENDENT DIRECTOR:**

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

“RESOLVED THAT pursuant to the provisions of Section 149, 150,152,160 and any other applicable provisions of the Companies Act, 2013 and the Rules made there under (including any statutory modification(s) or re-enactment thereof for the time being in force) read with Schedule IV to the Companies Act 2013, Shri. KANHAIYALAL, holding DIN 08227137, who was appointed as an additional director of the Company by the Board of Directors in terms of Section 161(1) of the Act and the Articles of Association of the Company and whose term of office expires at the 35<sup>th</sup> Annual General Meeting and in respect of whom the Company has received a notice in writing from a member proposing her candidature for the office of Director of the Company, be and is hereby appointed as an Independent Director of the Company to hold office for five consecutive years for a term up to 17<sup>th</sup> September 2023, not liable to retire by rotation.”

RESOLVED FURTHER that except for the aforesaid revision in salary, all other terms and conditions of his appointment as the Managing Director of the Company shall remain unchanged.

By Order of the Board  
**VINAY KUMAR GOYAL**  
Managing Director  
DIN-00134026

Place: Chennai  
Date: **14.08.2019**

**NOTES:**

1- A member entitled to attend and vote at AGM is entitled to appoint a proxy to attend and vote in the meeting instead of himself / herself and the proxy need not be a member of the company. A person can act as a proxy on behalf of a maximum of 50 members and holding in aggregate not more than 10% of the total share capital of the Company. A Member holding more than 10% percent of the total share capital of the Company carrying voting rights may appoint a single person as proxy, provided that the person does not act as proxy for any other person or shareholder.

2- Corporate members intending to send their authorized representatives to attend the meeting are requested to send a duly certified copy of the Board resolution on the letter head of the company, signed by one of the Directors or Company Secretary or any other authorized signatory and / or duly notarized power of Attorney, authorizing their representatives to attend and vote on their behalf at the meeting.

3-The instrument appointing the proxy, duly completed, must be deposited at the Company's registered office not less than 48 hours before the commencement of the meeting. A proxy form appointing a proxy for the AGM is enclosed herewith.

4- During the period beginning 24 hours before the time fixed for the commencement of the AGM and until the conclusion of the meeting, a member would be entitled to inspect the proxies lodged during the business hours of the company, provided that not less than three days of notice in writing is given to the company.

5-Members / proxies / authorized representatives should bring the duly filled attendance slip enclosed herewith to attend the meeting.

6- The register of Directors and Key Managerial Personnel and their shareholding, maintained under section 170 of the Companies Act, 2013 ( the Act ), and the Register of contracts or arrangements in which the directors are interested, maintained under section 189 of the Act, will be available for inspection by the members at the AGM.

7- The Register of Members and Share Transfer Books of the Company will remain closed from Tuesday, 24<sup>th</sup> September, 2019 to Monday, 30<sup>th</sup> September, 2019 (both days inclusive ) for the purpose of AGM.

8- Members are requested to notify immediately any change in their address to the Registrar and Share transfer Agent – M/s. Cameo Corporate Services Ltd., “Subramanian Buildings”, 1, Club House Road, Chennai-600 002.

9- The Ministry of Corporate Affairs (vide circular nos. 17/ 2011 and 18/2011 dated April 21, 2011 and April 29, 2011 respectively) has undertaken a Green Initiative in Corporate Governance and allowed Companies to share

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documents with its shareholders through an electronic mode. SEBI (LODR) Regulations 2015 permits companies to send soft copies of the Annual Report to all those shareholders who have registered their email addresses for the said purpose. Hence, Members are requested to register their e-mail addresses with the Company by sending their details relating to name, folio no./DP Id/Client Id to the company's email id : [investorgrievance@crmetal.in](mailto:investorgrievance@crmetal.in).

10- Members holding shares in physical form and in electronic mode are requested to immediately notify change in their address and updates of savings bank account details, if any, to their respective Depository Participant(s) and to Registrar and Share Transfer Agents, M/s. Cameo Corporate Services Ltd., "Subramanian Buildings", 1, Club House Road, Chennai-600 002 quoting their folio number.

11-Pursuant to section 72 of the Companies Act 2013, Shareholders holding shares in physical form may file nomination in the prescribed form SH-13 with the Company's Registrar and Transfer Agent. In respect of shares held in electronic / demat form, the nomination form may be filed with the respective Depository Participant

12-Members desirous of obtaining any information concerning the accounts of the Company are requested to address their queries to the Company Secretary at least seven days in advance of the Meeting so that the information required can be readily made available at the meeting.

13-All documents referred to in the accompanying notice and the explanatory statement requiring the approval of the members at the AGM and other statutory registers shall be available for inspection at the Registered office of the Company during business hours on all days, except Saturdays, Sundays and National Holidays from the date hereof up to the date of AGM

14- Information about Directors retiring by rotation.

Name of the Director	R.UMA	KanhaiyaLal
Din	07029264	08227137
Age	54	24
Date of appointment	28/09/2015	18/09/2018
Experience in years	18	3
No.of shares as on 31.03.2019	Nil	Nil
Directorship in other public companies	Nil	Nil
Chairman/Member of committees of other company	Nil	Nil
Relationship with any other Director	Nil	Nil

15- With effect from 1st April 2014, inter alia, provisions of Section 149 of Companies Act 2013 has been brought into force. In terms of the said section read with section 152(6) of the Act, the provisions of retirement by rotation are not applicable to Independent Directors.

16- Electronic copy of the AGM Notice of the Company inter alia indicating the process and manner of e-voting along with Attendance slip and Proxy form is being sent to all the members whose email IDs are registered with the Company/Depository Participant(s) for communication purposes unless any member has requested for a hard copy of the same. For members who have not registered their email address, physical copies of the Notice of the Company inter alia indicating the process and manner of e-voting along with Attendance slip and Proxy form is being sent in the permitted mode.

17- The route map showing directions to reach the venue of the 35th AGM is annexed

18- Voting through Electronic Means

In compliance with provisions of Section 108 of the Companies Act 2013 read with the Companies (Management and Administration) Rules, 2014, the Company is pleased to offer E-Voting facility as an alternate, for its shareholders to enable them to cast their votes electronically at the 35th Annual General Meeting (AGM) through e-voting service provided by Central Depository Services (India) Limited (CDSL). E-Voting is optional. The procedure and instructions for the same are as follows:

The Company will provide the e-voting facility through CDSL. The e-voting procedures are set out below:

The instructions for members for voting electronically are as under:-

(i) The voting period begins on Friday 27.09.2019 at 9.00 a.m. and ends on Sunday 29.09.2019 at 5.00 p.m. During this period shareholders of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date ( record date ) 23.09.2019, may cast their vote electronically. The e-voting module shall be disabled by CDSL for voting thereafter.

(ii) The Shareholders should log on the e-voting website [www.evotingindia.com](http://www.evotingindia.com)

(iii) Click on " Shareholders " tab

(iv) Now, select the " CRIMSON METAL ENGINEERING COMPANY LIMITED " from the drop down menu and click on " SUBMIT"

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(v) Now enter your user ID

- a. For CDSL: 16 digits beneficiary ID
- b. For NSDL: 8 Character DP ID followed by 8 Digits Client ID
- c. Members holding shares in Physical Form should enter Folio Number registered with the Company.

(vi) Next enter the image verification as displayed and click on Login

(vii) If you are holding shares in demat form and had logged on to [www.evotingindia.com](http://www.evotingindia.com) and voted on an earlier voting of any company, then your existing password is to be used.

(viii) If you are a first time user follow the steps given below:

For Members holding shares in Demat Form and Physical Form

**PAN\*** Enter your 10 digit alpha-numeric \*PAN issued by Income Tax Department (Applicable for both demat shareholders as well as physical shareholders)

- Members who have not updated their PAN with the Company/Depository Participant are requested to use the first two letters of their name and the last 8 digits of the demat account/folio number in the PAN field.
- In case the folio number is less than 8 digits enter the applicable number of 0's before the number after the first two characters of the name in CAPITAL letters. Eg. If your name is Ramesh Kumar with folio number 100 then enter RA00000100 in the PAN field.

**DOB#** Enter the Date of Birth as recorded in your demat account or in the company records for the said demat account or folio in dd/mm/yyyy format.

**Dividend Bank Details#** Enter the Dividend Bank Details as recorded in your demat account or in the company records for the said demat account or folio.

• Please enter the DOB or Dividend Bank Details in order to login. If the details are not recorded with the depository or company please enter the member id / folio number in the Dividend Bank details field as mentioned in instruction (v)

(ix) After entering these details appropriately, click on "SUBMIT" tab.

(x) Members holding shares in physical form will then reach directly the Company selection screen. However, members holding shares in demat form will now reach 'Password Creation' menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password is to be also used by the demat holders for voting for resolutions of any other company on which they are eligible to vote, provided that company opts for e-voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.

(xi) For Members holding shares in physical form, the details can be used only for e-voting on the resolutions contained in this Notice.

(xii) Click on the EVSN for CRIMSON METAL ENGINEERING COMPANY LIMITED

(xiii) On the voting page, you will see "RESOLUTION DESCRIPTION" and against the same the option "YES/NO" for voting. Select the option YES or NO as desired. The option YES implies that you assent to the Resolution and option NO implies that you dissent to the Resolution.

(xiv) Click on the "RESOLUTIONS FILE LINK" if you wish to view the entire Resolution details.

(xv) After selecting the resolution you have decided to vote on, click on "SUBMIT". A confirmation box will be displayed. If you wish to confirm your vote, click on "OK", else to change your vote, click on "CANCEL" and accordingly modify your vote.

(xvi) Once you "CONFIRM" your vote on the resolution, you will not be allowed to modify your vote.

(xvii) You can also take out print of the voting done by you by clicking on "Click here to print" option on the Voting page.

(xviii) If Demat account holder has forgotten the changed password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.

(xix) Note for Non-Individual Shareholders and Custodians Institutional shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodian are required to log on to [www.evotingindia.com](http://www.evotingindia.com) and register themselves as Corporates.

- A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com). an email to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com)
- After receiving the login details a compliance user should be created using the admin login and password. The compliance user would be able to link the account(s) which they wish to vote on.
- The list of accounts should be mailed to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) and on approval of the accounts they would be able to cast their vote.
- A scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.

(xx) In case you have any queries or issues regarding e-voting, you may refer the Frequently Asked Question ("FAQs") and e-voting manual available at [www.evotingindia.com](http://www.evotingindia.com) under help section or write an email to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com)

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10-Please note that by virtue of providing the e-voting facility by the company as per Rule 20 of Companies (Management and Administration) Rules, 2014 the following will be applicable:

(i) The manner of voting for the members being present in the General Meeting will be on "proportion principle" i.e. one share – one vote unlike one person one vote principle, further, as per the provision of the Companies Act, 2013, demand for poll will not be relevant.

(ii) The option of voting by show of hands will not be available for members presenting the General Meeting in view of clear provision of section 107 of the Companies Act, 2013, i.e. voting by show of hands would not be allowable in cases where Rule 20 of Companies (Management and Administration) Rules, 2014 is applicable.

(iii) Any member who has voted through e-voting facility provided by the company may also participate in the General Meeting in person, but such a member will not be able to exercise his vote again in the meeting and the earlier vote casted through electronic means will be treated as final.

(iv) The facility for voting through ballot form shall be made available to all the shareholders who could not exercise their vote through e-voting. The ballot paper in Form MGT-12 is being sent to all the members, along with this report. The voting rights of Members shall be in proportion their shares of the paid up equity share capital of the Company as on 23.09.2019.

A Member desiring to exercise vote by ballot paper should complete the Ballot Form attached with this report and sent it to :CRIMSON METAL ENGINEERING COMPANY LIMITED, 163/1 PRAKASAM ROAD, BROADWAY, CHENNAI.600 108.

Please return the form duly completed through post or courier, so as to reach the company on or before 5.00 p.m on 27.09.2019

The facility of voting through ballot form shall also be made available at the meeting and the members attending the meeting who have not cast their vote by remote e-voting shall be able to vote at the meeting through ballot form

(v) Any person, who acquires shares of the Company and becomes member of the Company after dispatch of the notice and holding shares on the cut-off date i.e. 23.09.2019 may obtain the login ID and password by sending an email to [investorgrievance@crmetal.in](mailto:investorgrievance@crmetal.in), [investor@cameoindia.com](mailto:investor@cameoindia.com) or [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) by mentioning their Folio No./DP ID and Client ID. However, if you are already registered with CDSL for remote e-voting then you can use your existing user ID and password for casting your vote

(vi) The Scrutinizer shall, immediately after the conclusion of voting at the general meeting, will first count the votes cast at the meeting and thereafter unblock the votes cast through remote e-voting in the presence of at least two witnesses not in the employment of the Company and shall make, not later than three days after the conclusion of the AGM, a consolidated scrutinizer's report of the total votes cast in favour or against, if any, to the Chairman or a person

authorized by him in writing, who shall countersign the same and declare the result of the voting forthwith.

(vii) The results declared along with the Scrutinizer's Report shall be placed on the Company's website [www.crmetal.in](http://www.crmetal.in) and website of CDSL <http://www.evotingindia.com> and also forward the same to the Bombay Stock Exchange Limited simultaneously, where the Company's shares are listed.

19. Members are requested to note that the Company's equity shares are under compulsory demat trading for all investors, subject to the provisions of SEBI Circular No.21/99 dated July 8, 1999. Members are, therefore, requested to dematerialise their shareholding to avoid inconvenience.

20. Members holding shares in dematerialized mode are requested to intimate all changes pertaining to their bank details, ECS mandates, email addresses, nominations, power of attorney, change of address/name etc. to their Depository Participant (DP) only and not to the Company or its Registrar and Transfer Agent. Any such changes effected by the DPs will automatically reflect in the Company's subsequent records.

**21. Members may avail of the nomination facility as provided under Section 72 of the Companies Act, 2013.**

**22. Members desirous of getting any information about the accounts and/or operations of the Company are requested to write to the Company at least seven days before the date of the Meeting to enable the Company to keep the information ready at the Meeting.**

23. All the documents referred to in the Notice and Explanatory Statement will be available for inspection by the Members at the Registered/Corporate Office of the Company during the business hours on all working days from the date hereof up to the time of the Meeting.

24. Members holding shares in electronic mode are requested to ensure to keep their email addresses updated with the Depository Participants. Members who have not registered their email id with their Depository Participants are requested to do so and support the green initiative. Members holding shares in physical mode are also requested to update their email addresses by writing to the Registrar and Transfer Agent of the Company at the address mentioned above quoting their folio number(s).

25. Explanatory Statement relating to Special Business is attached herewith.

Managing Director

VINAYKUMAR GOYAL  
DIN-00134026

**Place: Chennai**  
**Date:14.08.2019**



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**EXPLANATORY STATEMENT IN RESPECT OF THE SPECIAL BUSINESS PURSUANT TO SECTION 102 OF THE COMPANIES ACT, 2013**

**ITEM NO. 3:**

The Company during the financial year 2018 – 2019 has made certain excess payments to Shri Vinay Kumar Goyal, Managing Director of the Company as detailed below:

Particulars	Approved Limit	Actual Payment	Excess payment
Salary	30,00,000	3,600,000	600,000
Membership / Subscription	10,00,000	1,378,997	378,997
Insurance Premium	6,00,000	-	-

Since the payment of above amount requires the approval of Shareholders at the ensuing annual General Meeting by way of ratification, the special resolution in Item No. 3 is placed before the shareholders for approval.

Except Shri. Vinay Kumar Goyal, Managing Director, none of the Directors or Key Managerial Personnel of the Company or their relatives is in any way concerned or interested in the resolution.

**ITEM NO.4:**

Shri Vinay Kumar Goyal was reappointed as Managing Director for a period of Three years w.e.f. 01.08.2016 and his term of office expires on 31.07.2019. He has helped the company in achieving greater heights in terms of turnover and the profitability of the company with his rich experience in the field of steel industry. His re-appointment will benefit the company in many ways. The Board of directors at their meeting held on 30.05.2019 has reappointed Mr. Vinay Kumar Goyal as Managing Director subject to the approval of the members in the Annual General Meeting for a further period of three years w.e.f.01.08.2019 at the remuneration as recommended by the Remuneration Committee at its meeting held on 30.05.2019 as detailed in the resolution available in the notice of AGM.

Details as required in clause (iv) of Section II , Part II of Schedule V of the Companies Act 2013

**General Information: -**

- 1) Nature of Industry :Manufacturers of Steel Pipes
- 2) Date of Commencement of business: The company had commenced its business from the date of its inception.
- 3) Financial Performance:

PARTICULARS	Audited financial Statement for the year ended 31.03.2019	Audited financial Statement for the year Ended 31.03.2018
TOTAL REVENUE	10,08,14,989	33,37,39,092
TOTAL EXPENSES	9,93,81,931	32,78,83,808
PROFIT BEFORE TAX	14,33,058	58,55,283
CURRENT TAX	286612	11,71,057
DEFERRED TAX	-	-11,30,803
PROFIT AFTER TAX	11,46,446	58,15,030

- 4) Foreign investment or collaborators if any: NIL

Information about Mr. Vinay Kumar Goyal

Name of the Director	Vinay Kumar Goyal
Din	00134026
Age	51
Original Date of appointment	14/09/1996
Experience in years	30
No.of shares as on 31.03.2019	548791
Directorship in other public companies	NIL
Chairman/Member of committees of other company	NIL
Relationship with any other Director	NIL

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- 1) Background details: Promoter and has rich experience in manufacturing of Steel pipes.
- 2) Past remuneration: 250000/- per month exclusive of perquisites and other allowances .
- 3) Recognition or awards: Nil
- 4) Job profile and his suitability: Managing Director w.e.f.01.08.2016]
- 5) Remuneration proposed: 300000/- (Three Lakhsonly )per month plus perquisites and other allowances. The overall limit of the salary inclusive of perquisites and other allowances shall not exceed the ceiling as provided in section II (A) Part II of Schedule V of the Companies Act 2013.

6) Comparative remuneration profile with respect to industry, size of the company, profile of the position and person:

Only minimum remuneration proposed to managerial personnel and comparatively lower than any other company in the same industry and with the same kind of operation

7) Pecuniary relationship directly or indirectly with the company or relationship with the managerial personnel, if any,

Mr. Vinay Kumar Goyal is holding **548791** shares comprising 12.39% in the paid up capital of the company and is not related to any other directors on the board.

**Other information: -**

1) Reason for loss or inadequate profits:

The company has inadequate profit due to the increased cost of raw materials and other components required for manufacturing the product

2) Steps taken or proposed to be taken for improvement:

The company has taken steps to reduce variable cost and to increase sales by sales promotion

3) Expected increase in productivity and profits in measurable terms:

The rated capacity of plants will be achieved subject to market condition.

None of the Directors and Key Managerial Personnel of the company and their relatives is concerned or interested, financial or otherwise, in this resolution except Mr. Vinay Kumar Goyal.

**ITEM NO. 5**

Based on the recommendation of Nomination and Remuneration Committee, the Board of Directors have appointed Shri KanhaiyaLal as an additional director (Independent) under Section 161(1) of the Act read with the Articles of Association of the Company with effect from 18.09.2018. Accordingly, Shri KanhaiyaLal holds office as a director up to the date of the forthcoming Annual General Meeting. It is proposed to appoint him as a Non-executive Independent Director of the Company for five consecutive years till 17.09.2023 in terms of Section 149 of the Act.

The Company has received a notice along with the deposit of requisite amount under Section 160 of the Act from a member proposing Shri KanhaiyaLal as a candidate for the office of a director of the Company. Shri KanhaiyaLal has confirmed to the Board that he qualifies to be an independent director within the meaning of Clause 49(II) (B) (1) and Section 149(6) of the Act read with Rule 5 of the Companies (Appointment and Qualification of Directors) Rules, 2014. The Directors are of the view that Shri KanhaiyaLal fulfils the conditions specified in the Act and Rules made thereunder for his appointment as an Independent Director of the Company. The Directors are of the view that Shri KanhaiyaLal would bring valuable experience and the Company would benefit from her appointment as Director. Accordingly, the Board commends the passing of the Ordinary Resolution proposed at item no. 5 of the Notice. A copy of the draft letter setting out the terms and conditions of his appointment as Independent Director will be available for inspection by members at the registered office of the Company during the business hours on any working day up to the time of AGM.

None of the Directors/Key Managerial Personnel of the Company/ their relatives, except Shri KanhaiyaLal, is in any way, concerned or interested, financially or otherwise, in the resolution set out at item no. 5 of the Notice.

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**DIRECTORS' REPORT**

Dear Shareholders,

Your Directors have pleasure in presenting the 35th Annual Report of Crimson Metals Engineering Company Limited along with the audited financial statements for the year ended March 31, 2019.

**FINANCIAL HIGHLIGHTS**

**2018-2019    2017-2018**

*Amount in Rupees*

S. NO	PARTICULARS	Audited financial Statement for the year ended 31.03.2019	Audited financial Statement for the year ended 31.03.2018
1	TOTAL REVENUE	10,08,14,989	33,37,39,092
2	TOTAL EXPENSES	9,93,81,931	32,78,83,808
3	PROFIT BEFORE TAX	14,33,058	58,55,283
4	CURRENT TAX	286612	11,71,057
5	DEFERRED TAX	-	-11,30,803
6	PROFIT AFTER TAX	11,46,446	58,15,030

**PERFORMANCE AND STATE OF AFFAIRS OF THE COMPANY.**

During the year 2018-2019, the Company has earned a net profit after tax of Rs. 11,46,446 as against Rs. 58,15,030 earned in the previous year. On the sales front, the Company has achieved a turnover of about Rs. 10,08,14,989 during the year 2018-2019 as against Rs. 33,37,39,092 achieved in 2017-2018.

During the year under review the company has generated major income from leasing activities

**DIVIDEND & TRANSFER OF PROFIT TO RESERVES:**

In order to conserve resources the board of directors has decided not to declare any dividend for the current financial year 2018 – 2019 and has not proposed to transfer any of its profits to reserves.

**MATERIAL CHANGE AND COMMITMENTS OF THE COMPANY**

There are no material changes and commitments affecting the financial position of the company which have occurred between the end of the financial year of the company to which the financial statements relate and the date of the report except that the company has started earning lease rental income from its related party; and there are no significant

and material orders passed by the regulators or courts or tribunals impacting the going concern status and company's operations in future.

**PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS**

There has been no loan, guarantees and investment given or made by the Company under Section 186 of the Act during the financial year 2018 – 2019.

**SUBSIDIARIES, ASSOCIATES AND JOINT VENTURE COMPANIES**

The company doesn't have any subsidiaries, associates and joint venture companies.

**CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO**

The nature of business does not involve any Technology Absorption, and Conservation of Energy as stipulated under Section 134(3)(m) of the Companies Act, 2013 read with Rule 8 of the Companies (Accounts) Rules, 2014. However, efforts to reduce and optimize the use of energy through improved operations and other means continue.

**FOREIGN EXCHANGE EARNINGS AND OUTGO**

	31.03.2019	31.03.2018
Earnings in Foreign Currency	NIL	NIL
Expenditure in Foreign Currency	USD 13,059	USD 3,25,980
Expenditure in Foreign Currency	GBP 4,600	GBP 4,600

**DIRECTORS AND KEY MANAGERIAL PERSONNEL**

**Board Composition and Independent Directors**

The Board consists of the Executive Chairman, two Executive directors and Three Independent Directors.

Independent Directors are appointed for a term of five years and are not liable to retire by rotation.

All Independent Directors have given declarations that they meet the criteria of independence as laid down under Section 149(6) of the Companies Act, 2013 and Regulation 16(b) of the SEBI LODR.

**Retirement by Rotation: -**

In terms of Section 152 of the Companies Act 2013, Ms. R Uma, who retire by rotation at the forthcoming AGM and is eligible for re-appointment. Ms. R Uma offered herself for re-appointment. Her Brief profile is included in the Notice of forthcoming Annual General Meeting of the company

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**Key Managerial Personnel:**

The company has been appointed as Mr. Manish Rai as Company Secretary and Ms. Sivgami as Chief Financial Officer during the year under report.

**INDEPENDENT DIRECTORS' DECLARATION**

All independent Directors have given declarations that they meet the criteria of independence as laid down under Section 149 of the Companies Act, 2013 which has been relied on by the Company and placed at the Board Meeting of the Company.

**POLICY OF DIRECTORS APPOINTMENT AND REMUNERATION**

Directors' appointment and remuneration including criteria for determining qualifications, positive attributes, independence of a director and other matters provided under section 178 of the Act are covered under the Board's policy formulated by the Company and the same is available on the Company website [www.crmetal.in](http://www.crmetal.in).

**INFORMATION U/s 197(12) OF THE COMPANIES ACT 2013**

The information required under section 197 (12) of the Act read with rule 5(1) and 5 (2) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 is attached herewith as Annexure-I.

**DISCLOSURE WITH RESPECT TO DEMAT SUSPENSE ACCOUNT/UNCLAIMED SUSPENSE ACCOUNT**

The Company has nothing to disclose with respect to demat suspense account/ unclaimed suspense account

**AUDITORS**

**STATUTORY AUDITORS**

As per the provisions of the Companies Act 2013, of M/s. Jain Vishal & Co, Chartered Accountants (Firm registration number : 015407S) were appointed auditors of the company from the conclusion of the 33rd Annual General Meeting (AGM) of the company held on 26th September, 2017 till the conclusion of 38<sup>th</sup> AGM and they continue to be the Auditors. Consequent to the omission of proviso to sub-section 1 of section 139 by the Companies Amendment Act, 2018 read with Notification S.O. 1833(E) dated 7th May 2019, the ratification of the Appointment of Auditors is no longer required.

**COMMENT ON STATUTORY AUDITOR REPORT**

There are no qualifications, reservations, remarks or disclaimers made by M/s. Jain Vishal & Co, Chartered Accountants, in their auditor report. The statutory auditor

have not reported any incident of fraud to the Audit Committee of the Company during the financial year 2018 – 2019.

**SECRETARIAL AUDITOR**

Pursuant to the requirements of Section 204 (1) of the companies Act 2013 and Rule 9 of Companies (Appointment and Remuneration of Managerial Personnel) Rules 2014, the Company has appointed, M/s Lakshmmi Subramanian & Associates, a firm of Company Secretaries in Practice to undertake Secretarial Audit of the Company for the financial year 2018 – 2019.

The Secretarial Audit report as received from the secretarial auditor is annexed to this report as Annexure II.

**COMMENT ON SECRETARIAL AUDITOR REPORT**

With reference to the remarks made by the secretarial auditor, in the Secretarial Audit Report, the company has taken the corrective measures during the current financial year.

**INTERNAL CONTROL AND ITS ADEQUACY**

The Company has, in all material respects, an adequate internal financial control system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2019 based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control. The Company has an adequate Internal Control system, commensurate with the size, scale and complexity of its operations. During the year, such controls were tested and no reportable material weaknesses in the design or operation were observed. The company at present is not having an internal auditor and the company is in the process of appointing the same”

**RELATED PARTY TRANSACTIONS**

During the year 2018 – 2019, the Company has not entered into any transaction with related parties as per section 188 of the Companies Act, 2013.

**EXTRACT OF ANNUAL RETURN**

The details forming part of extract of Annual Return in form MGT -9 as provided under Sub Section (3) of the Section 92 of the Companies Act, 2013 (the “Act”) is annexed herewith as Annexure –III to this report.

**RISK MANAGEMENT POLICY**

The risk management is overseen by the Audit committee/ Board of Directors of the company in a continuous basis. Major risks, if any, identified by the business and functions are systematically addressed through mitigating action on a continuous basis. The Risk Management policy is available in the Company website [www.crmetal.in](http://www.crmetal.in)

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

The Company has zero tolerance for sexual harassment at workplace and has in place a policy on prevention, prohibition and redressal of sexual harassment at workplace in line with the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder. In view of Limited Number of Employees at present Internal Complaints committee has not been formed so far. During the financial year 2018 – 2019, the Company has not received any sexual harassment complaints.

**MAINTENANCE OF COST RECORDS**

Maintenance of cost records as specified by the Central Government under sub-section (1) of section 148 of the Companies Act, 2013, is not applicable to the Company.

**DEPOSITS FROM PUBLIC**

The Company has not accepted any deposits from public and as such, no amount on account of principal or interest on deposits from public was outstanding as on date of the balance sheet.

**CORPORATE GOVERNANCE REPORT**

Since your company's paid up capital and Net worth is less than Rs.10 Crores and Rs.25 Corers respectively, the provisions of clause 27 of the SEBILODR,2015 relating to Corporate Governance, is not applicable to the Company.

**NUMBER OF MEETINGS OF THE BOARD**

The Board met 7 (SEVEN) times during the financial year, and the intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013.

**ANNUAL BOARD EVALUATION**

Pursuant to the provisions of the Companies Act, 2013 and in terms of Regulation 17(10) of the SEBI Listing Regulations, the Board has carried out an annual performance evaluation of its own performance, the directors individually as well as the evaluation of the working of the Audit and the Nomination and Remuneration Committees.

**PERFORMANCE EVALUATION OF BOARD, COMMITTEE AND DIRECTORS**

Pursuant to the provisions of the Companies Act, 2013, the Board has carried out an annual performance evaluation

of its own performance, the directors individually as well as the evaluation of the working of the Audit and Nomination & Remuneration Committees and the same was based on questionnaire and feedback from all the Directors on the Board as a whole, Committees and self-evaluation.

A structured questionnaire was prepared after taking into consideration of the inputs received from the Directors, covering various aspects of the Board's functioning such as adequacy of the composition of the Board and its Committees, Board culture, execution and performance of specific duties, obligations and governance. A separate exercise was carried out to evaluate the performance of individual Directors including the Chairman of the Board, who were evaluated on parameters such as level of engagement and contribution, independence of judgment, safeguarding the interests of the Company and its minority shareholders etc.

The performance evaluation of the Independent Directors was carried out by the entire Board. The performance evaluation of the Chairman of the Board and the Executive Directors was carried out by the Independent Directors.

**CODE OF CONDUCT FOR DIRECTORS AND SENIOR MANAGEMENT**

The Board of Directors had adopted a Code of Conduct for the Board Members and employees of the company. This code helps the Company to maintain the standard of business ethics and ensure compliance with the legal requirements of the company

The code is aimed at preventing any wrongdoing and promoting ethical conduct at the Board and employees. The Compliance officer is responsible to ensure adherence to the Code by all concerned

The code lays down the standard of conduct which is expected to be followed by the Directors and the designated employees in their business dealings and in particular on matters relating to integrity in the work place, in business practices and in dealing with stakeholders

All the Board Members and the Senior Management personnel have confirmed compliance with the Code

**WHISTLE BLOWER POLICY/VIGIL MECHANISM**

Pursuant to section 177(9) of the Companies Act, 2013 read with Rule 7 of the Companies ( Meetings of Board and its Powers ) Rules,2014 and clause 49 of the Listing Agreement, the Board of Directors had approved the policy on vigil mechanism / whistle blower and the same was hosted on the website of the Company. The policy inter-alia provides a direct access to the Chairman of the Audit Committee.

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

Your Company hereby affirms that no Director / employee has been denied access to the Chairman of the Audit Committee and that no complaints were received during the year

**BOARD COMMITTEES**

The Board had constituted the following committees Viz Audit Committee, Nomination and Remuneration Committee and Stakeholders' Relationship Committee

**CORPORATE SOCIAL RESPONSIBILITY (CSR):**

Your company is not meeting the threshold as prescribed under Companies Act, 2013, i.e., Net Profit greater than Rs.5 Crores or Turnover greater than Rs.1000 Crores or Net worth greater than Rs. 500 Crores in the preceding 3 Financial Years and therefore the provisions relating to CSR in accordance with the provisions of section 135 of the Act does not arise.

**DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS/COURTS/TRIBUNALS IMPACTING THE GOING CONCERN STATUS AND COMPANY'S OPERATIONS IN FUTURE:**

During the year, there were no such instances of significant and material orders passed by the regulators, courts or tribunals.

**MANAGEMENT DISCUSSION AND ANALYSIS REPORT**

The Management Discussion and Analysis Report is attached with this Report as Annexure IV.

**DISCLOSURE OF ACCOUNTING TREATMENT:**

No differential treatment has been followed during the financial year 2018 – 2019 in preparation of the financial statements.

**DIRECTORS' RESPONSIBILITY STATEMENT**

Pursuant to the requirement of Section 134(5) of the Act, the Directors hereby confirm:

1. That in the Preparation of Final Accounts, the applicable Accounting Standards had been followed along with proper explanation relating to material departures;

2. That they had selected such Accounting Policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the Financial Year and of the Profit or Loss of the Company for that period;

3. That they had taken proper and sufficient care for 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 fraud and other irregularities;

4. That they had prepared the Annual Accounts on a Going Concern basis.

5. That they laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and operating properly; and

6. That they have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

**ACKNOWLEDGEMENT**

Your Directors wish to place on record their appreciation of the contributions made by employees at all levels, towards the continued growth and prosperity of your Company. Directors take this opportunity to convey their thanks to all the valued shareholders and the valuable services rendered by the Officers and Staff at all levels.

For and on behalf of  
the Board

VINAY KUMAR GOYAL  
MANAGING DIRECTOR  
DIN-00134026

CHANDRAKESH PAL  
WHOLE TIME DIRECTOR  
DIN: 07277936

Place: Chennai  
Date: **14.08.2019**

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**Annexure I**

**A) Disclosures pursuant to rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014**

Particulars	Disclosure Details		
	Vinay Kumar Goyal	Chandrakesh Pal	R.Uma
the ratio of the remuneration of each director to the median remuneration of the employees of the company for the financial year;	5.60	0.85	0.32
the percentage increase in remuneration of each director, Chief Financial Officer, Chief Executive Officer, Company Secretary or Manager, if any, in the financial year	Approximately up to 10% excluding workmen		
the percentage increase in the median remuneration of employees in the financial year;	Approximately up to 10% excluding workmen		
the number of permanent employees on the rolls of company	6		
average percentile increase already made in the salaries of employees other than the managerial personnel in the last financial year and its comparison with the percentile increase in the managerial remuneration and justification thereof (and point out if there are any exceptional circumstances for increase in the managerial remuneration;)	Average percentile increase for Managerial grade was up to 10%( approximately)  Average percentile increase for Non-Managerial grade was up to 10%( approximately)		
affirmation that the remuneration is as per the remuneration policy of the company	The Company affirms that the remuneration is as per the remuneration policy of the company		

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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**B) Disclosures pursuant to rule 5(2) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014:**

	<b>Employee 1</b>	<b>Employee 2</b>	<b>Employee 3</b>	<b>Employee 4</b>	<b>Employee 5</b>
<b>Name of the Employee</b>	Vinay Goyal	S.Sivagami	Chandrakesh Pal	Manish Kumar Rai	Uma R
<b>designation of the employee;</b>	Managing Director	Chief Finance Officer	Whole Time Director	Company Secretary	Whole Time Director
<b>remuneration received in Rs.;</b>	36,00,000	7,37,136	5,47,932	4,61,292	2,10,384
<b>nature of employment, whether contractual or otherwise;</b>	Permanent	Permanent	Permanent	Permanent	Permanent
<b>qualifications and experience of the employee;</b>	B.Com with 33 years	B.Com with 21 years	B.A with 21 years	ACS with 16 years	B.Com with 18 years
<b>date of commencement of employment;</b>	01-04-1997	01-08-2010	01-02-2016	05-12-2018	06-09-1995
<b>the age of such employee;</b>	50 yrs	43 yrs	42 yrs	41 yrs	52 yrs
<b>the last employment held by such employee before joining the company;</b>	nil	Ganges International Pvt Ltd	Ganges International Pvt Ltd	ClutchAuto Ltd.,	nil
<b>the percentage of equity shares held by the employee in the company within the meaning of clause (iii) of sub-rule (2) above; and</b>	10.29%	nil	nil	nil	nil
<b>whether any such employee is a relative of any director or manager of the company and if so, name of such director or manager:</b>	No	no	no	no	no
	<b>Employee 6</b>	<b>Employee 7</b>	<b>Employee 8</b>	<b>Employee 9</b>	<b>Employee 10</b>
<b>Name of the Employee</b>	M Sreyan Kumar				
<b>designation of the employee;</b>	Accounts Executive				
<b>remuneration received in Rs.;</b>	1,92,000				
<b>nature of employment, whether contractual or otherwise;</b>	Permanent				
<b>qualifications and experience of the employee;</b>	MBA with 5 years				
<b>date of commencement of employment;</b>	12-03-2018				
<b>the age of such employee;</b>	25 yrs				
<b>the last employment held by such employee before joining the company;</b>	India Motor Parts & Accessories Ltd				
<b>the percentage of equity shares held by the employee in the company within the meaning of clause (iii) of sub-rule (2) above; and</b>	nil				
<b>whether any such employee is a relative of any director or manager of the company and if so, name of such director or manager:</b>	no				



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**Annexure II**

**SECRETARIAL AUDIT REPORT FOR THE FINANCIAL YEAR ENDED 31.03.2019**  
**[Pursuant to section 204(1) of the Companies Act, 2013 and rule No.9 of the**  
**Companies (Appointment and Remuneration Personnel) Rules, 2014]**

The Members

**CRIMSON METAL ENGINEERING COMPANY LIMITED**

Chennai

We have conducted the secretarial audit of compliance of applicable statutory provisions and the adherence to good corporate practices by Crimson Metal Engineering Company Ltd. (hereinafter called the company). Secretarial audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/ statutory compliances and expressing our opinion thereon.

Based on our verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, we hereby report that in our opinion, the company has, during the audit period covering the financial year ended 31<sup>st</sup> March, 2019, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed with the Ministry of Corporate Affairs and other records maintained by Crimson Metal Engineering Company Limited ("the Company") for the financial year ended on 31<sup>st</sup> March, 2019 according to the provisions of:

- i. The Companies Act, 2013 (the Act) and the Rules made there under;
- ii. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the Rules made there under;
- iii. The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
- iv. The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'): -
  - a. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; however, the Regulation 24A relating to Secretarial compliance report is not applicable to the Company during the period under review.
  - b. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
  - c. The Securities and Exchange Board of India (Prohibition of Insider Trading Regulations, 2015);
  - d. The Securities and Exchange Board of India (Registrar to an issue and share transfer agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with clients.

We hereby report that

- a. The Company has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except mentioned under this report.
- b. The Company has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from our examination of those records.
- c. There were no actions taken against the listed entity/its promoters/directors/material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operation Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder.

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

- (i) The Listing Agreements entered into by the Company with the Stock Exchanges, where the Securities of the Company are listed and the uniform listing agreement with the said stock exchanges pursuant to the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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- (ii) Secretarial Standards with respect to Meetings of Board of Directors (SS-1) and General Meetings (SS-2) issued by the Institute of Company Secretaries of India.

In our opinion the following laws are applicable to the Company:

1. Employees Provident Fund and Miscellaneous Provisions Act, 1952
2. Employees' State Insurance Act, 1948
3. The Contract Labour (Regulation & Abolition) Act, 1970
4. The Factories Act, 1948
5. The Industrial Disputes Act, 1947
6. The Industrial Employment (Standing Orders) Act 1946
7. The Workmen's Compensation Act, 1923 & Rules
8. Payment of Gratuity Act 1972 & Rules
9. The Payment of Bonus Act, 1965
10. The Minimum Wages Act, 1948
11. The Maternity Benefit Act, 1961
12. Apprentices Act, 1961

It is reported that during the period under review, the Company has been regular in complying with the provisions of the Act, Rules, Regulations and Guidelines, as mentioned above except the following: -

- The delay in filing a form with the MCA.
- Strict compliance is required in adopting the secretarial standards 1 & 2 issued by Institute of Company Secretaries of India.
- The company may be required to change its object clause in the absence/delay of restoration of previous line of steel business.
- The Company is in the process of appointing an Internal Auditor.
- An independent director was appointed after the expiry of six months from the date of demise of an existing Independent director and its consequential effects.

We further report that there were no actions/events in the pursuance of

- a. The Securities and Exchange Board of India (Share Based employee Benefits) Regulations, 2014 and the Employees Stock Option Scheme, 2007 approved under the provisions of the Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;
- b. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009
- c. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998
- d. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
- e. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- f. Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;

Requiring compliance thereof by the Company during the Financial Year under review.

We further report that, based on the information provided by the Company, its officers and authorized representatives during the conduct of the audit, in our opinion, adequate systems and control mechanism exist in the Company to monitor and ensure compliance with other general laws.

We further report that the compliance by the Company of applicable financial laws, like direct and indirect tax laws, has not been reviewed in this Audit since the same have been subject to review by Statutory financial auditor and other designated professionals.

We further report that,

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

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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Notice was given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were delivered 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.

All decisions at Board Meetings and Committee Meetings are carried out unanimously as recorded in the minutes of the meetings of the Board of Directors or Committee of the Board, as the case may be.

We further report that during the audit period no events have occurred, which have a major bearing on the Company's affairs except the generation of major income from leasing business.

**For LAKSHMMI SUBRAMANIAN & ASSOCIATES**  
Sd/-  
**P.S.SRINIVASAN**  
Partner  
ACS No. 1090  
C.P.NO. 3122

**Place: Chennai**  
**Date: 14/08/2019**

**ANNEXURE-A**

To,  
The Members  
Crimson Metal Engineering Company Limited

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

**For LAKSHMMI SUBRAMANIAN & ASSOCIATES**  
Sd/-  
**P.S.SRINIVASAN**  
Partner  
ACS No. 1090  
C.P.NO. 3122

**Place: Chennai**  
**Date: 14/08/2019**

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**ANNEXURE III**

**EXTRACT OF ANNUAL RETURN  
 FORM MGT 9**

(Pursuant to Section 92 (3) of the Companies Act, 2013 and  
 Rule 12(1) of the Company (Management & Administration) Rules, 2014)

**Financial Year ended on 31.03.2019**

**I. REGISTRATION AND OTHER DETAILS :**

CIN	L27105TN1985PLC011566
Registration Date	<b>15.02.1985</b>
Name of the Company	<b>CRIMSON METAL ENGINEERING COMPANY LTD</b>
Category / Sub-Category of the Company	Company Limited by shares
Address of the Registered office and contact details	163/1 II FLOOR, PRAKASAM ROAD, BROADWAY, CHENNAI-600108
Whether listed company	Yes
Name, Address and Contact details of Registrar and Transfer Agent, if any	Cameo Corporate Services Limited 1, Subramaniam Building, Club House Road, Chennai – 600 002

**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:-

S. No.	Name and Description of main products/services	NIC Code of the Product/service	% to total turnover of the company
1	Manufacturers of Steel Pipes	24311	100.00

**III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES :**

S. No.	Name and address of the Company	CIN/GLN	Holding/ Subsidiary/ Associate	% of shares held	Applicable Section
NIL					

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**IV. SHAREHOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity) :**

**(i) Category-wise Share Holding**

**Name of the Company** : **CRIMSON METAL ENGINEERING COMPANY LTD**  
**Face Value** : **10 /-**  
**Paidup Shares as on 01-Apr-2017** : **4428207**  
**Paidup Shares as on 31-Mar-2018** : **4428207**  
**For the Period From** : **01-Apr-2018 To : 30-Mar-2019**

Category code	Category of Shareholders	No. of shares held at the beginning of the year				No. 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	
<b>A.</b>	<b>SHAREHOLDING OF PROMOTER AND PROMOTER GROUP</b>									
1.	INDIAN									
a.	INDIVIDUALS/HINDU UNDIVIDED FAMILY	1748232	0	1748232	39.4794	1748272	9920	1758192	39.7043	0.2249
b.	CENTRAL GOVERNMENT/STATE GOVERNMENT(S)	0	0	0	0.0000	0	0	0	0.0000	0.0000
c.	BODIES CORPORATE	0	0	0	0.0000	0	0	0	0.0000	0.0000
d.	FINANCIAL INSTITUTIONS/BANKS	0	0	0	0.0000	0	0	0	0.0000	0.0000
e.	ANY OTHER									
	<b>SUB - TOTAL (A)(1)</b>	<b>1748232</b>	<b>0</b>	<b>1748232</b>	<b>39.4794</b>	<b>1748272</b>	<b>9920</b>	<b>1758192</b>	<b>39.7043</b>	<b>0.2249</b>
2.	FOREIGN									
a.	INDIVIDUALS (NON-RESIDENT INDIVIDUALS/FOREIGN INDIVIDUALS)	0	0	0	0.0000	0	0	0	0.0000	0.0000
b.	BODIES CORPORATE	0	0	0	0.0000	0	0	0	0.0000	0.0000
c.	INSTITUTIONS	0	0	0	0.0000	0	0	0	0.0000	0.0000
d.	QUALIFIED FOREIGN INVESTOR	0	0	0	0.0000	0	0	0	0.0000	0.0000
e.	ANY OTHER									
	<b>SUB - TOTAL (A)(2)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0.0000</b>
	<b>TOTAL SHARE HOLDING OF PROMOTER AND PROMOTER GROUP (A) = (A)(1)+(A)(2)</b>	<b>1748232</b>	<b>0</b>	<b>1748232</b>	<b>39.4794</b>	<b>1748272</b>	<b>9920</b>	<b>1758192</b>	<b>39.7043</b>	<b>0.2249</b>
<b>B.</b>	<b>PUBLIC SHAREHOLDING</b>									
1.	INSTITUTIONS									
a.	MUTUAL FUNDS/UTI	0	0	0	0.0000	0	0	0	0.0000	0.0000
b.	FINANCIAL INSTITUTIONS/BANKS	0	0	0	0.0000	0	0	0	0.0000	0.0000
c.	CENTRAL GOVERNMENT/STATE GOVERNMENT(S)	0	0	0	0.0000	0	0	0	0.0000	0.0000
e.	INSURANCE COMPANIES	0	0	0	0.0000	0	0	0	0.0000	0.0000
f.	FOREIGN INSTITUTIONAL INVESTORS	0	0	0	0.0000	0	0	0	0.0000	0.0000
g.	FOREIGN VENTURE CAPITAL INVESTORS	0	0	0	0.0000	0	0	0	0.0000	0.0000
h.	QUALIFIED FOREIGN INVESTOR	0	0	0	0.0000	0	0	0	0.0000	0.0000
i.	ANY OTHER									
	<b>SUB - TOTAL (B)(1)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0.0000</b>

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)

Category code	Category of Shareholders	No. of shares held at the beginning of the year				No. 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.	NON-INSTITUTIONS									
a.	BODIES CORPORATE	1200	45040	46240	1.0442	9280	26160	35440	0.8003	-0.2438
b.	INDIVIDUALS -									
	I INDIVIDUAL SHAREHOLDERS HOLDING NOMINAL SHARE CAPITAL UPTO RS. 1 LAKH	58520	403400	461920	10.4313	78400	384280	462680	10.4484	0.0171
	II INDIVIDUAL SHAREHOLDERS HOLDING NOMINAL SHARE CAPITAL IN EXCESS OF RS.1 LAKH	35480	30080	65560	1.4805	35480	30080	65560	1.4805	0.0000
c.	QUALIFIED FOREIGN INVESTOR	0	0	0	0.0000	0	0	0	0.0000	0.0000
d.	ANY OTHER									
	FOREIGN CORPORATE BODIES	0	17040	17040	0.3848	0	17040	17040	0.3848	0.0000
	HINDU UNDIVIDED FAMILIES	240	0	240	0.0054	240	0	240	0.0054	0.0000
	NON RESIDENT INDIANS	1394190	694785	2088975	47.1742	1394270	694785	2089055	47.1760	0.0018
	Retirement Benefit Scheme	1394430	711825	2106255	47.5645	1394510	711825	2106335	47.5663	0.0018
	<b>SUB - TOTAL (B)(2)</b>	<b>1489630</b>	<b>1190345</b>	<b>2679975</b>	<b>60.5205</b>	<b>1517670</b>	<b>1152345</b>	<b>2670015</b>	<b>60.2956</b>	<b>-0.2249</b>
	<b>TOTAL PUBLIC SHAREHOLDING (B) = (B)(1)+(B)(2)</b>	<b>1489630</b>	<b>1190345</b>	<b>2679975</b>	<b>60.5205</b>	<b>1517670</b>	<b>1152345</b>	<b>2670015</b>	<b>60.2956</b>	<b>-0.2249</b>
	<b>TOTAL (A)+(B)</b>	<b>3237862</b>	<b>1190345</b>	<b>4428207</b>	<b>100.0000</b>	<b>3265942</b>	<b>1162265</b>	<b>4428207</b>	<b>100.0000</b>	<b>0.0000</b>
<b>C.</b>	<b>SHARES HELD BY CUSTODIANS AND AGAINST WHICH DEPOSITORY RECEIPTS HAVE BEEN ISSUED</b>									
	Promoter and Promoter Group	0	0	0	0.0000	0	0	0	0.0000	0.0000
	Public	0	0	0	0.0000	0	0	0	0.0000	0.0000
	<b>TOTAL CUSTODIAN (C)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0.0000</b>
	<b>GRAND TOTAL (A)+(B)+(C)</b>	<b>3237862</b>	<b>1190345</b>	<b>4428207</b>	<b>100.0000</b>	<b>3265942</b>	<b>1162265</b>	<b>4428207</b>	<b>100.0000</b>	<b>0.0000</b>

**IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity) (Contd.)**

**ii) Shareholding of promoters**

Name of the Company : CRIMSON METAL ENGINEERING COMPANY LTD

Sl. No	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in share holding during the year	FOLIO / DP_CL_ID	PAN	Pledged Shares at beginning of the Year	Pledged Shares at end of the Year
		No. of Shares	% of total shares of the Company	% of shares pledged / encumbered to total shares	No. of Shares	% of total shares of the Company	% of shares pledged / encumbered to total shares					
1	VINAY KUMAR GOYAL HAVING SAME PAN	538831	12.1681	0.0000	538831	12.1681	0.0000	0.0000	1204940000167961	AHOPG4904E	0	0
1	VINAY KUMAR GOYAL HAVING SAME PAN	0	0.0000	0.0000	9600	0.2167	0.0000	0.2167	00007985	AHOPG4904E	0	0
1	VINAY KUMAR GOYAL HAVING SAME PAN	0	0.0000	0.0000	320	0.0072	0.0000	0.0072	00007991	AHOPG4904E	0	0
1	VINAY KUMAR GOYAL	0	0.0000	0.0000	40	0.0009	0.0000	0.0009	1N30353410000730	AHOPG4904E	0	0
2	PREM CHAND GOYAL	423570	9.5652	0.0000	423570	9.5652	0.0000	0.0000	1204940000167923	ACUPG1545Q	0	0
3	PREMCHAND GOYAL AND SONS HUF .	327551	7.3969	0.0000	327551	7.3969	0.0000	0.0000	1204940000177885	AAHP2886D	0	0
4	SUNIL KUMAR GOYAL	249330	5.6304	0.0000	249330	5.6304	0.0000	0.0000	1204940000167942	ACUPG1485H	0	0
5	YASHOMATI GOYAL SAHUWALA	203430	4.5939	0.0000	203430	4.5939	0.0000	0.0000	1204940000169025	DOKPS3687Q	0	0
6	SHAKUNTALA DEVI	4560	0.1029	0.0000	4560	0.1029	0.0000	0.0000	1204940000168207	AKUPS2685P	0	0
7	ANURADHA GOYAL	320	0.0072	0.0000	320	0.0072	0.0000	0.0000	1204940000167864	AHOPG4905F	0	0
8	DEEPIKA GOYAL	320	0.0072	0.0000	320	0.0072	0.0000	0.0000	1204940000167879	AEAPG8661F	0	0
9	HINA DEVI GOYAL	320	0.0072	0.0000	320	0.0072	0.0000	0.0000	1204940000167883	AHLPG7138H	0	0

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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(iii) Change in Promoters' Shareholding (please specify, if there is no change)

Name of the Company : CRIMSON METAL ENGINEERING COMPANY LTD

Sl No	Name of the Share holder	Shareholding at the beginning of the year		Cumulative Shareholding during the year		FOLIO/ DP_CL_ID	PAN
		No of shares	% of total shares of the company	No of shares	% of total shares of the company		
1	VINAY KUMAR GOYAL At the beginning of the year 01-Apr-2018	538831	12.1681	538831	12.1681	'1204940000167961	AHOPG4904E
	At the end of the Year 30-Mar-2019	538831	12.1681	538831	12.1681		
1	HAVING SAME PAN VINAY KUMAR GOYAL At the beginning of the year 01-Apr-2018	0	0.0000	0	0.0000	'00007985	00
	Purchase 08-Mar-2019	9600	0.2167	9600	0.2167		
	At the end of the Year 30-Mar-2019	9600	0.2167	9600	0.2167		
1	HAVING SAME PAN VINAY KUMAR GOYAL At the beginning of the year 01-Apr-2018	0	0.0000	0	0.0000	'00007991	00
	Purchase 30-Mar-2019	320	0.0072	320	0.0072		
	At the end of the Year 30-Mar-2019	320	0.0072	320	0.0072		
1	HAVING SAME PAN VINAY KUMAR GOYAL At the beginning of the year 01-Apr-2018	0	0.0000	0	0.0000	'IN30353410000730	AHOPG4904E
	Purchase 29-Mar-2019	40	0.0009	40	0.0009		
	At the end of the Year 30-Mar-2019	40	0.0009	40	0.0009		
2	PREM CHAND GOYAL At the beginning of the year 01-Apr-2018	423570	9.5652	423570	9.5652	'1204940000167923	ACUPG1545Q
	At the end of the Year 30-Mar-2019	423570	9.5652	423570	9.5652		
3	PREMCHAND GOYAL AND SONS HUF . At the beginning of the year 01-Apr-2018	327551	7.3969	327551	7.3969	'1204940000177885	AAHP2886D
	At the end of the Year 30-Mar-2019	327551	7.3969	327551	7.3969		
4	SUNIL KUMAR GOYAL At the beginning of the year 01-Apr-2018	249330	5.6304	249330	5.6304	'1204940000167942	ACUPG1485H
	At the end of the Year 30-Mar-2019	249330	5.6304	249330	5.6304		
5	YASHOMATI GOYAL SAHUWALA At the beginning of the year 01-Apr-2018	203430	4.5939	203430	4.5939	'1204940000169025	DOKPS3687Q
	At the end of the Year 30-Mar-2019	203430	4.5939	203430	4.5939		
6	SHAKUNTALA DEVI At the beginning of the year 01-Apr-2018	4560	0.1029	4560	0.1029	'1204940000168207	AKUPS2685P
	At the end of the Year 30-Mar-2019	4560	0.1029	4560	0.1029		
7	ANURADHA GOYAL At the beginning of the year 01-Apr-2018	320	0.0072	320	0.0072	'1204940000167864	AHOPG4905F
	At the end of the Year 30-Mar-2019	320	0.0072	320	0.0072		
8	DEEPIKA GOYAL At the beginning of the year 01-Apr-2018	320	0.0072	320	0.0072	'1204940000167879	AEAPG8661F
	At the end of the Year 30-Mar-2019	320	0.0072	320	0.0072		
9	HINA DEVI GOYAL At the beginning of the year 01-Apr-2018	320	0.0072	320	0.0072	'1204940000167883	AHLPG7138H
	At the end of the Year 30-Mar-2019	320	0.0072	320	0.0072		

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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**IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity) (Contd.)**

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

**Name of the Company : CRIMSON METAL ENGINEERING COMPANY LTD**

Sl No	Name of the Share holder	Shareholding at the beginning of the year		Cumulative Shareholding during the year		FOLIO/ DP_CL_ID	PAN
		No of shares	% of total shares of the company	No of shares	% of total shares of the company		
1	JANARTHANAN .						
	At the beginning of the year 01-Apr-2018	1392857	31.4541	1392857	31.4541	'12047200	AMVPJ3766F
	At the end of the Year 30-Mar-2019	1392857	31.4541	1392857	31.4541	08291831	
2	CHANDRASHEKAR KRISHNA MURTHY						
	At the beginning of the year 01-Apr-2018	188200	4.2500	188200	4.2500	'00007795	ANUPC7533R
	At the end of the Year 30-Mar-2019	188200	4.2500	188200	4.2500		
3	GIRISH JHUNJHUNUWALA						
	JT1 : SURYAJHUNJHUNUWALA						
	At the beginning of the year 01-Apr-2018	134000	3.0260	134000	3.0260	'TL000104	
	At the end of the Year 30-Mar-2019	134000	3.0260	134000	3.0260		
4	SURYA JHUNJHUNUWALA						
	JT1 : GIRISH JHUNJHUNUWALA						
	At the beginning of the year 01-Apr-2018	106667	2.4088	106667	2.4088	'TL000112	
	At the end of the Year 30-Mar-2019	106667	2.4088	106667	2.4088		
5	VIDYADEVIJHUNJHUNUWALA						
	JT1 : SUNDER JHUNJHUNUWALA						
	At the beginning of the year 01-Apr-2018	79718	1.8002	79718	1.8002	'TL000105	
	At the end of the Year 30-Mar-2019	79718	1.8002	79718	1.8002		
6	VIDYA DEVI JHUNJHUNUWALA						
	JT1 : SHYAMSUNDARJHUNJHUNUWALA						
	At the beginning of the year 01-Apr-2018	64000	1.4452	64000	1.4452	'TL000151	
	At the end of the Year 30-Mar-2019	64000	1.4452	64000	1.4452		
7	SURYA JHUNJHUNUWALA						
	JT1 : GIRISH JHUNJHUNUWALA						
	At the beginning of the year 01-Apr-2018	60000	1.3549	60000	1.3549	'TL000152	
	At the end of the Year 30-Mar-2019	60000	1.3549	60000	1.3549		
8	GIRISH JHUNJHUNUWALA						
	JT1 : SURYA JHUNJHUNUWALA						
	At the beginning of the year 01-Apr-2018	60000	1.3549	60000	1.3549	'TL000153	
	At the end of the Year 30-Mar-2019	60000	1.3549	60000	1.3549		
9	BILASRAI GOYAL						
	At the beginning of the year 01-Apr-2018	35480	0.8012	35480	0.8012	'IN30036020	AEIPG8900M
	At the end of the Year 30-Mar-2019	35480	0.8012	35480	0.8012	013049	
10	KIRONCH						
	At the beginning of the year 01-Apr-2018	30080	0.6792	30080	0.6792	'TL000497	
	At the end of the Year 30-Mar-2019	30080	0.6792	30080	0.6792		
	NEW TOP 10 AS ON (30-Mar-2019)						



**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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**IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity) (Contd.)**

**(v) Shareholding of Directors and Key Managerial Personnel :**

**Name of the Company : CRIMSON METAL ENGINEERING COMPANY LTD**

SI No	Name of the Share holder	Shareholding at the beginning of the year		Cumulative Shareholding during the year		FOLIO/ DP_CL_ID	PAN
		No of shares	% of total shares of the company	No of shares	% of total shares of the company		
1	VINAY KUMAR GOYAL At the beginning of the year 01-Apr-2018 At the end of the Year 30-Mar-2019 HAVING SAME PAN	538831 538831	12.1681 12.1681	538831 538831	12.1681 12.1681	'1204940000167961	AHOPG4904E
1	VINAY KUMAR GOYAL At the beginning of the year 01-Apr-2018 Purchase 08-Mar-2019 At the end of the Year 30-Mar-2019 HAVING SAME PAN	0 9600 9600	0.0000 0.2167 0.2167	0 9600 9600	0.0000 0.2167 0.2167	'00007985	00
1	VINAY KUMAR GOYAL At the beginning of the year 01-Apr-2018 Purchase 30-Mar-2019 At the end of the Year 30-Mar-2019 HAVING SAME PAN	0 320 320	0.0000 0.0072 0.0072	0 320 320	0.0000 0.0072 0.0072	'00007991	00
1	VINAY KUMAR GOYAL At the beginning of the year 01-Apr-2018 Purchase 29-Mar-2019 At the end of the Year 30-Mar-2019	0 40 40	0.0000 0.0009 0.0009	0 40 40	0.0000 0.0009 0.0009	'IN30353410000730	AHOPG4904E

**(v) INDEBTEDNESS**

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

(Rs. in lakhs)

Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Indebtedness at the beginning of the financial year</b> i) Principal Amount ii) Interest due but not paid iii) Interest accrued but not due	151273880	3,60,58,149	NIL	187332029
<b>Total (i+ii+iii)</b>	<b>151273880</b>	<b>3,60,58,149</b>	<b>NIL</b>	<b>187332029</b>
<b>Change in Indebtedness during the financial year -</b> Addition - Reduction	- -1,29,63,569	- -3,60,58,149	NIL	-4,90,21,718
<b>Net Change</b>	<b>-1,29,63,569</b>	<b>-3,60,58,149</b>		<b>-4,90,21,718</b>
<b>Indebtedness at the end of the financial year</b> i) Principal Amount ii) Interest due but not paid iii) Interest accrued but not due	13,83,10,311	NIL NIL	NIL	13,83,10,311 NIL
<b>Total (i+ii+iii)</b>	<b>13,83,10,311</b>	<b>NIL</b>	<b>NIL</b>	<b>13,83,10,311</b>

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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**I. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**

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

S. No	Particulars of Remuneration	Name of MD/WTD/Manager			Total Amount
		VINAY KUMAR GOYAL	RAJARAM UMA	CHANDRAKESH PAL	
1.	Gross salary (a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	49,78,997	1,85,028	5,02,692	56,66,717
2.	Stock Option	Nil	Nil	Nil	Nil
3.	Sweat Equity	Nil	Nil	Nil	Nil
4.	Commission- as % of profit- others	Nil	Nil	Nil	Nil
5.	Others – Retirement benefits Provision for leave salary	Nil	Nil	Nil	Nil
	<b>Total (A)</b>	49,78,997	1,85,028	5,02,692	56,66,717
	Ceiling as per the Act	WITHIN SCHEDULE V LIMITS			

**B. Remuneration to other directors : NIL**

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

SN.	Particulars of Remuneration	Name of Key Managerial Personnel		Total Amount (Rs/Lac)
		MS. SIVAGAMI	MR. MANISH KUMAR RAI	
	Name	CFO	CS	
	Designation	CFO	CS	
1	Gross salary (a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	7,37,136	4,61,292	1198428
		-	-	-
		-	-	-
		-	-	-
2	Stock Option	-	-	-
3	Sweat Equity	-	-	-
4	Commission - as % of profit - others, specify	-	-	-
5	Others, please specify	-	-	-
	<b>Total</b>	7,37,136	4,61,292	1198428

**VII. PENALTIES / PUNISHMENT / COMPOUNDING OF OFFENCES: NIL**

**DECLARATION IN COMPLIANCE WITH THE CODE OF CONDUCT**

**This is to confirm that all the Board Members and the Senior Management have affirmed compliance with the Code of conduct for the year ended 31<sup>st</sup> March, 2018.**

For Crimson Metal Engineering Company Ltd.

Place: Chennai  
Date: 14<sup>th</sup> August 2019

Sd/-  
Vinay Kumar Goyal  
Managing Director  
DIN-00134026

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**ANNEXURE IV**

**MANAGEMENT DISCUSSION AND ANALYSIS REPORT**

I Industry structure and developments.

Crimson Metal Engineering Company Ltd is in to steel industry. Temporarily, we are not in our main line of business, albeit at low level, due to tough economic environment and will try to resume as situation warrants so.

II. Discussion on financial performance with respect to operational performance

As far as the financial performance of the company is concerned, During the year 2018-2019, the Company has earned a net profit after tax of Rs. 11,46,446 as against Rs. 58,15,030 earned in the previous year. On the sales front, the Company has achieved a turnover of about Rs. 10,08,14,989 during the year 2018-2019 as against Rs. 33,37,39,092 achieved in 2017-2018.

III. Opportunities and Threats.

Once economy is revived and demand of the Company's Products improves, our company is confident of bounce back to its normal operations. However, prolonged weak economy and delay in its revival can dampen the resumption of normal operations which requires effective consideration on the part of the management

IV. Segment-wise or product-wise performance.

The company have been operating in single segment and product viz., manufacture of pipes and recently leased its manufacturing activities for the time being.

V. Outlook

Outlook of the industry continues to be weak. With the economy expecting to recover we can expect quick recovery.

VI. Risks & Concerns

The main risk to which the company is exposed to is the fluctuation in the Raw material prices and the competition from the various competitors.

VII. Internal Control Systems

The Company has, in all material respects, an adequate internal financial control system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2019 based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control. The Company has an adequate Internal Control system, commensurate with the size, scale and complexity of its operations. During the year, such controls were tested and no reportable material weaknesses in the design or operation were observed. The company at present is not having an internal auditor and the company is in the process of appointing the same

VII. Material developments in Human Resources / Industrial Relations front, including number of people employed

No Material developments have occurred in Human Resources / Industrial Relations front.

VIII. Cautionary Statement:

Statement in the management discussion, prescribing the company's objective and expectations may be "forward looking statements" within the meaning of applicable SEBI laws and regulations. Actual results may differ materially from those expressed or implied. Important factors that could make a difference to the company's operations include economic demand/ supply and price conditions in the domestic/ international markets, change in government regulations, tax laws, other statutes and incidental factors.

**DISCLOSURE OF ACCOUNTING TREATMENT:**

No differential treatment has been followed during the financial year 2018 – 2019 in preparation of the financial statements.

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**INDEPENDENT AUDITORS' REPORT**

**TO THE MEMBERS OF CRIMSON METAL ENGINEERING COMPANY LIMITED**

**REPORT ON THE Ind AS FINANCIAL STATEMENTS**

We have audited the accompanying Ind AS financial statements of CRIMSON METAL ENGINEERING COMPANY LIMITED ("the Company"), which comprise the Balance Sheet as at March 31, 2019, and the Statement of Profit and Loss (including Other Comprehensive Income), the Cash Flow Statement and the Statement of change in Equity for the year then ended, and a summary of significant accounting policies and other explanatory information.

**MANAGEMENT'S RESPONSIBILITY FOR THE Ind AS FINANCIAL STATEMENTS**

The Company's Board of Directors is responsible for the matters stated in Section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these Ind AS financial statements that give a true and fair view of the financial position, financial performance including other comprehensive income, cash flows & changes in equity of the Company in accordance with the accounting principles generally accepted in India, including the Indian Accounting Standards Ind AS prescribed under Section 133 of the Act, read with rule 7 of the Companies (Accounts) Rules, 2014.

This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities, selection and application of the appropriate accounting policies, making judgements and estimates that are reasonable and prudent, and the design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the Ind AS financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

**AUDITORS' RESPONSIBILITY**

Our responsibility is to express an opinion on these Ind AS financial statements based on our audit. We conducted our audit of the Ind AS financial statements in accordance with the Standards on Auditing specified under Section 143(10) of the Act. Those Standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the Ind AS financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the Ind AS financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the Ind AS financial statements, whether due to fraud or error. In making those risk assessments; the auditor considers internal control relevant to the Company's preparation and fair presentation of the Ind AS financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of the accounting estimates made by management, as well as evaluating the overall presentation of the Ind AS financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Ind AS financial statement.

**OPINION**

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

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS**

1. As required by Section 143(3) of the Act, we report to the extent applicable that:

- a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit;
- b) In our opinion, proper books of account as required by law have been kept by the Company so far as appears from our examination of those books.
- c) The Balance Sheet, the Statement of Profit and Loss including other Comprehensive Income, the 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 Indian Accounting Standards prescribed under section 133 of the Act.
- e) On the basis of the written representations received from the directors as on March 31, 2019, taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2019, from being appointed as a director in terms of Section 164(2) of the Act.
- f) With respect to the adequacy of the internal financial controls over financial reporting of the company and the operating effectiveness of such controls, refer to our separate report in "Annexure A". 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 included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rule, 2014, as amended, in our opinion and to the best of our information and according to the explanation given to us:
  - i) The company has disclosed the impact of pending litigation on its financial position in its Ind AS financial statement.
  - ii) The company has made provision, as required under the applicable law or Accounting Standards, for material foreseeable losses, if any, on long term contracts including derivative contracts.
  - iii) There has been no delay in transferring amounts, required to be transferred, to the Investor's Education and Protection Fund by the company.

2. As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government of India in terms of Section 143(3) of the Act, we give in the "Annexure B" a statement on the matters specified in paragraphs 3 and 4 of the Order.

**For VISHAL JAIN & CO.,**  
**Chartered Accountants**  
**(FRN. 0541075)**

**(VISHAL JAIN)**  
**Proprietor**  
**M No 209530**

**Place : Bangalore**  
**Date : 30.05.2019**

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**Annexure “A” to the Independent Auditors’ Report on the Ind AS Financial Statements of Crimson Metal Engineering Company Limited.**

**Report on the Internal Financial Controls over Financial Reporting 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 M/s. Crimson Metal Engineering Company Limited (“the Company”) as of 31<sup>st</sup> March 2019 in conjunction with our audit of the standalone 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 Ind AS 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 Ind AS 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 Ind AS 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 Ind AS financial statements.

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

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**Inherent Limitations of Internal Financial Controls over Financial Reporting**

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

**Opinion**

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

**For VISHAL JAIN & CO.,**  
**Chartered Accountants**  
**(FRN. 0541075)**

**(VISHAL JAIN)**  
**Proprietor**  
**M No 209530**

**Place : Bangalore**  
**Date : 30.05.2019**

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**Annexure - B to the Independent Auditors' Report on the Financial Statements of Crimson Metal Engineering Company Limited**

**The Annexure referred to in paragraph 1 of our Report of even date to the members of Crimson Metal Engineering Company Limited. On the accounts of the Company for the year ended 31<sup>st</sup> March, 2019.**

On the basis of such checks as we considered appropriate and according to the information and explanation given to us during the course of our audit, we report that:

1. (a) The company has maintained proper records showing full particulars including quantitative details and situation of its fixed assets.  
  
(b) As explained to us, fixed assets have been physically verified by the management at reasonable intervals; no material discrepancies were noticed on such verification. In our opinion the frequency of verification is reasonable  
  
(c) The title deeds of immovable properties are held in the name of the Company.
2. (a) As explained to us, inventories have been physically verified during the year by the management at reasonable intervals.  
  
(b) In our opinion and according to the information and explanations given to us, the procedures of physical verification of inventories followed by the management are reasonable and adequate in relation to the size of the company and the nature of its business. The Company is generally maintaining proper records of its inventories. No material discrepancy was noticed on physical verification of stocks by the management as compared to book records.
3. (a) According to the information and explanations given to us and on the basis of our examination of the books of account, the Company has not granted any loans, secured or unsecured, to companies, firms or other parties listed in the register maintained under Section 189 of the Companies Act, 2013. Therefore the provision of clause 3(3a), (3b) and (3c) of the said order are not applicable to the Company.
4. In our opinion, and according to the information and explanations given to us, the Company has not given any loan nor made any investment and not provided guarantee or any security as such the provisions of Section 185 and 186 of the Companies Act, 2013 is not applicable on the Company.
5. The Company has not accepted any Deposits from the public within the meaning of section 73, 74, 75 and 76 of the Act and the rules framed there under to the extent notified.
6. We have broadly reviewed the cost records maintained by the Company pursuant to the Rules prescribed by the Central Government under Section 148(1) of the Companies Act, 2013 and are of the opinion that prima facie, the prescribed cost records have been made and maintained. We have, however, not made a detailed examination of the cost records with a view to determine whether they are accurate or complete.
7. (a) According to the information and explanations given to us and the records of the Company examined by us, in our opinion, the Company is regular in depositing the undisputed statutory dues, including Provident Fund, Employees' State Insurance, Income Tax, Sales Tax, Service Tax, Goods & Service Tax, Custom Duty, Excise Duty, Value Added Tax, cess and other material statutory dues, as applicable, with the appropriate authorities.  
  
(b) According to the information and explanations given to us and the records of the Company examined by us, the particulars of dues of income tax, sales tax, service tax, duty of customs and duty of excise duty, value added tax as at [balance sheet date] which have not been deposited on account of a dispute, are as follows:



**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

Name of the statute	Nature of dues	Amount (Rs.in Lakhs)	Period to which the amount relates	Forum where the dispute is pending
Central Excise Act, 1944	Adoption of Incorrect Jobwork Value	9.71	A/Y 2005-06	Hon'ble Madras High Court
Central Excise Act, 1944	Wrong Availment of Cenvat	154.69	A/Y 2006-07	Hon'ble Madras High Court
ESI	Additional Demand	7.09	A/Y 2009-13	ESI Court, Puducherry

8. According to the records of the Company examined by us and the information and explanation given to us, the Company has not defaulted in repayment of loans or borrowings to any financial institution or bank or government as of the balance sheet date.
9. The Company has not raised any moneys by way of initial public offer, further public offer (including debt instruments) and term loans. Accordingly, the provisions of Clause 3(9) of the Order are not applicable to the Company.
10. During the course of our examination of the books and records of the Company, carried out in accordance with the generally accepted auditing practices in India, and according to the information and explanations given to us, we have neither come across any instance of material fraud by the Company or on the Company by its officers or employees, noticed or reported during the year, nor have we been informed of any such case by the Management.
11. The Company has provided for Managerial Remuneration in Accordance with the Provision of Section 197 read with Section V to the Act. The Company has made the payment to Managing Director in excess of Approved amount as per the information and explanation given to us this shall be ratified in forth coming Annual General Meeting.
12. As the Company is not a Nidhi Company and the Nidhi Rules, 2014 are not applicable to it, the provisions of Clause 3(12) of the Order are not applicable to the company.
13. In our opinion and according to the information and explanations given to us, the company is in compliance with Section 177 and 188 of the Companies Act, 2013, where applicable, for all transactions with the related parties and the details of related party transactions have been disclosed in the Ind AS financial statements etc. as required by the applicable accounting standards.
14. The Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review<sup>39</sup>. Accordingly, the provisions of Clause 3(14) of the Order are not applicable to the company.
15. The Company has not entered into any non-cash transactions with its directors or persons connected with him. Accordingly, the provisions of Clause 3(15) of the Order are not applicable to the Company.
16. The Company is not required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934. Accordingly, the provisions of Clause 3(16) of the Order are not applicable to the Company.

**For VISHAL JAIN & CO.,**  
**Chartered Accountants**  
**(FRN. 0541075)**

**(VISHAL JAIN)**  
**Proprietor**  
**M No 209530**

**Place : Bangalore**  
**Date : 30.05.2019**

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**BALANCE SHEET AS AT 31<sup>ST</sup> MARCH 2019**

Particulars	Note	Amount in Rupees	
		As at 31st March,2019	As at 31st March,2018
<b>A ASSETS</b>			
<b>1 Non-Current Assets</b>			
(a) Property, Plant and Equipment	2	139,430,609	147,560,641
(b) Capital Work-in-Progress			
(c) Investment Property			
(d) Goodwill			
(e) Other Intangible Assets			
(f) Intangible assets under development			
(g) Biological Assets other than bearer plants			
(h) Financial Assets			
(i) Investments			
(ii) Trade Receivables			
(iii) Loans			
(iv) Others	3	17,894,812	14,602,059
(i) Deferred tax assets (net)			
(j) Other Non-Current Assets	4	33,474	33,474
<b>2 Current Assets</b>			
(a) Inventories	5	12,704,301	18,736,253
(b) Financials Assets			
(i) Investments			
(ii) Trade Receivables	6	23,164,972	76,118,719
(iii) Cash and Cash Equivalents	7	2,930,479	586,759
(iv) Bank balance other than mentioned above	8	612,973	612,973
(v) Loans			
(vi) Other financials assets	9	3,524,011	2,716,552
(c) Current Tax Assets (Net)			
(d) Other Current Assets	10	24,354,678	58,444,199
<b>Total Assets (1+2)</b>		<b>224,650,311</b>	<b>319,411,629</b>
<b>B EQUITY AND LIABILITIES</b>			
<b>1 (a) Equity Capital</b>	11	44,282,070	44,282,070
<b>(b) Other Equity</b>	12	7,895,579	6,749,133
<b>Total Equity</b>			
<b>2 Liabilities</b>			
<b>(a) Non-Current Liabilities</b>			
<b>(i) Financial Liabilities</b>			
- Borrowings	13	138,310,311	187,332,029
- Trade Payable			
- Other Financial Liabilities			
<b>(ii) Provisions</b>	14	2,667,918	2,777,009
<b>(iii) Deferred Tax Liabilities (Net)</b>		8,507,952	8,507,952
<b>(iv) Other non-current liabilities</b>			
<b>(b) Current Liabilities</b>			
<b>(i) Financial Liabilities</b>			
- Borrowings		-	-
- Trade Payable			
- Dues to micro and small enterprises			
- Dues to Others	15	769,905	6,036,791
- Other Financial Liabilities			
<b>(ii) Other Current Liabilities</b>	16	22,216,576	63,726,645
<b>(iii) Provisions</b>			
<b>(iv) Current Tax Liabilities (net)</b>			
<b>Total Equity and Liabilities</b>		<b>224,650,311</b>	<b>319,411,630</b>

Significant Accounting Policies and Notes on Financial Statements 1 to 33

As per our report of even date  
for JAIN VISHAL AND CO  
Chartered Accountants,

for and on behalf of the Board  
**(S. SIVAGAMI)**  
Chief Financial Officer  
**(VINAY GOYAL)**  
Managing Director  
DIN : 00134026

Place: Chennai / Bangaluru  
Date: 30.05.2019

**(CA VISHAL JAIN)**  
Proprietor  
M.No.209530

**(MANISH KUMAR RAI)**  
Company Secretary

**(CHANDRAKESH PAL)**  
Whole time Director  
DIN:07277936

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)

**PROFIT & LOSS ACCOUNT FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2019**

PARTICULARS	NOTES	Amount in Rupees	
		Year ended As at 31st March, 2019	Year ended As at 31st March, 2018
A	Revenue from operations		
	(a) Net sales/income from operations	17	98,510,049
	(b) Other Income	18	2,304,940
	<b>Total income from operations net</b>		<b>100,814,989</b>
B	Expenses		
	(a) Purchase of Material	19	43,014,503
	(b) Purchases of Stock in Trade		-
	(c) Consumable store Obsolete Stock		-
	(d) Employee benefits expense	20	1,624,837
	(e) Depreciation and amortisation expense		11,222,413
	(f) Finance costs	21	23,193,145
	(g) Other expenses	22	20,327,034
	<b>Total expenses</b>		<b>99,381,931</b>
	<b>Profit before tax</b>		<b>1,433,058</b>
	Tax expense		
	Current Tax	23	286,612
	Deferred Tax	24	-
	<b>Profit for the period</b>		<b>1,146,446</b>
	Other Comprehensive income		
	A (i) Items that will not be reclassified to profit or loss		
	(ii) Income tax relating to items that will not be reclassified to profit or loss		
	B (i) Items that will be reclassified to profit or loss		
	(ii) Income tax relating to items that will be reclassified to profit or loss		
	Total Other Comprehensive Income for the period / Year (Comprising profit and other comprehensive Income for the period)		-
	Total Comprehensive Income for the period / Year (Comprising profit and other comprehensive Income for the period)		1,146,446
	Total other comprehensive income net of tax		-
	Total comprehensive income for the period		5,815,029
	Earnings per Equity share		
	Equity shares of par value Rs. 10 each		
	Basic and Diluted		
	Basic and Diluted		

As per our report of even date  
for JAIN VISHAL AND CO  
Chartered Accountants,

(CA VISHAL JAIN)  
Proprietor  
M.No.209530

Place: Chennai / Bangaluru  
Date: 30.05.2019

for and on behalf of the Board  
(S. SIVAGAMI) (VINAY GOYAL)  
Chief Financial Officer Managing Director  
DIN : 00134026

(MANISH KUMAR RAI) (CHANDRAKESH PAL)  
Company Secretary Whole time Director  
DIN:07277936

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)

**CASH FLOW STATEMENT FOR THE YEAR ENDED 31 ST MARCH 2019**

Particulars	Note	Amount in Rupees	
		Year ended As at 31st March, 2019	Year ended As at 31st March, 2018
Cash Flow from Operating Activities:			
Net Profit Before Tax		1,433,058	5,855,283
Depreciation		11,222,413	11,067,288
Interest Paid		23,193,145	22,446,092
Loss on Sale of Fixed Asset		-	-
Interest Received		(2,290,940)	(1,189,714)
Other Income		(10,000)	-
Insurance Claim Received		-	(183,979)
Sundry Balance Write Back			
Lease Rent Received			
<b>Operating Profit before Working Capital Changes</b>		<b>33,547,675</b>	<b>37,994,971</b>
Adjustment For:			
Inventories		6,031,952	463,100
Trade Receivables		52,953,747	(15,319,204)
Long Term Loans & Advances		(807,460)	5,953,946
Short Term Loans and Advances		34,089,521	(52,862,796)
Trade Payables		(5,266,886)	(50,053,128)
Other Current Liabilities		(41,510,070)	52,420,688
Cash generated from Operation		79,038,479	(21,402,423)
Less: Tax Paid		286,612	1,171,057
<b>Net Cash Used in Operating Activity</b>	<b>(A)</b>	<b>78,751,868</b>	<b>(22,573,480)</b>
Cash Flow from Investing Activities:			
Loss on Sale of Fixed Assets			
Sale of Fixed Assets			
Purchase of Fixed Assets		(3,092,381)	(29,490,272)
Other Long Term Liability		(3,292,753)	(4,998,655)
Insurance Claim Received			
Sundry Balance Written back			
Lease Rent received			
<b>Net Cash used in Investing Activities</b>	<b>(B)</b>	<b>(6,385,134)</b>	<b>(34,488,927)</b>
Cash Flow from Financing Activities			
Proceed from Long Term Borrowings		(49,130,809)	19,042,794
Proceed from Short Term Borrowings		-	-
Other Income		10,000	183,979
Interest Received		2,290,940	1,189,714
Interest Paid		(23,193,145)	(22,446,092)
Net Cash from Financing Activities	<b>(C)</b>	(70,023,013)	(2,029,605)
<b>Net Increase/ ( Decrease )</b>	<b>[A+B+C]</b>	<b>2,343,720</b>	<b>(59,092,013)</b>
In Cash or Cash Equivalents			
Opening Balance of Cash & Cash Equivalents		1,199,732	60,291,745
Closing Balance of Cash & Cash Equivalents		3,543,452	1,199,732
		<b>2,343,720</b>	<b>(59,092,013)</b>

As per our report of even date  
for JAIN VISHAL AND CO  
Chartered Accountants,

(CA VISHAL JAIN)  
Proprietor  
M.No.209530

Place: Chennai / Bangaluru  
Date: 30.05.2019

for and on behalf of the Board

(S. SIVAGAMI)  
Chief Financial Officer

(MANISH KUMAR RAI)  
Company Secretary

(VINAY GOYAL)  
Managing Director  
DIN : 00134026

(CHANDRAKESH PAL)  
Whole time Director  
DIN:07277936

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

**NOTES TO THE FINANCIAL STATEMENT**

As at and for the year ended March 31, 2019

**1. CORPORATE INFORMATION**

**CRIMSON METAL ENGINEERING COPMANY** is a public limited company domiciled in India and incorporated under the provisions of the Companies Act, 1956 under CIN: L27105TN1985PLCO11566 its shares are listed on Stock Exchanges in India. The Company is engaged in the manufacturing and selling a reputed Brand of Black Pipe (ERW Pipe) & G I Pipe. The company caters only domestic market.

**2. SIGNIFICANT ACCOUNTING POLICES**

**a. Basis of Preparation of Financial Statements:**

These financial statements have been prepared in accordance with the Indian Accounting Standards (hereinafter referred to as in 'Ind AS') as notified by Ministry of Corporate Affairs pursuant to section 133 of the Companies Act, 2013 read with Rule 3 of the Companies (Indian Accounting standard Rules, 2015 and Companies (Indian Accounting Standards) Amendment Rules, 2016

These financial statements for the year ended 31st March, 2019 are prepared under Ind AS. For all periods up to and including the year ended 31st March, 2017 , the Company prepared its financial statements under historical cost convention in accordance with the generally accepted Accounting Principles in India and the provision of the Companies Act, 2013 read with Section 133 of the Companies Act 2013, read with Rule 7 of the Companies (Accounts) rules 2014, till the standards of accounting or any addendum thereto are prescribed by Central Government in consultation with recommendation of the National Financial Reporting Authority, the existing Accounting Standards notified under Companies Act, 1956 shall continue to apply in all the material aspects with the accounting standards notified under Section 211(3C) (Companies (Accounting Standards) Rules, 2016, as amended) and other relevant provisions of the Companies Act, 2013 immediately before adopting Ind AS. The financial statements for the year ended 31st March, 2017 and the opening Balance Sheet as at 1st April, 2016 have been restated in accordance with Ind AS for comparative information.

The financial statements have been prepared on accrual and going concern basis. The accounting policies are applied consistently to all the periods presented in the financial statements, including the preparation of the opening Ind AS Balance Sheet as at 1st April, 2016 being the 'date of transition to Ind AS'. All assets and liabilities have been classified as Current or non-current as per the Company's normal operating cycle and other criteria as set out in the Division II of Schedule III to the Companies Act, 2013. Based on the nature of products and the time between acquisition of assets for processing and their realization in cash and cash equivalents, the Company has ascertained its operating cycle as 12 months for the purpose of current or non-current classification of assets and liabilities. These financial statements are prepared under the historical cost convention unless otherwise indicated.

**b. Use of Estimates:**

The preparation of the financial statements requires the Management to make judgments, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities and the disclosure of contingent liabilities, at the end of the reporting period. Although these estimates are based on the management's best knowledge of current events and actions, uncertainty about these assumptions and estimates could result in the outcomes requiring a material adjustment to the carrying amounts of assets or liabilities in future periods.

**c. Property, Plant and Equipment:**

The property, plant and equipment, acquired are stated at cost, net of accumulated depreciation and accumulated impairment losses, if any. The cost comprises purchase price, borrowing costs if capitalized criteria are met and directly attributable cost or bringing the assets to its working condition for the intended use. Any trade discounts and rebates are deducted in arriving at the purchase price.

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

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Subsequent expenditure related to an item of fixed assets is added to its book value only if it increases the future benefits from the existing asset beyond its previously assessed standard performance. All other expenses on existing property, plant and equipment, including day to day repair and maintenance expenditure and cost of replacing parts, are charged to the statement of profit and loss for the period during which such expenses are incurred.

Losses arising from the retirement of, and gains or losses arising from disposal of the property, plant and equipment which are carried at cost are recognized in the Statement of Profit and Loss.

**d. Depreciation:**

Depreciation on tangible assets is calculated on Straight Line value method (SLV) on the property, plant and equipment using the rates arrived at based on the useful lives estimated by the management or those prescribed under the Schedule II to the Companies Act, 2013.

Depreciation for additions to/deletions from owned assets is calculated on pro-rata from/to the day of addition/deletion.

**e. Inventories:**

Raw materials, components, store and spares are valued at lower of cost and net realizable value. However, materials and other items held for use in the production of inventories are not written down below cost if the finished products in which they will be incorporated are expected to be sold at or above cost. Cost of raw materials, components and stores and spares is determined on a weighted average basis.

Work in progress and finished goods are valued at lower of cost and net realizable value. Cost includes direct materials and labour and a proportion of manufacturing overheads based on normal operating capacity.

Scrap is valued at net realisable value. Net realizable value is estimated at selling price in the ordinary course of business.

**f. Impairment of Assets (AS-28):**

The assessment is done at each Balance Sheet date as to whether there is any indication that an asset (tangible and intangible) may be impaired. In the opinion of the company, the recoverable amount of the fixed assets of the company will not be lower than the book value of the fixed assets. Hence no provision has been made for impairment.

**g. Revenue Recognition:**

Revenue from sale of products manufactured, sale of products traded and sale or supply of services is recognized when practically all obligations connected with the transaction risks and rights to the buyer have been fulfilled and excluded sales tax and state value added taxes. This usually occurs upon dispatch and collection of the receivable is reasonably certain.

**h. Other Income:**

Interest income is recognized using time proportion method based on the rates implicit in the transaction.

**i. Employee's Benefits:**

- (a)** Contribution to Provident Fund and other recognised fund is charged to profit and loss account.
- (b)** Liability for Leave Encashment is provided for as and when the entitlement is ascertained.
- (c)** In respect of Gratuity, the Company offers a non contributory defined benefit plan to its employees. The liability for the same as at the year end is provided for on the bases of actuarial valuation.

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**j. Excise Duty/Service Tax/Sales Tax/Goods and Service Tax/ and Value added Tax:**

Excise duty/Service Tax/Goods and Services Tax is accounted on the basis of both, payments made in respect of goods cleared/ services provided as also provision made for goods lying in bonded warehouse if there is Sales Tax/ Value added Tax/Goods and Services Tax is charged to profit and loss account.

**k. Taxation:**

**Current Tax:**

Provision for Current Tax is made after taking into consideration benefits admissible under the provisions of Income Tax act 1961.

**Deferred Taxes:**

Deferred tax resulting from "Timing difference" between taxable and accounting income is accounted for using the Tax rate and loss that are enacted or substantively enacted as on the balance sheet date. Deferred Tax Liability is recognized and carried forward only to the extent that there is a virtual certainty that the assets will be realized in future.

**l. Segment reporting:**

The accounting policies adopted for segment reporting are in line with the accounting policies stipulated. The company primarily operates in single business segment which is steel tubes (Black and GI pipes), and accordingly there are no primary segments to be reported as per Ind AS 108 "Operating Segments".

**m. Earning per share:**

The basic earnings per share is computed by dividing the net profit or loss for the period attributable to the equity shareholders by the weighted average number of equity shares outstanding during the reporting period . The number of shares used in computing diluted earnings per share and also the weighted average number of shares considered for deriving basic earnings per share which may be issued on the conversion of all dilutive potential shares, unless the results would be anti-dilutive.

**n. Contingent Liabilities:**

- i. Central Excise dues for the A/Y 2005 - 06 Rs.9.71 lakhs for which no provision has being made in the books of accounts and appeal is filed before Hon'ble High Court of Madras, being contingent on the judgment of the Hon'ble High Court.
- ii. Central Excise dues for the A/Y 2006 - 07 Rs.154.69 lakhs for which no provision has being made in the books of accounts and appeal is filed before Hon'ble High Court of Madras, being contingent on the judgment of the Hon'ble High Court
- iii. Additional Demand of ESI for the Period AY 2009 – 10 of Rs. 7.09 Lakhs for which no provision has been made the books of accounts and appeal is filed before Hon'ble ESI Court of Puducherry, being contingent on the judgment of the Hon'ble ESI Court of Puducherry.

**o. Lease Rent:**

The company has leased out the 48,298 sq.mt. factory shed and depreciated machinery valued at Rs.7.34 crore to M/s. Ganges Internationale Pvt Ltd for Rs.1,20,00,000/- annually and as per the agreement, M/s. Crimson Metal Engineering Ltd shall have absolute rights to all scraps generated by M/s. Ganges Internationale Pvt ltd and shall be utilized in whatever manner. Accordingly, the AS-17 has not been followed by the company.

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**NOTES**                      **Notes on Financial Statements for the Year ended 31st March, 2019**                      *Amount in Rs.*

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>3. OTHER FINANCIAL ASSETS</b> (Unsecured, considered good unless otherwise stated)		
<b>NON-CURRENT</b>		
Security and other deposits	17,894,812	14,602,059
	<b>17,894,812</b>	<b>14,602,059</b>
<b>4. OTHER NON-CURRENT ASSETS</b>		
Security Deposits with excise, EB and Other Government Authorities	33,474	33,474
Capital Advances Other Advance includes advances for material(s) Less: Allowance for bad and doubtful advances		
	<b>33,474</b>	<b>33,474</b>
<b>5. INVENTORIES</b>		
Raw material	-	-
Finished goods	-	-
Other goods	-	-
stores and spares	12,704,301	18,736,253
	<b>12,704,301</b>	<b>18,736,253</b>
<b>6. TRADE RECEIVABLES</b>		
(Unsecured unless otherwise stated)		
Considered good	23,164,972	76,118,719
Considered doubtful		
Less: Allocance for bad and doubtful debts	<b>23,164,972</b>	<b>76,118,719</b>
<b>7. CASH AND CASH EQUIVALENTS</b>		
Cash on hand	122,030	53,942
Balance with Banks in current accounts	2,808,449	532,817
Term deposits with original matureity of less than three months Short term, highly liquid invesetments		
Treasury bills with roiginal maturity of less than three months	<b>2,930,479</b>	<b>586,759</b>



**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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Amount in Rs.

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>8. BANK BALANCES OTHER THAN CASH AND CASH EQUIVALENTS</b>		
Earmarked balances with banks		
unpaid dividend		
Margin money deposits		
Investments in term deposits [with original maturity of more than three months but less than twelve months]	612,973	612,973
	<b>612,973</b>	<b>612,973</b>
<b>9. OTHER FINANCIAL ASSETS</b>		
Advance to GENERAL PURCHASE	1,779,287	1,183,457
Advance for RAW MATERIAL		
Advance for Expenses		
Advances Others	1,744,725	1,533,094
	<b>3,524,011</b>	<b>2,716,551</b>
<b>10. OTHER CURRENT ASSETS</b>		
VAT credit receivable		
Excise duty receivable		
Service tax Credit	-	-
CENVAT receivable	-	0
GST receivable		
Other advance [includes prepaid expenses etc]	24,354,680	58,444,199
	<b>24,354,680</b>	<b>58,444,199</b>
<b>11. EQUITY SHARE CAPITAL</b>		
	Balance	
As at 1st April, 2016	44,282,070	
Changes in equity share capital during the year	-	
As at 31st March, 2017	44,282,070	
Changes in equity share capital during the year	-	
As at 31st March, 2018	44,282,070	
Changes in equity share capital during the year	-	
As at 31st March, 2019	44,282,070	

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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Amount in Rs.

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>12. OTHER EQUITY</b>		
A. Summary of Other Equity balance		
Capital Reserve		
Reserve State Subsidy	-	-
Forfeited Shares	-	-
Retained Earnings	-	-
Items of other Comprehensive Income		
- Remeasurements of defined benefit plans		
<b>Total Other Equity</b>	-	-

**12. STATEMENT OF CHANGES IN EQUITY**

	Reserves and Surplus		Items of Other Comprehensive Income(OCI)		Total	Total
	Capital Reserve	Retained Earnings	Remeasurements of net defined benefit plans	Debt Instruments through OCI		
<b>As at 1st April, 2018</b>		6,749,133			6,749,133	6,749,133
Profit for the year		1,159,456			1,159,456	1,159,456
<b>Total comprehensive income for the year</b>			-		-	-
<b>As at 31st March, 2019</b>	-	<b>7,908,589</b>	-		<b>7,908,589</b>	<b>7,908,589</b>
Profit for the year		-			-	-
<b>Total comprehensive income for the year</b>			-		-	-
<b>As at 31st March, 2019</b>	-	<b>7,908,589</b>	-		<b>7,908,589</b>	<b>7,908,589</b>

**Notes:2**  
to the financial statements for the year ended 31st Mar, 2019 Cont.)

	Land	Building	Plant & Machinery	Office Equipment	Tools & Equipment	Furniture & Fittings	Vehicles	Airconditioner & Water Cooler	Computer	Total
<b>Gross Block</b>										
Balance as at 1st April 2017 (Deemed Cost)	2,428,588	107,649,817	132,374,159	2,327,959	5,164,210	4,303,086	3,016,949	1,722,961	4,920,147	263,907,876
Additions	-	2,137,468	27,352,804	-	-	-	-	-	-	29,490,272
Disposals	-	-	-	-	-	-	-	-	-	-
Balance as at 31st March 2018	2,428,588	109,787,285	159,726,963	2,327,959	5,164,210	4,303,086	3,016,949	1,722,961	4,920,147	293,398,148
Additions	-	-	3,060,894	-	-	-	-	1,887	29,600	3,092,381
Disposals	-	-	-	-	-	-	-	-	-	-
Balance as at 31st March 2019	2,428,588	109,787,285	162,787,857	2,327,959	5,164,210	4,303,086	3,016,949	1,724,848	4,949,747	296,490,529
<b>Accumulated Depreciation</b>										
Balance as at 1st April 2017	-	35,285,887	78,967,849	2,211,561	4,906,000	4,087,932	3,016,949	1,636,812	4,657,229	134,770,219
Additions	-	3,480,257	7,587,031	-	-	-	-	-	-	11,067,288
Disposals	-	-	-	-	-	-	-	-	-	-
Balance as at 31st March 2018	-	38,766,144	86,554,880	2,211,561	4,906,000	4,087,932	3,016,949	1,636,812	4,657,229	145,837,507
Additions	-	3,480,257	7,732,423	-	-	-	-	359	9,374	11,222,413
Disposals	-	-	-	-	-	-	-	-	-	-
Balance as at 31st March 2019	-	42,246,401	94,287,303	2,211,561	4,906,000	4,087,932	3,016,949	1,637,170	4,666,603	157,059,920
<b>Net Block</b>										
Balance as at 1st April 2017	2,428,588	72,363,930	53,406,310	116,398	258,210	215,154	-	86,149	262,918	129,137,657
Balance as at 31st March 2018	2,428,588	71,021,141	73,172,083	116,398	258,210	215,154	-	86,149	262,918	147,560,641
Balance as at 31st March 2019	2,428,588	67,540,884	68,500,554	116,398	258,210	215,154	-	87,678	283,144	139,430,609

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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Amount in Rs.

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>13. BORROWINGS</b>		
<b>Borrowings</b>		
Term Loan from Bank of Ceylon	138,310,311	151,273,880
<b>Securities offered</b>		
Secured by Hypothecation of Plant & Machinery, Fixtures, Electrical Items & Miscellaneous items purchased/ to be purchased out of Term Loan		
<b>Collateral Security</b>		
Mortgage over land & Building situated at Plot No.A-73 to A-78, B-73 to B-86, B-89 to B-95, B-98 to B-104, Pipdic Industrial Estate, Sedarpet, Mailam Road, Puducherry-605111 Hypothecation of Machineries in the factory premises of the company situated at Puducherry		
<b>Guarantee</b>		
Personal guarantee of Mr. Vinay Goyal - Managing Director		
<b>Unsecured Loan</b>		
Inter Corporate Loans	-	36,058,149
TOTAL		
Current Maturity of Long Term Borrowings is shown in Note No.10- Other Current Liabilities		
	<b>138,310,311</b>	<b>187,332,029</b>
<b>OTHER FINANCIAL LIABILITIES</b>		
<b>NON-CURRENT</b>		
Security Deposits	-	-
Total(A)	-	-
<b>CURRENT</b>		
Other payable (payable for purchase of property, plant and equipemnt, employee liability etc)		
Total(B)		
Total (A +B)		
a. There no amounts due for payment to the Investor Education and Protection fund under section 125 of companies act 125 of the Companies Act 2013 as at 31st March 2018 (31st March 2017 Nil, 1st April 2016 Nil)		
<b>14. PROVISIONS</b>		
<b>NON-CURRENT</b>		
Provisions for employee benefits (pension, compensated absence and others (refer note no.xx)	2,667,918	2,777,009
Other provisions (including restructuring etc)		
Total(A)	<b>2,667,918</b>	<b>2,777,009</b>
<b>CURRENT</b>		
Provisions for employee benefits (pension, compensated absence and others (refer note no.xx)	-	-
Total(B)	-	-
Total (A +B)	2,667,918.00	2,777,009.00

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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*Amount in Rs.*

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>OTHER NON-CURRENT LIABILITIES</b>		
Advance for land		
Employee and ex-employee related liabilities		
Total	-	-
<b>SHORT TERM BORROWINGS</b>		
Secured		
Central Bank of India	-	-
(Secured by hypothecation of Stock in Trade, receivable, EM on Factory Land, Building, Plant & Machinery, all moveable and immovable assets and personal guarantee of Managing Director of the Company)		
Unsecured		
From directors	-	-
inter corporate loans	-	-
Total	-	-
<b>15. TRADE PAYABLE</b>		
<b>DUES TO MICRO AND SMALL ENTERPRISES</b> (as per intimation received from vendor)		
a. Principal and interest amount remaining unpaid		
b. Interest due thereon remaining unpaid		
c. Interest paid by the Company in terms of Sections 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		
d. 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 Enterprise Act, 2006		
e. Interest accrued and remaining unpaid		
f. Interest remaining due and payable even in succeeding years, until such date when the interest dues as above are actually paid to these small enterprises		
<b>DUES TO OTHERS</b>		
Acceptances		
Trade payable	769,905	6,036,791
Total	<b>769,905</b>	<b>6,036,791</b>
<b>16. OTHER CURRENT LIABILITIES</b>		
Salaries, wages, bonus and other employee payable	3,683,594	9,655,315
Statutory dues (including provident fund, tax deducted at source and others)	667,883	2,609,300
Advance from customers	1,065,098	2,190,444
Other payables	16,800,000	49,271,586
	<b>22,216,576</b>	<b>63,726,645</b>

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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Amount in Rs.

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>17. REVENUE FROM OPERATIONS</b>		
Sale of products	-	170,280,306
Others - sale of scrap, commission etc	43,414,503	162,085,093
Lease Rental Income	55,095,546	-
	<b>98,510,049</b>	<b>332,365,399</b>
<b>18. OTHER INCOME</b>		
Interest Income		
Bank deposits	-	-
Others	2,300,940	1,189,714
Other Misc income	4,000	183,979
	<b>2,304,940</b>	<b>1,373,693</b>
<b>19. COST OF MATERIALS CONSUMED</b>		
<b>Purchase of Material</b>		
Opening Stock	-	-
Add: Purchase	43,014,503	157,074,081
Less: Closing Stock	-	-
<b>Purchase of Material (A)</b>	<b>43,014,503</b>	<b>157,074,081</b>
Manufacturing Expenses		
Carriage Inward	-	2,003,778
Power & Fuel	-	46,889,811
Labour Charges	-	6,497,589
<b>Cost of Stores Obsolete</b>	-	10,580,621
Machinery Maintenance	-	386,791
<b>TOTAL</b>	<b>-</b>	<b>66,358,590</b>
<b>TOTAL COST OF MATERIALS CONSUMED</b>	<b>43,014,503</b>	<b>223,432,672</b>
<b>20. EMPLOYEE BENEFITS EXPENSES</b>		
Salary	1,284,006	13,568,168
Gratuity	22,120	342,623
Bonus	50,522	186,732
P.F. Company's Contribution	24,757	372,323
E.S.I Company's Contribution	17,812	1,167,425
Staff Welfare	225,620	328,782
	<b>1,624,837</b>	<b>15,966,053</b>

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
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Amount in Rs.

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>21. FINANCE COST</b>		
Interest To Bank	19,230,852	18,707,038
Bank Charges	34,007	105,340
Interest To Others	3,928,286	3,633,715
	<b>23,193,145</b>	<b>22,446,092</b>
<b>DEPRECIATION AND AMORTISATION EXPENSES</b>		
Depreciation on property, plant and equipment	11,222,413	11,067,288
	<b>11,222,413</b>	<b>11,067,288</b>
<b>22. OTHER EXPENSES</b>		
<b>A. MANAGERIAL REMUNERATION:</b>		
Directors Salary	5,666,717	6,489,215
	<b>5,666,717</b>	<b>6,489,215</b>
<b>B. PAYMENT TO AUDITORS</b>		
Audit Fees	-	-
Tax Audit Fees	100,000	100,000
I.T Matters	80,000	80,000
Vat Audit Fees	-	-
	<b>180,000</b>	<b>180,000</b>
<b>C. INSURANCE EXPENSES</b>		
Insurance	93,004	406,069
	<b>93,004</b>	<b>406,069</b>
<b>D. POWER &amp; FUEL EXPENSES</b>		
Power & Fuel	-	-
<b>E. OTHERS :</b>		
Rent & lease rent	4,596,240	4,263,410
Postage & telegram	164,208	209,535
Telephone	113,440	202,232
Travelling expenses	280,195	500,743
Printing & stationery	89,379	70,127
Subscription & membership	64,131	72,644
Fees	832,430	329,449
Office maintenance	265,165	1,024,159
Miscellaneous expenses	156,743	237,423
Professional charges	738,414	970,386
Service Tax Expenses	-	55,662
Rates & taxes	848,683	1,292,302
Repairs & maintenance	131,822	428,069
Bad debts	-	2,284,092
Freight & transportation	2,500	5,017,575
Advertisement	72,010	64,710
Sales promotion	-	176,662
Swacch bharat cess	-	83,992
Commission & Brokerage	-	21,769
Loss on sale of stores stock	6,031,952	-
Quantitative Discount allowed	-	30,591,479
<b>TOTAL (E)</b>	<b>14,387,313</b>	<b>47,896,419</b>
<b>Grand Total - Other exp</b>	<b>20,327,034</b>	<b>54,971,703</b>

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

Amount in Rs.

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>23. CURRENT TAX</b> Income Tax Provision for the Current Tax	<b>286,612</b>	<b>1,171,057</b>
<b>24. DEFERRED TAX</b> Provision for Deferred Tax for the Year	-	<b>(1,130,803)</b>
<b>25. EARNINGS PER SHARE</b> The following reflects the profit and share data used in the basic and diluted EPS computations		
Profit after Tax	1,166,447	5,815,029
Net Profit for EPS calculation	1,166,447	5,815,029
Weighted average number of shares outstanding during the year (Nominal value of Rs.10/-per share each) in absolute numbers	4,428,207	4,428,207
Basic and diluted earning per share	<b>0.26</b>	<b>1.31</b>
<b>26. CONTINGENT LIABILITIES</b>		
(i) On account of pending appeals of Central Excise		
(a) Job Work-incorrect adoption of value vide ref:V/73/15/61/2004-CXADJ/8/02/05 for Rs.20226475/-	20,226,475	20,226,475
(b) Availment of Cenvat credit vide ref.V/73/15/100/2005-CX ADJ/25/01/06 for Rs.16506601/-	16,506,601	16,506,601
( c ) Removal of waste & scrap without payment of duty vide ref: V/Ch.73/15/55/2006-CX ADJ/29/01/09 for Rs.1318706/-	1,318,706	1,318,706
(ii) Electricity tax on electricity bill Pondy Rs.13.10 lacs	1,310,000	1,310,000
(iii) ESI Additional demand	787,622	709,096
<b>27. SEGMENT REPORTING</b> As per information given to us and to the best of our knowledge company is only manufacturing of Skelp, MS Pipes & GI Pipes and Operating from one Place therefore segment reporting in this case is not applicable.		
<b>28. EARNINGS AND EXPENSES IN FOREIGN CURRENCY</b>		
Expenses in Foreight Currency	USD 13,059	USD 3,25,980
Expenses in Foreight Currency	GBP 4,600	GBP 4,600



**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
(Formerly known as **SRI SAARBATI STEEL TUBES LIMITED**)

Amount in Rs.

PARTICULARS	As at 31st March, 2019	As at 31st March, 2018
<b>29. RELATED PARTY DISCLOSURE</b>		
29.1 Nature of Relationship		
Key Managerial Person		
i) Holding Company	NIL	NIL
ii) Subsidiaries	NIL	NIL
iii) Key Managerial Personnel		
Mr VinayGoyal (Managing Director)		
Ms.Uma (Whole Time Director)		
Mr Chandrakesh Pal(Whole Time Director)		
<b>30. Directors Remuneration</b>		
Mr Vinay Goyal (Managing Directors salary, insurance and subscription)	4,978,997	5,933,519
Mr.Chandrakesh Pal(Whole Time Director)	502,692	419,232
Ms.Uma	185,028	136,464
<b>TOTAL</b>	<b>5,666,717</b>	<b>6,489,215</b>
<b>31. IMPORTED &amp; INDIGENOUS RAW MATERIALS CONSUMED</b>		
Imported	-	-
Indigenous	43,014,503	157,074,081
<b>TOTAL</b>	<b>43,014,503</b>	<b>157,074,081</b>
<b>Percentage of consumption</b>		
Imported	-	-
Indigenous	100%	100%
<b>TOTAL</b>	100%	100%
<b>32. Detail of finished goods</b>		
32.1 Purchase of stock in trade	-	-
32.2 Sale of finished goods ( GP Slitted coil)	-	170,280,306
32.3 Stock of finished goods		
Opening	-	9,612,451
Closing	-	-

**33. GENERAL**

- (a) Balance in Sundry Debtors/ Creditors and advances are subject to confirmation  
(b) Previous Year's Figures have been re-arranged and re-grouped wherever necessary.  
(c) Tax deducted at source from the payment to contractors, Professional charges, Commission, interest and Salaries have been deposited.  
(d) In view of insufficient information from the suppliers regarding their status as SSI units the amount due to small scale Industrial Undertakings cannot be ascertained.  
(e) Additional information pursuant to the provisions of schedule-III of Companies Act, 2013 to the extent applicable to the company.

**SIGNATURE TO NOTES ON FINANCIAL STATEMENTS 2 TO 33**

As per our report of even date  
for JAIN VISHAL AND CO  
Chartered Accountants,

(CA VISHAL JAIN)  
Proprietor  
M.No.209530

Place: Chennai / Bangaluru  
Date: 30.05.2019

for and on behalf of the Board

(S. SIVAGAMI)  
Chief Financial Officer

(VINAY GOYAL)  
Managing Director  
DIN : 00134026

(MANISH KUMAR RAI)  
Company Secretary

(CHANDRAKESH PAL)  
Whole time Director  
DIN:07277936

# CRIMSON METAL ENGINEERING LIMITED

CIN: L27105TN1985PLCO11566

Regd. Office : "K Sons Complex", 163/1, Prakasam Road, II Floor, Chennai 600108

Phone : 044-25240393, Fax : 044-42079967, Website : www.crmetal.in.

Date : 14.08.2019

Dear Shareholder

## **Sub: Updation of PAN, Bank account details, Email address and Dematerialisation of Shares**

Securities and Exchange Board of India (SEBI) vide circular No: SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018 has mandated all listed Companies to update the Permanent Account Number (PAN) and Bank account details of all shareholders who are holding shares in physical form. As per our record, PAN and Bank details have not been updated in your Folio. Hence, we request you to send us the enclosed form, duly filled and signed by all shareholders (including joint holders, if any) along with the following documents to the below mentioned address of our Registrar and Share Transfer Agent within 21 days from the date of this letter.

- (1) Self attested copy of PAN card of all shareholders including joint holders. In case of residence of Sikkim, the requirement of PAN Card be substituted with a valid Identity proof issued by Government.
- (2) Original Cancelled Cheque Leaf bearing the name of Sole / first named shareholder (or) attested copy of Bank passbook.

**M/s. Cameo Corporate Services Ltd.,  
"Subramanian Building" 1, Club House Road, Chennai - 600 002.  
Ph : 28460390, 28460391 Fax : 044-28460129  
E-mail ID : murali@cameoindia.com**

Please note that Companies Act, 2013, provides for sending all documents, notices convening general meetings, audited financial statements, directors' report, auditors' report and every other documents required by law to be annexed or attached thereto etc., in electronic form to the registered e-mail address of the Shareholders. In terms of Regulation 36 (1) (a) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed entity shall send soft copies of full annual report to all those shareholder(s) who have registered their e-mail address(es) for the purpose. In order to receive all the documents and correspondences from us by e-mail, you may kindly mention your e-mail id, which will be registered with us as your registered e-mail id for sending all documents and correspondence by e-mail to you.

Also, on 8<sup>th</sup> June 2018, SEBI vide its notification No. SEBI/LAD-NRO/GN/2018/24 had amended the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), which states that, "except in case of transmission or transposition of securities, requests for effecting transfer of securities shall not be processed unless the securities are held in the dematerialized form with a depository."

As such, SEBI had mandated transfer of shares in dematerialised form alone. This comes into effect from December 2018 and hence you are requested to take note of it and take necessary steps to dematerialise your shares that are held in physical form.

We seek your co-operation in this regard.

**For CRIMSON METAL ENGINEERING LIMITED**

**Vinay Kumar Goyal**  
**Managing Director**  
**DIN-00134026**  
Encl. as above

To  
**Cameo Corporate Services Limited**  
 (Unit: CRIMSON METAL ENGINEERING LIMITED)  
**Regd. Office: "K Sons Complex", 163/1, Prakasam Road, II Floor, Chennai 600108**

Folio No:

**PERMANENT ACCOUNT NUMBER (PAN) AND BANK ACCOUNT UPDATION FORM**

SHARE HOLDER (S) NAME		PAN									
1											
2											
3											

**PARTICULARS OF BANK ACCOUNT OF FIRST / SOLE SHAREHOLDER**

<b>Name of the Bank</b>	
<b>Branch</b>	
<b>Account Number</b>	
<b>Account Type</b>	<b>Savings / Current</b>
<b>MICR Code (9-Digit Code Number of the Bank and Branch appearing on the MICR cheque issued by the Bank)</b>	
<b>IFSC of Bank Branch</b>	
<b>Mobile No. of First / Sole holder (Phone / Mobile No.)</b>	
<b>Email ID of First / Sole holder for serving all future communications including Annual Report, AGM Notice etc.</b>	

**(Please attach a blank "cancelled" cheque leaf)**

I, hereby, declare that the particulars given above are correct and complete. If the transaction is delayed or not effected at all for reasons of incomplete or incorrect information, I would not hold the user institution responsible.

Signature of Shareholder(First / Sole)	
Signature of Joint Holder 1 (if any)	
Signature of Joint Holder 2 (if any)	

Date :  
 Encl :

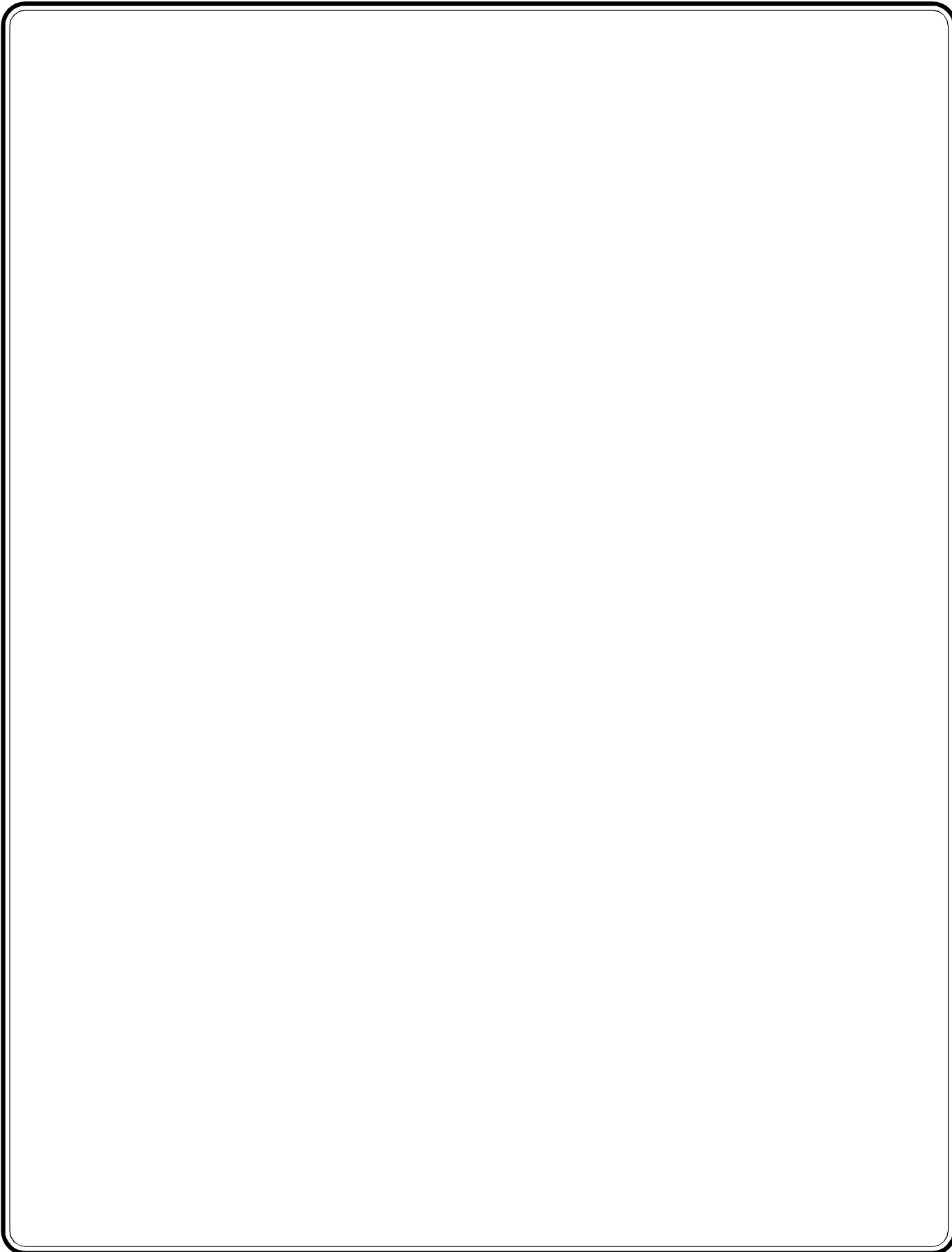
- (1) Self attested copy of PAN card of all shareholders including joint holders.
  - (2) Original Cancelled Cheque Leaf bearing the name of Sole / first named shareholder (or) attested copy of Bank passbook.
  - (3) Shareholders are requested to get the specimen signature attested by their bank manager, in case of any change in their signature.
- In case, the shareholder is not in a position to submit "cancelled cheque leaf", please submit Copy of Bank Pass Book (1st page and Current Transaction page) certified by Concerned Bank Manager as under

**Certificate of the Shareholder's Bank**

Certified that the particulars furnished above are correct as per our records.

Date :  
 ( Please affix Bank Seal with Identity Number of Bank Official)

Signature of the Authorised Official of the Bank



**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
**(Formerly known as SRI SAARBATI STEEL TUBES LIMITED)**

## IMPORTANT

Company's shares are listed in Bombay Stock Exchange and can be traded. Company has obtained ISIN from CDSL and NSDL. Now shares can be demated and traded, shareholders can approach their DP for demating their shares.

ISIN NO: INE318P01016

BSE SCRIPT CODE : 526977

Date :

Dear Sir / Madam

Pursuant to the Green Initiative in the Corporate Governance initiated by the Ministry of Corporate Affairs (MCA) vide its circular dated 21/4/2011, your company has proposed to send the Notice / Annual Report / documents through electronic mode to our shareholders.

This, you will appreciate, would facilitate fast, secured communication and contribute towards improved environment.

Kindly arrange to send the following details to our Registered Office address duly signed, which will be considered by us for sending the future communication through Email.

<b>Company Name</b>	Crimson Metal Engineering Ltd
Folio No.	
Name (1 <sup>st</sup> / Sole Holder)	
Email ID	
Mobile Number	
Pan (Optional)	

In case if you are holding the shares in electronic mode, you may kindly register / update your correct email id with your DP, so that the future communication can be sent through the same.

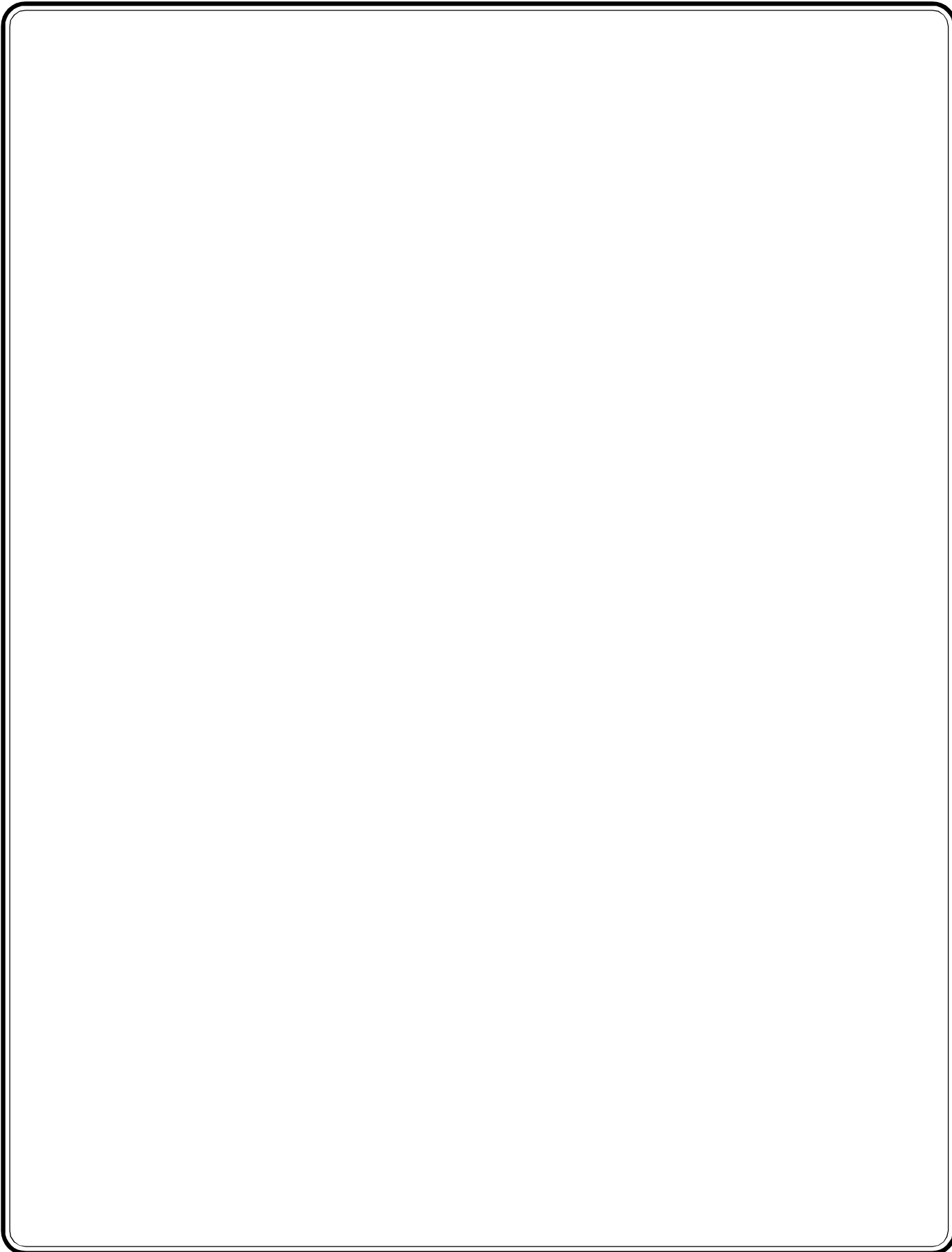
Signature of the Shareholder

Thanking You,

Yours truly,  
For CRIMSON METAL ENGINEERING LIMITED

DIRECTOR

Tear Here



# CRIMSON METAL ENGINEERING LIMITED

CIN: L27105TN1985PLCO11566

Regd.Office : "K Sons Complex", 163/1, Prakasam Road, II Floor, Chennai 600108

Phone : 044-25240393, Fax : 044-42079967, Website : www.crmetal.in.

**35<sup>th</sup> ANNUAL GENERAL MEETING ON MONDAY THE 30TH DAY OF SEPTEMBER 2019 AT 10:30 A.M**

## ATTENDANCE SLIP

Please complete the attendance slip and hand over at the entrance of the Meeting Hall.

Name & Address of the Shareholder(s) (In block letters):

Joint Holder's Name (In block letters):

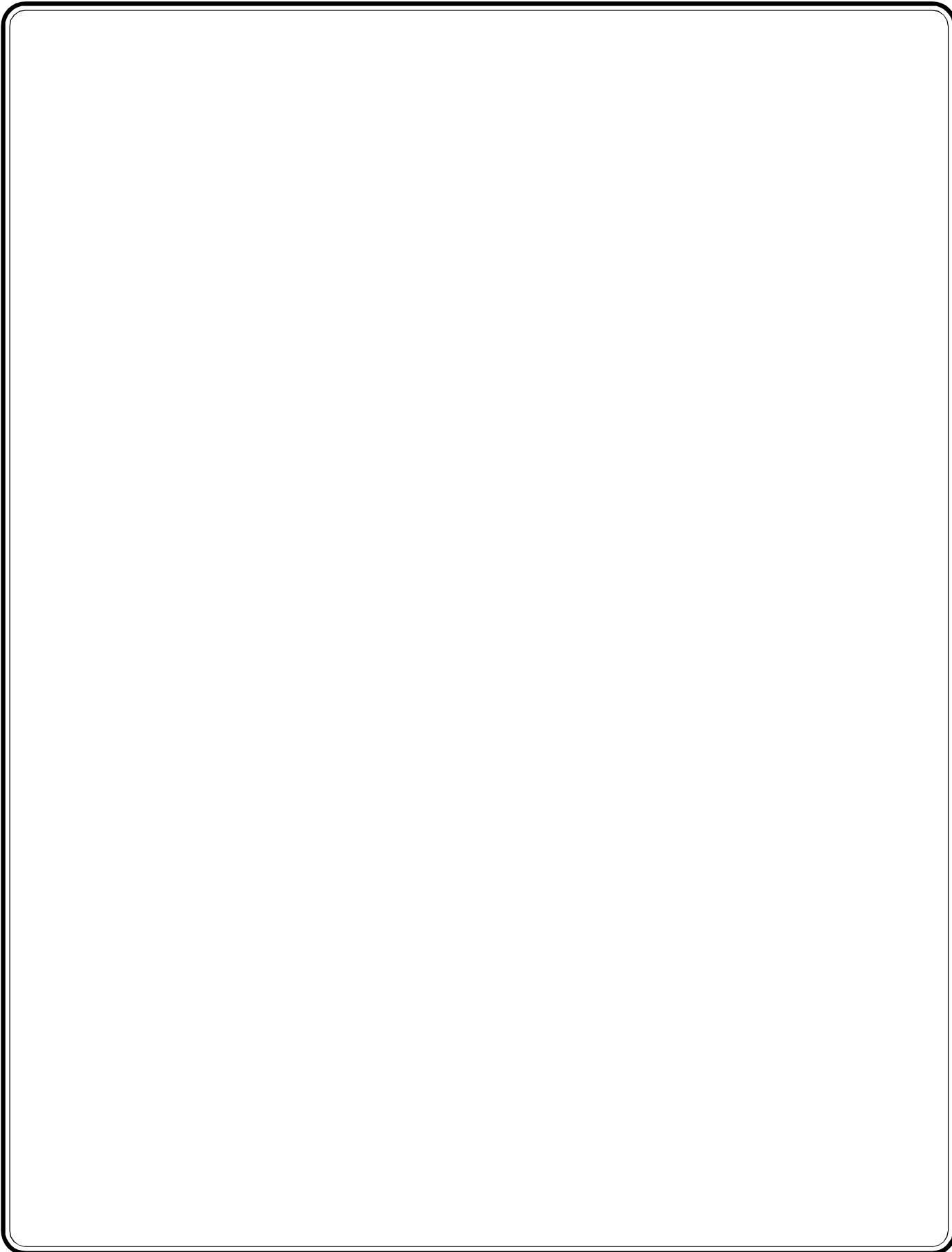
**No of Shares Held :**

I certify that I am a registered equity shareholder / Proxy for the registered equity shareholder of the Company. I hereby record my presence at the 35th Annual general meeting, to be held on Monday, 30th September 2019 at Andhra Chamber of Commerce Velagapudi Ramakrishna Building, 23, Third Cross Street, West C.I.T Nagar, Nandhanam, Chennai- 600 035 at 10.30 a.m.

Signature of shareholder / Joint Holder / Proxy attending the Meeting.....

Electronic Voting Event Number (Even)	User ID	Password

Note: Person attending the Meeting is requested to bring this Attendance Slip and Annual Report with him / her. Duplicate Attendance Slip and Annual Report will not be issued at the Annual General Meeting.





# CRIMSON METAL ENGINEERING LIMITED

CIN: L27105TN1985PLCO11566

Regd. Office : "K Sons Complex", 163/1, Prakasam Road, II Floor, Chennai 600108

Phone : 044-25240393, Fax : 044-42079967, Website : www.crmetal.in.

**35<sup>th</sup> ANNUAL GENERAL MEETING ON MONDAY THE 30TH DAY OF SEPTEMBER 2019 AT 10:30 A.M**

## FORM MGT-11

### Proxy Form

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

Name of the member (s) :

Registered address :

E-mail Id :

Folio No/ Client Id :

DP ID :

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

1. Name: ..... Address.....

E-mail Id:..... Signature....., or failing him/her

2. Name: ..... Address.....

E-mail Id:..... Signature....., or failing him/her

3. Name: ..... Address.....

E-mail Id:..... Signature....., or failing him/her

as my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the 35<sup>th</sup> Annual general meeting, to be held on Monday, 30<sup>th</sup> September 2019 at Andhra Chamber of Commerce Velagapudi Ramakrishna Building, 23, Third Cross Street, West C.I.T Nagar, Nandhanam, Chennai- 600 035 at 10.30 a.m. and at any adjournment thereof in respect of such resolutions as are indicated below:

Resolution Number	Description of Resolution	No. of Shares held by me	I assent to the resolution	I dissent to the resolution
<b>Ordinary Business</b>				
1	Consider and adopt the Audited Statements of Account for the year ended 31 <sup>st</sup> March, 2019 and the Reports of Directors and the Auditors thereon.			
2.	Re-appointment of Ms. R Uma (DIN: 07029264) who retires by rotation as a whole time Director			
<b>SPECIAL BUSINESS</b>				
3.	RATIFICATION OF PAYMENT OF REMUNERATION TO MANAGING DIRECTOR			
4.	REAPPOINTMENT OF SHRI. VINAYKUMAR GOYAL AS MANAGING DIRECTOR FOR A FURTHER PERIOD OF THREE YEARS			
5.	Appointment of Mr. Kanhaiya Lal as Independent Director			

Signed this..... day of..... 2019

Signature of shareholder

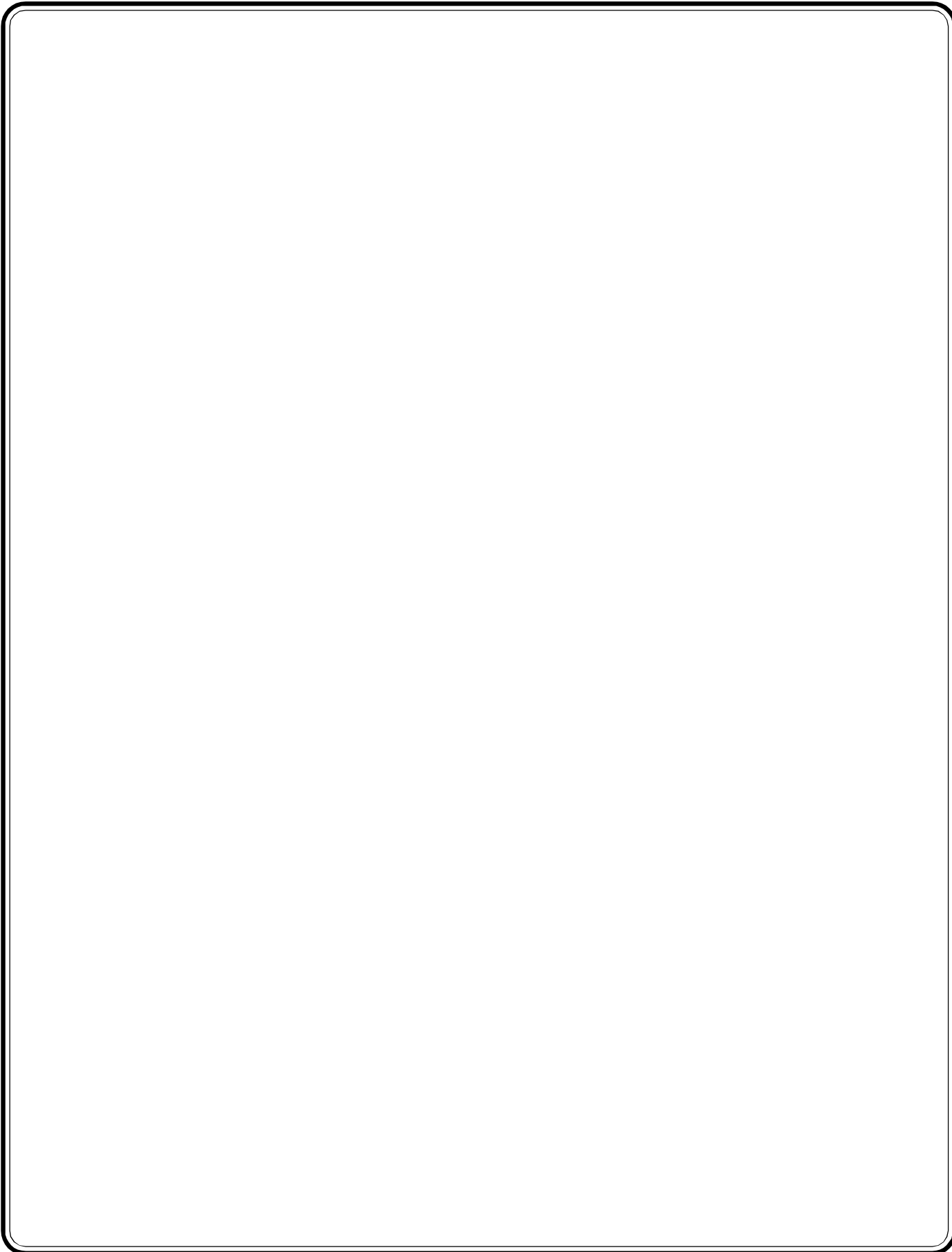
Signature of Proxy holder(s)

**Affix One  
Rupee  
Revenue  
Stamp**

Note: 1. This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company, not less than 48 hours before the commencement of the Meeting. It is optional to indicate your preference. If you label column 'For, Against, Abstain' blank against all or any of the resolutions, your proxy will be entitled to vote in the manner as he / she may deem appropriate.

2. For the Resolutions, Explanatory Statement and Notes, please refer to the Notice of the 35<sup>th</sup> Annual General Meeting.

3. A person can act as proxy on behalf of Members not exceeding fifty(50) and holding in the aggregate not more than 10% of the total share capital of the Company carrying voting rights, In case a proxy is proposed to be appointed by a Member holding more than 10% of the total share capital of the Company carrying voting rights, then such proxy shall not act as a proxy for any other person or Member.



# CRIMSON METAL ENGINEERING LIMITED

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**Phone : 044-25240393, Fax : 044-42079967, Website : www.crmetal.in.**

**Form No. MGT-12**

## POLLING / BALLOT PAPER

[Pursuant to section 109(5) of the Companies Act, 2013 and rule 21(1)(c) of the Companies (Management and Administration) Rules, 2014]

Sl. No.	Particulars	Details
1	Name of the First Named Shareholder (In block letters)	EQUITY
2	Postal Address	
3	Registered Folio No / *Client ID No: (* Applicable to Investors holding shares in dematerialized form)	
4	Class of Share	

Resolution Number	Description of Resolution	No. of Shares held by me	I assent to the resolution	I dissent to the resolution
<b>Ordinary Business</b>				
1	Consider and adopt the Audited Statements of Account for the year ended 31 <sup>st</sup> March, 2019 and the Reports of Directors and the Auditors thereon.			
2.	Re-appointment of Ms. R Uma (DIN: 07029264) who retires by rotation as a whole time Director			
<b>SPECIAL BUSINESS</b>				
3.	RATIFICATION OF PAYMENT OF REMUNERATION TO MANAGING DIRECTOR			
4.	REAPPOINTMENT OF SHRI. VINAY KUMAR GOYAL AS MANAGING DIRECTOR FOR A FURTHER PERIOD OF THREE YEARS			
5.	Appointment of Mr.Kanhaiya Lal as Independent Director			

Place :

Date : .....(Signature of shareholder)

### INSTRUCTIONS

1. Members may after duly filling up the Ballot Form printed overleaf, submit the same in a sealed envelope to the Scrutinizer, **Mrs.Lakshmmi Subramanian**, Practising Company Secretary, Unit: **Crimson Metal Engineering Company Limited, "K Sons Complex", 163/1, Prakasam Road, II Floor, Chennai 600108** to his email id [lakshmmi6@gmail.com](mailto:lakshmmi6@gmail.com) as to reach by 5.00 p.m. on or before Monday, the 30th day of September, 2019. Ballot paper received thereafter will strictly be treated as if not received.
2. The consent must be accorded by recording the assent in the column 'I Assent the Resolution' and dissent in the column 'I Dissent the Resolution' by placing tick mark ( ✓ ) in the appropriate column.
3. The Company will not be responsible, if the envelope containing the Ballot Form is lost in transit.
4. Unsigned, incomplete or incorrectly ticked forms are liable to be rejected and the decision of the Scrutinizer on the validity of the forms will be final.
5. In the event a member casts his votes through both the processes, i.e., e-voting and Ballot Form, the votes in the electronic system will be considered and the Ballot Form will be ignored.
6. The right of voting through Ballot Form shall not be exercised by a proxy.
7. To avoid fraudulent transactions, the identity / signature of the members holding shares in electronic / demat form is verified with the specimen signatures furnished by NSDL / CDSL and that of members holding shares in physical form is verified as per the records of the share transfer agent of the Company (i.e., Cameo Corporate Services Limited). Members are requested to keep the same updated.
8. There will be only one Ballot Form for every Folio / DP ID / Client ID irrespective of the number of joint members.
9. In case of Joint Holders, the Ballot Form should be signed by the first named shareholder and in his/her absence by the next named shareholders. Ballot Form signed by the Joint Holder shall be treated valid if signed as per records available with the Company and the Company shall not entertain any objection on such Ballot Form signed by other joint holders.
10. Where the Ballot Form has been signed by an authorized representative of the body corporate / Trust / Society, etc, a certified copy of the relevant authorization / Board resolution to vote should accompany the Ballot Form.
11. Instructions for the e-voting procedure are available in the Notice of the AGM and are also placed on the website of the Company.

**REGISTERED BOOK - POST  
PRINTED MATTER**

**To**

**If undelivered Please return to :**

**CRIMSON METAL ENGINEERING COMPANY LIMITED**  
Regd. Office : 163/1, Prakasam Road,  
K.Sons Complex, II Floor,  
Chennai - 600 108.