

BEHARI LAL ISPAT PRIVATE LIMITED

CIN: U27109PB1995PTC016490

Regd. Office: Village – Salani, Amloh Road, Mandi Gobindgarh, Punjab-147301

Email Id: bansal.jiwan@gmail.com Contact No.: 017-65254576

DIRECTOR'S REPORT

To,

The Members of
BEHARI LAL ISPAT PRIVATE LIMITED
Mandi Gobindgarh

You're Directors presenting the Next Annual Report on the affairs of the Company for the financial year ended on 2020-21 together with the Audited Financial Statements and the report of the Auditors thereon.

1. FINANCIAL SUMMARY OR HIGHLIGHTS/PERFORMANCE OF THE COMPANY

The financial results for the year ended 31st March, 2021 and the corresponding figures for the last year are as under: -

Particulars	(In Rs.)	
	2020- 21	2019- 2020
Total Income	2,93,08,49,519.57	2,11,12,49,436.86
Total Expenditure	2,70,74,54,433.18	1,99,62,50,052.22
Profit/(Loss) Before Tax .	22,33,95,086.39	11,49,99,384.64
Provision for Taxation	-	-
Current Tax	5,58,71,400.00	2,91,57,300.00
Deferred Tax	4,35,900.00	-51,600.00
Provision for Income Tax	-	-
Gratuity Provisions	-	-
Earlier years Tax	85,944.00	90,341.80
Profit/(Loss) after Tax	16,70,01,842.39	8,58,03,342.84

The total revenue during the period have been Rs. 2,93,08,49,519.57/- as against Rs. 2,11,12,49,436.86/- in the previous year. The profit before taxation has been Rs. 22,33,95,086.39/- for the financial year 2020-21 as against Rs. 11,49,99,384.64/- in the previous year. For the financial year 2020-21, your Company's profit after tax stood at Rs. 16,70,01,842.39/-.

2. STATE OF THE COMPANY'S AFFAIRS

1. The Company is engaging in the business of Manufacture of other basic iron and steel items n.e.c.
2. There has been no change in the business of the Company during the financial year ended 31st March, 2021.

3. DETAILS IN RESPECT OF FRAUDS REPORTED BY AUDITORS UNDER SUB SECTION (12) OF SECTION 143 OTHER THAN THOSE REPORTABLE TO THE CENTRAL GOVERNMENT

No material fraud by the company or on the company by its officers or employees has been noticed or reported during the course of audit.

4. DIVIDEND

Your Directors' have not recommended any dividend for the financial year 2020-21.

5. RESERVE & SURPLUS

During the year under the review company has earned a profit of **Rs. 16,70,01,842.39/-**, which has been transferred to the Reserve and Surplus Account of the Company.

6. TRANSFER OF UNCLAIMED DIVIDEND TO INVESTOR EDUCATION AND PROTECTION FUND

Since there was no unpaid/unclaimed Dividend declared and paid last year, the provisions of Section 125 of the Companies Act, 2013 do not apply.

7. FINANCE

Cash and cash equivalents as at 31st March, 2021 was Rs. 67,64,262.02/-, The Company continues to focus on judicious management of its working capital.

8. SHARE CAPITAL

There was no change in Paid up Share Capital of the company during the year.

9. DEPOSIT

As per Section 76 of the Companies Act, 2013 and the Companies (Acceptance of Deposits) Rules, 2014 the Company has not invited/accepted any deposits from the public during the year ended March 31, 2021. There were no unclaimed or unpaid deposits as on March 31, 2021.

10. CHANGE IN THE NATURE OF BUSINESS

There was no Change in the nature of the business of the Company during the year under review.

11. MATERIAL CHANGES AND COMMITMENTS

No material changes and commitments affecting the financial position of the Company occurred between the ends of the financial year to which these financial statements relate and the date of this report.

12. SIGNIFICANT AND MATERIAL ORDER PASSED BY THE REGULATORS OR COURTS

No significant or material order has been passed by the Regulator or Courts or Tribunals during the Financial Year.

13. SUBSIDIARIES, JOINT VENTURES OR ASSOCIATE COMPANIES

During the financial year under report, the Company has no Subsidiary Company, Joint Venture or Associate Company.

14. COMPLIANCE WITH SECRETARIAL STANDARDS

The Company has complied with secretarial standards applicable to the Company.

15. WEB LINK OF ANNUAL RETURN, IF ANY

Website of the company is WWW.BEHARILAL.COM and provide the link on website about the Annual Return of the company.

16. DIRECTORS

The present constitution of the Board is as follows:

S. No.	NAME OF THE DIRECTOR	DESIGNATION	APPOINTMENT DATE
1.	PARKASH CHAND GARG	DIRECTOR	23/05/1995
2.	DINESH GARG	Wholetime Director	07/06/1995
3.	LOVLISH GARG	Wholetime Director	01/04/2016

There was no change in the Board of Directors during the financial year 2020-21.

17. BOARD MEETINGS

*Eight Meetings of the Board of Directors were held during the financial year.

The intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013.

The Company has observed the provisions of Secretarial Standards issued by Institute of Company Secretaries of India.

18. COMPANY'S POLICY RELATING TO DIRECTORS APPOINTMENT, PAYMENT OF REMUNERATION AND DISCHARGE OF THEIR DUTIES

The provisions of Section 178(1) relating to constitution of Nomination and Remuneration Committee are not applicable to the Company and hence the Company has not devised any policy relating to appointment of Directors, payment of Managerial remuneration, Directors qualifications, positive attributes, independence of Directors and other related matters as provided under Section 178(3) of the Companies Act, 2013.

19. DISCLOSURE OF COMPOSITION OF AUDIT COMMITTEE AND PROVIDING VIGIL MECHANISM

The Company has adopted the Whistle Blower Policy/Vigil Mechanism for the directors and employees, to report concerns about unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct and Ethics.

20. AUDITORS AND AUDITORS' REPORT

M/s BANSAL JIWAN & ASSOCIATES, (FRN: 034320N) Chartered Accountants, the Statutory Auditors of the Company to hold office till the conclusion of Annual General Meeting of the Company to be held in the year 2024.

The Notes on financial statement referred to in the Auditors' Report are self-explanatory and do not call for any further comments. The Auditors' Report does not contain any qualifications, reservations or adverse remark.

21. BOARD'S COMMENT ON THE AUDITORS' REPORT

The observations of the Statutory Auditors, when read together with the relevant notes to the accounts and accounting policies are self-explanatory and do not call for any further comment.

22. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS

The information related to Loans, guarantees and investments covered under Section 186 of the Companies Act, 2013 form part of the financials of the Company.

23. RELATED PARTY TRANSACTIONS

The particulars of contracts or arrangements with related parties referred to in sub section (1) of section 188 entered by the Company during the financial year ended 31st March, 2021 is annexed hereto as **Annexure- I** in prescribed Form AOC-2 and forms part of this report.

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

The details of conservation of energy, technology absorption, foreign exchange earnings and outgo are as follows:

The information on conservation of energy, technology absorption and foreign exchange earnings and outgo stipulated under Section 134(3)(m) of the Companies Act, 2013 read with Rule, 8 of The Companies (Accounts) Rules, 2014, has been annexed hereunder: -

A. Conservation of energy

Energy Conservation is an ongoing process in the Company. The Company continued its effort to improve energy usage efficiencies and increase the share of renewable energy. Various key performance indicators like specific energy (energy consumed per unit of production), specific energy costs and renewable energy contributions were continuously tracked to monitor alignment with the Company's overall sustainability approach.

(i) Steps taken or impact on conservation of energy:

a. Improvement in energy usage efficiency in lighting systems by installation of more efficient lighting solutions such as Light Emitting Diodes.

(ii) Steps taken by the company for utilizing alternate sources of energy: NIL

(iii) Capital investment on energy conservation equipment's: NIL

B. Technology absorption

I. the efforts made towards technology absorption: NIL

II. The benefits derived like product improvement, cost reduction, product development or import substitution:-: NIL

III. In case of imported technology (imported during the last three years reckoned from the beginning of the financial year) -: NIL

IV. The expenditure incurred on Research and Development: NIL

C. Foreign exchange earnings and Outgo

During the year, no foreign exchange was earned or spent.

25. EXTRACT OF ANNUAL RETURN

The Company having website and provide the link on website about the Annual Return of the company and also company has attached extract of Annual return (MGT-9) as **Annexure-II** to this board report.

26. DECLARATION BY INDEPENDENT DIRECTORS

The Company was not required to appoint Independent Directors under Section 149(4) and Rule 4 of the Companies (Appointment and Qualification of Directors) Rules, 2014 hence no declaration has been obtained.

27. HUMAN RESOURCES

Your Company treats its "human resources" as one of its most important asset.

Your Company continuously invests in attraction, retention and development of talent on an ongoing basis. A number of programs that focus on human resource development in the company are currently underway. Your Company thrust is on the promotion of talent internally through job rotation and job enlargement.

28. ENVIRONMENTAL HEALTH & SAFETY

The Company continuously endeavors to improve on environmental management and safety measures.

29. CORPORATE GOVERNANCE CERTIFICATE

This certificate is not required as the company is not a listed company.

30. MANAGEMENT DISCUSSION AND ANALYSIS

Not Applicable as the Company is not a Listed Company.

31. SHARES

a. BUY BACK OF SECURITIES

The Company has not bought back any of its securities during the year under review.

b. SWEAT EQUITY

The Company has not issued any Sweat Equity Shares during the year under review.

c. BONUS SHARES

No Bonus Shares were issued during the year under review.

d. EMPLOYEES STOCK OPTION PLAN

The Company has not provided any Stock Option Scheme to the employees.

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

The Company has a group policy in place against Sexual Harassment in line with the requirements of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013. Internal Complaints Committee (ICC) has been set up to redress complaints received regarding sexual harassment.

No complaints of Sexual Harassment were received during the financial year 2020-21.

33. CONSOLIDATED FINANCIAL STATEMENTS

Since the company has no subsidiary/ associate company, the consolidation of accounts with those of the subsidiary are not applicable.

34. REPORTING OF FRAUDS BY THE AUDITORS, OTHER THAN THOSE WHICH ARE REPORTABLE TO THE CENTRAL GOVERNMENT

No fraud has been reported either by the company or against the company.

35. DISCLOSURE OF MAINTENANCE OF COST RECORDS

Maintenance of Cost Records under sub-section (1) of section 148 of the Companies Act, 2013 has been applicable to the Company. Prima facie the cost records prescribed by the Central Government of India under section 148(1) of the Act have been made & maintained.

36. DEVELOPMENT AND IMPLEMENTATION OF A RISK MANAGEMENT POLICY

The Company has been addressing various risks through well-defined risk management policy/procedures, which are in the opinion of the Board may threaten the existence of the Company.

37. Internal Financial Control System

The Company has laid down adequate internal financial control system with reference to financial statements. During the year such controls were tested and no material weakness in their operating effectiveness was observed.

38. CORPORATE SOCIAL RESPONSIBILITY INITIATIVES

The provisions of Section 135 of the Act, with regard to Corporate Social Responsibility (CSR) are at present applicable on the Company.

The Composition of the CSR committee: the Company has constituted a corporate Social Responsibility committee as per the provision of Section 135 of the Companies Act, 2013 and Details of its members are as follows: -

- | | |
|---|----------|
| 1. Sh. Parkash Chand Garg (DIN: 00215024) | Chairman |
| 2. Sh. Dinesh Garg (DIN: 00215117) | Member |
| 3. Sh. Lovlish Garg (DIN: 02000916) | Member |

The brief outline of the Corporate Social Responsibility (CSR) Policy of the Company and the initiatives undertaken by the Company on CSR activities during the year are set out in **ANNEXURE-III** of this report in the format prescribed in the Companies (Corporate Social Responsibility Policy) Rules, 2014.

39. DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to Section 134(5) of the Companies Act, 2013 the Board of Directors of the Company confirms that-

- a) In the preparation of the annual accounts for the year ended March 31, 2021 the applicable accounting standards read with requirements set out under Schedule III to the Act, have been followed and there are no material departures from the same.
- b) The Directors have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company as at March 31, 2021 and of the profit of the Company for the year ended on that date.
- c) The Directors have 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.
- d) The Directors have prepared the annual accounts on a 'going concern' basis.
- e) The directors had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively.
- f) The directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

40. ACKNOWLEDGEMENT

Your Directors wish to place on record their sincere appreciation and acknowledge with gratitude the support and consideration extended by the Bankers, Shareholders and employees and look forward for their continued support and cooperation.

By Order of the Board of Director
For **BEHARI LAL ISPAT PRIVATE LIMITED**


DINESH GARG
Wholetime Director
DIN: 00215117


LOVLISH GARG
Wholetime Director
DIN: 02000916

DATE: 22/11/2021
PLACE: Mandi Gobindgarh

BEHARI LAL ISPAT PRIVATE LIMITED

CIN: U27109PB1995PTC016490

Regd. Office: Village – Salani, Amloh Road, Mandi Gobindgarh, Punjab-147301

Email Id: bansal.jiwan@gmail.com Contact No.: 017-65254576

ANNEXURE-I

Form No. AOC-2

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

Form for disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 including certain arm's length transactions under third proviso thereto.

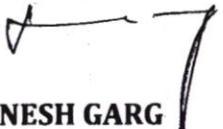
1. Details of contracts or arrangements or transactions not at arm's length basis: NIL

2. Details of material contracts or arrangement or transactions at arm's length basis

S. No.	Name(s) of the related party and nature of relationship	Nature of contracts/ arrangements/ transactions	Duration of the contracts / arrangements/ transactions	Salient terms of the contracts or arrangements or transactions including the value, if any:	Date(s) of approval by the Board, if any:	Amount paid as advances, if any:
1.	Bhuvnesh Garg (Relative of Director of the Company)	Salary	2020-21	Rs. 22,00,000	-	-
2.	Kanav Garg (Relative of Director of the Company)	Salary	2020-21	Rs. 16,50,000	-	-
3.	Parkash Multimetal Private Limited (Sister Concern)	Purchases Sales	2020-21 2020-21	Rs. 4,30,37,871 Rs. 93,60,175	-	-
4.	BLC Metal Private Limited (Sister Concern)	Purchases Sales	2020-21 2020-21	Rs.1,19,358 Rs. 60,38,491	-	-
5.	Belco Ispat & Alloys (Sister Concern)	Freight	2020-21	Rs. 17,27,570	-	-
6.	Akanksha Goyal (Relative of Director of the Company)	Lease Rent	2020-21	Rs. 2,00,000	-	-
7.	Yogita Garg (Relative of Director of the Company)	Lease Rent Rent	2020-21 2020-21	Rs. 2,00,000 Rs. 4,50,000	-	-

8.	Anju Garg (Relative of Director of the Company)	Rent	2020-21	Rs. 4,80,000	-	-
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By Order of the Board of Director
For **BEHARI LAL ISPAT PRIVATE LIMITED**


DINESH GARG
Wholetime Director
DIN: 00215117


LOVLISH GARG
Wholetime Director
DIN: 02000916

DATE: 22/11/2021
PLACE: Mandi Gobindgarh

ANNEXURE-III

ANNUAL REPORT ON CSR ACTIVITIES

1. Brief outline on CSR Policy of the Company: To promote education (Literacy) and provide trainings.

2. Composition of CSR Committee:

Sl. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
1.	Parkash Chand Garg	Chairman	4	4
2.	Dinesh Garg	Member	4	4
3.	Lovlish Garg	Member	4	4

3. Provide the web-link where Composition of CSR Committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company: <https://www.beharilispit.com/csr.php>

4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, if applicable (attach the report): **Not Applicable**

5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any: **Not Applicable**

Sl. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs)	Amount required to be set-off for the financial year, if any (in Rs)
1			
2			
3			
4	Total		

6. Average net profit of the company as per section 135(5): **Rs. 9,57,39,961.69/-**

7. (a) Two percent of average net profit of the company as per section 135(5): **Rs. 19,14,799.00/-**

(b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years: **Not Applicable**

(c) Amount required to be set off for the financial year, if any: **Not Applicable**

(d) Total CSR obligation for the financial year (7a+7b-7c): **Rs. 19,14,799.00/-**

8. (a) CSR amount spent or unspent for the financial year: Spent- **Rs. 19,14,799.00/- (Rs. 7,37,693.00 spend during the financial year 2020-21 and Balance amount was spent upto 30.09.2021)**

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

	Amount Unspent (in Rs.)	
Total Amount Spent for the	Total Amount transferred to	Amount transferred to any fund specified

Financial Year. (in Rs.)	Unspent CSR Account as per section 135(6).		under Schedule VII as per second proviso to section 135(5).		
	Amount.	Date of transfer.	Name of the Fund	Amount.	Date of transfer.
Rs. 19,14,799.00/-	NIL		NA	NA	NA

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

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	(10)	(11)
S. No.	Name of the Project.	Item from the list of activities in Schedule VII to the Act.	Local area (Yes/No).	Location of the project.	Project duration.	Amount allocated for the project (in Rs.).	Amount transferred to Unspent CSR Account for the project as per section 135(6) (in Rs.).	Mode of Implementation - Through Implementing Agency	Mode of Implementation - Direct (Yes/No).	Name
				State	District.					
	Promoting Education	Literacy	Yes	Punjab	Mandi Gobindgarh	Rs. 19,14,799	NIL	Yes	-	
	Total									

Details of CSR amount spent

against other than ongoing projects for the financial year: **Not Applicable**

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

(d) Amount spent in Administrative overheads: Nil

(e) Amount spent on Impact Assessment, if applicable: Nil

(f) Total amount spent for the Financial Year (8b+8c+8d+8e): **Rs. 19,14,799.00/- (Rs. 7,37,693.00 spend during the financial year 2020-21 and Balance amount was spent upto 30.09.2021)**

(g) Excess amount for set off, if any

Sl. No.	Particular	Amount (in Rs.)
(i)	Two percent of average net profit of the company as per section 135(5)	Rs. 19,14,799/-
(ii)	Total amount spent for the Financial Year	Rs. 19,14,799/- (Rs. 7,37,693.00 spend during the financial year 2020-21 and Balance amount was spent upto 30.09.2021)
(iii)	Excess amount spent for the financial year [(ii)-(i)]	Nil
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	Nil
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	Nil

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

S. No.	Preceding Financial Year.	Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.)	Amount spent in the reporting Financial Year (in Rs.).	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any.			Amount remaining to be spent in succeeding financial years. (in Rs.)
				Name of the Fund	Amount (in Rs).	Date of transfer.	
1.	2017-2018	NIL	NIL				NIL
2.	2018-2019	13,06,789	2,28,000				10,78,789
3.	2019-2020	19,14,799	31,74,137				NIL
	Total						

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

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Sl. No.	Project ID.	Name of the Project.	Financial Year in which the project was commenced.	Project duration.	Total amount allocated for the project (in Rs.).	Amount spent on the project in the reporting Financial Year (in Rs).	Cumulative amount spent at the end of reporting Financial Year. (in Rs.)	Status of the project Completed /Ongoing.
1.		Promoting Education (Literacy)	2019-20			Rs. 31,74,137	Rs. 34,02,137 (2,28,000 + 31,74,137)	Ongoing
2.								
	Total							

10. In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year (asset-wise details): **Not Applicable**

(a) Date of creation or acquisition of the capital asset(s).

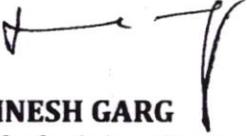
(b) Amount of CSR spent for creation or acquisition of capital asset.

(c) Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc.

(d) Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset).

11. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5): **Not Applicable**

By Order of the Board of Director
For **BEHARI LAL ISPAT PRIVATE LIMITED**


DINESH GARG
Wholetime Director
DIN: 00215117


LOVLISH GARG
Wholetime Director
DIN: 02000916

DATE: 22/11/2021
PLACE: Mandi Gobindgarh

BEHARI LAL ISPAT PRIVATE LIMITED

CIN: U27109PB1995PTC016490

Regd. Office: Village – Salani, Amloh Road, Mandi Gobindgarh, Punjab-147301

Email Id: bansal.jiwan@gmail.com Contact No.: 017-65254576

ANNEXURE-II

FORM NO. MGT-9

EXTRACT OF ANNUAL RETURN

AS ON THE FINANCIAL YEAR ENDED ON 31 MARCH, 2021

[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the Companies (Management and Administration) Rules, 2014]

I. REGISTRATION AND OTHER DETAILS:

i)	CIN	U27109PB1995PTC016490
ii)	Registration Date	23/05/1995
iii)	Name of the Company	BEHARI LAL ISPAT PRIVATE LIMITED
iv)	Category / Sub-Category of the Company	Private Company/ Limited By Shares
v)	Address of the Registered office and contact details	VILLAGE - SALANI AMLOH ROAD MANDI GOBINDGARH PB 147301 IN Email Id: bansal.jiwan@gmail.com
vi)	Whether listed company	No
vii)	Name, Address and Contact details of Registrar and Transfer Agent, if any	N.A.

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: -

Name and Description of Main Products/Services	NIC Code of the Products/Service	% to total turnover of the Company
IRON & STEEL PRODUCTS	2401	100

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES-None

IV. SHARE HOLDING PATTERN MORE THAN 5% (Equity Share Capital Breakup as percentage of Total Equity)

(B)	Total Public Shareholding (B)= (B)(1) + (B)(2)	0	0	0	0	0	0	0	0	0
	TOTAL (A)+(B)	0	4000000	4000000	100	0	4000000	4000000	100	0

(C)	Shares held by Custodians and against which Depository Receipts have been issued	0	0	0	0	0	0	0	0	0
1	Promoter and Promoter Group	0	0	0	0	0	0	0	0	0
2	Public	0	0	0	0	0	0	0	0	0
	Sub-Total (C)	0	0	0	0	0	0	0	0	0
	GRAND TOTAL (A)+(B)+(C)	0	4000000	4000000	100	0	4000000	4000000	100	0

ii) Shareholding of Promoters

S.No.	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			Shares of % change in shareholding during the year
		No. Of Shares	% of total Shares of the Company	% of Shares Pledged/ Encumbered to total Shares	No. Of Shares	% of total Shares of the Company	% of Shares Pledged/ Encumbered to total Shares	
1	Sh. Parkash Chand Garg	359999	9.00	0	359999	9.00	0	0
2	Parkash Chand Garg HUF	311380	7.78	0	311380	7.78	0	0
3.	Sh. Anil Kumar Gupta	1	0	0	1	0	0	0
4.	Anil Kumar Gupta HUF	1	0	0	1	0	0	0
5.	Sh. Rajesh Kumar Garg	384720	9.62	0	384720	9.62	0	0
6.	Rajesh Kumar Garg (HUF)	196999	4.92	0	196999	4.92	0	0

7.	Sh. Dinesh Garg	337300	8.43	0	337300	8.43	0	0
8.	Dinesh Garg (HUF)	397200	9.93	0	397200	9.93	0	0
9.	Smt. Alpana Gupta	1	0	0	1	0	0	0
10.	Sh. Shentam Gupta	1	0	0	1	0	0	0
11.	Smt. Anju Garg	380196	9.50	0	380196	9.50	0	0
12.	Smt. Yogita Garg	398200	9.96	0	398200	9.96	0	0
13.	Sh. Lovlish Garg	396200	9.91	0	396200	9.91	0	0
14.	Smt. Pushpa Goyal	200	0.01	0	199	0.01	0	0
15.	Smt. Kiran Garg (HUF)	19000	0.48	0	19000	0.48	0	0
16.	Ms. Ridhisha Garg	200	0.01	0	200	0.01	0	0
17.	Smt. Pratibha Goyal	100	0	0	100	0	0	0
18.	Sh. Sandeep Goyal	100	0	0	100	0	0	0
19.	Sh. Akarsh Goyal	1	0	0	1	0	0	0
20.	Pushpa Goyal (HUF)	1	0	0	1	0	0	0
21.	Lovlish Garg (HUF)	25000	0.63	0	25000	0.63	0	0
22.	Smt. Bhanu Garg	258198	6.45	0	258198	6.45	0	0
23.	Sh. Bhuvnesh Garg	163600	4.09	0	163600	4.09	0	0
24.	Sh. Kanav Garg	370800	9.27	0	370800	9.27	0	0
25.	Sh. Atul Kumar Goel	1	0	0	1	0	0	0
26.	Smt. Shalini Goel	1	0	0	1	0	0	0

27.	Sandeep Goyal (HUF)	1	0	0	1	0	0	0
28.	Smt. Aakanksha Garg	599	0.01	0	599	0.01	0	0
29.	Smt. Sheena Goyal	0	0	0	1	0	0	0
	TOTAL	4000000	64.67	0	4000000	64.67	0	0

iii) **Change in Promoters' Shareholding (Please specify, if there is no change)-**

S. No.	Name	Shareholding at the beginning of the year		Cumulative Shareholding during the year (1.04.2020 to 31.03.2021)	
		No. of Shares	% of total shares of the Company	No. of Shares	% of total shares of the Company
1.	SMT. PUSHPA GOYAL At the beginning of the year	200	0.01	200	0.01
	Date wise increase/decrease in promoters shareholdings during the year specifying the reasons for increase/decrease (e.g. allotment/transfer/bonus/sweat equity etc.)	1 Share Transferred to Smt. Sheena Goyal as on 01.04.2020			
	At the end of the Year	199	0.01	199	0.01
2.	SMT. SHEENA GOYAL At the beginning of the year	0	0	0	0
	Date wise increase/decrease in promoters shareholdings during the year specifying the reasons for increase/decrease (e.g. allotment/transfer/bonus/sweat equity etc.)	1 Share Transferred from Smt. Pushpa Goyal as on 01.04.2020			
	At the end of the Year	1	0	1	0

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

S. No.	Name	Shareholding at the beginning of the year		Date	Increase / Decrease in shareholding	Reason	Cumulative Shareholding during the year (01.04.2020 to 31.03.2021)	
		No. of Shares	% of total shares of the Company				No. of Shares	% of total shares of the Company
	NA	NA			NA		NA	

v) Shareholding of Directors and Managerial Personnel

S. No.	Name	Shareholding at the beginning of the year		Cumulative Shareholding during the year (1.04.2020 to 31.03.2021)	
		No. of Shares	% of total shares of the Company	No. of Shares	% of total shares of the Company
1.	PARKASH CHAND GARG (Director) At the beginning of the year At the end of the Year	359999	9.00	359999	9.00
		359999	9.00	359999	9.00
2.	DINESH GARG (Wholetime Director) At the beginning of the year At the end of the Year	337300	8.43	337300	8.43
		337300	8.43	337300	8.43
3.	LOVLISH GARG (Wholetime Director) At the beginning of the year At the end of the Year	396200	9.91	396200	9.91
		396200	9.91	396200	9.91

V. INDEBTENDNESS

Indebtedness of the Company including Secured Loans/Unsecured Loans and Deposits if any.

Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i)Principal Amount	5,74,57,923.75	17,30,77,497.99	NIL	23,05,35,421.74
ii)Interest due but not paid	NIL	NIL	NIL	NIL
iii)Interest accrued but not due	NIL	NIL	NIL	NIL
Total (i+ii+iii)	5,74,57,923.75	17,30,77,497.99	NIL	23,05,35,421.74
Change in Indebtedness during the financial year				
-Addition (principal amount)	2,36,47,757.99	6,72,55,745.38	NIL	9,09,03,503.37
- Reduction (principal amount)	NIL	NIL	NIL	NIL
Net Change	2,36,47,757.99	6,72,55,745.38	NIL	9,09,03,503.37
Indebtedness at the end of the financial year				
i)Principal Amount	8,11,05,681.74	24,03,33,243.37	NIL	32,14,38,925.11
ii)Interest due but not paid	NIL	NIL	NIL	NIL

iii) Interest accrued but not due	NIL	NIL	NIL	NIL
Total (i+ii+iii)	8,11,05,681.74	24,03,33,243.37	NIL	32,14,38,925.11

VI. REMUNERATION OF DIRECTORS AND KEY MANGERIAL PERSONNEL

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

Sl. no.	Particulars of Remuneration	Name of MD/WTD/ Manager				Total Amount
		DINESH GARG	LOVLISH GARG	-	-	
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	66,00,000	66,00,000		NIL	1,32,00,000
2.	Stock Option					
3.	Sweat Equity					
4.	Commission - as % of profit - others, specify...					
5.	Others, please specify					
	Total (A)	66,00,000	66,00,000			1,32,00,000
	Ceiling as per the Act					

B. Remuneration to other directors:

S. No.	Particulars	Name of Directors		Total Amount
		PARKASH CHAND GARG		
1.	Independent Directors <ul style="list-style-type: none"> • Fee for attending board committee meetings • Commission • Others, please specify 	-	-	
	Total (1)	NIL	NIL	NIL
2.	Executive Directors <ul style="list-style-type: none"> • Salary • Commission if any • Others, please specify 	-	-	-
	Total (2)	-	-	
	Total (B)=(1+2)	-	-	
	Total Managerial Remuneration	-	-	-
	Overall Ceiling as per Act	NIL		

VII. Remuneration to Key Managerial Personnel other than MD/ Manager/ WTD: None

VIII. PENALTIES/ PUNISHMENTS/ COMPOUNDING OF OFFENCES: None

By Order of the Board of Director
For **BEHARI LAL ISPAT PRIVATE LIMITED**



DINESH GARG
Wholetime Director
DIN: 00215117



LOVLISH GARG
Wholetime Director
DIN: 02000916

DATE: 22/11/2021
PLACE: Mandi Gobindgarh