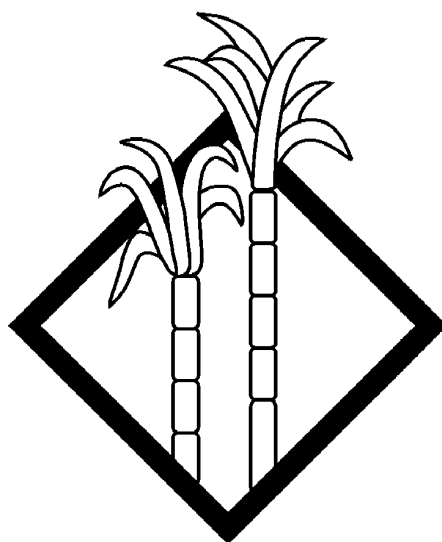




# ***SBEC Sugar Limited***



## **T W E N T Y   N I N T H   A N N U A L   R E P O R T**

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# **2023**



## BOARD OF DIRECTORS

Shri. Umesh K Modi - Chairman & President  
Smt. Kumkum Modi  
Shri. Abhishek Modi - Whole Time Director  
Shri. Jayesh Modi  
Shri. Vijay Kumar Modi  
Shri. Narayan Prakash Bansal  
Shri. Jagdish Chander Chawla  
Smt. Mohi Kumari  
Sh. Sudhanshu Goil

## CHIEF FINANCIAL OFFICER

Shri. A.K. Goel

## COMPANY SECRETARY

Shri. Ankit K. Srivastava

## AUDITORS

M/s DOOGAR & ASSOCIATES  
13, Community Centre,  
East of Kailash  
New Delhi-110065

## BANKERS

Axis Bank Ltd.  
Punjab National Bank  
State Bank of India  
U.P. Co-operative Bank Ltd.

## REGISTERED OFFICE & PLANT

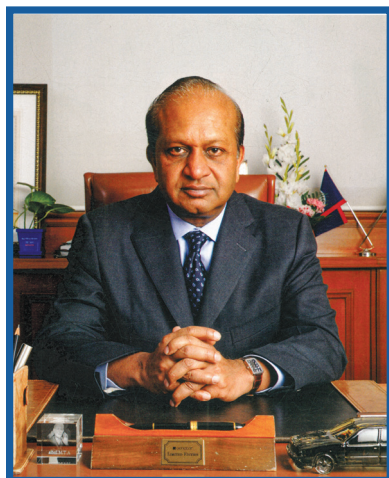
Village: Loyan Malakpur,  
Tehsil: Baraut - 250 611,  
Distt. Baghpat,  
Uttar Pradesh

## REGISTRAR & SHARE TRANSFER AGENT

M/s Beetal Financial & Computer Services (P) Ltd.  
Beetal House, 3rd Floor, 99 Madangir,  
Near Dada Harsukhdas Mandir,  
Behind Local Shopping Centre,  
New Delhi-110062

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## Shri Umesh Kumar Modi

Chairman and President

SBEC Sugar Limited

### DIRECTORS' REPORT

To,  
The Shareholders,  
SBEC Sugar Limited

Dear Members,

Your Directors have pleasure in presenting the 29<sup>th</sup> Annual Report of the Company together with the Audited Accounts for the year ended 31st March, 2023.

#### **FINANCIAL RESULT**

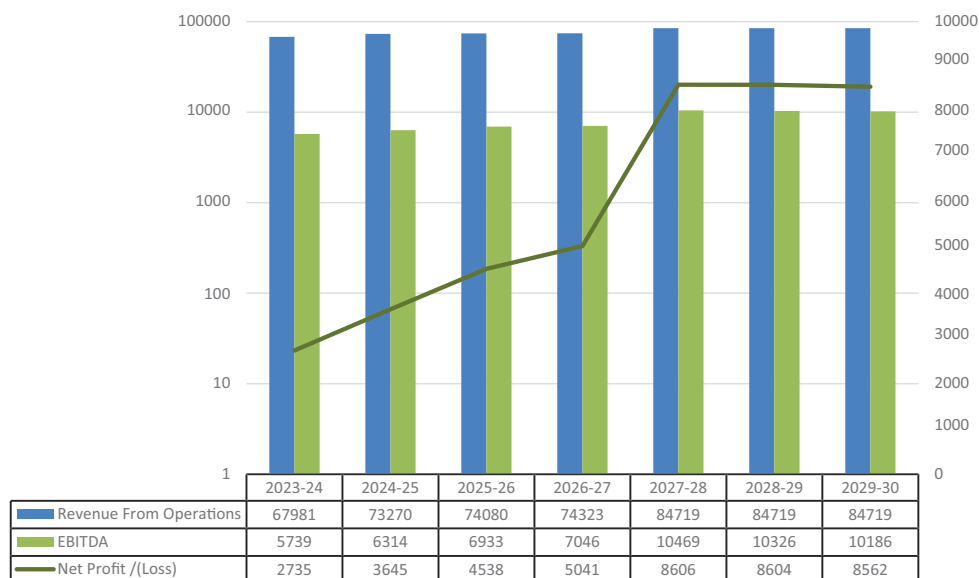
The summarised financial results of SBEC Sugar Ltd. as well as Consolidated with its subsidiaries i.e. SBEC Bioenergy Limited and SBEC Stockholding and Investment Limited for the financial year ended 31st March, 2023 are as under:

(Rs. in Lacs)

Financial Parameters	STANDALONE		CONSOLIDATED	
	Period ended 31.03.2023	Period ended 31.03.2022	Period ended 31.03.2023	Period ended 31.03.2022
<b>INCOME</b>				
Revenue from operations	64,698.49	60,218.99	65,846.19	61,401.33
Other Income	147.66	83.64	1,064.40	653.95
<b>Total Income</b>	<b>64,846.14</b>	<b>60,302.63</b>	<b>66,910.59</b>	<b>62,055.28</b>
Cost of materials consumed	52,415.47	52,263.67	52,415.47	52,263.67
Changes in inventories of finished goods, stock - in - trade and work - in - progress	2,687.87	(2,265.13)	2,688.99	(2,264.26)
Employee benefits expenses	1,874.93	1,629.09	2,211.12	1,913.94
Other expenses	5,715.24	6,383.89	6,470.73	6,968.99
<b>Operating Profit/Loss</b>	<b>2,152.63</b>	<b>2,291.11</b>	<b>3,124.28</b>	<b>3,172.94</b>
<b>EBITDA</b>	<b>2,152.63</b>	<b>2,291.11</b>	<b>3,124.28</b>	<b>3,172.94</b>
Depreciation and amortization expenses	1,897.85	1,850.60	2,117.59	2,070.61
<b>EBIT</b>	<b>254.78</b>	<b>440.51</b>	<b>1,006.69</b>	<b>1,102.32</b>
Finance costs	1,545.50	1,506.28	1,836.75	1,844.92
<b>EBT</b>	<b>(1,290.72)</b>	<b>(1,065.77)</b>	<b>(830.06)</b>	<b>(742.60)</b>
<b>TAX</b>	<b>0.00</b>	<b>0.00</b>	<b>217.11</b>	<b>114.44</b>
<b>PAT</b>	<b>(1,290.72)</b>	<b>(1,065.77)</b>	<b>(1,047.17)</b>	<b>(857.03)</b>



### PROJECTION OF NEXT SEVEN YEARS (₹ IN LACS)



### OPERATIONS

The crushing for the season 2022-23 started on November 13, 2022 and ended on April 30, 2023 and cane crushed during season 2022-23 was 133.44 Lac Qtls as compared to 134.08 Qtls in the last season.

Particulars	Unit	Sugar Season		
		2022-23	2021-22	2020-21
Cane Crush	Lac Qtl	133.44	134.08	148.84
Recovery	%	10.75	11.19	11.07
Sugar Production	Lac Qtl	14.38	15.19	16.47

Company crushed 133.44 Lac Qtls sugarcane. However, recovery decreased by 0.44% due to climatic conditions and some disease in cane.

Your Company's sugar factory is in U.P. where state government announces the Sate Administered cane Price (SAP), which is much higher than the Fair Remunerative Price (FRP). This creates a distortion in the industry because SAP is neither linked to sugar recovery nor does it take into account domestic and global prices and other relevant parameters. As a result, when sugar prices are low, mill owners are unable to pay to farmers resulting in delayed payment, huge cane arrears and trust deficit between farmers and millers.

Despite the drop in sugar production, there is ample supplies in the country to fulfill local consumption of 27.5 million tons. Considering an opening stock of 6.2 million tons as on 1st October 2022, India's consumption of 27.5 million tons, sugar exports of 6.1 million tons and an estimated production of 32.8 million tons, the closing stock of sugar in India as on 30th September, 2023 is expected at 5.5 million tons. The scenario may not undergo any significant change during the forthcoming sugar season. It is expected that the pressure on the sugar price would continue to remain given the over-supply scenario.

Despite several challenges, your company lays continuous trust on strong farmer relationship, cost control, efficiency improvement and continue to focus on cane development activities, comprising clean cane, varietal change and modern agriculture practices which is expected to further improve productivity in the coming years.

### Indian sugar market

Next to Brazil, India is the largest global producer of sugar. In India, sugarcane is produced majorly in nine states, viz. Uttar Pradesh, Maharashtra, Karnataka, Punjab, Andhra Pradesh, Bihar, Gujarat, Haryana, and Tamil Nadu. It is one of the important agro-based industries that impacts the rural livelihood of many. Demand for cane and sugar is increasing in India because of their extensive use in applications like food and beverages, bakery, confectionery, and others.

### Sugar exports and imports

As per Department of Food and Public Distribution (DFPD), during 2022-23 (as on 21.03.2023) India had exported 33.89 Lakh MT of white sugar and 19.22 lakh MT of raw sugar aggregating 53.11 Lakh MT of sugar. To prevent the uncontrolled export of sugar and ensure sufficient availability for domestic consumption at a reasonable price, Directorate General of Foreign Trade (DGFT), Ministry of Commerce vide notification No. 10/2015-20 dated 24.05.2022 amended the export policy with respect to sugar and covered it under the restricted category w.e.f. 01.06.2022 for 2021-22 sugar season. The Government also decided to allow the export of sugar up to a reasonable limit w.e.f. 01.11.2022 till 31.10.2023 for the current sugar season. Further, DFPD allocated an export quota of 60 LMT to sugar mills for sugar season 2022-23 w.e.f. 01.11.2022 along with the guidelines for the export of sugar.



The import of raw sugar by refineries for refining the imported raw sugar and re-exporting the same was under Advance Authorization Scheme (AAS). Such import was not meant for domestic consumption.

### **Sugar production**

Indian Sugar Mills Association (ISMA) in its report revised the estimated sugar production to 328 Lakh Tonnes of sugar (after diversion for ethanol) between October, 2022 and May, 2023 during the current sugar season as against 358 Lakh tonnes in the same period last sugar season. This was about 30 Lakh MT lower than previous year's production. Uttar Pradesh, the Country's largest sugar producer recorded a production of 107 Lakh MT of sugar during 2022-23 season, after diversion of 14 Lakh MT for Ethanol. The second largest producer of sugar, Maharashtra, achieved a production of 105 Lakh MT of sugar after diverting 13 Lakh MT of sugar. Karnataka, the third largest producer of sugar, was estimated to have produced 57 Lakh MT after a diversion of 10 Lakh MT of sugar to ethanol. Lower cane yields owing to higher ratoon crop share and uneven distribution of rainfall caused a lower production in Maharashtra. However, cane yield in Uttar Pradesh bettered this year. Considering an opening stock of about 7 Mn Tonnes as on 1st October, 2022 domestic consumption of 27.5 Mn Tonnes, sugar exports of over 6.1 Mn Tonnes and the estimated sugar production of 32.8 Mn T, the closing stock as on 30th Sep 2023 is expected to be around 6.2 Mn Tonnes. The sugar sales by end of March 2023 is estimated to be 13.5 Mn Tonnes as against 13.6 Mn Tonnes in the corresponding period last year, which is higher by 0.75%.

### **Sugar consumption**

The overall estimated domestic sugar consumption was 27.5 MMT in India 2022-23. Since 2019-20, the sugar consumption volume is gradually increasing. The primary reasons for increase in demand comprise a growing population and improving economic conditions. The major consumers of sugar produced directly by mills are bakeries, local sweets and candy manufacturers and together with soft drink manufacturers, they comprise almost 60% of consumers. The primary consumers of khandsari are locally operating sweet establishments, while gur is used in the rural areas, in its standard form, both as a sweetener and as feed. Manufacturers of biscuits and food products, pharmaceutical companies, hotels and restaurants also consume a fair quantity of sugar.

### **Long-term Industry Outlook**

The Indian Sugar industry is witnessing a positive turnaround. Due to lower production of sugar, the prices of sugar is all time high and prices would further rises because of summer season & upcoming wedding season.

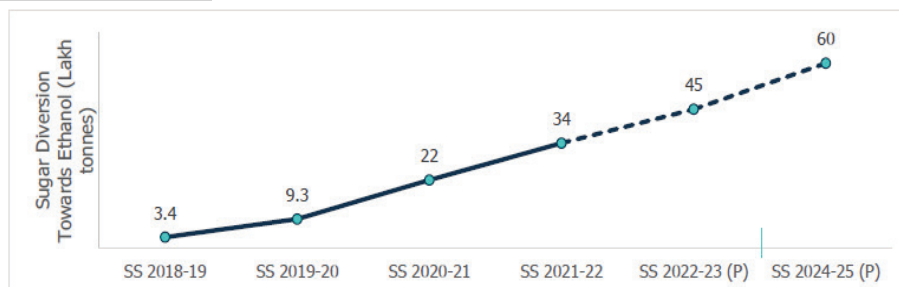
Despite India's sugar production fell by approx 8.00% to 32.8 million tons in comparison to previous year's 35.5 million tons, the production of sugar in Uttar Pradesh rose to 10.19 million tons (approx) against 10.02 million tons in the previous year period. The average recovery in the current season in the Uttar Pradesh is 9.65%.

Sugar production is estimated to be 32.8 million tons in SS 2022-23, as compared to the peak of 35.5 million tons produced in the previous SS 2021-22; with the highest ever diversion towards ethanol estimated at 45 lakh tonnes (higher by 41% y-o-y), according to the Indian Sugar Mills Association (ISMA). This increasing diversion towards high realisation ethanol is likely to support 8-12% revenue growth for sugar mills this fiscal. By the year 2025, the government is targeting to divert 6 million tonnes of excess sugar towards ethanol annually.

The lower sugar output could limit exports from the world's second-biggest exporter, lifting global prices and allowing rivals Brazil and Thailand to boost their shipments.

The sugar export quota is set at 60 lakh tonnes by the government in the current SS, which is still lower than exports of 72 lakh tonnes and 112 lakh tonnes in the SS 2020-21 and SS 2021-22, respectively. The additional sugar export quota will be decided after evaluating the current demand-supply scenario. Furthermore, a GST reduction from 18% to 5% coupled with any additional export quota announcement by the government, could support the sugar mills' performance in the near term.

### **Trends of sugar diversion towards ethanol**



Source: ISMA

The future of the sugar industry appears encouraging; nevertheless, certain concerns need urgent attention. The Government has always been proactive and supportive of the industry, keeping in mind the size of the sugar industry and the number of livelihoods associated with it. However, the focus equally needs to be on addressing problems connected to Fair and Remunerative Price (FRP) or increase in Minimum Selling Price (MSP) and cane arrears. In June 2018, the Indian government fixed the MSP of sugar for the first time at Rs. 29 per kg when the FRP of sugarcane was Rs. 2,550 per ton. Subsequently, MSP increased to Rs. 31/Kg. However, the FRP has been steadily increasing, while the MSP of sugar has remained unchanged since February 2019.

The industry has been requesting the Government to increase the MSP for sugar from Rs. 31/kg. As per NITI Ayog, Rs. 31/kg does not cover the cost of manufacture, given the FRP, which is at a reasonably high floor. One way of improving liquidity of sugar mills is to raise the MSP of sugar, which could help sugar mills cover the cost of production, including interest, maintenance costs etc. Keeping in view the emerging developments, the MSP for sugar needs to be reviewed urgently.

To prevent the problem of arrears for sugarcane farmers and to keep the sugar industry in sound financial health, sugarcane prices must be linked to the sugar price. The Revenue Share Formula advocated by Dr. Rangarajan Committee needs to be introduced strictly with a Price Stabilization Fund (PSF) to protect farmers from receiving prices below the FRP.



Despite producing a high-quality sugar, the competitiveness of Indian exports is affected by the country's high cane costs relative to other major producers, including Brazil, Thailand and Australia, rendering exports unviable without subsidy until about a year back.

Despite diversion of sugar towards ethanol, the sugar stock is still higher than the normative carry forward requirement.

Surplus production compels the regular export of sugar. High cane prices make Indian sugar manufacturers uncompetitive and dependent on government subsidies for exports. With the probability of export subsidy being phased out after 2023 (as per WTO), Indian sugar mills need to deal with a formidable problem of diversion of surplus sugar into ethanol to improve liquidity and check a decline in sugar price.

However, with a likely increase in sugar diversion towards ethanol to 45 lakh tonnes (Sugar Season 2022: 34 lakh tonnes), the net sugar production is likely to come in at 32.8 million tonnes while consumption could continue to grow at around 1-2 per cent, increasing to 27.5 million tonnes in Sugar Season 2023.

#### **Expansion of plant capacity:**

SBEC Sugar has a total cane area of 26,500 Hectare of land which produces approx. 238.50 Lac Qtl. Cane. The yield of sugarcane is going up year after year. Thus the yield of the company's cane area is going to be approx.. 2,65,000 Ton. With 70% drawal, the sugarcane availability for crushing is going to be 1,85,500 Ton.

Previously, the production facilities were designed for a daily sugarcane crushing capacity of 8,000 TCD (approx.). To take advantage of the increasing cane production, the Company in first phase has increased its production capacity upto 9,000 TCD, which was operative from SS 2022-23. The Company is also considering to increase its production capacity upto 10,000 TCD in next phase.

#### **ETHANOL PLANT**

In the SS 2022-23, India has crossed the mark of 11.65% ethanol blending with petrol. To achieve 20% blending by 2025, about 12 million litres of ethanol would be required. The sugar diversion towards ethanol production is estimated to be at a consecutive record high of 45 lakh tonnes in SS 2022-23 against 32 lakh tonnes in SS 2021-22 (y-o-y increase of 41%). By the SS 2024-25, the government is targeting to divert 60 lakh tonnes of excess sugar towards ethanol, 88% higher than the diversion made in SS 2021-22.

Considering the emphasis being laid by the Government on increasing Ethanol production capacity to give impetus to its Ethanol Blending Policy with Petrol so as to save foreign exchange being spent on import of petro products, to some extent, the Company is taking steps for setting up a 100 KLPD Ethanol Plant within its complex in Village Loyan Malakpur (Baraut). The Company has already received the license to set-up the ethanol plant up to the capacity of 100 KLPD. The Company has also received in principle approval for interest subvention on loan for an amount of Rs. 97.88 crores from the Ministry of Consumer Affairs, F & D Department of Food & Public Distribution.

The Company has also made an application for loan of Rs. 130.50 crore with U.P. Co-operative Bank Ltd., Lucknow.

#### **DIVIDEND & RESERVES**

As the Company has incurred loss during the year under review, your Board has not recommended any dividend for the financial year ended March 31, 2023.

#### **SHARE CAPITAL**

The paid up equity capital as on March 31, 2023 was Rs.4765.38 Lacs. During the year under review, the Company has not issued any shares or any other security.

#### **MATERIAL CHANGES AND COMMITMENTS**

No material changes or commitments have occurred between the end of the financial period to which the financial statements relate and the date of this report, affecting the financial position of the Company.

#### **SUBSIDIARY COMPANIES**

As on March 31st 2023, the Company has one Wholly Owned Subsidiary i.e. SBEC Stockholding & Investments Limited and one Subsidiary i.e. SBEC Bioenergy Limited. There are no associate companies within the meaning of Section 2(6) of the Companies Act, 2013 ("Act"). There has been no material change in the nature of the business of the subsidiaries.

In accordance with Section 129(3) of the Companies Act, 2013, the Company has prepared a consolidated financial statement of the Company and all its subsidiary companies, which is forming part of the Annual Report. A statement containing salient features of the financial statements of the subsidiary companies are annexed in Form AOC-1 and marked as "**Annexure-A**" to the Annual Financial Statements.

In accordance with the provisions of Section 136(1) of the Companies Act, 2013, the Annual Report of the Company containing standalone and consolidated financial statements has been placed on the website of the Company, [www.sbecsugar.com](http://www.sbecsugar.com). Further, the audited accounts of the Subsidiary Companies and the related detailed information have also been placed on the website of the Company [www.sbecsugar.com](http://www.sbecsugar.com). A copy of annual accounts of subsidiaries will be made available to shareholders seeking such information at any point of time.

On the basis of Audited Financials Accounts of the Company for the FY.2022-23 the Company has two Material Subsidiary Companies i.e. SBEC Bioenergy Limited and SBEC Stockholding & Investment Limited. The Minutes of the Board Meetings of the subsidiary companies are placed at the Board Meetings of the Company. Details of significant transactions and arrangements entered into by the subsidiary companies are noted by the Board. The Audit Committee of the Company reviews the financial Statement of the subsidiary companies including investments made.

There has been no change in relationship of any subsidiary company during the financial year.

#### **CONSOLIDATED FINANCIAL STATEMENT**

The consolidated financial statements of the Company for the financial year 2022-23, are prepared in compliance with applicable provisions of the Companies Act, 2013, Indian Accounting Standard (Ind AS) and SEBI (LODR) Regulations, 2015.



## **DIRECTORS**

In accordance with the provisions of Section 152 of the Companies Act, 2013 and the Articles of Association of the Company, Mr. Jayesh Modi (DIN: 02849637), Director of the Company retires by rotation at the ensuing Annual General Meeting and he is eligible for re-appointment.

The office of Mr. Shyam Babu Vyas & Mr. Rohit Garg, Independent Directors had fallen vacant w.e.f. July 20, 2020 pursuant to Section 167(1)(b) of the Companies Act, 2013, as they absented themselves from all the meetings from the Board of Directors held during the period of twelve months.

Ms. Mohi Kumari & Mr. Sudhanshu Goil were appointed as Independent Director w.e.f. August 16, 2022 in the Board Meeting held on August 06, 2022 and their appointment was regularized in the 28th Annual General Meeting.

The Board of Directors in its meeting held on August 11, 2023 appointed Mr. Anirudh Kumar Modi & Mr. Ajay Kumar Aggarwal as Additional Non-Executive Independent Directors of the Company for the period of five years w.e.f. September 01, 2023 and also proposes their regularization as Non-Executive Independent Directors for shareholders' approval in the ensuing 29th Annual General Meeting.

The Board also approved the Change in designation of Mr. Vijay Kumar Modi from Non-Executive Independent Director to Non-Executive Non - Independent Director w.e.f. September 01, 2023 subject to Shareholders approval in the ensuing 29th Annual General Meeting.

The Board also proposes the re-appointment of Sh. Abhishek Modi as Whole Time Director designated as Executive Director for the period of five years with effect from 25th May, 2024 without any remuneration. The same is subject to the shareholders in the ensuing 29th Annual General Meeting.

Particulars of Directors seeking appointment/re-appointment have been given in the explanatory statement annexed to the notice for the Annual General Meeting.

All the Directors have made necessary disclosures as required under various provisions of the Companies Act, 2013 and SEBI (LODR) Regulations, 2015.

## **CHAIRMAN & KEY MANAGERIAL PERSONNEL (KMP)**

During the financial period ended 31.03.2023, details of Chairman & Whole Time Key Managerial personnel (KMP) of the Company are as follows:

S.No.	Name	Designation
1.	Shri Umesh Kumar Modi	Chairman & President
2.	Shri Abhishek Modi	Whole Time Director
3.	Shri Anil Kumar Goel	Chief Financial Officer
4.	Shri Ankit Kumar Srivastava	Company Secretary & Compliance officer
5.	Shri Vipin Kumar	Occupier

## **BOARD MEETINGS**

The Board met four times during the financial year 2022-23, the details of which are given in the Corporate Governance Report. The intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013 and the SEBI (LODR), Regulations, 2015.

## **FORMAL ANNUAL EVALUATION**

Pursuant to the requirements of Section 134(3)(p) of the Companies Act, 2013 read with Regulation 17 of the SEBI (Listing Obligations and Disclosure Requirements), 2015, the Board has carried out a performance evaluation of itself, its Committees, the Chairman and each of the other Directors.

A structured questionnaire was prepared after taking into consideration 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, obligation and governance.

A separate exercise was carried out to evaluate the performance of individual directors including the Chairman of the Board. The performance evaluation of Independent Directors was carried out by the entire Board. The performance evaluation of the Chairman and the Non-Independent Directors was carried out by the Independent Directors at their meeting held separately.

At the conclusion of the evaluation exercise, the Members of the Board assessed that the Board as a whole together with each of its committees was working effectively towards performance of its key functions.

## **STATEMENT REGARDING OPINION OF THE BOARD WITH REGARD TO INTEGRITY, EXPERTISE AND EXPERIENCE OF THE INDEPENDENT DIRECTORS APPOINTED DURING THE YEAR**

During the Year Ms. Mohi Kumari & Mr. Sudhanshu Goil were appointed as Non-Executive Independent Director of the Company w.e.f., 16th August 2022. In the opinion of Board, Ms. Mohi Kumari & Mr. Sudhanshu Goil are Advocates by profession and they have high moral values, rich experience in the matter of Corporate Laws.

## **DIRECTOR'S RESPONSIBILITY STATEMENT**

Pursuant to the provisions contained in Section 134 (5) of the Companies Act, 2013, your Directors to the best of their knowledge and belief and according to information and explanations obtained from the management, confirm that:

- in the preparation of the annual accounts for the financial year ended March 31, 2023, the applicable accounting standards have been followed and there are no material departures from the same;
- the Board of Directors have selected such accounting policies and applied them consistently and made judgements 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, 2023 and of the statement of profit and loss of the Company for the year ended on that date;
- the Board of Directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;





- d) The Directors have prepared the Annual Accounts on a going concern basis.
- e) The Directors have laid down proper internal financial controls to be followed by the Company and such controls are adequate and operating effectively; and
- f) The Directors have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems are adequate and operating effectively.

#### **DECLARATION FROM INDEPENDENT DIRECTORS**

All Independent Directors of the Company have given declarations for the financial year 2022-23, that they meet the criteria of Independence as laid down under Section 149(6) of the Companies Act, 2013 and SEBI (LODR), Regulations, 2015.

#### **INTERNAL FINANCIAL CONTROLS**

Your company has in place an adequate internal control system in order to ensure that all transactions are authorized, recorded and reported correctly and that all assets are protected against the perils of unauthorized use or disposition. Towards enhancing the efficiency of internal controls, services of consultants are hired wherever necessary, and their suggestions are reviewed and implemented. Your Company has in place an Internal Audit system, whereby an independent professional firm of Internal Auditors conducts regular audit across the Company and their scope and findings are reviewed by the Management and Audit Committee on a regular basis.

The Audit Committee of the board also meets periodically to review the internal controls, internal audit findings, action taken reports and to advise the management on corrective policies, if any.

#### **AUDITORS AND AUDITORS' REPORT**

##### **Statutory Auditors**

M/s. Doogar & Associates, Chartered Accountants (FRN.000561N) were appointed as Statutory Auditors of the Company for a term of 5 Years to hold office from the conclusion of 28th Annual General Meeting (AGM) held on September 29, 2022 and their tenure will expire after the conclusion of the 33rd Annual General Meeting.

##### **STATUTORY AUDITORS' REPORT**

The Auditors' Report of M/s. Doogar & Associates, Chartered Accountants contains qualifications and the Company has given its comments on Auditor Qualified Opinion for the Financial Year 2022-23. The details are mentioned here under:

##### **Response to Qualified Opinion (i)**

Under the power vested with the Cane Commissioner (U.P) for waiver of interest under U.P. Sugar Cane (Regulation of Supply and Purchase) Act, 1953 in respect of loss making/ sick companies, the Company had made an application to Cane Commissioner (U.P.) for waiver of interest on Cane Dues. Pending receipt of the Cane Commissioner's decision, no interest has been provided on the cane dues. The Company has decided to account for the same on actual payment basis.

##### **Response to Qualified Opinion (ii)**

The management is of the opinion that no provision for doubtful debts is required as the company is the major secured creditor of Modi Industries Limited which owns substantial properties which are quite sufficient to take care of its entire liabilities. In view of that the management is confident for recovery of whole amount.

##### **Response to qualified opinion (iii)**

The Company has valued closing stock at NRV of Rs. 3517.24 considering the current market price of around Rs. 3520.00 per quintal. The same is still lower than the Market price.

#### **COST AUDITORS**

As per the requirement of the Central Government and pursuant to Section 148 of the Companies Act, 2013 read with the Companies (Cost Records and Audit) Rules, 2014 as amended from time to time, your Company's cost records are subject to Cost Audit.

The Board of Directors, on the recommendation of the Audit Committee, have appointed M/s. M.K. Singhal & Co., Cost Accountants, as the Cost Auditors to audit the cost accounting records maintained by the Company for the financial year 2023-24 at a remuneration of Rs.1,00,000/- plus taxes as applicable and reimbursement of out of pocket expenses. As required under the Companies Act, 2013, a resolution seeking member's approval for the remuneration payable to the Cost Auditor forms part of the notice convening the Annual General Meeting.

#### **SECRETARIAL AUDITOR**

The Board appointed M/s Soniya Gupta & Associates, Practicing Company Secretaries, as the Secretarial Auditors to undertake the Secretarial Audit of the Company for Financial Year 2022-23. The Report of the Secretarial Auditors along with report of Secretarial Auditors of Material Subsidiary Companies are annexed in "**Annexure-B**" to this Report.

The observations in secretarial audit report are self-explanatory and therefore do not call for any further explanation.

#### **FIXED DEPOSITS**

During the financial year, Company has not accepted any deposit from public within the meaning of section 73 of the Companies Act, 2013 read with Companies (Acceptance of Deposit) Rules, 2014.

#### **RISK MANAGEMENT POLICY**

As per Section 134(3) (n) of the Companies Act, 2013, the Company has adopted a Risk Management Policy which is reviewed on a periodic basis in order to recognize and reduce exposure to risks wherever possible. The Company's risk management policies are based on the philosophy of achieving





substantial growth while mitigating and managing risks involved. Major risks identified are discussed at the meetings of the Audit Committee and the Board of Directors of the Company.

#### **AUDIT COMMITTEE**

The Audit Committee comprises of four Independent Directors, viz., Mr. Vijay K. Modi as Chairman, Mr. J.C. Chawla, Mr. N.P. Bansal & Ms. Mohi Kumari as Members. The details of terms of reference of the Audit Committee, number and dates of meeting held, attendance, among others are given separately in the attached Corporate Governance Report.

#### **NOMINATION AND REMUNERATION COMMITTEE**

Pursuant to the provisions of Section 178 of the Companies Act, 2013 read with Rules made there under, the Board has constituted a Nomination & Remuneration Committee and the details of terms of reference, number & dates of meeting held, attendance and other details are given separately in the attached Corporate Governance Report. The Board on the recommendation of Nomination & Remuneration Committee framed a policy i.e. Nomination and Remuneration Policy for selection and appointment of Directors, senior managerial personnel and their remuneration.

#### **REMUNERATION POLICY**

The Company has adopted a Remuneration Policy for executive and non-executive directors and persons who may be appointed in Senior Management and Key Managerial positions and to determine their remuneration as approved by the Board of Directors on the recommendation of Nomination and Remuneration Committee. The remuneration so approved is subject to the approval by the shareholders and such other authorities as the case may be. The Non-Executive Directors do not draw any remuneration from the Company except sitting fee paid to them for each meeting of the Board/ Committee thereof attended by them. The aforesaid policy can be accessed on the Company's website [www.sbcsugar.com](http://www.sbcsugar.com)

#### **CORPORATE SOCIAL RESPONSIBILITY (CSR) INITIATIVES**

Pursuant to the provisions of the Section 135 of the Companies Act, 2013 (the Act), the CSR provisions are not applicable as per immediately preceding financial years of the Company. The CSR Committee constituted by the Board of Directors has been dissolved **w.e.f. 9th August, 2018**.

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

The information relating to conservation of energy, technology absorption and foreign exchange earnings and outgo pursuant to Section 134(3)(m) of the Companies Act, 2013 read with Rule 8 of the Companies (Accounts) Rules, 2014 is enclosed in "**Annexure-C**" and forms part of this Report.

#### **PARTICULARS OF EMPLOYEES AND RELATED DISCLOSURES**

The information required under Section 197(12) of the Companies Act, 2013 read with the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 and forming part of the Board's Report for the year ended March 31, 2022 are given in "**Annexure -D**" to this Report.

#### **PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS**

The details of Loans, Guarantees and Investment covered under the provisions of Section 186 of the Companies Act, 2013 are given in the notes to financial statements.

#### **RELATED PARTY TRANSACTIONS**

The transactions entered with related parties during the year under review were on Arm's Length basis and in the ordinary course of business and complied the provisions of Section 188 of the Companies Act, 2013. All related party transactions were approved by the Audit Committee and the Board. The relevant information regarding related party transactions has been set out in Note No. 30 of the Financial Statements for the financial year ended 31.3.2023.

However, there was a transaction between the Company and SBEC Bioenergy Limited which was on arm's length basis but the same was a material transaction. All the relevant details of the said transaction have been given in AOC-2 which is enclosed as "**Annexure E**" and forms part of this directors' report.

The Board has framed a Policy on related party transactions and placed the same on the Company's website at [www.sbcsugar.com](http://www.sbcsugar.com).

#### **VIGIL MECHANISM & WHISTLE BLOWER POLICY**

The Company has formulated and implemented the Whistle Blower Policy/ Vigil Mechanism. This has provided a mechanism for directors and employees of the Company and other persons dealing with the Company to report to the Chairman of the Audit Committee; any instance of unethical behaviour, actual or suspected fraud or violation of the Company's code of conduct. The aforesaid policy has also been uploaded on the Company's website at [www.sbcsugar.com](http://www.sbcsugar.com).

#### **SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013.**

The Company is committed to a workplace free of harassment, including sexual harassment at the workplace, and has zero tolerance for such unacceptable conduct. The Company encourages reporting of any harassment concerns and is responsive to complaints about harassment or other unwelcome or offensive conduct. The Company has in place a policy on prevention of sexual harassment in line with the requirements of the Sexual Harassment of women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Policy). An Internal Complaint Committee is in place to redress the complaints received regarding sexual harassment. All employees are covered under this policy. Necessary disclosures in relation to the sexual harassment complaints received and redressal thereof are provided in Board's Report 2023. The Company has also a Whistleblower Policy to report genuine concerns and grievances. As part of Whistleblower Policy and POSH Policy, there is a provision on the protection of identity of the complainant to provide necessary safeguards against victimisation of employees. All such matters are dealt in strict confidence. Also as part of its Code of Conduct, the Company does not tolerate any form of retaliation against anyone reporting legitimate concerns.

During the year from April 1, 2022 to March 31, 2023 the Committee has not received any complaint under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. At the end of March 31, 2023, no complaint was pending for redressal.

**ANNUAL RETURN**

As per Companies Act, 2013 the Annual Return of the Company for the year will be available on the website of the Company at <http://sbecsugar.com>.

**COMPLIANCE OF SECRETARIAL STANDARDS**

The Company has complied with the Secretarial Standards issued by The Institute of Company Secretaries of India and approved by the Central Government as required under Section 118(10) of the Companies Act, 2013.

**LISTING OF SECURITIES**

The equity shares of your Company are listed on the BSE Limited and the Calcutta Stock Exchange Association Limited. The Company's application for delisting of shares with the Calcutta Stock Exchange Association Limited is still pending.

**BOARD DIVERSITY**

The Company recognizes and embraces the importance of a diverse board in its success. We believe that a truly diverse board will leverage differences in thought, perspective, knowledge, skill, regional and industry experience, cultural and geographical background, age, ethnicity, race and gender, which will help us retain our competitive advantage. The Board has adopted the Board Diversity Policy which sets out the approach to diversity of the Board of Directors. The Board Diversity Policy is available on our website ([www.sbecsugar.com](http://www.sbecsugar.com)). More detail on diversity is available in the corporate governance report that forms part of this Annual Report.

**CORPORATE GOVERNANCE**

In Compliance with Regulation 17 to 27 of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015, a detailed Corporate Governance Report has been given elsewhere in this report, along with Management Discussion and Analysis Report, which form an integral part of the Annual Report.

A certificate from M/s Soniya Gupta & Associates, a firm of Company Secretaries in practice confirming compliance by the Company with the conditions of Corporate Governance as stipulated under part E of schedule V of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 is attached to this report.

The Whole Time Director and the Chief Financial Officer have submitted a certificate to the Board regarding the financial statements and other matters as required under SEBI (LODR), Regulations, 2015.

**INSOLVENCY & BANKRUPTCY CODE**

During the year, an application was filed under section 9 of the Insolvency and Bankruptcy Code, 2016 against the Company before the National Company Law Tribunal, Allahabad bench alleging default of an amount of Rs. 1,08,02,731/- (Rupees One Crore Eight Lakh Two Thousand Seven Hundred Thirty One).

However as per the Company's records, nothing is payable to said party as the party did not lift the contracted material within stipulated time limit. A detailed counter was filed by the Company refuting all the allegations. The matter is still pending before the NCLT, Allahabad bench.

During the year no application was made under the Insolvency & Bankruptcy Code, 2016.

**DETAILS OF DIFFERENCE BETWEEN AMOUNT OF THE VALUATION DONE AT THE TIME OF ONE TIME SETTLEMENT AND VALUATION DONE WHILE TAKING LOAN FROM THE BANKS OR FINANCIAL INSTITUTIONS**

During the year there were no differences in the valuation of the Company, as there was no one time settlement in the FY 2022-23.

**SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS OR COURTS OR TRIBUNALS**

During the year under review, there were no significant and material orders passed by the Regulators or Courts or Tribunals that could impact the going concern status of the Company and its future operations.

**PERSONNEL RELATIONS**

Your directors hereby place on record their appreciation for the services rendered by the executives, staff and workers of the Company for their hard work, dedication and commitment. During the year under review, relations between the employees and the management continued to remain cordial.

**APPRECIATION**

Your directors thank the various Central and State Government Authorities and Agencies for the continued help and cooperation extended by them. The Directors gratefully acknowledge all stakeholders of the Company viz., farmers, customers, members, dealers, vendors and banks for their excellent support during the year. The Directors also place on record their sincere appreciation to all employees of the Company for their unstinted commitment and continued cooperation to the Company.

**For & behalf of the Board  
SBEC Sugar Limited**

**sd/-  
Umesh Kumar Modi  
(Chairman & President)  
(DIN: 00002757)**

**Place: New Delhi  
Date: 11.08.2023**



"ANNEXURE-A"

**ANNEXURE TO BOARD'S REPORT  
"FORM- AOC-1"**

Pursuant to first proviso to sub-section (3) of section 129 of the Companies Act, 2013, read with rule 5 of Companies (Accounts) Rules, 2014.  
Statement containing salient features of The Financial Statements of Subsidiaries or associate companies or Joint ventures.

**PART A – SUBSIDIARIES**

(Rs. In Lacs)

S. No.	Name of the Subsidiary Company	Date on which when Subsidiary was acquired	Financial period ended	Ex-change Rate	Share Capital	Reserves & Surplus	Total Assets	Total Liabilities	Investments	Turnover	Profit before Taxation	Profit after Taxation	Proposed Dividend	% of Shareholding
1	SBEC Bioenergy Limited	12.03.1997	31-Mar-2023	INR	2300	3,920.47	7,340.70	7,340.70	1,093.57	1,147.7	(389)	(389)	NIL	55%
2	SBEC Stockholding Investments Limited	09.06.2001	31-Mar-2023	INR	455	966.89	3,799.99	3,799.99	3,792.51	0.00	940.20	723.09	45.5	100%

**For & behalf of the Board  
SBEC Sugar Limited**

**sd/-  
Umesh Kumar Modi  
(Chairman & President)  
(DIN: 00002757)**

**Place: New Delhi  
Date: 11.08.2023**

"ANNEXURE-B"

**SECRETARIAL AUDIT REPORT  
of SBEC SUGAR LIMITED  
(For the year ended on 31.03.2023)**

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

To,  
**The Members of  
SBEC SUGAR LIMITED**  
Vill- Lohan Malakpur, Teh- Baraut  
Distt. – Baghpat, Uttar Pradesh

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by SBEC SUGAR LIMITED having CIN: L15421UP1991PLC019160 (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 information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, we hereby report that in our opinion, the company has, during the audit period covering the financial year ended on 31st March, 2023, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by Company for the financial year ended on 31st March, 2023 according to the provisions of:

- The **Companies Act, 2013 (the Act)** and the Rules made thereunder;
- The Securities and Exchange Board of India (**Listing Obligations and Disclosure Requirements**) **Regulations, 2015** thereunder;
- The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
- The Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') viz.:



- (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
- (d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

The Management has identified and confirmed the following laws as specifically applicable to the Company:

- a) The Factories Act, 1948
- b) The Industrial Dispute Act, 1947
- c) The Water (Prevention & Control of Pollution) Act, 1974, Read with Water (Prevention & Control of Pollution) Rules, 1975,
- d) The Air (Prevention & Control of Pollution) Act, 1981 read with the Air (Prevention & Control of Pollution) Rules, 1982
- e) The Contract Labour (Regulation and Abolition) Act, 1970
- f) The Industrial Employment (Standing Orders) Act, 1946
- g) The Levy Sugar Price Equalisation Fund Act, 1976
- h) The Food & Safety Standards Act, 2006
- i) The Essential Commodities Act, 1955
- j) The Indian Boilers Act, 1923
- k) The Uttar Pradesh Vaccum Pan Sugar Factories Licensing Order 1969
- l) Sugar Control Order 1966
- m) The Molasses Control (Regulation of Fund for Erection of storage Facilities) Order, 1976
- n) The Insolvency and Bankruptcy Code, 2016
- o) The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

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

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India.
- (ii) The Listing Agreement entered into by the Company with BSE Ltd. (Stock Exchange), read with SEBI (Listing obligation & Disclosure Requirement) Regulations 2015.

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc mentioned above except to the extent as mentioned below:

1. **The Securities and Exchange Board of India on September 17, 2018 had issued directions to the Promoter group of the Company (namely Shri Umesh Kumar Modi, Kumkum Modi, Jayesh Modi, Longwell Investments Private Limited, A to Z Holdings Pvt. Ltd., Moderate Leasing and Capital Services Limited and SBEC Systems (India) Limited), severally or jointly to make a public announcement to acquire the shares of Target Company (i.e. SBEC SUGAR LIMITED) in accordance with the provisions of the Takeover Regulations, 2011, within a period of 45 days from the date of the above mentioned order. The shareholding/ voting rights of the promoter group had increased from 54.46% (2,59,51,083 Shares) as on June 30, 2014 to 63.86% (3,04,32,117 shares) as on September 30, 2014. In addition to the aforesaid acquisition, one of the lending promoter i.e. Moderate Leasing and Capital Services limited had also acquired 1.31% of SBEC Sugar Limited during March 18, 2015 to March 23, 2015, which increased the shareholding of promoter group to 65.17%. As per the said impugned order, the promoter group have violated the provisions of Regulation 3(2) of the Takeover Regulations, 2011 by acquiring shares in excess of the prescribed limit without making an announcement for open offer.**

**Against the said impugned SEBI order, M/S SBEC Systems (India) Limited had filed appeal no. 1 (No. 443/2018) before the Securities Appellant Tribunal, Mumbai.**

**Whereas the promoter group namely (Shri Umesh Kumar Modi, Ms. Kumkum Modi, Mr. Jayesh Modi, Longwell Investments Private Limited, A to Z Holdings Pvt. Ltd., Moderate Leasing and Capital Services Limited) had filed appeal no. 2 (No. 444/2018) before the Securities Appellant Tribunal, Mumbai.**

**The Hon'ble Securities Appellate Tribunal upon hearing the said Appeal vide its order dated January 29, 2020 has allowed the Appeal No. 1 (Appeal No.443 of 2018) and partly allowed Appeal No. 2 (Appeal No.444 of 2018), whereby, the directions issued by SEBI for open offer vide order dated September 17, 2018 qua promoters namely SBEC System (India) Limited, Shri. Umesh Kumar Modi, Smt. Kumkum Modi, Shri. Jayesh Modi and Longwell Investment Private Limited has been set aside, however, the directions issued by SEBI for Open Offer vide order dated September 17, 2018 issued qua the promoters namely A to Z Holdings Pvt. Ltd. and Moderate Leasing & Capital Services Ltd. (the acquirer of the shares) has been modified in terms of Regulation 32(1) (b) and they had been directed to sell the shares acquired in violation of the SAST Regulation and to transfer the proceeds of the same to the Investor Protection Fund established under the SEBI (Investor Protection and Education Fund), 2009 within a period of 6 (Six) months from the date of the order i.e. from January 29, 2020.**

**The promoters namely A to Z Holdings Pvt. Ltd. and Moderate Leasing & Capital Services Ltd. (the acquirer of the shares) could not comply with the order dated January 29, 2020, therefore, the said promoters approached the Hon'ble Securities Appellate**



***Tribunal vide Misc. Application no. 209 / 2020 seeking an extension of 6 (six) months for compliance of the order dated January 29, 2020 inter-alia on the grounds of operations of the said promoters being shut due to the pandemic COVID – 19. The said Misc. Application was listed before Hon'ble Securities Appellate Tribunal on July 29, 2020 and dismissed vide order dated July 29, 2020.***

***In the meantime, the Securities Exchange Board of India filed a Civil Appeal bearing nos. 2995 – 2996 / 2020 before the Hon'ble Supreme Court of India on July 29, 2020 against the order dated January 29, 2020 passed by Hon'ble Securities Appellate Tribunal.***

***Furthermore, the promoters namely A to Z Holdings Pvt. Ltd. and Moderate Leasing & Capital Services Ltd. have also filed a Civil Appeal bearing no. 3002 / 2020 before the Hon'ble Supreme Court of India on August 11, 2020 against the order dated July 29, 2020 passed by Hon'ble Securities Appellate Tribunal.***

***It is important to point out that both the Civil Appeals before the Hon'ble Supreme Court of India have been connected and the pleadings therein are complete. The said Civil Appeal was listed before the Hon'ble Supreme Court of India on August 18, 2021 and the matter is still pending for further proceedings.***

- 2. *The Company's application for delisting of shares with the Calcutta Stock Exchange Association Limited is still pending.***
- 3. *During the financial year, there was a cyber attack/ virus attack at the data server of the Company including structural digital database software's server, in which all the data was encrypted by ransomware attacked. Due to this all the data captured on structured digital database (SDD) software maintained was lost and could not be recovered.***
- 4. *The Company had sent the Corrigendum to the Notice of 28th Annual General Meeting (AGM) dated August 06, 2022 with respect to item no. 5 & 6 and its explanatory statement of the AGM notice, which was intimated to BSE Ltd (Stock Exchange) on 23rd September, 2022 with rectified AGM Notice and the said corrigendum was also published in the Newspaper on 24th September, 2022.***
- 5. *During the period under review, an application was filed under section 9 of the Insolvency and Bankruptcy Code, 2016 against the Company before the Hon'ble National Company Law Tribunal, Allahabad bench alleging default of an amount of Rs. 1,08,02,731/- (Rupees One Crore Eight Lakh Two Thousand Seven Hundred Thirty One).***

***However, as per the Management reply, nothing is payable to said party as the party did not lift the contracted material within stipulated time limit. A detailed counter was filed by the Company refusing all the allegations. The matter is still pending before the NCLT, Allahabad bench.***

We further report that,

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

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

Majority decision is carried through while the dissenting members' views are captured and recorded as part of the minutes.

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

We further report that,

As on March 31st 2023, the Company has two material subsidiaries i.e. SBEC Stockholding & Investments Limited (Wholly Owned Subsidiary Company) and SBEC Bioenergy Limited (Subsidiary Company).

**For Soniya Gupta & Associates**

**Sd/-  
(Soniya Gupta)  
Proprietor  
M. NO. 7493  
CP NO. 8136  
PRFCN.: 1548/2021  
UDIN: F007493E000763435**

**Place: New Delhi  
Dated: 11.08.2023**

**(This report is to be read with our letter of even date which is annexed as Annexure "A" and forms an integral part of this report)**



**Annexure "A" of the Report**

**To,**  
**The Members of**  
**SBEC SUGAR LIMITED**  
Vill- Loyan Malakpur, Teh- Baraut  
Distt. – Baghpat, Uttar Pradesh

Our report of even date is to be read alongwith this letter.

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 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. Wherever 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 management. Our examination was limited to the verification of procedures on 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 Soniya Gupta & Associates**

**Sd/-**  
**(Soniya Gupta)**  
**Proprietor**  
**M. NO. 7493**  
**CP NO. 8136**

**Place: New Delhi**  
**Dated: 11.08.2023**

**CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS**

(Pursuant to Regulation 34(3) and Schedule V Para C clause (10) (i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

**To,**  
**The Members of**  
**SBEC SUGAR LIMITED**  
Vill- Loyan Malakpur, Teh- Baraut  
Distt. – Baghpat, Uttar Pradesh

We have examined the relevant registers, records, forms, returns and disclosures received from the Directors of **SBEC SUGAR LIMITED** having CIN: **L15421UP1991PLC019160** and having registered office at Vill- Loyan Malakpur, Teh- Baraut, Distt. – Baghpat, Uttar Pradesh (hereinafter referred to as 'the Company'), produced before us by the Company for the purpose of issuing this Certificate, in accordance with Regulation 34(3) read with Schedule V Para-C Sub clause 10 (i) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In my opinion and to the best of my information and according to the verifications (including Directors Identification Number (DIN) status at the portal [www.mca.gov.in](http://www.mca.gov.in)) as considered necessary and explanations furnished to me by the Company & its officers, I hereby certify that none of the Directors on the Board of the Company for the Financial Year ending on 31st March, 2023 have been debarred or disqualified from being appointed or continuing as Directors of companies by the Securities and Exchange Board of India, Ministry of Corporate Affairs or any such other Statutory Authority.

Ensuring the eligibility for the appointment /continuity of every Director on the Board is the responsibility of the management of the Company. Our responsibility is to express an opinion on these based on our verification. This certificate is neither an assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the Company.

**For Soniya Gupta & Associates**

**Sd/-**  
**(Soniya Gupta)**  
**Proprietor**  
**M. NO. 7493**  
**CP NO. 8136**  
**PRFCN.: 1548/2021**  
**UDIN: F007493E000763611**

**Place: New Delhi**  
**Dated: 11.08.2023**





**SECRETARIAL AUDIT REPORT OF MATERIAL SUBSIDIARY COMPANIES**

**Form MR-3**

**Secretarial Audit Report of SBEC BIOENERGY LIMITED**

**(For the year ended on 31.03.2023)**

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

To,  
The Members  
**SBEC BIOENERGY LIMITED**  
CIN: U40105UP1996PLC037250  
Village Layan Malakpur,  
Tehsil Baraut UP 250611 India

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by SBEC BIOENERGY LIMITED (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 information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, we hereby report that in our opinion, the company has, during the audit period covering the financial year ended on 31st March, 2023, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by Company for the financial year ended on 31st March, 2023 according to the provisions of:

- i). The **Companies Act, 2013 (the Act)** and the Rules made thereunder;
  - ii). The Securities and Exchange Board of India (**Listing Obligations and Disclosure Requirements**) **Regulations, 2015** thereunder;
  - iii). The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
  - iv). Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
  - v). The Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') viz.: **Not Applicable on the company**
    - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
    - (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
    - (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
    - (d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
    - (e) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- The Management has identified and confirmed the following laws as specifically applicable to the Company:
- a) The Factories Act, 1948
  - b) The Industrial Dispute Act, 1947
  - c) The Water (Prevention & Control of Pollution) Act, 1974, Read with Water (Prevention & Control of Pollution) Rules, 1975,
  - d) The Air (Prevention & Control of Pollution) Act, 1981 read with the Air (Prevention & Control of Pollution) Rules, 1982
  - e) The Contract Labour (Regulation and Abolition) Act, 1970
  - f) The Industrial Employment (Standing Orders) Act, 1946
  - g) Indian Boilers Act, 1923
  - h) The Uttar Pradesh Vacuum Pan Sugar Factories Licensing Order 1969
  - i) The Electricity Act, 2003
  - j) The Insolvency and Bankruptcy Code, 2016
  - k) The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

We have also examined compliance with the applicable clauses of the Secretarial Standards issued by The Institute of Company Secretaries of India with respect to Board and General Meetings.

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc mentioned above except to the extent as mentioned below:

- 1. The Company has not confirmed in its Board Report that it has constituted any separate 'Internal Complaints Committee' under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. However, they have taken note and confirmed that no complaint of sexual harassment of women at workplace was received during the year under review.**

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





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

Majority decision is carried through while the dissenting members' views are captured and recorded as part of the minutes.

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

**For Soniya Gupta & Associates**

**Sd/-**  
**(Soniya Gupta)**  
**Proprietor**  
**M. NO. 7493**  
**CP NO. 8136**

**Place: New Delhi**  
**Dated: 11.08.2023**

**PRFCN.: 1548/2021**  
**UDIN: F007493E000763811**

**(This report is to be read with our letter of even date which is annexed as Annexure "A" and forms an integral part of this report.)**

**Annexure "A"**

To,  
The Members  
**SBEC BIOENERGY LIMITED**  
CIN: U40105UP1996PLC037250  
Village Loyan Malakpur,  
Tehsil Baraut UP 250611 India

Our report of even date is to be read alongwith this letter.

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 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. Wherever 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 management. Our examination was limited to the verification of procedures on 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 Soniya Gupta & Associates**

**Sd/-**  
**(Soniya Gupta)**  
**Proprietor**  
**M. NO. 7493**  
**CP NO. 8136**  
**PRFCN.: 1548/2021**

**Place: New Delhi**  
**Dated: 11.08.2023**



## SECRETARIAL AUDIT REPORT OF SBEC STOCKHOLDING & INVESTMENT LTD.

For The Financial Year Ended On 31st March, 2023

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

To,  
The Members  
**SBEC STOCKHOLDING AND INVESTMENT LTD**  
613, Hemkunt Tower,  
98 Nehru Place,  
New Delhi - 110019

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **SBEC STOCKHOLDING AND INVESTMENT LIMITED** (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 information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, we hereby report that in our opinion, the company has, during the audit period covering the financial year ended on 31st March, 2023, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by the company for the financial year ended on 31st March, 2023 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder: Not Applicable
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder: Not Applicable
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings: Not Applicable
- (v) The Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') viz.: Not Applicable
  - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; Not Applicable
  - (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992; Not Applicable
  - (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009; Not Applicable
  - (d) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999: Not Applicable
  - (e) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client: Not Applicable
- (vi) OTHER APPLICABLE ACTS,
  - (a) The Payment of Wages Act, 1936, and rules made there-under,
  - (b) The Minimum Wages Act, 1948, and rules made there-under,
  - (c) The Payment of Gratuity Act, 1972
  - (d) The Employees Provident Fund & Miscellaneous Provisions Act, 1952.
  - (e) The Payment of Bonus Act, 1965, and rules made there-under,
  - (f) The Sexual Harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013,

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

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India.
- (ii) The Non-Banking Financial (Non-Deposit Accepting or Holding) Companies Prudential Norms (Reserve Bank) Directions 2015 and all other applicable provisions of the Non-Banking Financial Companies.
- (iii) The Reserve Bank Act, 1934.

In respect of other laws specifically applicable to the Company, we have relied on information/records produced by the Company during the course of our audit and the reporting is limited to that extent. During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc mentioned above except to the extent as mentioned below:

- The Reserve Bank of India vide letter no. DNBS/NO.783/CMS VIII/05.19.494/2019-20 dated July 30, 2019 had called for an explanation from the Company within 15 days of the letter, pointing out that the Company has failed to achieve minimum required Net owned fund in violation of RBI Circular No. 002/03.10.0001/2014-15 dated November 10, 2014. Further the Company was not able to meet the Principal Business Criteria for last three years and such other matters.

As informed by the Company, it has not submitted the reply till date of the report, as the matter is under consideration of the higher management for suitable action.



We further report that,

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

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

Majority decision is carried through while the dissenting members' views are captured and recorded as part of the minutes.

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

We further report as under:

That there was no specific event having a major bearing on the Company's affairs in pursuance to above referred laws, rules, regulations, guidelines, standards etc. referred above.

We have relied on the report of the Statutory Auditor for compliance of Prudential Norms on Income recognition, accounting standards, asset classification, provisioning for bad and doubtful debts and concentration of credit/investments as specified in the Directions issued by the Reserve Bank of India in terms of Non-Banking Financial Companies Prudential Norms (Reserve Bank) Directions, 2007.

**Sumit Bist**  
**Practising Company Secretary**

**Sd/-**  
**Prop.**  
**M. No. 60580**  
**UDIN: A060580E000784644**

**Place: New Delhi**  
**Dated: 11.08.2023**

Note: This report is to be read with the note given below which forms an integral part of this report.

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 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. We have relied on the audited financial statements and statutory auditor report for the year ended on 31.03.2023 for 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 management. Our examination was limited to the verification of procedures on 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.
7. The audit was conducted based on the verification of company's books, papers, minutes books, forms and returns filed, documents and other records furnished by / obtained from the Company electronically and also the information provided by the Company and its officers by audio and visual means.

**Sumit Bist**  
**Practising Company Secretary**

**Sd/-**  
**Prop.**  
**M. No. 60580**

**Place: New Delhi**  
**Dated: 11.08.2023**


**Information to be given under Section 134 read with Rule 8(3) of the Companies (Accounts) Rules, 2014**
**A. CONSERVATION OF ENERGY**
**(i) The steps taken or impact on conservation of Energy**

1. Installation of VFD:
  - a) Clear Juice Pump
  - b) Four nos. Pan Mechanical Circulators.

**(ii) Step taken by the company for utilizing alternate sources of energy: - Nil**
**(iii) Capital investment on energy conservation equipment: - Nil**
**B. TECHNOLOGY ABSORPTION:**
**(i) Efforts made towards technology absorption: -**

- (a) Mechanical Circulator – 04 Nos.
- (b) Raw Juice partial heating by common condensate heaters.
- (c) 3Nos. 650 M<sup>2</sup> Heating Surface Tubular Heater.
- (d) Double stage DCH installed for Sul. Juice Heating.
- (e) 01No. Juice compartment addition in 28 feet Clarifier.
- (f) 1st, 2nd & 3rd Vapour headers changed of suitable size.
- (g) Weak Calendria of 2nos. pans have been changed.
- (h) Four nos. suitable capacity condensers installed at Evaporator and Pans.

**(ii) Benefit derived like product improvement, cost reduction, Product development or import substitution:**

- (a) 2nd Vapour temp. increased due to suitable size of vapour pipe.
- (b) Steam Reduction.
- (c) Falls grain removes.
- (d) Steam % Cane will be reduced.

**C. FOREIGN EXCHANGE EARNINGS AND OUTGO**
**(Rs. In Lacs)**

Name of Director	2022-23	2021-22
<b>The foreign exchange earned in terms of actual inflows during the year and the Foreign exchange outgo during the year in terms of actual outflows.</b>		
Foreign Exchange earned	-	-
Foreign Exchange outgo	7.79	26.44

**For & behalf of the Board  
SBEC Sugar Limited**
**sd/-  
Umesh Kumar Modi  
(Chairman & President)  
(DIN: 00002757)**
**Place: New Delhi  
Date: 11.08.2023**


**"ANNEXURE-D"**
**STATEMENT OF PARTICULARS OF EMPLOYEES AS REQUIRED UNDER SECTION 197(12) OF THE COMPANIES ACT, 2013 READ WITH RULE 5(1) OF THE COMPANIES (APPOINTMENT & REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014.**
**(1) Information as per Section 197(12) read with Rule 5(1) of the Companies (Appointment & Remuneration of Managerial Personnel) Rules, 2014:**

- (a) The median remuneration of employees of the Company during the financial year was Rs. 3,20,364 (12 months). The Ratio of the Remuneration of each Director to the Median Remuneration of the Employees of the Company for the financial year 2022-23 are as under:

Directors	Designation	Remuneration Of Directors In Financial Period 2022-23 (Rs.)	Ratio Of Remuneration To Median Remuneration Of Employees
Shri. Umesh Kumar Modi*	Non-Executive Director	-	N.A.
Smt. Kumkum Modi*	Non-Executive Director	-	N.A.
Shri. Abhishek Modi#	Whole Time Director	-	N.A.
Shri. Jayesh Modi*	Non-Executive Director	-	N.A.
Shri. Vijay Kumar Modi*	Non- Executive & Independent Director	-	N.A.
Shri. N.P. Bansal*	Non- Executive & Independent Director	-	N.A.
Shri. J.C. Chawla*	Non- Executive & Independent Director	-	N.A.
Shri. Shyam Babu Vyas*	Non- Executive & Independent Director	-	N.A.
Shri. Rohit Garg*	Non- Executive & Independent Director	-	N.A.
Smt. Mohi Kumari*	Non- Executive & Independent Director	-	N.A.
Sh. Sudhanshu Goil*	Non- Executive & Independent Director	-	N.A.

\*All the non-executive Directors of the Company were not paid any remuneration and were paid only sitting fee for attending the meetings of the Board/ Committee of Directors. Therefore, the said ratio of remuneration of each director to median remuneration of the employees of the company is not applicable.

# Shri. Abhishek Modi was appointed as Whole time Director but not drawing any remuneration from the Company.

- (b) The percentage increase in Remuneration of each Director, Whole Time Director, Chief Financial Officer and Company Secretary in the financial year:

**Directors**

Directors	Designation	% Increase in Remuneration
Shri. Umesh Kumar Modi*	Non-Executive Director	N.A.
Smt. Kumkum Modi*	Non-Executive Director	N.A.
Shri. Abhishek Modi#	Whole Time Director	N.A.
Shri. Jayesh Modi*	Non-Executive Director	N.A.
Shri. Vijay Kumar Modi*	Non- Executive &Independent Director	N.A.
Shri. N.P. Bansal*	Non- Executive &Independent Director	N.A.
Shri. J.C. Chawla*	Non- Executive &Independent Director	N.A.
Shri. Shyam Babu Vyas*	Non- Executive &Independent Director	N.A.
Shri. Rohit Garg*	Non- Executive &Independent Director	N.A.
Smt. Mohi Kumari	Non- Executive & Independent Director	N.A.
Sh. Sudhanshu Goil	Non- Executive & Independent Director	N.A.

\*All the non-executive Directors of the Company were not paid any remuneration and were paid only sitting fee for attending the meetings of the Board/ Committee of Directors. Therefore, the percentage increase in remuneration of each Director is not applicable.

# Shri. Abhishek Modi was appointed as Whole time Director but not drawing any remuneration from the Company.

**Key Managerial Personnel's (KMPs)**

Key Managerial Personnel's	Designation	Remuneration of KMP In Financial Period 2022-23 (in Rs.)	% Increase In Remuneration
Shri. A. K. Goel	Chief Financial Officer	37,68,396	6%
Shri. Ankit K. Srivastava	Company Secretary	5,59,872	8%
Shri Vipin Kumar	Occupier	22,95,660	7%



- (c) The percentage increase in the Median Remuneration of Employees in the financial period was 11%.
- (d) The number of Permanent Employees on the Rolls of the Company:  
The number of Permanent Employees on the Rolls of Company as on 31st March, 2023 was 367.
- (e) Average percentage increase already made in the salaries of employees other than managerial personnel in the last financial period and its comparison with percentile increase in the Managerial Remuneration and justification thereof and point out if there are any exceptional circumstances for increase in the Managerial Remuneration:  
The average increase in salaries of employees in 2022-23 was 10.17%.
- (f) Affirmation that the Remuneration is as per the Remuneration Policy of the Company:  
The Company affirms that the Remuneration paid during the period were as per the Remuneration Policy of the Company.

**(2) Information as per Section 197 (12) of the Companies Act, 2013 read with Rule 5 (2) and 5 (3) the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.**

- (a) Name of employee employed throughout the financial year and was in receipt of remuneration Rs.1,02,00,000/- or more: NIL
- (b) Name of employee employed for a part of the financial year and was in receipt of remuneration not less than Rs.8,50,000/- per month: NIL
- (c) Details of Top Ten Employees in terms of remuneration drawn:

Name/Age	Designation of Employees	Remuneration (Rs.)	Qualification/ Experience (Years)	Date of Commencement of Employment	Previous Employment
Shri A.K. Goel/70	Chief Financial Officer	37,68,396	FCA, FCS/47	01.11.2017	Modipon Limited
Shri Vipin Kumar/53	Vice President	22,95,660	B. Tech. BOE / Energy Mgr./33	01.07.2017	Modi Sugar Mill Modinagar U.P
Shri Vijay Kumar Jain/44	Dy. General Manager (Commercial)	18,27,840	B.Ed. MBA LLB MA (Eco.)/23	01.04.2000	N.A.
Shri Jogendra Singh/ 50	SR.DY.GM.(PROD.)	17,28,000	ANSI Sugar Tech.1997/ 24	06.08.2021	Wave Sugar Inds. Pvt. Ltd., Dhanaura
Shri Mukesh Malik/ 56	General Manager (Cane)	1,692,444	B.Sc. (AG)/30	20.12.2011	Titawi Sugar Complex Titawi
Smt. Renu/47	OSD	12,36,156	Graduate/6	01.07.2017	N.A.
Sh. Devesh Kr Tyagi/40	DGM (HR & ADMIN)	12,00,000	M.COM.LLB,PGDHRM/17	08.08.2022	YADU SUGAR LTD, BADAUN
Shri. Rahul Kumar/36	SR. MGR (INST.)	11,75,952	B.Tech (Inst.)/16	01.10.2020	Shimbhaoli Power Pvt. Ltd
Shri. KS Jaglan/ 51	Add. Chief Engineer	11,50,212	Diploma Mechanical /27	01.01.2021	Bajaj Hindustan Sugar Ltd.
Shri. Naresh Kr. Gupta/59	Addl. Chief Engineer	10,73,436	Diploma in ELCET. Engg/31	21.06.2006	LAKSHMI SUGAR MILL CO.LTD IQBALPUR

**Notes:**

- The nature of employment of all employees above is whole time in nature and terminable with 1 months' notice on either side.
- The above mentioned employees are not relatives (in terms of the Companies Act, 2013) of any Director of the Company.

**For & behalf of the Board  
SBEC Sugar Limited**

**sd/-  
Umesh Kumar Modi  
(Chairman & President)  
(DIN: 00002757)**

**Place: New Delhi  
Date: 11.08.2023**



"ANNEXURE-E"

**FORM NO. AOC.2****(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014)**

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

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

Name of Related Party	<b>NONE</b>
Name of Relationship	
Nature and Duration of the Contracts/arrangements/transactions	
Salient terms of the contracts or arrangements or transactions including the value, if any	
Justification for entering into such contracts or arrangements or transactions	
Date of approval by the Board	
Amount paid as advances, if any:	
Date of Shareholder Resolution Passed if any.	

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

Name of Related Party	Smt. Nandini Modi
Nature of Relationship	Wife of Shri. Abhishek Modi
Duration of the contracts/ arrangements/ transactions	01-04-2022 to 31-03-2023
Salient terms of the contracts or arrangements or transactions including the value, if any	As per section 118(1)(f) of the Companies Act, 2013 holds place of profit in SBEC Bioenergy Limited a subsidiary of the Company
Date of approval by the Board	29.05.2018
Amount paid as advances, if any:	NIL
Date of Shareholders Resolution Passed if any.	24-09-2018

**For & behalf of the Board  
SBEC Sugar Limited****sd/-  
Umesh Kumar Modi  
(Chairman & President)  
(DIN: 00002757)****Place: New Delhi  
Date: 11.08.2023**





## MANAGEMENT DISCUSSION & ANALYSIS

### ***Sugar Industry- Global***

Over the years, India has become an efficient and consistent supplier of Sugar to global market. During the year 2021-22, India surprised the global Sugar community by exporting a record 11.1 million MT of Sugar as against last highest export at level of 7.2 million MT during previous year.

During Sugar season 2022-23, India is estimated to export a quantity of 6.2 million MT and quantities have dwindled this year because of lower production as against last year.

Initially trade was expecting export of 8.0 – 9.0 million MT from India during 2022-23 and now since quantities have been curtailed to around 6.0 million MT, reflection of same can be seen in International Sugar prices.

International Sugar prices for both raw and white sugar have touched high of last 11 years due to lower than estimated crop not only in India but also in other major sugar producing countries.

### ***Sugar Industry- Scenario in India***

Sugar season 2022-23 started with opening stock at 70 Lac Tons. All India Production is estimated at 328 Lac Tons and the closing stock is estimated to be around 61.5 Lac Tons. Sugar sale price during the period April 2022 till March 2023 moved in the range of Rs.3400-3550/mt. Since the production estimate has been cast lower at 325-330 Lac Tons, sugar sale price is expected to remain firm during April 2023 to March 2024.

### **Government Policies for Sugar Industry**

#### **- Fixation of Fair and Remunerative Price (FRP)**

The government has recently announced the Fair and Remunerative Price (FRP) of 315/quintal for sugarcane for Sugar Season 2023-24 with more than 100% margin over Paid out cost + imputed value of family labour. This is amongst the highest margin in crops thereby assuring high returns for farmers. This decision will benefit about 5 crore sugarcane farmers, including their dependents. The new FRP aims to address the aspirations of the farmers while ensuring competitiveness of the Indian sugar industry. The FRP is the benchmark price below which no sugar factory can purchase sugarcane. Therefore, it is like Minimum Support Price but here procurement is carried out by the sugar factories and not by the government.

#### **- Green energy**

The Ministry of Power (MOP) issued Electricity (Promoting Renewable Energy Through Green Energy Open Access) Rules, 2022 vide Notification No. GSR 418(E) dated 6th June, 2022 whereby the consumers will be eligible for green energy open access if they have contract demand or sanctioned load of 100 KW or more and for captive consumers, there will be no load limitation. The rules will be applicable for the generation, purchase and consumption of green energy including the energy from the waste-to-energy projects. Further, as per the regulations from the date of commencement of these rules, there will be a uniform renewable purchase obligation on all obligated entities in the area of a distribution licensee.

#### **- Use of Jute Packaging Material**

The Jute Packaging Materials (Compulsory use in Packing Commodities) Act, 1987 specifies the percentage of commodities to be packed mandatorily in the jute packaging material. As per notification No. INSP.F-1(3)/2007/VOL.I dated 24th April, 2023, the Central Government prescribed that 20% of the total production of sugar is to be mandatorily packed in the Jute packaging material. However, certain category of sugar is excluded from the purview of the said reservation viz., (a) sugar fortified with vitamins, (b) packaging for export of commodities (c) small consumer packs of 25 Kgs and below for sugar (d) bulk packing of more than 100 Kgs. and (e) sugar packed for export.

#### **- Production of Ethanol**

The Department of Revenue – Central Excise has issued Notification No. 12/2022 - GSR 510(E) dated 04.07.2022 with a view to allocate nil duty to a blend of 12% ethanol and 88% petrol as also for the blend consisting of 15% ethanol and 85% petrol. Further, in supersession of earlier guidelines, the Ministry of Consumer Affairs, Food and Public Distribution, New Delhi vide notification No.F No.4/1/2018-(BP & E) (Part) dated 11.11.2022 devised detailed mechanism for production of ethanol from B-Heavy, C-Heavy molasses, sugarcane juice, sugar & sugar syrup and food grains and also to identify the quantity of ethanol produced from feed stocks.

The Cabinet Committee on Economic Affairs on 02.11.2022 approved higher prices for ethanol derived from different sugarcane based raw materials under the Ethanol Blending Programme for the sugar season 2022-23 commencing from 1st December, 2022 to 31st October, 2023.

#### **- Scheme for extending financial assistance to set up distilleries**

The Central Government with a view to increase production of ethanol and its supply under Ethanol Blending Programme have been extending financial assistance to sugar mills & molasses based standalone distilleries for enhancement and augmentation of ethanol production capacity. During the year, vide Notification No.1 (10)/2018-SP-I dated 22.04.2022 the Government opened a window for six months w.e.f. 22nd April, 2022 under modified scheme dated 14.01.2021 for inviting fresh applications from project proponents who have acquired land for ethanol project and obtained Environmental Clearance (EC) for enhancement of their existing ethanol distillation capacity or to set up new distillery for producing 1st Generation (1G) ethanol from feed stocks such as cereals (rice, wheat, barley, corn & sorghum), sugarcane (including sugar, sugar syrup, sugarcane juice, B-heavy molasses, C-heavy molasses), sugar beet etc.

#### **- Sugar exports**

Vide Notification No.10/2015-20 dated 24.05.2022 of the Director General of Foreign Trade (DGFT), export of sugar (raw, refined and white sugar) was placed under 'restricted' category from 1st June 2022 onwards (except fixed quantity of sugar being exported under CXL and Tariff Rate Quota (TRQ) to EU and USA). Pursuant to the aforesaid notification of DGFT, the Department of Food & Public Distribution, New Delhi in Notification No.1-1/(2022)-SP-I dated 24.05.2022, in order to maintain the domestic availability and price stability of sugar, commenced monitoring and regulating export of sugar for a maximum quantity of 100 Lakh MT during sugar season i.e., 2021-22. Consequently, the Central Government set up Export Release Order mechanism to sugar mills through National Single Window System (NSWS) Portal.

Further, with a view to prevent uncontrolled export of sugar thereby ensuring sufficient availability of sugar for domestic consumption at reasonable price, the Central Government allowed export of all grades of sugar i.e., raw, white & refined sugar upto 60 LMT pro-rated to all sugar mills @ 18.23% of their



last 3 years average sugar production vide DFPD notification No. F. No. 1(1)/2022-Trade dated 05.11.2022 read with DGFT Notification No. 40/2015-20 dated 28.10.2022.

#### **Overview- Sugarcane**

Despite the target of 12% (approx) ethanol blending was achieved, sugar diversion towards production of ethanol is estimated at around 45 lakh tonnes in the current season as against 34 lakhs tonnes during previous season. It is no help to the scenario of liquidity crisis for sugar mills as the same will remain unchanged, which in turn resulted in the accumulation of huge cane dues. In order to support the industry and cane farmers, various measures were taken both by the Central Government in the form of soft loans, cane production subsidy, transport subsidy on sugar exports, fixing of minimum sugar price (MSP) and interest subvention for setting up of ethanol capacities and the State governments in the form of soft loans and cane subsidies which provided some respite to the sugar industry.

Despite the various policies and incentives by the Government, unless the surplus stock is cleared from the country, the scenario may not undergo any significant change. It is expected that the pressure on the sugar price would continue to remain given the over-supply scenario. To cope with this problem, the Central Government also allowed export of some sugar and blending of ethanol has been allowed to be increased to 20% by the year 2025.

#### **COMPANY STRUCTURE AND DEVELOPMENT**

The Company is located at Village Malakpur, District Baghpat, Uttar Pradesh. The plant started with an initial crushing capacity of 3500 tons of cane crushed per day (TCD), which has been gradually increased to 9,000 TCD. The Company has one of the most modern and efficient sugar factories in the country.

The company is considering augmenting its production capacity in due course to 10,000 TCD. The first phase to increase the plant capacity upto 9,000 TCD was completed and which has been operative from SS 2022-23. The Company is considering on second phase to increase its capacity upto 10,000 TCD.

#### **OPERATIONAL PERFORMANCE**

The crushing for the season 2022-23 started on November 13, 2022 and cane crushed during season 2022-23 was 133.44 Lac Qtls as compared to 134.08 Lac Qtls in the last season.

Particulars	Unit	Sugar Season		
		2022-23	2021-22	2020-21
Cane Crush	Lac Qtl	133.44	134.08	148.84
Recovery	%	10.75	11.19	11.07

#### **FINANCIAL PERFORMANCE**

(Rs. In Lacs)

Particulars	2022-23	2021-22	2020-21
<b>Total Income</b>	64,846.14	60,302.63	57,013.84
<b>EBITDA**</b>	2,152.63	2,291.11	1,564.31

\*\* Earning before interest, tax, depreciation and amortization.

#### **RISK AND CONCERNS-SWOT**

##### **Analysis Strengths**

- Located in sugarcane rich belt of Western UP with high sucrose varieties of cane.
- The Company has continued its focus on cane quality promotion and is continually investing in cane variety development. The same is also visible in form of increased availability of high yield variety of cane and higher Sugar recovery.

##### **Weaknesses**

- The State Government decides sugarcane prices in a manner that is not linked to sugar prices. Unviable sugarcane prices may impact the profitability of the Company.
- High Cane arrears due to low sugar prices.
- Risk of coercive measures by the State Government on account of huge cane arrears.

##### **Opportunities**

- Higher recovery, Higher rates of by-products of Sugar.
- Government support towards production of Ethanol.

##### **Threats**

- Due to domestic surplus, there could be a softening in the sugar prices affecting the profitability.
- Increase in State Administrative Price of Sugarcane by the State Government.
- Reduction of Co-generation tariffs.



## FUTURE OUTLOOK

The sugar industry will be a major player in producing cost effective energy and fuel from its by-products bagasse and molasses. Bagasse can be processed for co-generation of power, ethanol produced from molasses can be used for blending with petrol for motor fuel.

## INTERNAL CONTROLS AND SYSTEMS

Your company has in place an adequate internal control system in order to ensure that all transactions are authorized, recorded and reported correctly and that all assets are protected against the perils of unauthorized use or disposition. Towards enhancing the efficiency of internal controls, services of consultants are hired wherever necessary, and their suggestions are reviewed and implemented. Your Company has in place an Internal Audit system, whereby an independent professional firm of Internal Auditors conducts regular audit across the Company and their scope and findings are reviewed by the Management and Audit Committee on a regular basis.

The Audit Committee of the board also meets periodically to review the internal controls, internal audit findings, action taken reports and to advise the management on corrective policies, if any.

## HUMAN RESOURCES AND INDUSTRIAL RELATIONS

The Company considers human capital as a critical asset and success factor for smooth organizational work flow. Efforts are made to improve skills, knowledge and performance of employees by timely training, job satisfaction and enrichment. The Company has added to its fold, experienced manpower in line with future areas of growth.

## DETAILS OF SIGNIFICANT CHANGES

Details of significant changes as required under SEBI (LODR) Regulations, 2015 are as under:

SI. NO.	Particulars	As on 31.03.2023	As on 31.03.2022
1.	Debtors Turnover	63.44 times	42.75 times
2.	Inventory Turnover	3.29 times	3.06 times
3.	Interest Coverage Ratio	1.34 times	1.52 times
4.	Current Ratio	0.36times	0.44 times
5.	Debt Equity Ratio (Total liability/Equity)	(12.33) times	(17.22) times
6.	Operating Profit Margin (%)	0.34 % times	0.73 % times
7.	Net Profit Margin (%)	(1.99)% times	(1.77)% times
8.	Return on net worth	(0.24) times	(0.26) times

## CAUTIONARY STATEMENT

The above Management Discussion and Analysis Report contains "forward looking statements" within the meaning of applicable laws, and regulations and is futuristic in nature. All statements that address expectations or projections about the future, including, but not limited to statements about the Company's strategy for growth, market position, expenditures and financial results are forward looking statements. The Company's actual results, performance or achievement could thus differ materially from those projected in any such forward looking statements. Investors are requested to make their own independent judgments before taking any investment decisions and the Company assumes no responsibility.



## REPORT ON CORPORATE GOVERNANCE

### 1. COMPANY'S PHILOSOPHY ON CODE OF CORPORATE GOVERNANCE

SBEC Sugar Limited ("SBEC Sugar"), a member of Umesh Modi Group of Companies, firmly believes in effective Corporate Governance practices and follow all the applicable laws in true letter and spirit. Corporate Governance is an ethically driven process that constitute the strong foundation on which successful commercial enterprise are built and enhancing the organization's wealth generating capacity. The company also has a strong belief in fair, transparent and ethical governance practices.

The Company has adopted a Code of Conduct for its Board of Directors and its Senior Management persons which is available on the Company's website. The Company's corporate governance philosophy has been further strengthened through the SBEC Sugar Code of Conduct for Prevention of Insider Trading. The Company's corporate governance philosophy is based on the following broad principles;

- Comply all applicable Laws in true letter and Spirit;
- Independence and bias free Board of Directors;
- Simple and transparent corporate structure for enhancing overall shareholder value;
- Delegation of decision-making authority with clearly defined roles, responsibilities and accountability

The Company is in compliance with the requirements of Corporate Governance as stipulated under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR).

### 2. BOARD OF DIRECTORS

#### (a) Composition

- As on March 31, 2023, the Company has 9 Directors of which 08 are Non-Executive Directors. 5 out of the 09 Board Members are Independent Directors. The Chairman of the Board is a Non-Executive Director. The Composition of the Board is in conformity with Regulation 17 of SEBI (LODR) Regulations, 2015. As required under Section 149(1) of the Companies Act, 2013, Mrs. Kumkum Modi, is a Woman Director on the Board of Directors of the Company.
- The Independent Directors have confirmed that they satisfy the 'criteria of independence' as stipulated in Sec 149(7) of the Companies Act, 2013. Independent Directors do not serve in more than 7 listed companies.
- The names and categories of the Directors on the Board, their attendance at Board Meetings held during the year and the number of Directorships and Committee Chairmanships/Memberships (including SBEC Sugar Limited) held by them in Public Companies as on March 31, 2023 are given below. Other directorships do not include alternate directorships, Section 8 Companies, Private Companies and foreign companies. Chairmanships/Memberships in Committees include only Audit Committee and Stakeholders' Relationship Committee of Indian public limited companies.

Name of the Director	Category	Number of Board meetings during the year 2022-23		Attendance at the Last AGM (Held on September 29, 2022)	No of Directorships including this Company (as on March 31, 2023)	Number of membership/ chairmanship in other Board committee (as on March 31, 2023)	
		Held	Attended			Public	Chairman
Shri. Umesh Kumar Modi	NED	4	4	Not Present	6	Nil	Nil
Smt. Kumkum Modi	NED	4	3	Not Present	4	Nil	Nil
Shri. Abhishek Modi*	ED	4	2	Not Present	5	Nil	Nil
Shri. Jayesh Modi	NED	4	3	Not Present	5	Nil	Nil
Shri. Vijay Kumar Modi	INED	4	4	Present	7	5	6
Shri. N.P. Bansal	INED	4	2	Present	3	-	2
Shri. J.C. Chawla	INED	4	4	Present	5	1	9
Shri. Shyam Babu Vyas#	INED	1	-	NA	NA	NA	NA
Shri. Rohit Garg#	INED	1	-	NA	NA	NA	NA
Smt. Mohi Kumari##	INED	2	1	Not Present	1	-	1
Shri. Sudhanshu Goil##	INED	2	-	Not Present	1	-	-

# The office of Sh. Shyam Babu Vyas & Sh. Rohit Garg, Independent Directors had fallen vacant w.e.f. July 20, 2020 pursuant to Section 167(1)(b) of the Companies Act, 2013, as they absented themselves from all the meetings of the Board of Directors held during the period of twelve months.

## Smt. Mohi Kumari & Sh. Sudhanshu Goil were appointed as Independent Director w.e.f. August 16, 2022 in the Board Meeting held on August 06, 2022.

The Board also proposes the re-appointment of Sh. Abhishek Modi as Whole Time Director designated as Executive Director for the period of five years with effect from 25th May, 2024 without any remuneration. The same is subject to approval of the shareholders in the ensuing Annual General Meeting.

#### Note:

- (a) ED: Executive Director (b) NED: Non-Executive Director (c) INED: Independent Non-Executive Director (d) CEO: Chief Executive Officer
- None of the Directors used Video/tele-conferencing facilities to participate in the meetings, except Shri Umesh Kumar Modi.

**(b) Board Meetings**

The Board meets at least once in a quarter to review the financial results and other items on the agenda. The Agenda of Board Meeting is circulated to all the Directors well in advance and contains all relevant information which is distributed to the Directors in advance.

Four (04) Board meetings were held during the year ended March 31, 2023. These were held on May 25, 2022, August 06, 2022, November 14, 2022 & February 14, 2023, the maximum gap between the two Board Meetings did not exceed 120 days. Necessary quorum was present at all meetings.

None of the Non-Executive Directors have any material pecuniary relationship or transaction with the Company.

**(c) Name of other listed entities where Directors of the company are Directors and the category of Directorship:**

Name of Director	DIN	Name of Listed Companies (excluding this Company) in which the concerned Director is Director	Category of Directorship
Shri. Umesh Kumar Modi	00002757	1. Bihar Sponge Iron Limited	Non-Independent Non-Executive Director
Smt. Kumkum Modi	00522904	1. Bihar Sponge Iron Limited	Non-Independent Non-Executive Director
Shri. Abhishek Modi	00002798	1. Bihar Sponge Iron Limited	Non-Independent Non-Executive Director
Shri. Jayesh Modi	02849637	1. Bihar Sponge Iron Limited	Non-Independent Non-Executive Director
Shri. Vijay Kumar Modi	00004606	1. SBEC Systems (India) Limited 2. Bihar Sponge Iron Limited	Non-Independent Non-Executive Director Independent Director
Shri. N.P. Bansal	00010587	-	-
Shri. J.C. Chawla	05316202	1. Bihar Sponge Iron Limited 2. SBEC Systems (India) Limited	Independent Non- Executive Director Independent Non- Executive Director
Smt. Mohi Kumari	09696682	-	Independent Non- Executive Director Independent Non- Executive Director
Shri. Sudhanshu Goil	07010199	-	-

**(d) Details of Shareholding of Non-Executive Directors**

Shri. Umesh Kumar Modi holds 15,71,223 equity Shares, Smt. Kumkum Modi holds 28,300 equity Shares, Shri. Jayesh Modi holds 55,487 equity Shares and Shri. Jagdish Chandra Chawla holds 250 equity Shares of the Company as on 31st March, 2023.

**(e) Familiarization programme for Independent Director**

At the time of appointment, the Director is explained in detail the compliances required from him under the Companies Act, 2013 and SEBI (LODR) Regulations, 2015 and other relevant regulations and his affirmations taken. By way of an introduction to the Company, the Chairman/CEO interacts with the newly appointed Director and explains the functioning of various divisions/departments, the Company's market share, governance and internal control processes and other relevant information pertaining to the Company's business. The above initiatives help the Director to understand the Company, its business and the regulatory framework in which the Company operates and equips him/her to effectively fulfil his/her role as a Director of the Company. The familiarization programme for Directors is also placed on the Company's website [www.sbecsugar.com](http://sbecsugar.com/ContentFile/Investor/Notice%20for%20Shareholder/2022-23/Details%20of%20Familiarisation%20Programmes%20Independent%20Directors%20-%202022-23.pdf) and can be accessed through the following link <http://sbecsugar.com/ContentFile/Investor/Notice%20for%20Shareholder/2022-23/Details%20of%20Familiarisation%20Programmes%20Independent%20Directors%20-%202022-23.pdf>

**(f) Information supplied to the Board**

The Company provides the information to the Board and Board Committees as set out in Regulation 17 read with Part A of Schedule II of Listing Regulations, 2015 to the extent it is applicable and relevant. Such information is submitted either as part of the agenda papers of the respective meetings or by way of presentations and discussions during the meeting.

**(g) Skills/Expertise/Competence of the Board of Directors**

The following is the list of core skills / expertise / competencies identified by the Board of Directors as required in the context of the Company's business and that the said skills are available with the Board Members:

1. Knowledge on Company's businesses (Manufacturing sugar from sucrose from sugar cane) policies and culture (including the Mission, Vision and Values) major risks / threats and potential opportunities and knowledge of the industry in which the Company operates.
2. Behavioral skills - attributes and competencies to use their knowledge and skills to contribute effectively to the growth of the Company.
3. Business Strategy, Sales & Marketing, Corporate Governance, Administration and Decision Making.
4. Financial and Management skills.
5. Technical / Professional skills and specialized knowledge in relation to Company's business.



In the table below, the specific areas of focus or expertise of individual Board members have been highlighted:

Name of Director	Areas of Skills, Expertise and Competencies				
	Knowledge on Company's business, policies & Culture	Behavioral Skills	Business Strategy, Sales & Marketing etc.,	Financial and Management Skills	Technical/ Professional skills
Shri Umesh Kumar Modi	YES	YES	YES	YES	YES
Shri Abhishek Modi	YES	YES	YES	YES	YES
Smt. Kumkum Modi	YES	YES	YES	YES	YES
Shri Jayesh Modi	YES	YES	YES	YES	YES
Shri Jagdish Chander Chawla	YES	YES	YES	YES	YES
Shri N.P. Bansal	YES	YES	YES	YES	YES
Shri Vijay Kumar Modi	YES	YES	YES	YES	YES
Smt. Mohi Kumari	YES	YES	YES	YES	YES
Shri. Sudhanshu Goil	YES	YES	YES	YES	YES

**(h) Confirmation**

Based on the declaration received from the Independent Directors, the Board confirms that in its opinion, the Independent Directors of the Company fulfill the conditions specified in the SEBI Listing Regulations, 2015 and are independent of the management.

**3. Audit Committee**

**(a) Terms of Reference**

The Audit Committee acts as a link between the Statutory and the Internal Auditors and Board of Directors. The purpose of the Committee is to assist the Board in fulfilling its oversight responsibilities of monitoring financial reporting process, reviewing the Company's established systems and processes for internal financial controls, governance and reviewing the Company's Statutory and Internal Audit Activities. The powers, roles, delegation, responsibilities, and terms of reference of the Audit Committee are prescribed under Section 177 of the Companies Act, 2013 and also as provided in Regulation 18 of SEBI (LODR) Regulations, 2015.

**(b) Composition**

As on March 31, 2023 the Audit Committee of the Board comprises four Directors. All four directors are Independent Directors and have sound knowledge of finance and accounting. Shri Vijay K. Modi is Chairman of the Committee and he was presented in the previous Annual General Meeting held on September 29, 2022. The Company Secretary acts as the Secretary to the Audit Committee.

The Head of Departments, Internal Auditors and Statutory Auditors are also invited to the meeting of the Audit Committee as and when required by the Committee. Besides them, Chief Financial Officer of the Company is permanent invitee of the Audit Committee.

The Audit Committee was reconstituted in the meeting of Board of Directors held on August 06, 2022 on account of vacation of office of Sh. Shyam Babu Vyas w.e.f. July 20, 2022 & appointment of Ms. Mohi Kumari as Independent Director of the Company. After reconstitution the composition of the Audit Committee is hereunder:

Shri Vijay Kumar Modi	-	Chairman
Shri. N.P. Bansal	-	Member
Shri J.C. Chawla	-	Member
Smt. Mohi Kumari	-	Member

During the financial year ended 31st March, 2023, the Audit Committee met five times on May 25, 2022, August 06, 2022, November 14, 2022, February 14, 2023 & March 01, 2023 and the maximum gap between the two Audit Committee Meetings did not exceed 120 days. The necessary quorum was present for all the meetings.

**The particulars of meetings held and attended by the members of the Audit Committee are given below:**

S. No.	Name of the Member	Designation	Category	Number of meetings during the year 2022-23	
				Eligible to attend	Attended
1.	Shri. V. K. Modi	Chairman	Independent Director	5	5
2.	Shri. Shyam Babu Vyas*	Member	Independent Director	1	-
3.	Shri. J.C. Chawla	Member	Independent Director	5	5
4.	Shri N.P. Bansal	Member	Independent Director	5	4
5.	Smt. Mohi Kumari**	Member	Independent Director	3	1

\* The office of Shri Shyam Babu Vyas, Independent Director of the Company has become vacant w.e.f. July 20, 2022, pursuant to Section 167(1)



(b) of the Companies Act, 2013, as he absented himself from all the meetings of Board of Directors held during a period of twelve months.

\*\* Smt. Mohi Kumari has been appointed as Independent Director in the meeting of Board of Directors held on August 06, 2022 w.e.f. August 16, 2022.

#### 4. Nomination and Remuneration Committee

##### (a) Terms of Reference

The Company has a Board Committee namely "Nomination and Remuneration Committee" as required under Section 178 (1) of the Companies Act, 2013 and Regulation 19 of SEBI (LODR) Regulations, 2015.

The Nomination and Remuneration Committee looks terms and conditions of appointment, remuneration and related matters of Managerial Personnel such as Whole Time Directors & Directors etc. Remuneration Committee recommends the remuneration for Executive Directors to the Board of Directors for its approval and such remuneration is also subject to the approval of shareholders and such other approvals as may be required. In its recommendations, the remuneration committee considers parameters like performance and contribution, practices and norms and followed by companies of similar size and industry standards.

Shri J. C. Chawla, Chairman of the Nomination and Remuneration Committee was present at the Annual General Meeting held on September 29, 2022. The Company Secretary acts as Secretary to the Committee.

During the period ended March 31, 2023, 2 meetings of the Committee were held on May 25, 2022 and August 06, 2022.

##### (b) The Composition of the Nomination and Remuneration Committee and details of the Meetings of the Committee held and attended during the year 2022-23 are as under:

S. No.	Name of the Member	Designation	Number of meetings during the year 2022-23	
			Eligible to attend	Attended
1.	Shri. J. C. Chawla- Chairman	Independent Director	2	2
2.	Shri. V. K. Modi	Independent Director	2	2
3.	Shri. N. P. Bansal	Independent Director	2	2

##### (c) Performance Evaluation of Independent Directors

The performance evaluation criteria for Independent Directors includes qualification, experience, knowledge, competency, availability, attendance, commitment, contribution of the individual directors to the Board and Committee meetings and fulfillment of independence criteria by them and their independence from the management. The performance evaluation of Independent Directors is done by the entire Board of Directors and in the evaluation the directors who are subject to evaluation do not participate.

#### 5. Stakeholders Relationship Committee

##### (a) Terms of Reference

The Company has a Board Committee namely "Stakeholder Relationship Committee" as required under the provisions of Section 178 (1) of the Companies Act, 2013 and Regulation 20 of SEBI (LODR) Regulations, 2015 to look into various issues relating to delay in transfers of shares, non-receipt of balance sheet, non-receipt of declared dividends/share certificates, dematerialization of shares, replacement of lost/stolen/ mutilated share certificates, etc.

##### (b) The Composition of Stakeholders Relationship Committee and details of the Meetings of the Committee held and attended during the year 2022-23

As on March 31, 2023, the Stakeholders Relationship Committee of the Board comprises of 3 Directors. All Three directors are Independent Directors. Mr. Vijay Kumar Modi is Chairman of the Committee. The Company Secretary acts as the Secretary of the Committee.

During the financial year 2022-23, the Committee met once on May 25, 2022.

The Particulars of meetings held and attended by the members of the Committee are given below:

S. No.	Name of the Member	Category	Number of meetings during theyear 2022-23	
			Eligible to attend	Attended
1.	Shri. Vijay K. Modi Chairman	Independent Director	1	1
2.	Shri. N.P. Bansal	Independent Director	1	-
3.	Shri. J.C. Chawla	Independent Director	1	1

Mr. Ankit Kumar Srivastava, Company Secretary is the Compliance Officer.

The Compliance Officer can be contacted at:

SBEC Sugar Limited  
Village Layan, Malakpur,  
Tehsil Baraut,  
Dist. Baghpat- 250611  
Uttar Pradesh  
Email:investors@sbecsugar.com





During the year ended March 31, 2023, no complaint was received from the shareholders. No complaints are pending at the end of the financial period.

#### 6. Senior Management

The particulars of senior management of the Company as on March 31, 2023 are hereunder:

S. No.	Name	Designation
1	ANIL KUMAR GOEL	CHIEF FINANCE OFFICER
2	VIPIN KUMAR	VP (U.H), OCCUPIER
3	RENU	OFFICER SPECIAL DUTY
4	MUKESH KUMAR	GENERAL MANAGER (Cane)
5	VIJAY KR.JAIN	DY. General Manager (Comm.)
6	DEVESH KR TYAGI	DY. General Manager (HR & Admin.)
7	KAUSHALENDRA SINGH	DY. General Manager (Pur.)
8	RAHUL KUMAR	CHIEF MANAGER (Inst)
9	JOGENDER SINGH	Sr. DY. General Manager (Prod.)
10	PRITAM SINGH	ADDL Chief Chemist
11	NARESH KUMAR GUPTA	ADDL CHIEF ENGR.
12	KULDEEP SINGH JAGLAN	ADDL CHIEF ENGR.
13	DEEPAK MISHRA	MANAGER ACCOUNTS
14	ANKIT KUMAR SRIVASTAVA	COMPANY SECRETARY

The Changes during the Senior Management of the Company during the F.Y. 2022-23 are as under:

Sr. No.	NAME	DESIGNATION	Date of Joining	Date of Cessation/ Resignation
1	AKHIL SINGH RATHI	DY. General Manager (HR & Admin.)	29.09.2021	14.06.2022
2	DEVESH KR TYAGI	DY. General Manager (HR & Admin.)	08.08.2022	
3	DEEPAK MISHRA	ASSTT. MANAGER Accounts	15.05.2021	30.09.2022
4	DEEPAK MISHRA	MANAGER Accounts	02.01.2023	
5	LC Sharma	Sr. Manager Accounts	-	30.04.2023

#### 7. Remuneration of Directors

The Company has adopted a Remuneration Policy for executive and non-executive directors and persons who may be appointed in Senior Management and Key Managerial positions and to determine their remuneration as approved by the Board of Directors on the recommendation of Nomination and Remuneration Committee. The remuneration so approved is subject to the approval by the shareholders and such other authorities as the case may be. The remuneration policy of the Company is also placed on the website: [www.sbecsugar.com](http://www.sbecsugar.com).

##### (i) Remuneration to Managing/Whole time/ Executive/ Managing Director, KMP and Senior Management Personnel:

The Remuneration/ Compensation/ Commission etc. to be paid to Director/ Managing Director etc. shall be governed as per provisions of the Companies At, 2013 and rules made there under or any other enactment for the time being in force.

##### (ii) Remuneration to Non-Executive/ Independent Director:

##### **Pecuniary Relationship**

The Company does not have any pecuniary relationship or transaction with the Non-executive Directors.



### Sitting Fee

The Non-executive Directors and Independent Directors of the Company are entitled to sitting fees as determined by Board from time to time for attending Board/ Committee meetings thereof in accordance with the provisions of Act.

The Non-Executive Directors do not draw any remuneration from the Company other than the aggregate sitting fee of Rs. 55,000/- for the meetings of the Board and Committee thereof attended by them during the year.

### Remuneration

The Companies Act, 2013, under Section 197 allows a company to pay remuneration to its NED depending upon the role and the degree, quality of their engagement with the Board, either by way of a monthly payment or at a specified percentage of the net profits of the company or partly by one way and partly by the other as per the Company's criteria for making payment to Non-executive Directors. An independent director shall not be entitled to any stock option and may receive remuneration only by way of fees and reimbursement of expenses for participation in meetings of the Board or/committee thereof and profit related commission up to a certain percentage of net profits in such proportion, as maybe permissible under the applicable law.

The Company does not pay any remuneration to its Executive Directors.

The Company does not provide any fixed component and performance linked incentives to its Directors.

The Company does not have any service contracts with its Directors and no policy regarding notice period & severance fees.

The Company does not have any Employees Stock Option Scheme.

## 8. VIGIL MECHANISM

Pursuant to Section 177(9) and (10) of the Companies Act, 2013, the Company has a Whistle-Blower Policy and Vigil Mechanism for Directors and employees to report genuine concerns regarding unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct. The said mechanism also provides for adequate safeguards against victimization of the persons who use such mechanism and makes provision for direct access to the chairperson of the Audit Committee in appropriate or exceptional cases. No employee of the Company was denied access to the Audit Committee. The said whistle blower policy and vigil mechanism has been hosted on the website of the Company at: [www.sbecsugar.com](http://www.sbecsugar.com)

No complaints were received under this policy during the year. No person has been denied to excess the Chairman of the Audit Committee.

## 9. General Body Meetings:

### (a) Annual General Meetings

Location and time of the last three Annual General Meetings:-

Year	Date & Time of Meeting	Location	Special Resolution passed (Yes/ No)
2021-22	September 29, 2022 At 01:00 P.M.	Village: Loyan Malakpur, Tehsil Baraut, Distt. Baghpat, Uttar Pradesh	1. Re-Appointment of Sh. Narayan Prakash Bansal (DIN: 00010587) as an Independent Director of the Company for Second term. 2. To Regularize the appointment of Sh. Sudhanshu Goil as an Independent Director of the Company. 3. To Regularize the appointment of Smt. Mohi Kumari as an Independent Director of the Company.
2020-21	September 16, 2021 At 04:00 P.M.	--do--	1. Re-Appointment of Sh. Vijay Kumar Modi (DIN: 00004606) as an Independent Director for Second term.
2019-20	September 28, 2020 At 11:30 A.M.	--do--	1. Re-Appointment of Mr. Rajeev Kumar Agarwal (DIN: 00298252) as an Independent Director for Second term. 2. Re-Appointment of Mr. Jagdish Chander Chawla (DIN: 05316202) as an Independent Director for a second term. 3. Re-Appointment of Mr. Shyam Babu Vyas (DIN: 02025415) as an Independent Director for a second term.

### (b) Extraordinary General Meetings

No Extraordinary General Meeting of the Members was held during the year 2022-23.

### (c) Postal Ballot

No postal ballot was done during the year 2022-23.

## 10. Means of Communication

### (a) Quarterly Results

The Company's quarterly results in the proforma prescribed by the Stock Exchange pursuant to Regulation 33 & 47 of the Listing Regulations are approved and taken on record by the Board within the prescribed time frame, and sent forthwith to all the Stock Exchanges on which the Company's shares are listed. These results are being published in national and local newspapers, namely The Financial Express in English and Haribhoomi in Hindi, having wide circulation.



The Annual Reports, notices and other communications have been sent through digital mode to the shareholders whose email address is updated with the Company. As per the statutory requirements under Regulation 33 & 47 of the Listing Regulations, the quarterly/annual financial results are generally published in "Financial Express" in English and "Haribhoomi" in Hindi. The financial results, shareholding pattern and other updates on the working of the Company have been posted on the Company's website: [www.sbecsugar.com](http://www.sbecsugar.com). Besides the above, the Company also submits, inter-alia, to the Stock Exchanges, the full version of the Annual Report; quarterly report on corporate governance; quarterly/ yearly financial results; quarterly shareholding pattern; quarterly secretarial audit report; details of appointment/resignation of Directors and Company Secretary and such other reports as may be specified. The Company has also designated the email id: investors@sbecsugar.com exclusively for investor servicing.

**(b) Website**

As per the requirements of Regulation 46 of the Listing Regulations, all the data related to quarterly financial results, shareholding pattern etc. is filed with stock exchanges and also disseminated on the Company's website: [www.sbecsugar.com](http://www.sbecsugar.com) within the time prescribed in this regard. The Company's website also displays the official news releases.

**(c) Annual Report**

Annual Report containing, inter alia, Audited Annual Accounts, Financial Statements, Director's Report, Auditor's Report and other important information is circulated to members and others entitled thereto. The Management Discussion and Analysis (MDAR) Report forms part of the Annual Report.

**11. General Shareholder Information**

**(i) Annual General Meeting is proposed to be held on Friday September 29, 2023** at Village: Loyan Malakpur, Tehsil Baraut, Distt. Baghpat, Uttar Pradesh-250611.

**(ii). Financial Year**

The Financial Year covers the period from April 1, 2022 to March 31, 2023 (Both days Inclusive)

**(iii). Date of Book Closure**

September 23, 2023 to September 29, 2023 (Both days inclusive)

**(iv). Dividend Payment Date**

Not Applicable

**(v). Listing on Stock Exchanges**

The company is listed on the following Stock Exchanges:-

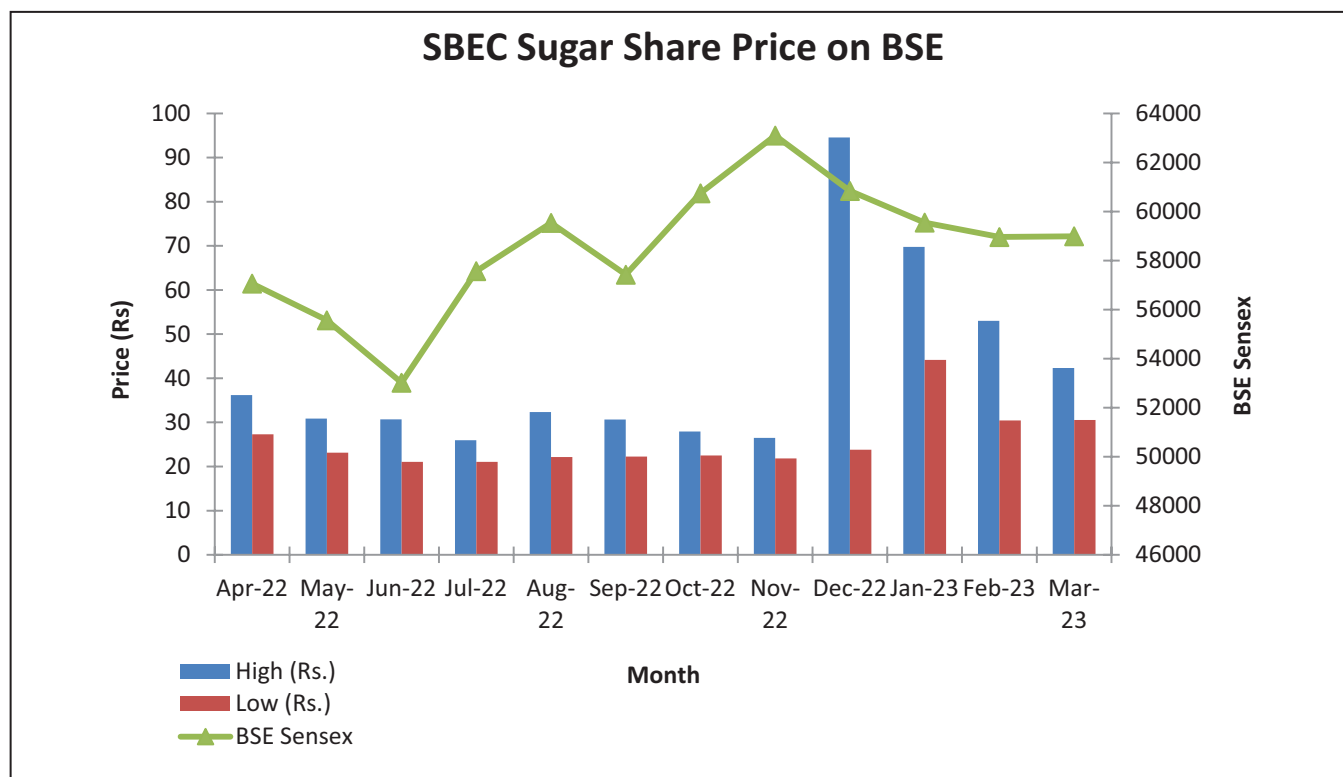
Stock Exchange	Stock Code
BSE Limited	532102
The Calcutta Stock Exchange Association Limited	----

The Company has paid annual listing fee to BSE Limited for the year 2023-24.

The Company had initiated steps to get the shares delisted from The Calcutta Stock Exchange Association Limited. However, application for delisting of the shares is still pending with the Calcutta Stock Exchange Association Limited.

**(vi) Market Price Data:**

Month	High Price	Low Price	Close Price	Volume
Apr-22	36.2	27.3	28.35	2,50,167
May-22	30.85	23.15	26.3	55,862
Jun-22	30.7	21.05	25.8	63,858
Jul-22	25.95	21.05	23.65	50,302
Aug-22	32.35	22.15	25.95	1,73,506
Sep-22	30.65	22.25	25.05	88,923
Oct-22	27.95	22.5	24.9	32,702
Nov-22	26.5	21.85	23.8	60,884
Dec-22	94.55	23.8	73.4	12,48,100
Jan-23	69.75	44.15	50.5	3,24,406
Feb-23	53	30.45	31.6	2,81,833
Mar-23	42.31	30.55	33.62	1,42,809



**(vii) Registrar & Share Transfer Agent:**

The transfer of Equity Shares and Electronic Connectivity for the Depository mode for both NSDL and CDSL is being provided by M/s Beetal Financial & Computer Services Pvt. Limited, Registrar & Transfer Agents of the company whose address is given below:

M/s Beetal Financial & Computer Services Pvt. Ltd.  
 Beetal House, 3rd Floor,  
 99, Madangir, Near Dada Harsukhdas Mandir,  
 Behind Local Shopping Complex  
 New Delhi -110062  
 Ph. No. 011- 29961281-83  
 Fax: 011-29961284 Email: [beetal@beetalfinancial.com](mailto:beetal@beetalfinancial.com)

**(viii) Share Transfer System:**

The Equity shares of the Company are in dematerialized form. In respect of the Shares held in physical form the transfers and transmission are done by the Registrar and Share Transfer Agent of the Company viz. M/s Beetal Financial & Computer Services Pvt. Ltd.

The Company obtains yearly certificate from a Company Secretary in Practice relating to compliance with the shares transfer formalities as required under Regulation 40 (9) of the SEBI (LODR) Regulations, 2015 and files a copy of the certificate with the Stock Exchanges, from time to time.

**(ix) Distribution of Shareholdings as on March 31, 2023.**

Month	Number of Shareholders	Number of Shares	% of total Shares
Upto 5000	5365	1034596	2.17
5001 -10000	552	481908	1.01
10001 – 20000	229	368912	0.77
20001- 30000	311	815534	1.71
30001 – 40000	50	179649	0.38
40001 – 50000	142	692507	1.45
50001 – 100000	130	978708	2.06
100001 and above	89	43102066	90.45
<b>Total</b>	<b>6868</b>	<b>47653880</b>	<b>100.00</b>



**x) Shareholding Pattern as on March 31, 2023**

SI No.	Category of Shareholder	Total No. of Shares	% of Shareholding
<b>A</b>	<b>PROMOTER AND PROMOTER GROUP</b>	3,10,33,032	65.12
	<b>Sub Total (A)</b>	<b>3,10,33,032</b>	<b>65.12</b>
<b>B</b>	<b>PUBLIC SHAREHOLDING</b>		
<b>I</b>	<b>INSTITUTIONS</b>		
a	Foreign Institutional Investor	9,59,700	2.01
<b>II</b>	<b>NON-INSTITUTIONS</b>		
a	Bodies Corporate	84,58,041	17.75
b	Individuals	71,85,153	15.08
c	NRI/ OCB	2,565	0.00
d	HUF	13,815	0.03
e	Clearing Member	1,074	0.00
f	Unclaimed/Suspense/Escrow A/C	500	0.0
	<b>Sub-Total [B=(BI + BII)]</b>	<b>1,66,20,848</b>	<b>34.88</b>
	<b>Total (A+B)</b>	<b>4,76,53,880</b>	<b>100.00</b>

**(xi) Dematerialization of equity Shares and liquidity**

The trading in Equity Shares of the Company is permitted in dematerialized form. The Company has joined National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL) to facilitate the trading. Accordingly, it is requested to all the shareholders who are holding the shares in physical form to get their shares converted into demat form and thereby avail the option of scrip less trading. For this purpose, Shareholders can open a de-mat account with a depository participant (DP) to avail the facility of dematerialization of shares or shareholders having de-mat account can surrender their share certificate to their respective DPs. As on 31st March 2023, 83.13% of the Company's total listed capitals representing 3,96,13,500 shares were held in dematerialized form and the balance 16.87 % comprising 80,40,380 shares were held in physical form. Under the depository system, the International Securities Identification Number (ISIN) allotted to the Company is **INE948G01019**.

**(xii) Outstanding GDRs/ ADRs/ Warrants or any Convertible Instruments, conversion date and likely impact on equity**

The Company has no outstanding GDRs / ADRs / Warrants or any Convertible Instruments.

**(xiii) Plant Location of the Company**

Village: Loyan Malakpur, Tehsil Baraut, Dist. Baghpat, Uttar Pradesh-250611

**(xiv) Investor's Correspondence may be addressed to**

All the queries of investors regarding the Company's shares may be sent at the following address:

Mr. Bhawendra Jha, M/s Beetal Financial & Computer Services Pvt. Ltd. Beetal House, 3rd Floor, 99, Madangir, Near Dada Harsukhdas Mandir, Behind Local Shopping Complex New Delhi-110062 Ph. No. 011-29961281-83 Fax: 011-29961284 Email: [beetal@beetalfinancial.com](mailto:beetal@beetalfinancial.com)

**(xv) Details of credit ratings**

The Company has not obtained any rating from any credit rating agency.

**(xvi) Disclosure of commodity price risks/foreign exchange risk and commodity/foreign exchange hedging Activities.**

**A. Commodity risks and hedging**

Most of the Company's sugar trade is however concentrated in domestic spot markets. As per the Industry's convention, in domestic market, Physical Sugar is mostly traded on spot basis on prevailing physical sugar prices and is not through exchange (spot or futures market) barring miniscule trade of Institutional trade through exchange.

**B. Foreign exchange risks and hedging**

The Company does not have material foreign exchange risk in the normal course of business, as the Company has only domestic sales.

**12. Disclosures**

**(i) Related Party Transactions**

The transactions entered with related parties during the year under review were on Arm's Length basis and in the ordinary course of business and complied the provisions of Section 188 of the Companies Act, 2013. All related party transactions were approved by the Audit Committee and the Board. The relevant information regarding related party transactions has been set out in Note No. 30 of the Financial Statements for the financial year ended 31.03.2023.

The Board has framed a Policy on related party transactions and placed the same on the Company's website at [www.sbecsugar.com](http://www.sbecsugar.com).

**(ii) Subsidiary**

The Company has two material subsidiary Companies i.e. M/s. SBEC Bioenergy Limited and M/s. SBEC Stockholding and Investment Limited as defined under regulation 24 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015. The Policy for Determining Material Subsidiaries has been formulated and uploaded on the website of the Company i.e. [www.sbecsugar.com](http://www.sbecsugar.com) and can be accessed through the following link <http://sbecsugar.com/ContentFile/CodeOfConduct/MATERIAL%20SUBSIDIARY%20POLICY-SBEC%20SUGAR%20LTD.pdf>



The details of material subsidiaries and their auditor's details are hereunder:

Name of Subsidiary	Date of Incorporation	Place of Incorporation	Name of Statutory Auditors	Date of Appointment of Statutory Auditors
SBEC Bioenergy Limited	18-04-1996	Delhi	K.K. Jain & Co., Chartered Accountants	30-09-2022
SBEC Stockholding & Investment Limited	14-09-2001	Delhi	Sarat Jain & Associates, Chartered Accountants	23-09-2019

(iii) There are no actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under except;

a) The Securities Exchange Board of India on September 17, 2018 had issued directions to the Promoter Group of the Company (namely Shri. Umesh Kumar Modi, Smt. Kumkum Modi, Shri Jayesh Modi, Longwell Investments Pvt. Ltd., A to Z Holdings Pvt. Ltd, Moderate Leasing and Capital Services Limited and SBEC Systems (India) Ltd, severally or jointly to make a public announcement to acquire the shares of the Target Company (i.e. SBEC Sugar Limited) in accordance with the provisions of the Takeover Regulations, 2011, within a period of 45 days from the date of above mentioned order. The shareholding/voting rights of the Promoter Group had increased from 54.46% (2,59,51,083 shares) as on June 30, 2014 to 63.86% (3,04,32,117 shares) as on September 30, 2014. In addition to the aforesaid acquisition, one of the lending promoter i.e. Moderate Leasing & Capital Services Ltd. had also acquired 1.31% shares of SBEC Sugar Limited during March 18, 2015 to March 23, 2015, which increased the shareholding of the Promoter Group to 65.17%. As per the said impugned order, the Promoter Group have violated the provisions of Regulation 3(2) of the Takeover Regulations, 2011 by acquiring shares in excess of the prescribed limit without making an announcement for open offer.

Against the said impugned SEBI order, the Promoter Group namely (Shri. Umesh Kumar Modi, Smt. Kumkum Modi, Shri Jayesh Modi, Longwell Investments Pvt. Ltd, A to Z Holdings Pvt. Ltd and Moderate Leasing and Capital Services Limited) had filed an appeal before the Securities Appellate Tribunal, Mumbai. Whereas, M/s. SBEC Systems (India) Ltd. had filed a separate appeal before the Securities Appellate Tribunal, Mumbai.

Whereas the promoter group namely (Shri Umesh Kumar Modi, Kumkum Modi, Jayesh Modi, Longwell Investments Private Limited, A to Z Holdings Pvt. Ltd., Moderate Leasing and Capital Services Limited) had filed appeal no. 2 (No. 444/2018) before the Securities Appellate Tribunal, Mumbai.

The Hon'ble Securities Appellate Tribunal upon hearing the said Appeal vide its order dated January 29, 2020 has allowed the Appeal No. 1 (Appeal No.443 of 2018) and partly allowed Appeal No. 2 (Appeal No.444 of 2018), whereby, the directions issued by SEBI for open offer vide order dated September 17, 2018 qua promoters namely SBEC System (India) Limited, Shri. Umesh Kumar Modi, Smt. Kumkum Modi, Shri. Jayesh Modi and Longwell Investment Private Limited has been set aside, however, the directions issued by SEBI for Open Offer vide order dated September 17, 2018 issued qua the promoters namely A to Z Holdings Pvt. Ltd. and Moderate Leasing & Capital Services Ltd. (the acquirer of the shares) has been modified in terms of Regulation 32(1)(b) and they had been directed to sell the shares acquired in violation of the SAST Regulation and to transfer the proceeds of the same to the Investor Protection Fund established under the SEBI (Investor Protection and Education Fund), 2009 within a period of 6 (Six) months from the date of the order i.e. from January 29, 2020.

The promoters namely A to Z Holdings Pvt. Ltd. and Moderate Leasing & Capital Services Ltd. (the acquirer of the shares) could not comply with the order dated January 29, 2020, therefore, the said promoters approached the Hon'ble Securities Appellate Tribunal vide Misc. Application no. 209 / 2020 seeking an extension of 6 (six) months for compliance of the order dated January 29, 2020 inter-alia on the grounds of operations of the said promoters being shut due to the pandemic COVID – 19. The said Misc. Application was listed before Hon'ble Securities Appellate Tribunal on July 29, 2020 and was dismissed vide order dated July 29, 2020.

In the meantime, the Securities Exchange Board of India filed a Civil Appeal bearing nos. 2995 – 2996 / 2020 before the Hon'ble Supreme Court of India on July 29, 2020 against the order dated January 29, 2020 passed by Hon'ble Securities Appellate Tribunal.

Furthermore, the promoters namely A to Z Holdings Pvt. Ltd. and Moderate Leasing & Capital Services Ltd. have also filed a Civil Appeal bearing no. 3002 / 2020 before the Hon'ble Supreme Court of India on August 11, 2020 against the order dated July 29, 2020 passed by Hon'ble Securities Appellate Tribunal.

It is important to point out that both the Civil Appeals before the Hon'ble Supreme Court of India have been connected and the pleadings therein are complete. The said Civil Appeal are now listed before the Hon'ble Supreme Court of India on August 18, 2021 and matter is still pending for further proceedings.

(iv) The details of vigil mechanism/ whistle blower policy is mentioned in the Directors report.

**(v) Disclosure of Accounting Treatment**

The financial statements have been prepared in accordance with applicable Indian Accounting Standards (Ind AS) and relevant presentational requirements of the Companies Act, 2013, as applicable.

**(vi) Insider Trading**

As required under The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Company has formulated a Code of practices and procedures for fair disclosures of unpublished price sensitive information, to inter alia, prevent insider trading in the shares of the Company.

**(vii) Code of Conduct**

The Company has adopted the code of conduct for all Board members and Senior Management as required under Regulation 17 of the Listing Regulations. The Code is posted on the Company's website: [www.sbecsugar.com](http://www.sbecsugar.com). All Board members and Senior Management personnel have affirmed compliance with the Code on an annual basis and a declaration to this effect signed by Mr. Abhishek Modi, Whole Time Director forms part of this Report.

Declaration	
I, Abhishek Modi, Whole Time Director of SBEC Sugar Limited, hereby declare that all the members of the Board of Directors and the Senior Management personnel have affirmed compliance with the Code of Conduct, applicable to them as laid down by the Board of Directors in terms of Regulation 17 of the SEBI (LODR) Regulation, 2015, for the year ended March 31, 2023.	
Place: New Delhi	sd/-
Date: 26.05.2023	Abhishek Modi Whole Time Director

**(viii) CEO/ CFO CERTIFICATION**

Mr. Abhishek Modi, Whole Time Director and Mr. Anil Kumar Goel, Chief Financial Officer of the Company have furnished a certificate relating to financial statement and internal controls systems as per the format prescribed under SEBI (LODR), Regulations, 2015 and the Board took the same on record.

**(ix) Details of utilization of funds through preferential allotment:**

During the Financial Year ended 31st March, 2023, the Company did not raise any funds through preferential allotment or qualified institutions placement as specified under Regulation 32(7A).

**(x) Compliance Certificate from Practicing Company Secretary:**

A. The Company has obtained a certificate from M/s Soniya Gupta & Associates, Practicing Company Secretary confirming compliance with conditions of Corporate Governance as stipulated in Regulations Part C of Schedule V of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, which is annexed to this report.

B. The Company has obtained a certificate from M/s Soniya Gupta & Associates, Practicing Company Secretary that none of the directors on the board of the Company have been debarred or disqualified from being appointed or continuing as directors of companies by the Board/Ministry of Corporate Affairs or any such statutory authority.

**(xi) Recommendation of any Committee;**

There have been no instances of non-acceptance of any recommendations of any Committee by the Board during the Financial Year under review.

**(xii) Fees paid by Company and its subsidiaries, to its Statutory Auditor**

Total fees of Rs.4.78 Lacs for financial year 2022-23, for all services, was paid by the Company and its subsidiaries, on a consolidated basis, to the statutory auditor and all entities in the network firm/ network entity of which the statutory auditor is a part.

**(xiii) Directors with materially pecuniary or business relationship with the Company**

There has been no material relevant pecuniary transaction or relationship between the Company and its non-executive and/or independent Directors for the period under report.

**(xiv) Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.**

During the year from April 1, 2022 to March 31, 2023 the Company has not received any complaint under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. At the end of March 31, 2023, no complaint was pending for redressal.

As per the report of Internal Complaint Committee, the details of complaints are hereunder:

No. of Complaints filed during the year	No. of Complaints disposed – off during the year	No. of Complaints at the end of the year
0	0	0

**(xv) Loan & advances in the nature of loans to firms/ companies in which directors are interested:**

The details of loan & advances given by the Company & its subsidiary companies in which Directors are interested are mentioned in the financial statement of the Company.

**(xvi) Disclosure with respect to demat suspense account/ unclaimed suspense account:**

The details of unclaimed equity shares lying in the Company's Unclaimed Shares Suspense Account as required under SEBI (LODR) Regulations, is as under:

As on March 31, 2022		Shareholders approached during the year		As on March 31, 2023	
No. of holders	No. of Shares	No. of holders	No. of Shares	No. of holders	No. of Shares
-	-	01	500	01	500



**(xvii) Disclosure of certain types of agreements binding on listed entities:**

The Company has not executed or entered any such type of agreements which shall be binding on the Company.

**13. Non-mandatory Clauses**

The Company has not adopted any of the non-mandatory requirements as provided in SEBI (LODR), Regulations, 2015.

**14. Disclosures of compliances with Corporate Governance**

(i) The Company has complied all the requirements of corporate governance related to the above paras of this corporate governance report.

**(ii) Adoption of discretionary requirements specified in Part E of Schedule II of SEBI Listing Regulations**

- (a) The Board: The Chairman of the Company is Non-Executive;
  - (b) Shareholder Rights: Quarterly and yearly financial results are published in newspapers and uploaded on Company's website (www.sbcsugar.com). At present, the half yearly financial performance and the summary of the significant events in last six months are not sent to each household of shareholders;
  - (c) Modified opinion(s) in audit report: The Auditors have given the qualified report for the standalone & consolidated financial results. The details of their qualification/modification along with Board remarks on the same are already mentioned in the Directors Report.
  - (d) Separate posts of Chairperson and the Managing Director or the Chief Executive Officer: At present there is no separation of posts of Chairperson and the Managing Director or the Chief Executive Officer.
  - (d) Reporting of Internal Auditor: The Internal Auditor of the Company submits its Internal Audit report to the Audit Committee on quarterly basis.
- (iii) The Company has complied all the applicable compliances specified in Regulation 17 to 27 and clauses (b) to (i) of sub-regulation (2) of regulation 46 of SEBI (LODR), 2015.

**For & behalf of the Board  
SBEC Sugar Limited**

**sd/-  
Umesh Kumar Modi  
(Chairman & President)  
(DIN: 00002757)**

**Place: New Delhi  
Date: 11.08.2023**

## Corporate Governance Compliance Certificate

**To,  
The Members of  
SBEC SUGAR LIMITED**  
Vill- Lohan Malakpur, Teh- Baraut  
Distt. – Baghpat, Uttar Pradesh

I have examined the compliance of the conditions of Corporate Governance by SBEC SUGAR LIMITED ('the Company') for the year ended on March 31, 2023, as stipulated under Chapter IV of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The compliance of the conditions of Corporate Governance is the responsibility of the management. My examination was limited to procedures and implementation thereof, as adopted by the Company for ensuring compliance of the conditions of Corporate Governance. It is neither an audit nor an expression of opinion on the financial statements of the Company.

In my opinion and to the best of our information and according to the explanations given to me, I certify that the Company has complied with the:

- All the mandatory conditions of Corporate Governance as stipulated in the provisions as specified in Chapter IV of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

I further state that such compliance is neither an assurance as to the future viability of the company nor the efficiency or effectiveness with which the management has conducted the affairs of the Company.

**Place: New Delhi  
Dated: 11.08.2023**

**Sd/-  
(Soniya Gupta)  
Proprietor  
M. NO. 7493  
CP NO. 8136  
PRFCN.: 1548/2021  
UDIN: F007493E000763655**



## INDEPENDENT AUDITORS' REPORT

### To The Members of SBEC Sugar Limited

#### Qualified Opinion

We have audited the accompanying standalone financial statements of M/s SBEC SUGAR LIMITED ('the Company'), which comprise the Balance Sheet as at 31st March 2023, and the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash flows for the year ended, including a summary of the significant accounting policies and other explanatory information (hereinafter referred to as "the Standalone Ind AS Financial Statements").

In our opinion and to the best of our information and according to the explanations given to us, except for the possible effects of the matter described in the **Basis for Qualified Opinion** section of our report, the aforesaid standalone financial statements give the information required by the Companies Act, 2013 ("the Act") in the manner so required and give a true and fair view in conformity with the Indian Accounting Standards prescribed under section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended ("Ind AS") and other accounting principles generally accepted in India, of the state of affairs of the Company as at 31st March 2023, the loss and total comprehensive income (loss), changes in equity and its cash flows for the year ended on that date.

#### Basis for Qualified Opinion

- 1) During the year ended 31st March 2023, the company has not made provision for interest on late payment of cane dues amounting to Rs 725.41 lacs for sugar season 2022-23, Rs.3,850.13 lacs for the sugar season 2021-22, Rs.101.50 lacs for the sugar season 2020-21, had the company made provisions the loss for the year would have been higher by Rs.4,677.04 lacs respectively and its consequential impact on EPS.**
- 2) The company has taken the debt of IDBI, PNB & IFCI in Modi Industries Limited. As at 31st March, 2023 the company has net exposure of Rs.14,685.98 lacs. No Interest on the said amount has been provided as there is no reasonable certainty of its collection since the networth of Modi Industries Limited has been completely eroded. Recoverability of the above balance is also doubtful. However, no provisions for doubtful debts were made in the financial statements of the company and consequently we are unable to opine on the appropriateness of the same and its consequential impact on the financial statements.**
- 3) The company has valued the closing stock at NRV instead of "the lower of cost and net realisable value" as required under IND AS-2 "Inventories". Since the NRV is higher than cost this has resultant in over statement of Inventories (Finished Goods and WIP-Sugar) by Rs. 720.54 lacs, understatement of losses for the year by Rs. 720.54 lacs and its consequential impact on EPS.**

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

#### Emphasis of Matters

We draw attention to note no 34 (v) of the standalone audited financial statement regarding interest payment on cane dues where the High Court vide its order dated 9th March, 2017 has set aside the decision of State Government for the waiver of Interest for the year 2012-13, 2013-14 and 2014-15 and asked the Cane Commissioner to take a final call in the matter, pending final order the Company has not made provision for interest, on the late payment of cane dues for years 2012-13, 2013-14 and 2014-15. The Hon'ble Supreme Court vide its order dated 23.04.2018 has upheld the Hon'ble High Court order dated 9th March, 2017. The matter is still sub-judice.

Under the power vested with the Cane Commissioner (U.P.) for waiver of interest under UP Sugar Cane (Regulation of Supply & Purchase) Act, 1953 in respect of loss making/sick companies, the company had made an application to Cane Commissioner (U.P.) for waiver of interest on cane dues. Pending receipt of the Cane Commissioner's decision, no interest has been provided on the cane dues. The company has decided to account for the same upon decision in the matter/payment.

Our opinion is not qualified in respect of this matter.

#### Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the standalone Ind AS financial statements of the current period. We have determined that except for the matter described in the "Basis for Qualified Opinion" section, there are no other key audit matters to communicate in our report.

#### Information Other than the Standalone Ind AS Financial Statements and Auditor's Report thereon

The Company's Board of Directors is responsible for the preparation of the other information. The other information comprises the information included in the Management Discussion and Analysis, Board's Report including Annexures to Board's Report, Business Responsibility Report, Corporate Governance and Shareholder's Information, but does not include the standalone Ind AS financial statements and our auditor's report thereon.

Our opinion on the standalone financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the standalone Ind AS financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the standalone financial statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

#### Responsibilities of Management and Those Charged with Governance for the Standalone 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 standalone Ind AS financial statements that give a true and fair view of the financial position, financial performance, total comprehensive income, changes in equity and cash flows of the Company in accordance with the Indian Accounting Standards (Ind AS) and other



accounting principles generally accepted in India, including the Accounting Standards specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making 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 standalone Ind AS financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

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

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

#### **Auditor's Responsibilities for the Audit of the Standalone Financial Statements**

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

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

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

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

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

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

#### **Report on Other Legal and Regulatory Requirements**

1. As required by Section 143(3) of the Act, based on our audit, we report, that:
  - (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit.
  - (b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
  - (c) The Balance Sheet, the Statement of Profit and Loss including Other Comprehensive Income, Statement of Changes in Equity and the Statement of Cash Flows dealt with by this Report are in agreement with the books of account.
  - (d) In our opinion, the aforesaid standalone financial statements comply with the Indian Accounting Standards specified under Section 133 of the Act, read with the Companies (Indian Accounting Standards) Rules, 2015, as amended.
  - (e) On the basis of the written representations received from the Directors as on 31st March 2023 taken on record by the Board of directors, none of the Directors is disqualified as on 31st March 2023 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 internal financial control over financial reporting of those companies, for reasons stated therein.
  - (g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended:



In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Company to its directors during the year is in accordance with the provisions of section 197 of the Act.

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

- i. The Company has disclosed the impact of pending litigations on its financial position in its financial statements – Refer Note 27 to the financial statements.
- ii. The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
- iii. There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.

- iv. (a) The Management has represented that, to the best of its knowledge and belief as disclosed in the note 35(vii) to the standalone financial statements, no funds have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the Company to or in any other person(s) or entity(ies), including foreign entities ("Intermediaries"), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Company ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.

- (b) The Management has represented, that, to the best of its knowledge and belief as disclosed in the note 35(viii) to the standalone financial statements, no funds have been received by the Company from any person(s) or entity(ies), including foreign entity (ies).

Based on the audit procedures performed that have been considered reasonable and appropriate in the circumstances, nothing has come to our notice that has caused us to believe that the representations under sub-clause (i) and (ii) of Rule 11(e), as provided under (a) and (b) above, contain any material misstatement.

- v. The company has not declared or paid any dividend during the year and has not proposed final dividend for the year.

2. As required by the Companies (Auditor's Report) Order, 2020 ("the Order") issued by the Central Government in terms of sub section (11) of section 143 of the Act, we give in "Annexure B" a statement on the matters specified in paragraphs 3 and 4 of the Order.

**For Doogar & Associates**  
**Chartered Accountants**  
**Firm Registration No. 000561N**

**Sd/-**  
**Mukesh Goyal**  
**Partner**

**Membership No.081810**  
**UDIN: 23081810BGZCII1486**

**Place: New Delhi**  
**Date: 26.05.2023**

### **"Annexure A" to the Independent Auditor's Report of even date on the Standalone Ind AS Financial Statements of SBEC Sugar Limited**

#### **Report on the Internal Financial Controls under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 ("the Act") as referred to in paragraph 1(f) of 'Report on Other Legal and Regulatory Requirements' section**

We have audited the internal financial controls over financial reporting of SBEC Sugar Limited ("the Company") as of March 31, 2023 in conjunction with our audit of the 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. 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 the 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.

#### **Auditor's 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 as specified 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.

An 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 judgement, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

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

#### Meaning of Internal Financial Controls Over Financial Reporting

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

#### Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

#### Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2023, 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 Doogar & Associates**  
**Chartered Accountants**  
**Firm Registration No. 000561N**

**Sd/-**  
**Mukesh Goyal**  
**Partner**

**Membership No.081810**

**Place: New Delhi**

**Date: 26.05.2023**

#### "Annexure B" to the Independent Auditor's Report to the members of SBEC Sugar Limited dated May 26th, 2023.

**Report on the matters specified in paragraph 3 of the Companies (Auditor's Report) Order, 2020 ("the Order") issued by the Central Government of India in terms of section 143(11) of the Companies Act, 2013 ("the Act") as referred to in paragraph 2 of 'Report on Other Legal and Regulatory Requirements' section**

i.	(a)	(i) The Company has maintained proper records showing particulars, including quantitative details and situation of fixed assets. (ii) The Company has maintained proper records showing full particulars of intangible assets.
	(b)	Though the Company has a programme of physical verification of its property, plant and equipment in phased manner which, in our opinion, is reasonable having regard to the size of the company and the nature of its assets, <b>however the Company is under a process of carrying out physical verification of Property, Plant and equipment and any discrepancy will be dealt with after completion of physical verification.</b>
	(c)	According to information and explanations given to us and on the basis of our examination of the records of the Company, the title deeds of immovable properties included in fixed assets are held in the name of the company. Some of these title deeds are given as security for securing various facilities and accordingly these original title deeds are kept as security for the lenders.
	(d)	The Company has not revalued any of its property, plant and equipment (including right-of-use assets) and intangible assets during the year.
	(e)	No proceedings have been initiated during the year or are pending against the Company as at March 31, 2023 for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (as amended in 2016) and rules made thereunder.
ii.	(a)	The physical verification of inventory has been conducted by the management at reasonable intervals during the year, In our opinion, the coverage and procedure of such verification by the management is appropriate. There was no discrepancy of 10% or more which was noticed in the aggregate for each class of inventory.
	(b)	According to the information and explanations given to us, at any point of time of the year, the Company has not been sanctioned any working capital facility from banks or financial institutions and hence reporting under clause (ii)(b) of the Order is not applicable.
iii.		According to the information and explanations given to us, the company has not granted any loans, secured or unsecured to companies, firms, Limited Liability Partnerships or other parties covered in the register maintained under section 189 of the Companies Act, 2013. Accordingly, the provisions of clause 3(iii) (a) to (c) of the Order are not applicable to the company and hence not commented upon.



iv.		In our opinion and according to the information and explanations given to us, there are no loans, investments, guarantees, and securities granted in respect of which provisions of section 185 and 186 of the Companies Act 2013 are applicable and hence not commented upon.
v.		The Company has not accepted any deposit or amounts which are deemed to be deposits. Hence, reporting under clause (v) of the Order is not applicable.
vi.		We have broadly reviewed the records, including the books of account maintained by the company pursuant to the rules prescribed by the Central Government for the maintenance of cost records under sub-section (1) of section 148 of the Companies Act, 2013 in respect of company's products and are of the opinion that prima facie the prescribed accounts and records have been made and maintained.
vii.	(a)	According to the records of the Company, undisputed statutory dues including provident fund, employees' state insurance, income tax, sales tax, service tax, duty of customs, duty of excise, value added tax, cess and other material statutory dues have generally been regularly deposited during the year with the appropriate authorities.
	(b)	According to the information and explanations given to us and as per the books and records examined by us, the particulars of statutory dues of the specified statute as at the year, which have not been deposited on account of a dispute are referred to in <b>"Annexure C"</b> .
viii.		There were no transactions relating to previously unrecorded income that were surrendered or disclosed as income in the tax assessments under the Income Tax Act, 1961 (43 of 1961) during the year.
ix.	(a)	In our opinion, the Company has not defaulted in the repayment of loans or other borrowings or in the payment of interest thereon to any lender during the year.
	(b)	The Company has not been declared wilful defaulter by any bank or financial institution or government or any government authority.
	(c)	The Company has not taken any term loan during the year and there are no unutilised term loans at the beginning of the year and hence, reporting under clause 3(ix)(c) of the Order is not applicable.
	(d)	The Company has not raised any funds on short-term basis and hence reporting under clause 3(ix)(d) of the Order is not applicable.
	(e)	The Company has not made any investment in or given any new loan or advances to its subsidiaries during the year and the Company do not have any associate or joint venture. Hence, reporting under clause 3(ix)(e) of the Order is not applicable.
	(f)	The Company has not raised any loans during the year and hence reporting on clause 3(ix)(f) of the Order is not applicable.
x.	(a)	The Company has not raised moneys by way of initial public offer or further public offer (including debt instruments) during the year and hence reporting under clause 3(x)(a) of the Order is not applicable.
	(b)	During the year the Company has not made any preferential allotment or private placement of shares or convertible debentures (fully or partly or optionally) and hence reporting under clause 3(x)(b) of the Order is not applicable to the Company.
xi.	(a)	To the best of our knowledge, no fraud by the Company and no material fraud on the Company has been noticed or reported during the year.
	(b)	To the best of our knowledge, no report under sub-section (12) of section 143 of the Companies Act has been filed in Form ADT-4 as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government, during the year and up to the date of this report.
	(c)	As represented to us by the Management, there were no whistle blower complaints received by the Company during the year and upto the date of this report.
xii.		In our opinion and according to the information and explanations given to us, the Company is not a nidhi company. Therefore, the provisions of clause 3(xii) of the order are not applicable to the Company and hence not commented upon.
xiii.		Based on our audit procedures and according to the information and explanations given to us, transactions with the related parties are in compliance with section 177 and 188 of Companies Act, 2013 where applicable and the details have been disclosed in the notes to the financial statements, as required by the applicable accounting standards.
xiv.	(a)	In our opinion the Company has an adequate internal audit system commensurate with the size and the nature of its business.
	(b)	We have considered the internal audit reports issued to the Company during for the period under audit.
xv.		In our opinion during the year the Company has not entered into any non-cash transactions with any of its directors or directors of its holding company, subsidiary company or persons connected with such directors and hence provisions of section 192 of the Companies Act, 2013 are not applicable to the Company.
xvi.		The Company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934. Hence, reporting under clause 3(xvi)(a), (b) and (c) of the Order is not applicable.
		The Group does not have any Core investment Company (CIC) as part of the group and accordingly reporting under clause 3(xvi)(d) of the Order is not applicable.
xvii.		The Company has not incurred cash losses during the financial year covered by our audit and there were no cash losses in the preceding financial year
xviii.		There has been no resignation of the statutory auditors of the Company during the year.





xix.	On the basis of the financial ratios, ageing and expected dates of realization of financial assets and payment of financial liabilities, other information accompanying the financial statements and our knowledge of the Board of Directors and Management plans and based on our examination of the evidence supporting the assumptions, nothing has come to our attention, which causes us to believe that any material uncertainty exists as on the date of the audit report indicating that Company is not capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date. We, however, state that this is not an assurance as to the future viability of the Company. We further state that our reporting is based on the facts up to the date of the audit report and we neither give any guarantee nor any assurance that all liabilities falling due within a period of one year from the balance sheet date, will get discharged by the Company as and when they fall due.
xx.	The provisions of Section 135 towards corporate social responsibility are not applicable on the company.
xxi.	The reporting under clause (xxi) is not applicable in respect of audit of standalone financial statements of the Company. Accordingly, no comment has been included in respect of said clause under this report. The reporting under clause (xxi) is not applicable in respect of audit of standalone financial statements of the Company. Accordingly, no comment has been included in respect of said clause under this report

**For Doogar & Associates**  
**Chartered Accountants**  
**Firm Registration No. 000561N**

**Sd/-**  
**Mukesh Goyal**  
**Partner**  
**Membership No.081810**

**Place: New Delhi**  
**Date: 26.05.2023**

### **"ANNEXURE C" TO AUDITORS' REPORT**

Referred in Paragraph VII(B) of Annexure "B" a statement on the matters specified in the Companies (Auditors' Report) Order, 2020 for the year ended 31st March 2023.

<b>Name of The Statue</b>	<b>Name of Dues</b>	<b>Amount (Rs. in Lacs)</b>	<b>Period to which amount relates</b>	<b>Forum where dispute is pending</b>
UP VAT Act , 2008	Vat Imposed on bagasse given to M/s SBEC Bioenergy Ltd.	43.47	2008-09	Appeal Filed before Hon'ble High Court Allahabad by Commercial Tax department against order passed by the Member Commercial Tax, Tribunal , Meerut
Finance Act , 1994	Service Tax on Commission	150.88	2003-04	Pending before Commissioner Central Excise, Meerut-1 for remand
Finance Act , 1994	Service Tax on lease Rent	16.83	01.04.2008 to 01.12.2010	Appeal allowed by way of remand by CESTAT, Delhi
Finance Act , 1994	Service Tax on lease Rent	7.24	2010-11	Appeal allowed by way of remand by CESTAT , Delhi
Central Act , 1944	Excise duty on removal for Bagasse & Press-mud	119.78	Dec 2016- June 2017	Appeal allowed by commissioner appeals and department filed the appeal against us before CESTAT Allahabad





## BALANCE SHEET AS AT 31.03.2023

(Amount in Lakhs)

Particulars	Note No.	As at 31.03.2023	As at 31.03.2022
<b>ASSETS</b>			
<b>1 Non-current assets</b>			
(a) Property, Plant and Equipment	3	20,217.65	19,378.88
(b) Other intangible assets	3(a)	0.34	0.60
(c) Capital work - in - progress	3(b)	357.33	1,756.86
(d) Financial assets			
- Investments	4	1,725.83	1,725.83
- Others	4A	14,685.98	14,685.98
(e) Other non - current assets	5	64.43	28.14
		<b>37,051.55</b>	<b>37,576.28</b>
<b>2 Current assets</b>			
(a) Inventories	6	21,561.01	24,308.80
(b) Financial assets			
(i) Trade receivables	7	1,216.95	822.80
(ii) Cash and cash equivalents	8	354.80	336.88
(iii) Loans	9	243.08	2,042.66
(iv) Other Bank Balances	10	25.00	16.20
(c) Other current assets	5	140.52	850.63
		<b>23,541.36</b>	<b>28,377.96</b>
(d) Non Current assets held for sale		-	-
		<b>23,541.36</b>	<b>28,377.96</b>
<b>Total assets</b>		<b>60,592.91</b>	<b>65,954.25</b>
<b>EQUITY AND LIABILITIES</b>			
<b>1 EQUITY</b>			
(a) Equity share capital	11	4,769.40	4,769.40
(b) Other equity	12	(10,115.54)	(8,835.35)
		<b>(5,346.14)</b>	<b>(4,065.95)</b>
<b>LIABILITIES</b>			
<b>2 Non-current liabilities</b>			
(a) Financial liabilities			
(i) Borrowings	13	695.40	5,489.18
(ii) Trade payables	16	-	-
- Total Outstanding dues of micro enterprises and small enterprises		-	-
- Total Outstanding dues of creditors other than micro enterprises and small enterprises		-	-
(b) Provisions	14	616.62	437.35
(c) Other non-current liabilities	15	11.55	10.47
		<b>1,323.56</b>	<b>5,937.00</b>
<b>3 Current liabilities</b>			
(a) Financial liabilities			
(i) Borrowings	13	9,503.64	9,253.36
(ii) Trade payables	16	-	-
- Total Outstanding dues of micro enterprises and small enterprises		294.68	58.84
- Total Outstanding dues of creditors other than micro enterprises and small enterprises		50,798.91	50,595.00
(iii) Other financial liabilities	17	3,427.46	3,694.86
(b) Other current liabilities	15	562.83	338.86
(c) Provisions	14	27.96	142.27
		<b>64,615.48</b>	<b>64,083.19</b>
<b>Total Equity &amp; Liabilities</b>		<b>60,592.91</b>	<b>65,954.25</b>

The accompanying note no. (3 to 26) are integral part of the financial statement.

Summary of Significant Accounting Policies

For Doogar &amp; Associates

Chartered Accountants

Firm Registration No 000561N

Sd/-

Mukesh Goyal

Partner

Membership No. 081810

Sd/-

Umesh Kumar Modi

(Chairman &amp; President)

DIN: 00002757

Sd/-

Abhishek Modi

(Whole Time Director)

DIN: 00002798

Sd/-

J.C. Chawla

(Director)

DIN: 05316202

Sd/-

Vijay Kumar Modi

(Director)

DIN: 00004606

Sd/-

N.P. Bansal

(Director)

DIN: 00010587

Place: New Delhi

Date: 26th May, 2023

Sd/-

A.K. Goel

(Chief Financial Officer)

Sd/-

Ankit K. Srivastava

(Company Secretary)



## STATEMENT OF PROFIT AND LOSS FOR THE PERIOD ENDED 31.03.2023

(Amount in Lakhs)

Particulars	Note No.	For the Year Ended 31.03.2023	For the Year Ended 31.03.2022
<b>I</b> Revenue from operations	18	<b>64,698.49</b>	60,218.99
<b>II</b> Other income	19	<b>147.66</b>	83.64
<b>III</b> <b>Total income (I + II)</b>		<b>64,846.14</b>	60,302.63
<b>IV</b> <b>Expenses:</b>			
Cost of materials consumed	20	<b>52,415.47</b>	52,263.67
Changes in inventories of finished goods, stock - in - trade and work - in - progress	21	<b>2,687.87</b>	(2,265.13)
Employee benefits expenses	22	<b>1,874.93</b>	1,629.09
Finance costs	23	<b>1,545.50</b>	1,506.28
Depreciation and amortization expenses	24	<b>1,897.85</b>	1,850.60
Other expenses	25	<b>5,715.24</b>	6,383.89
<b>Total expenses</b>		<b>66,136.86</b>	61,368.40
<b>V</b> <b>Profit / (loss) before exceptional items and tax (I - IV)</b>		<b>(1,290.72)</b>	(1,065.77)
<b>VI</b> Exceptional items		-	-
<b>VII</b> Profit / (loss) before tax (V - VI)		<b>(1,290.72)</b>	(1,065.77)
<b>VIII</b> <b>Tax expense</b>			
(1) Current tax		-	-
(2) Deferred tax		-	-
(3) Adjustment of Tax for Earlier Years		-	-
		-	-
<b>IX</b> <b>Profit / (loss) from continuing operations (VII - VIII)</b>		<b>(1,290.72)</b>	(1,065.77)
<b>X</b> Profit / (loss) from discontinued operations (VII - VIII)		-	-
<b>XI</b> Tax expense of discontinued operations		-	-
<b>XII</b> Profit / (loss) from discontinued operations (after tax) (X - XI)		-	-
<b>XIII</b> <b>Profit / (loss) for the period (IX + XII)</b>		<b>(1,290.72)</b>	(1,065.77)
<b>XIV</b> <b>Other comprehensive income</b>			
<b>A</b> (i) Items that will not be reclassified to profit or loss		<b>10.54</b>	(74.94)
(ii) Income tax relating to items that will not be reclassified to profit or loss		-	-
<b>B</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		-	-
		<b>10.54</b>	(74.94)
<b>XV</b> <b>Total comprehensive income for the period (XIII + XIV)</b>		<b>(1,280.19)</b>	(1,140.71)
<b>XVI</b> <b>Earnings per equity share (for continuing operations)</b>			
(i) Basic	26	<b>(2.71)</b>	(2.24)
(ii) Diluted	26	<b>(2.71)</b>	(2.24)

The accompanying note no. (3 to 26) are integral part of the financial statement.

### Summary of Significant Accounting Policies

As per our report of even date, attached

### For Doogar & Associates

Chartered Accountants

Firm Registration No 000561N

Sd/-

Mukesh Goyal

Partner

Membership No. 081810

Sd/-

Umesh Kumar Modi

(Chairman & President)

DIN: 00002757

Sd/-

Abhishek Modi

(Whole Time Director)

DIN: 00002798

Sd/-

J.C. Chawla

(Director)

DIN: 05316202

Sd/-

Ankit K. Srivastava

(Company Secretary)

Sd/-

Vijay Kumar Modi

(Director)

DIN: 00004606

Sd/-

N.P. Bansal

(Director)

DIN: 00010587

Place: New Delhi

Date: 26th May, 2023

Sd/-

A.K. Goel

(Chief Financial Officer)



## CASH FLOW STATEMENT FOR THE YEAR ENDED 31ST MARCH, 2023

(Amount in Lakhs)

Particulars	Year Ended 31.03.2023	Year Ended 31.03.2022
<b>A. Cash flow from operating activities:</b>		
Profit for the year before tax	(1,290.72)	(1,065.77)
Adjustments for:		
Finance costs	1,545.50	1,506.28
Interest income	(2.86)	(1.43)
Depreciation and amortisation expense	1,897.85	1,850.60
Loss/(Profit) on sale of Fixed Assets	(21.70)	(1.43)
Provision for Bad & doubtful debts/Advances	-	-
Provision written back	(25.59)	(80.78)
Dividend Income	(91.60)	-
<b>Operating Profit/(Loss) before working capital changes</b>	<b>2,010.87</b>	<b>2,207.48</b>
<b>Movements in working capital:</b>		
Trade receivables	(394.15)	1,171.95
Other assets	665.02	381.50
Inventories	2,747.79	(2,300.31)
Loans	1,799.58	496.76
Adjustments for increase / (decrease) in operating liabilities:		
Trade payables	439.75	6,044.53
Other liabilities	225.05	(83.63)
Other financial liabilities	(267.40)	1,226.99
Provisions/other items	101.08	145.62
<b>Cash generated from operations</b>	<b>7,327.59</b>	<b>9,290.89</b>
Income tax paid	-	-
<b>Net cash generated by operating activities (A)</b>	<b>7,327.59</b>	<b>9,290.89</b>
<b>B. Cash flows from investing activities</b>		
Investment	-	(0.00)
Purchases of fixed assets (including WIP)	(1,464.43)	(2,015.75)
Interest received	2.86	1.43
Dividend received	91.60	-
Proceeds from Sales of Fixed Assets	149.30	1.88
Non Current assets held for sale	-	-
<b>Net cash generated by/(used in) investing activities (B)</b>	<b>(1,220.67)</b>	<b>(2,012.45)</b>
<b>C. Cash flow from financing activities (refer note 44)</b>		
Proceed /Repayment of term loan	(4,543.50)	(5,677.42)
Interest paid	(1,545.50)	(1,506.28)
<b>Net cash generated by/(used in) financing activities (C)</b>	<b>(6,089.00)</b>	<b>(7,183.70)</b>
<b>Net Increase/decrease in Cash and cash equivalents (A+B+C)</b>	<b>17.92</b>	<b>94.74</b>
<b>Cash and cash equivalents at the beginning of the year</b>	<b>336.88</b>	<b>242.14</b>
<b>Cash and cash equivalents at the end of year end</b>	<b>354.80</b>	<b>336.88</b>

In terms of our report of even date, attached

**For Doogar & Associates**  
Chartered Accountants  
Firm Registration No 000561N  
Sd/-  
**Mukesh Goyal**  
Partner  
Membership No. 081810

Sd/-  
**Umesh Kumar Modi**  
(Chairman & President)  
DIN: 00002757

Sd/-  
**Abhishek Modi**  
(Whole Time Director)  
DIN: 00002798

Sd/-  
**Vijay Kumar Modi**  
(Director)  
DIN: 00004606

Sd/-  
**J.C. Chawla**  
(Director)  
DIN: 05316202

Sd/-  
**N.P. Bansal**  
(Director)  
DIN: 00010587

Place: New Delhi  
Date: 26th May, 2023

Sd/-  
**A.K. Goel**  
(Chief Financial Officer)

Sd/-  
**Ankit K. Srivastava**  
(Company Secretary)



## STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED MARCH 31, 2023

(Amount in Lakhs)

Particulars	Equity Share Capital	Reserves & Surplus			Item of Other Comprehensive Income	Total Other Equity	Total Equity
		Capital reserve	Surplus in the statement of profit & loss	Storage fund for molasses Account	Acturial gain/(loss) on employee benefit plans through OCI		
<b>As at April 01, 2021</b>	<b>4,769.40</b>	<b>49.17</b>	<b>(7,717.42)</b>	<b>21.19</b>	<b>(47.57)</b>	<b>(7,694.65)</b>	<b>(2,925.24)</b>
Add: Profit for the Year	-	-	(1,065.77)	-	-	(1,065.77)	(1,065.77)
Add: Transfer to/ (from) storage fund for molasses	-	-	12.48	(12.48)	-	-	-
Add: Reimbursement of defined benefit obligation	-	-	-	-	(74.94)	(74.94)	(74.94)
<b>As at March 31, 2022</b>	<b>4,769.40</b>	<b>49.17</b>	<b>(8,770.71)</b>	<b>8.71</b>	<b>(122.51)</b>	<b>(8,835.35)</b>	<b>(4,065.95)</b>
Add: Profit for the Year	-	-	(1,290.72)	-	-	(1,290.72)	(1,290.72)
Add: Transfer to/ (from) storage fund for molasses	-	-	(3.31)	3.31	-	-	-
Add: Reimbursement of defined benefit obligation	-	-	-	-	10.54	10.54	10.54
<b>As at March 31, 2023</b>	<b>4,769.40</b>	<b>49.17</b>	<b>(10,064.75)</b>	<b>12.02</b>	<b>(111.97)</b>	<b>(10,115.54)</b>	<b>(5,346.14)</b>

### For Doogar & Associates

Chartered Accountants

Firm Registration No 000561N

Sd/-

Mukesh Goyal

Partner

Membership No. 081810

Sd/-

Umesh Kumar Modi

(Chairman &amp; President)

DIN: 00002757

Sd/-

Abhishek Modi

(Whole Time Director)

DIN: 00002798

Sd/-

J.C. Chawla

(Director)

DIN: 05316202

Sd/-

Ankit K. Srivastava

(Company Secretary)

Sd/-

Vijay Kumar Modi

(Director)

DIN: 00004606

Sd/-

N.P. Bansal

(Director)

DIN: 00010587

Place: New Delhi

Date: 26th May, 2023

Sd/-  
A.K. Goel  
(Chief Financial Officer)

**NOTES TO FINANCIAL STATEMENT FOR THE YEAR ENDED 31 MARCH 2023****Note: 1. Company Overview**

SBEC Sugar Limited ('the Company') is a Public Limited Company incorporated in India under the provisions of the Companies Act and its shares are listed on BSE Ltd (Stock Exchange). The registered office of the Company is situated at Village-Loyan, Malakpur, Baraut, District- Baghpat, 250611 (UP), and its principal place of business is at Malakpur, Baraut District- Baghpat, 250611 (UP), the Company is engaged in production of sugar, incorporated in the year 1991, the Company commenced its operations in 1990-2000 with capacities of 3125 TCD and increase to 9000 TCD.

**Note: 2. Significant Accounting Policy****2.1 Basis of preparation of financial information**

The financial statements have been prepared in accordance with Indian Accounting Standards ("Ind AS") notified under the Companies (Indian Accounting Standards) Rules, 2015 (as amended from time to time)

The preparation of financial statements requires the use of certain significant accounting estimates and judgments. It also requires the management to exercise judgment in applying the Company's accounting policies.

The Financial statement are prepared and rounded off to nearest lakhs rupees

**2.2 Historical Cost Convention**

The financial statements are prepared on accrual basis of accounting under historical cost convention in accordance with generally accepted accounting principles in India and the relevant provisions of the Companies Act, 2013 including Indian Accounting Standards notified there under, except for certain financial instruments which are measured at fair values at the end of each reporting period, as explained in the accounting policies below. Historical cost is generally based on the fair value of the consideration given in exchange for goods and services.

**2.3 Summary of Significant Accounting Policies****Current and non-current classification:**

**The Group presents assets and liabilities in the balance sheet based on current/non-current classification.**

**An asset is treated as current when it is:**

- i) expected to be realized or intended to be sold or consumed in normal operating cycle,
- ii) held primarily for the purpose of trading,
- iii) expected to be realized within twelve months after the reporting period,
- iv) cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period, or
- v) Carrying current portion of non-current financial assets. All other assets are classified as non-current.

**A liability is current when:**

- i) It is expected to be settled in normal operating cycle,
- ii) It is held primarily for the purpose of trading,
- iii) It is due to be settled within twelve months after the reporting period,
- iv) There is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period, or
- v) It includes current portion of non-current financial liabilities.

**All other liabilities are classified as non-current.****a) Inventory Valuation**

- (i) Finished Goods (Sugar): Sugar – at Net Realisable Value
- (ii) Goods in Process - at cost
- (iii) Raw material - at cost
- (iv) Stores and spares - at cost (computed on FIFO basis)
- (v) Molasses (By-product) is valued at net realizable value.
- (vi) Provision for obsolescence and other anticipated losses are made on the stocks, whenever identified / considered necessary.

**b) Property, Plant and Equipment**

Property, plant and equipment are stated at cost, net of accumulated depreciation and accumulated impairment losses, if any. When significant parts of plant and equipment are required to be replaced at intervals, the Company depreciates them separately based on their specific useful lives. Subsequent expenditures relating to property, plant and equipment is capitalized only when it is probable that future economic benefits associated with these will flow to the company and the costs of the item can be measured reliably. Repairs and maintenance costs are charged to the statement of profit and loss when incurred. An item of property, plant and equipment and any significant part initially recognized is de-recognized upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on de-recognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the income statement when the asset is derecognized. The residual values, useful lives and methods of depreciation of property, plant and equipment are reviewed at each financial year end and adjusted prospectively.

**c) Intangible assets**

Intangible assets are stated at their cost of acquisition. The cost comprises purchase price, borrowing cost if capitalization criteria are met and directly attributable cost of bringing the asset to its working condition for the intended use. Any trade discount and rebates are deducted in arriving at the purchase price.



**d) Depreciation**

Depreciation on Tangible fixed assets other than Land and Building, Plant & Machinery is charged on straight line method so as to write off the cost/carrying amount of assets. The useful life of assets as prescribed under Part C of Schedule II of the Companies Act 2013 and depreciation is charged on that are on the following basis:-

- (i) Depreciation on All Assets is charged at Straight Line Method basis in the manner as prescribed in Companies Act 2013 and rate as per prescribed useful life.
- (ii) Intangible assets are amortized over a period of 5 year on a straight line basis.

The management has estimated the useful life is different as below:

Assets	Useful Life (Years)
Plant & Machinery	25-32
Building	30-60

**e) Expenditure during Construction**

In respect of new projects, all expenses including interest incurred up to the date of commencement of commercial production are capitalized.

In respect of substantial expansion of business, at existing locations, only direct costs are capitalized together with interest on the funds relatable to them up to the date of commercial production.

**f) Impairment of Non- Financial Assets**

The carrying amount of any property, plant and equipment and intangible assets with infinite lives are reviewed at each balance sheet date, if there is any indication of impairment based on internal / external factor. An asset is impaired when the carrying amount of the asset exceeds the recoverable amount. Recoverable amount is higher of an asset's or cash generating unit's net selling price and its value in use. An impairment loss is charged to the statement of profit and loss in the year in which an asset is identified as impaired. An impairment loss recognized in prior accounting periods is reversed if there has been change in the estimate of the recoverable amount. At each balance sheet date, the Company assesses whether there is any indication that any property, plant and equipment and intangible assets with finite lives may be impaired. If any such impairment exists, the recoverable amount of an asset is estimated to determine the extent of impairment, if any. Where it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the cash-generating unit to which the asset belongs.

**g) Recognition of Revenues & Expenses**

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

Revenue is recognized only if the following conditions are satisfied:-

- (i) The Company has transferred risks and rewards incidental to ownership to the customer; -
- (ii) The Company retains neither continuing managerial involvement to the degree usually associated with ownership nor effective control over the goods sold; -
- (iii) It is probable that the economic benefit associated with the transaction will flow to the Company; and -
- (iv) It can be reliably measured and it is reasonable to expect ultimate collection
- (v) Dividends income is recognized when the shareholders right to receive payment was established by the balance sheet date.

**h) Foreign Currency Transactions**

- (i) Foreign currency transactions are recorded at the rates of exchange prevailing on the date of transaction. Monetary foreign currency assets and liabilities outstanding at the close of the financial year are revalued at the exchange rates prevailing on the balance sheet date. Exchange differences arising on account of fluctuation in the rate of exchange is recognised in the statement of profit and loss.
- (ii) Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value is determined. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e., translation differences on items whose fair value gain or loss is recognised in OCI or statement of profit and loss are also recognised in OCI or statement of profit and loss, respectively).

**i) Investments**

- (i) Long term Investments are stated at cost of acquisition. Provision for diminution in the value is made only if the decline is other than temporary.
- (ii) Unquoted investments are stated at cost.
- (iii) Current investments are valued at carrying value without any adjustment for increase/diminution, if any is accounted at the time of sale of such investments.

**j) Borrowing Cost**

Borrowing Cost attributable to the acquisition or construction of qualifying assets is capitalized as part of cost of that asset. Other borrowing costs are recognized as expense in the period in which they relate.

**k) Employee Benefits**

Expenses and liabilities in respect of employee benefits are recorded in accordance with Indian Accounting Standard (Ind AS) -19 – 'Employee Benefits'.

**(i) Provident Fund and ESI**

The Company makes contribution to statutory Provident Fund and Employee State Insurance in accordance with Employees Provident Fund and Miscellaneous Provisions Act, 1952 and Employee State Insurance Act, 1948 which is a defined contribution plan and contribution paid or payable is recognized as an expense in the period in which services are rendered by the employee.

**(ii) Gratuity**

Gratuity is a post employment benefit and is in the nature of a defined benefit plan. The liability recognized in the balance sheet in respect of gratuity is the present value of the defined benefit/obligation at the balance sheet date less the fair value of plan assets, together with adjustment for unrecognized actuarial gains or losses and past service costs. The defined benefit/obligation is calculated at or near the balance sheet date by an independent actuary using the projected unit credit method.

Gains and losses through re-measurements of the net defined benefit liability / (asset) are recognized in other comprehensive income. The actual return of the portfolio of plan assets, in excess of the yields computed by applying the discount rate used to measure the defined benefit obligations recognized in Other Comprehensive Income. The effect of any plan amendments is recognized in net profits in the Statement of Profit and Loss.

**(iii) Compensated Absence**

Liability in respect of compensated absence becoming due or expected after the balance sheet date is estimated on the basis of an actuarial valuation performed by an independent actuary using the projected unit credit method.

**(iv) Leave Encashment**

The Liability on account of un-availed earned leave at the yearend is fully provided for on actuarial valuation basis.

**(v) Other Short Term Benefits**

Expense in respect of other short term benefits is recognized on the basis of the amount paid or payable for the period during which services are rendered by the employee.

**l) Leases**

Ind AS 116 requires lessees to determine the lease term as the non-cancellable period of a lease adjusted with any option to extend or terminate the lease, if the use of such option is reasonably certain. The Company makes an assessment on the expected lease term on a lease-by-lease basis and thereby assesses whether it is reasonably certain that any options to extend or terminate the contract will be exercised. In evaluating the lease term, the Company considers factors such as any significant leasehold improvements undertaken over the lease term, costs relating to the termination of the lease and the importance of the underlying asset to Company's operations taking into account the location of the underlying asset and the availability of suitable alternatives. The lease term in future periods is reassessed to ensure that the lease term reflects the current economic circumstances. After considering current and future economic conditions, the company has concluded that no changes are required to lease period relating to the existing lease contracts.

**The Company as a lessee**

The Company's lease asset classes primarily consist of leases for buildings. The Company assesses whether a contract contains a lease, at inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company assesses whether: (i) the contract involves the use of an identified asset (ii) the Company has substantially all of the economic benefits from use of the asset through the period of the lease and (iii) the Company has the right to direct the use of the asset.

At the date of commencement of the lease, the Company recognizes a right-of-use asset ("ROU") and a corresponding lease liability for all lease arrangements in which it is a lessee, except for leases with a term of twelve months or less (short-term leases) and low value leases. For these short-term and low value leases, the Company recognizes the lease payments as an operating expense on a straight-line basis over the term of the lease.

Certain lease arrangements include the options to extend or terminate the lease before the end of the lease term. ROU assets and lease liabilities includes these options when it is reasonably certain that they will be exercised.

The right-of-use assets are initially recognized at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or prior to the commencement date of the lease plus any initial direct costs less any lease incentives. They are subsequently measured at cost less accumulated depreciation and impairment losses.

Right-of-use assets are depreciated from the commencement date on a straight-line basis over the shorter of the lease term and useful life of the underlying asset. Right of use assets are evaluated for recoverability whenever events or changes in circumstances indicate that their carrying amounts may not be recoverable. For the purpose of impairment testing, the recoverable amount (i.e. the higher of the fair value less cost to sell and the value-in-use) is determined on an individual asset basis unless the asset does not generate cash flows that are largely independent of those from other assets. In such cases, the recoverable amount is determined for the Cash Generating Unit (CGU) to which the asset belongs.

The lease liability is initially measured at amortized cost at the present value of the future lease payments. The lease payments are discounted using the interest rate implicit in the lease or, if not readily determinable, using the incremental borrowing rates in the country of





domicile of these leases. Lease liabilities are re-measured with a corresponding adjustment to the related right-of-use asset if the Company changes its assessment of whether it will exercise an extension or a termination option. Lease liability and ROU asset have been separately presented in the Balance Sheet and lease payments have been classified as financing cash flows.

#### **The Company as a Lessor**

Leases for which the Company is a lessor is classified as a finance or operating lease. Whenever the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee, the contract is classified as a finance lease. All other leases are classified as operating leases. When the Company is an intermediate lessor, it accounts for its interests in the head lease and the sublease separately. The sublease is classified as a finance or operating lease by reference to the right-of-use asset arising from the head lease. For operating leases, rental income is recognized on a straight line basis over the term of the relevant lease.

#### **m) Financial instruments:**

##### **i) Financial assets**

#### **A) Initial recognition**

The Company classifies financial instruments, or their component parts, on initial recognition as a financial asset, a financial liability or an equity instrument in accordance with the substance of the contractual arrangement. Financial instruments are recognized when the group becomes a party to the contractual provisions of the instrument. Financial instruments are recognized initially at fair value plus transactions costs that are directly attributable to the acquisition or issue of the financial instrument, except for financial assets at fair value through statement of profit and loss, which are initially measured at fair value, excluding transaction costs (which is recognized in statement of profit and loss).

#### **B) Subsequent measurement**

##### **a) Financial assets carried at amortized cost (AC)**

A financial asset is subsequently measured at amortized cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

##### **b) Financial assets at fair value through other comprehensive income (FVTOCI)**

A financial asset is subsequently measured at fair value through other comprehensive income if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

##### **c) Financial assets at fair value through statement of profit and loss (FVTPL)**

###### **Equity instruments**

All equity investments in scope of Ind AS 109 are measured at fair value either as at FVTOCI or FVTPL. The Company makes such election on instrument-by-instrument basis. For equity instruments measured as at FVTOCI, all fair value changes on the instrument, excluding dividends, are recognized in the OCI. Equity instruments included within the FVTPL category are measured at fair value with all changes recognized in the P&L.

Investment in subsidiaries and associates

Investment in subsidiaries and associates are carried at cost.

#### **d) Impairment of financial assets**

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

1. Financial assets that are debt instruments, and are measured at amortized cost e.g., loans, debt securities, deposits, trade receivables and bank balance
2. Financial assets that are debt instruments and are measured as at FVTOCI
3. Lease receivables
4. Trade receivables or any contractual right to receive cash or another financial asset
5. Loan commitments which are not measured as at FVTPL

The Company follows 'simplified approach' for recognition of impairment loss allowance on: Trade receivables or contract revenue receivables; and all lease receivables. The application of simplified approach does not require the Company to track changes in credit risk rather; it recognizes impairment loss allowance based on 12 months ECLs at each reporting date, right from its initial recognition. For recognition of impairment loss on other financial assets and risk exposure, the Company determines that whether there has been a significant increase in the credit risk since initial recognition. If credit risk has not increased significantly, 12-month ECL is used to provide for impairment loss. However, if credit risk has increased significantly, lifetime ECL is used. If, in a subsequent period, credit quality of the instrument improves such that there is no longer a significant increase in credit risk since initial recognition, then the entity reverts to recognizing impairment loss allowance based on 12-month ECL. Lifetime ECL are the expected credit losses resulting from all possible default events over the expected life of a financial instrument. The 12-month ECL is a portion of the lifetime ECL which results from default events that are possible within 12 months after the reporting date.

##### **ii) Financial liabilities**

#### **A. Initial recognition and measurement:**

All financial liabilities are recognized initially at fair value and in case of loans and borrowings and payables, net of directly attributable cost. Fees of recurring nature are directly recognized in statement of profit and loss as finance cost.

**B. Subsequent measurement:**

Financial liabilities are subsequently carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

- a) **Loans and borrowings after initial recognition**, interest bearing loans and borrowings are subsequently measured at amortized cost using the effective interest rate (EIR) method. Gains and losses are recognized in statement of profit and loss when liabilities are derecognized. Amortized cost is calculated by taking into account any discount or premium on acquisition and fees or costs that are an integral part of the EIR. The EIR amortization is included as finance cost in the statement of profit and loss.
- b) **Compound financial instruments** at the issue date the fair value of the liability component of a compound instrument is estimated using the market interest rate for a similar non-convertible instrument. This amount is recorded as a liability at amortized cost using the effective interest method until extinguished upon conversion or at the instrument's redemption date. The equity component is determined as the difference of the amount of the liability component from the fair value of the instrument. This is recognized in equity, net of income tax effects, and is not subsequently re-measured.

**iii) De-recognition of financial instruments**

The Company derecognizes a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the financial asset and the transfer qualifies for de-recognition under Ind AS 109. A financial liability (or a part of a financial liability) is derecognized from the Company's balance sheet when the obligation specified in the contract is discharged or cancelled or expires.

**iv) Fair value of financial instruments**

In determining the fair value of its financial instruments, the Company uses a variety of methods and assumptions that are based on market conditions and risks existing at each reporting date. The methods used to determine fair value include discounted cash flow analysis, available quoted market prices. All methods of assessing fair value result in general approximation of value, and such value may vary from actual realization on future date.

**v) Derivative financial instruments**

Derivative financial instruments are initially recognized at fair value on the date on which a derivative contract is entered into and are subsequently re-measured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative. Any gains or losses arising from changes in the fair value of derivatives are taken directly to statement of profit and loss, except for the effective portion of cash flow hedges which is recognized in Other Comprehensive Income and later to statement of profit or loss when the hedge item effects profit or loss or treated as basis adjustment if a hedged forecast transaction subsequently results in the recognition of a non-financial assets or non-financial liability.

**n) Accounting for Taxation**

- (i) Provision for Current Tax is made on the basis of applicable Income Tax Act, 1961.
- (ii) Deferred Tax assets and liabilities are accounted for in accordance with IND AS-12.

**o) Earnings per Share**

Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders (after deducting preference dividends and attributable taxes) by the weighted average number of equity shares outstanding during the period.

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

**p) Provisions, Contingent Liabilities and Contingent Assets**

Provisions are recognized when the company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation.

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

**q) Cash and Cash Equivalent**

Cash and cash equivalents for the purpose of Cash Flow Statement comprise cash at Bank, cash in hand and demand deposits with bank with an original maturity of three months or less than the date of acquisition.

**r) Cash Flow Statement**

Cash flow are reported using the indirect method, whereby profit before extraordinary items and tax is adjusted for the effects of transactions of non-cash nature and any deferrals or accruals of past or future cash receipts or payments and item of income or expenses associated with investing or financing cash flows.

The cash flows from operating, investing and financing activities of the company are segregated based on the available information.

**s) Estimates and assumptions**

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year, are described below:

**i) Depreciation and useful lives of property, plant and equipment:**

Property, plant and equipment are depreciated over the estimated useful lives of the assets, after taking into account their estimated residual value. Management reviews the estimated useful lives and residual values of the assets annually in order to determine the amount of depreciation to be recorded during any reporting period. The useful lives and residual values are based on the Company's historical experience with similar assets and take into account anticipated technological changes. The depreciation for future periods is adjusted if there are significant changes from previous estimates.



**ii) Recoverability of trade receivable:**

Judgments are required in assessing the recoverability of overdue trade receivables and determining whether a provision against those receivables is required. Factors considered include the credit rating of the counterparty, the amount and timing of anticipated future payments and any possible actions that can be taken to mitigate the risk of non-payment.

**iii) Provisions:**

Provisions and liabilities are recognized in the period when it becomes probable that there will be a future outflow of funds resulting from past operations or events and the amount of cash outflow can be reliably estimated. The timing of recognition and quantification of the liability require the application of judgment to existing facts and circumstances, which can be subject to change. Since the cash outflows can take place many years in the future, the carrying amounts of provisions and liabilities are reviewed regularly and adjusted to take account of changing facts and circumstances.

**iv) Impairment of non-financial assets:**

The Company assesses at each reporting date whether there is an indication that an asset may be impaired. If any indication exists, or when annual impairment testing for an asset is required, the Company estimates the asset's recoverable amount. An asset's recoverable amount is the higher of an asset's or CGU's fair value less costs of disposal and its value in use. It is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or groups of assets. Where the carrying amount of an asset or CGU exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount. In assessing value in use, the estimated future cash flows are discounted to their present value using pretax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. In determining fair value less costs of disposal, recent market transaction are taken into account, if no such transactions can be identified, an appropriate valuation model is used.

**v) Impairment of financial assets:**

The impairment provisions for financial assets are based on assumptions about risk of default and expected cash loss rates. The Company uses judgment in making these assumptions and selecting the inputs to the impairment calculation, based on Company's past history, existing market conditions as well as forward looking estimates at the end of each reporting period.

**vi) Fair value measurement of financial instruments:**

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year. The Company based its assumptions and estimates on parameters available when the financial statements were prepared. Existing circumstances and assumptions about future developments, however, may change due to market changes or circumstances arising that are beyond the control of the Company. Such changes are reflected in the assumptions when they occur.


**NOTE:3 PROPERTY, PLANT AND EQUIPMENT**
**(Amount in Lakhs)**

Gross Block										
	Land		Buildings	Lease Hold	Plant &	Office	Computer	Factory	Furniture	Vehicles
	Freehold	Leasehold		Improvements	Machinery	Equipment	Equipment	Approach Road	& Fixtures	
As at 31st March 2019	1,671.98	4,322.75	3,138.61	0.85	26,157.47	43.85	112.51	244.32	70.97	51.79
Additions	-	-	-	-	1,192.72	5.17	5.62	-	-	10.52
Disposals	-	-	-	-	-	-	-	-	-	8.51
As at 31st March 2020	1,671.98	4,322.75	3,138.61	0.85	27,350.18	49.02	118.13	244.32	70.97	53.80
Additions	-	-	-	-	601.70	11.75	11.85	-	-	12.37
Disposals	-	-	-	-	-	-	-	-	-	32.62
As at 31st March 2021	1,671.98	4,322.75	3,138.61	0.85	27,951.88	60.75	129.98	244.32	70.97	33.54
Additions	-	-	4.64	-	347.73	6.82	3.09	95.41	-	15.37
Disposals	-	-	-	-	5.20	-	-	-	-	3.88
As at 31st March,2022	1,671.98	4,322.75	3,143.26	0.85	28,294.42	67.58	133.07	339.73	70.97	45.03
Additions	-	-	519.52	-	2,324.47	8.90	10.66	-	0.42	-
Disposals	-	-	-	-	372.25	-	-	-	-	-
As at 31st March , 2023	1,671.98	4,322.75	3,662.77	0.85	30,246.64	76.48	143.73	339.73	71.39	45.03

Depreciation										
	Land		Buildings	Lease Hold	Plant &	Office	Computer	Factory	Furniture	Vehicles
	Freehold	Leasehold		Improvements	Machinery	Equipment	Equipment	Approach Road	& Fixtures	
As at 31st March 2019	-	830.20	916.11	0.85	10,953.04	36.75	100.66	244.32	66.35	48.81
Charged for the year	-	272.73	134.17	-	1,398.32	4.96	8.36	-	2.08	1.88
Disposals	-	-	-	-	-	-	-	-	-	7.95
As at 31st March 2020	-	1,102.93	1,050.28	0.85	12,351.36	41.71	109.02	244.32	68.43	42.74
Charged for the year	-	272.73	134.17	-	1,459.18	7.22	11.45	-	1.83	2.91
Disposals	-	-	-	-	-	-	-	-	-	32.10
As at 31st March 2021	-	1,375.65	1,184.46	0.85	13,810.54	48.92	120.47	244.32	70.26	13.56
Charged for the year	-	272.73	134.17	-	1,435.55	7.32	-0.97	-	-1.52	3.06
Disposals	-	-	-	-	4.94	-	-	-	-	3.68
As at 31st March,2022	-	1,648.38	1,318.63	0.85	15,246.08	56.25	119.50	244.32	68.74	12.94
Charged for the year	-	272.73	140.92	-	1,468.14	5.65	7.49	-	0.03	2.64
Disposals	-	-	-	-	244.65	-	-	-	-	-
As at 31st March,2023	-	1,921.11	1,459.55	0.85	16,464.63	61.89	126.99	244.32	68.78	15.57

Net Block										
As at 31st, March 2019	1,671.98	3,492.55	2,222.50	-	15,204.43	7.10	11.85	-	4.62	2.98
As at 31st March 2020	1,671.98	3,219.82	2,088.33	-	14,998.82	7.31	9.11	-	2.54	11.05
As at 31st March 2021	1,671.98	2,947.09	1,954.16	-	14,141.35	11.83	9.51	-	0.71	19.98
As at 31st March 2022	1,671.98	2,674.37	1,824.63	-	13,053.27	11.33	13.57	95.41	2.23	32.09
As at 31st March 2023	1,671.98	2,401.64	2,203.22	-	13,782.01	14.59	16.74	95.41	2.62	29.45

**NOTE:3(a) INTANGIBLE ASSETS**
**(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
<b>Gross Block</b>		
Opening	20.37	20.37
Additions	-	-
Disposals	-	-
<b>Closing as at 31.03.2023</b>	<b>20.37</b>	<b>20.37</b>
<b>Depreciation</b>		
Opening	19.78	19.52
Charge for the year	0.26	0.26
Disposals	-	-
<b>Closing as at 31.03.2023</b>	<b>20.04</b>	<b>19.78</b>
<b>Net Block as at 31.03.2023</b>	<b>0.34</b>	<b>0.60</b>

**NOTE:3(b) CAPITAL WORK -IN-PROGRESS****(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
Plant and machinery under erection	1,756.86	214.17
Additions	1,343.60	1,812.69
Disposals	2,743.13	270.00
<b>Total as at 31.03.23</b>	<b>357.33</b>	<b>1,756.86</b>

**CWIP AGEING SCHEDULE****(Amount in Lakhs)**

CWIP	Amount of CWIP for a period of				Total
	Less than 1 Year	1-2 Year	2-3 Year	More Than 3 Years	
Cane Yard Rcc Road Wip	0.49	10.24	44.52	-	55.25
Etp Extension Wip	125.57	-	-	-	125.57
Mech. Circulator Wip	54.25	36.35	12.65	-	103.25
New Sugar Godown No.5	5.50				5.50
Safety Equipment	33.20				33.20
Ethanol Project	3.88	5.00		25.69	34.56
<b>Total</b>	<b>222.89</b>	<b>51.59</b>	<b>57.17</b>	<b>25.69</b>	<b>357.33</b>

**CWIP COMPLETION SCHEDULE FOR PROJECTS****(Amount in Lakhs)**

CWIP	To be Completed In		Total
	Less than 1 Year	1-2 Year	
Cane Yard Rcc Road Wip	55.25		55.25
Etp Extension Wip	125.57	-	125.57
Mech. Circulator Wip	103.25	-	103.25
New Sugar Godown No.5	5.50	-	5.50
Safety Equipment	33.20	-	33.20
Ethanol Project		34.56	34.56
<b>Total</b>	<b>322.77</b>	<b>34.56</b>	<b>357.33</b>

**NOTE:4 INVESTMENTS****(Amount in Lakhs)**

Particulars	Non - current As at 31.03.2023	Current As at 31.03.2023	Non - current As at 31.03.2022	Current As at 31.03.2022
<b>Investment in Subsidiary Companies</b>				
1,26,50,000 Equity Shares of Rs.10/-each in SBEC Bioenergy Ltd. (P.Y. 1,26,50,000 Equity Shares of Rs.10/-each)*	<b>1,265.83</b>		1,265.83	
45,50,000 Equity Shares of Rs.10/-each in SBEC Stockholding & Investment Ltd.(P.Y. 45,50,000 Equity Shares of Rs.10/ each)	<b>455.00</b>		455.00	
<b>Other Investments:</b>				
20,000 Equity Shares of Rs.25/-each in The SVC Bank Ltd (P.Y. 20,000 Equity Shares of Rs.25/each)	<b>5.00</b>		5.00	
50 Equity shares of Rs. 10 each in saraswat bank	<b>0.01</b>		0.01	
<b>Total</b>	<b>1,725.83</b>	-	<b>1,725.83</b>	-
<b>*Including Rs.82500/-Share Transfer Fee</b>				
Aggregate amount of unquoted investments	<b>1,725.83</b>		1,725.83	


**NOTE 4A: FINANCIAL ASSETS-OTHER**

(Amount in Lakhs)

Particulars	Non - current As at 31.03.2023	Current As at 31.03.2023	Non - current As at 31.03.2022	Current As at 31.03.2022
Debt Assignment Recoverable	14,685.98	-	14,685.98	-
<b>Total Financial Assets-Other</b>	<b>14,685.98</b>		<b>14,685.98</b>	

**NOTE: 5 OTHER ASSETS**

(Amount in Lakhs)

Particulars	Non - current As at 31.03.2023	Current As at 31.03.2023	Non - current As at 31.03.2022	Current As at 31.03.2022
- Unsecured, considered good				
Advances recoverable in cash or kind or for value to be received	-	21.08	-	731.71
<b>Advances other than Capital Advances -</b>				
Security deposits	3.79	-	2.21	-
-Prepaid Expenses	-	45.74	-	41.58
<b>Balances with statutory authorities</b>		73.70		77.34
-Direct tax Recoverable	60.64	-	25.93	-
<b>Total other assets</b>	<b>64.43</b>	<b>140.52</b>	<b>28.14</b>	<b>850.63</b>

**NOTE: 6 INVENTORIES**

(Amount in Lakhs)

Particulars	As At 31.03.2023	As At 31.03.2022
<b>Raw Materials</b>	4.94	2.88
Stores & Spares	997.09	1,058.55
Work - in - progress	774.73	758.75
Finished goods	17,508.68	19,450.62
Others	2,275.57	3,037.98
<b>Total</b>	<b>21,561.01</b>	<b>24,308.80</b>

**NOTE: 7 TRADE RECEIVABLES**

(Amount in Lakhs)

Particulars	As At 31.03.2023	As At 31.03.2022
<b>Exceeding 6 months from payment due date</b>		
- Unsecured, considered good	8.58	14.28
- Unsecured, considered Doubtful	49.04	39.56
- Allowance for bad & doubtful debts	(49.04)	(39.56)
	<b>8.58</b>	<b>14.28</b>
<b>Less than 6 months</b>		
- Unsecured, considered good from related party	-	-
- Unsecured, considered good	1,208.37	808.52
<b>Total</b>	<b>1,216.95</b>	<b>822.80</b>

**TRADE RECEIVABLE SCHEDULE**

(Amount in Lakhs)

PARTICULARS	Outstanding for following period from due Date of Payment					As on 31.03.2023
	Less than 6 months	6 Months - 1 Year	1-2 years	2-3 years	More than 3 years	Total
Undisputed Trade Receivables - Considered good	1,208.37	8.29	-	0.30	39.70	1,256.66
Undisputed Trade Receivables - which has significant increase in credit risk	-	-	-	-	-	-
Undisputed Trade Receivables - Credit Impaired	-	-	-	-	-	-
Disputed Trade Receivables - Considered good	-	-	-	-	-	-
Disputed Trade Receivables - which has significant increase in credit risk	-	-	-	-	9.33	9.33
Disputed Trade Receivables - Credit Impaired	-	-	-	-	-	-
<b>Total</b>	<b>1,208.37</b>	<b>8.29</b>	<b>-</b>	<b>0.30</b>	<b>49.03</b>	<b>1,265.99</b>



PARTICULARS	Outstanding for following period from due Date of Payment					As on 31.03.2022
	Less than 6 months	6 Months - 1 Year	1-2 years	2-3 years	More than 3 years	Total
Undisputed Trade Receivables - Considered good	808.52	-	0.30	13.98	39.56	862.35
Undisputed Trade Receivables - which has significant increase in credit risk						-
Undisputed Trade Receivables - Credit Impaired						-
Disputed Trade Receivables - Considered good						-
Disputed Trade Receivables - which has significant increase in credit risk						-
Disputed Trade Receivables - Credit Impaired						-
<b>Total</b>	<b>808.52</b>	<b>-</b>	<b>0.30</b>	<b>13.98</b>	<b>39.56</b>	<b>862.35</b>

**NOTE: 8 CASH & CASH EQUIVALENTS**

(Amount in Lakhs)

Particulars	As At 31.03.2023	As At 31.03.2022
Balances with banks		
- in Current Accounts	352.30	332.42
Cheques, drafts in hand	-	-
Cash in hand	2.50	4.46
<b>Total</b>	<b>354.80</b>	<b>336.88</b>

**NOTE: 9 LOANS**

(Amount in Lakhs)

Particulars	Current	
	As At 31.03.2023	As At 31.03.2022
<b>Security Deposits</b>		
- Unsecured, considered good		
Loans to related parties	-	1,850.50
Less: Expected Credit loss	-	-
Advance to vendors	276.60	213.53
Less: Provision for Doubtful Advance	(33.52)	(21.37)
<b>Total</b>	<b>243.08</b>	<b>2,042.66</b>

**NOTE: 10 OTHER BANK BALANCES**

(Amount in Lakhs)

Particulars	As At 31.03.2023	As At 31.03.2022
Margin Money	-	2.20
Balance with Govt dept.	-	-
Fixed Deposit	25.00	14.00
<b>Total</b>	<b>25.00</b>	<b>16.20</b>

**NOTE 11: SHARE CAPITAL****(1) Current reporting Period**

(Amount in Lakhs)

Particular	Balance at the beginning of the current reporting period	Changes in share capital due to prior period errors	Restated balance at the beginning of current reporting period	Changes in equity share capital during the current year	Balance at the end of current reporting period
<b>Authorised Share Capital:</b>					
100,000,000 Equity Shares of Rs.10/- each.	10,000.00				10,000.00
<b>Issued, Subscribed Capital:</b>		-	-	-	-
47,814,430 Equity Shares of Rs.10/- each.	4,781.44				4,781.44
<b>Paid Up Capital:</b>		-	-	-	-
47,653,880 Equity Shares of Rs.10/- each.	4,765.39				4,765.39
Share Forfeiture Account	4.01	-	-	-	4.01
<b>Total</b>	<b>4,769.40</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>4,769.40</b>




**(1) Previous reporting Period**
**(Amount in Lakhs)**

Particular	Balance at the beginning of the current reporting period	Changes in share capital due to prior period errors	Restated balance at the beginning of current reporting period	Changes in equity share capital during the current year	Balance at the end of current reporting period
<b>Authorised Share Capital:</b>		-	-	-	-
100,000,000 Equity Shares of Rs.10/- each.	10,000.00				10,000.00
<b>Issued, Subscribed Capital:</b>		-	-	-	-
47,814,430 Equity Shares of Rs.10/- each.	4,781.44				4,781.44
<b>Paid Up Capital:</b>		-	-	-	-
47,653,880 Equity Shares of Rs.10/- each.	4,765.39				4,765.39
Share Forfeiture Account	4.01	-	-	-	4.01
<b>Total</b>	<b>4,769.40</b>	-	-	-	<b>4,769.40</b>

**a) Terms/rights attached to Equity Shares**

Company has only one class of equity shares having a par value of Rs.10/-. Each holder of equity shares is entitled to one vote per share. The Company declares and pays dividends in Indian rupees. The dividend, if any, proposed by the Board of Directors is subject to the approval of the shareholders in the ensuing Annual General Meeting.

In the event of liquidation of the Company, the holders of equity shares will be entitled to receive remaining assets of the company, after distribution of all preferential amounts. The distribution will be in proportion to the number of equity shares held by the shareholders.

**b) Detail of Shareholders holding more than 5% Equity Shares in the company**

Name of Shareholder	As at 31.03.2023		As At 31.03.2022	
	No. of shares Held	% age of Holding	No. of shares Held	%age of Holding
<b>Equity Shares</b>				
1. M/s SBEC Systems (India) Ltd.	1,42,30,884.00	29.86%	1,42,30,884.00	29.86%
2. M/s Moderate Leasing & Capital Services Ltd	90,65,568.00	19.02%	90,65,568.00	19.02%
3. M/s Abhikum Leasing and Investment Pvt. Ltd.	56,25,844.00	11.81%	56,25,844.00	11.81%
4. M/s A to Z Holdings Pvt. Ltd.	33,60,070	7.05%	33,60,070	7.05%
5. M/s Longwell Investments Pvt. Ltd.	27,21,500.00	5.71%	27,21,500.00	5.71%

**c) Shares held by the promoters as on 31.03.2023**

S.No.	Promoters Name	No. of Shares	% of Total Shares	% changes during the year
1	M/s SBEC Systems (India) Ltd.	1,42,30,884.00	29.86%	-
2	M/s Moderate Leasing & Capital Services Ltd	90,65,568.00	19.02%	-
3	M/s Longwell Investments Pvt. Ltd.	27,21,500.00	5.71%	-
4	M/s A to Z Holdings Pvt. Ltd.	33,60,070.00	7.05%	-
5	Mr. Umesh Kumar Modi	15,71,223.00	3.30%	
6	Mr. Jayesh Modi	55,487.00	0.12%	
7	Mrs. Kumkum Modi	28,300.00	0.06%	-
	<b>Total</b>	<b>3,10,33,032.00</b>	<b>65.12%</b>	

**d) Reconciliation of the shares outstanding at the beginning and at the end of the reporting period**

Equity Shares	As at 31.03.2023		As At 31.03.2022	
	No. of shares	(Rs.)	No. of shares	(Rs.)
At the beginning of the year	4,76,53,880.00	47,65,38,800.00	4,76,53,880.00	47,65,38,800.00
Add: Shares Issued during the year	-	-	-	-
Less: Bought back during the year	-	-	-	-
<b>Outstanding at the end of the year</b>	<b>4,76,53,880.00</b>	<b>47,65,38,800.00</b>	<b>4,76,53,880.00</b>	<b>47,65,38,800.00</b>



- e) The Company has not allotted any fully paid up shares pursuant to contract(s) without payment being received in cash nor has allotted any fully paid up shares by way of bonus shares nor has bought back any class of shares during the period of five years immediately preceding the balance sheet date.

<b>NOTE 12: OTHER EQUITY</b>					
(1) Current Reporting Period				(Amount in Lakhs)	
Particular	Reserve and surplus			other items of other comprehensive income	Total
	Capital reserve	Other reserve (Molasses storage fund)	Retained earnings		
Balance at the beginning of the current reporting period	49.17	8.71	(8,770.71)	(122.51)	(8,835.35)
Changes in accounting policy of prior period items	-		-	-	-
Restated balance at the beginning of current reporting period	49.17	8.71	(8,770.71)	(122.51)	(8,835.35)
Total comprehensive Income For the Year	-		(1,290.72)	10.54	(1,280.19)
Dividends	-	-	-	-	-
Transfer to retained earnings	-			-	-
Any other changes	-	3.31	(3.31)	-	-
<b>Balance at the end of current reporting period</b>	<b>49.17</b>	<b>12.02</b>	<b>(10,064.74)</b>	<b>(111.97)</b>	<b>(10,115.54)</b>

(2) Previous Reporting Period					
(Amount in Lakhs)					
Particular	Reserve and surplus			other items of other comprehensive income	Total
	Capital reserve	Other reserve (Molasses storage fund)	Retained earnings		
Balance at the beginning of the current reporting period	49.17	21.19	(7,717.42)	(47.57)	(7,694.65)
Changes in accounting policy of prior period items	-		-	-	-
Restated balance at the beginning of current reporting period	49.17	21.19	(7,717.42)	(47.57)	(7,694.65)
Total comprehensive Income For the Year	-		(1,065.77)	(74.94)	(1,140.71)
Dividends	-	-	-	-	-
Transfer to retained earnings	-			-	-
Any other changes	-	(12.48)	12.48	-	-
<b>Balance at the end of current reporting period</b>	<b>49.17</b>	<b>8.71</b>	<b>(8,770.71)</b>	<b>(122.51)</b>	<b>(8,835.35)</b>


**NOTE:13 BORROWINGS**
**(Amount in Lakhs)**

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
<b>Term Loans</b>				
<b>- Secured</b>				
From Banks	691.75	-	5,480.30	-
Current maturities of long term debt	-	4,543.41	-	5,570.04
Vehicle Loans	3.65	6.60	8.88	6.60
<b>Net Balance</b>	<b>695.40</b>	<b>4,550.01</b>	<b>5,489.18</b>	<b>5,576.64</b>
<b>- Unsecured</b>				
Deposits From Selling Agents	-	-	-	-
Vehicle Loans				
Inter Corporate Deposit	-	4,953.63	-	3,676.72
<b>Total</b>	<b>695.40</b>	<b>9,503.64</b>	<b>5,489.18</b>	<b>9,253.36</b>

**NOTE:13 (1) Loan repayment and security schedule**

S.No.	Name of Bank/ Financial Institution/Lender	Nature of Loan	Amount outstanding as on 31st March , 2023	Interest Rate (Per Annum)	Repayment Periodicity	Remaining Installments as on 31st March, 2023	Security
	<b>Secured</b>						
1.	U.P. Co-operative Bank Limited - 201 crores	Soft Loan	4,711.75	5%	Rs. 335 Lacs Plus applicable interest per month	15	1. First and exclusive charge on our Complete plant and machinery ,building,land , Road and all civil work. Value of above security will be Rs.255 crores. 2. First and paripasu cahrgre on assets of SBEC Bioenergy limited . Value of Bioenergy Assets was Rs 56 crores. 3. Colleteral security on Mr. Umesh kumar Modi Delhi's farmhouse value of such farmhouse was Rs. 91 crores. Total Security value of Rs. 402 crores. 4. Mr. Umesh Kumar Modi and Mr. Abhishek Modi has given their personal guarantee for the loan from U.P. Co-operative Limited
2.	U.P. Co-operative Bank Limited - 46.50 Crores	Soft Loan	523.42	5%	Rs. 129.17 Lacs Plus applicable interest per month	5	
3.	Punjab National Bank - 8.90 lacs	Vehicle Loan -1	2.27	8.55%	Rs. 0.20 Lacs per Month	12	
4.	Punjab National Bank-9.60 lacs	Vehicle Loan -2	3.81	8.55%	Rs. 0.20 Lacs per Month	21	
5.	Punjab National Bank -6.34 lacs	Vehicle Loan -3	4.16	8.20%	Rs. 0.15 Lacs per Month	31	Hypothecation/Mortgage of Assets created out of bank finance
	<b>Unsecured</b>						
1.	Modearte Leasing and capital service Ltd.	Inter corporate Deposit for 10 Years	1,459.11	16.00%	Monthly installment for principle plus applicable interest	67	N.A.
2.	Modearte Leasing and capital service Ltd.	Inter corporate Deposit	3494.52	16%	N.A.	N.A.	N.A.
<b>Total</b>			<b>10,199.04</b>				

**NOTE: 14 PROVISIONS**

(Amount in Lakhs)

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
<b>Provision for employee benefits</b>				
- Gratuity	562.22	22.72	393.65	132.57
- Leave Encashment	54.40	5.25	43.70	9.70
<b>Total</b>	<b>616.62</b>	<b>27.96</b>	<b>437.35</b>	<b>142.27</b>

**NOTE: 15 OTHER LIABILITIES**

(Amount in Lakhs)

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
Security Deposits	11.55	-	10.47	-
Statutory Payables	-	533.49	-	288.35
Retention money	-	29.34	-	50.52
<b>Total</b>	<b>11.55</b>	<b>562.83</b>	<b>10.47</b>	<b>338.86</b>

**NOTE:16 TRADE PAYABLE**

(Amount in Lakhs)

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
Due to parties registered under MSMED Act	-	294.68	-	58.84
Due to other parties	-	50,798.91	-	50,595.00
Due to related parties	-	-	-	-
<b>Total</b>	<b>-</b>	<b>51,093.59</b>	<b>-</b>	<b>50,653.84</b>

**TRADE PAYABLE AGEING SCHEDULE**

(Amount in Lakhs)

PARTICULARS	Outstanding as on 31.03.23				Total
	Less than 1 Year	1-2 Year	2-3 Years	More than 3 Years	
Others	1,982.20	68.40	4.14	21.02	2,075.76
Sugarcane	49,017.83	-	-	-	49,017.83
<b>Total</b>	<b>51,000.03</b>	<b>68.40</b>	<b>4.14</b>	<b>21.02</b>	<b>51,093.59</b>

**TRADE PAYABLE AGEING SCHEDULE**

(Amount in Lakhs)

PARTICULARS	Outstanding as on 31.03.22				Total
	Less than 1 Year	1-2 Year	2-3 Years	More than 3 Years	
Others	2,285.39	44.35	13.20	52.38	2,395.32
Sugar Cane	48,258.52	-	-	-	48,258.52
<b>Total</b>	<b>50,543.90</b>	<b>44.35</b>	<b>13.20</b>	<b>52.38</b>	<b>50,653.84</b>

**NOTE:17 OTHER FINANCIAL LIABILITIES**

(Amount in Lakhs)

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
Employees related dues	-	218.04	-	219.69
Advance from Customer	-	2,955.25	-	1,714.27
Other Liabilities for Expenses	-	184.14	-	224.69
Other Payables	-	70.03	-	1,536.21
<b>Total</b>	<b>-</b>	<b>3,427.46</b>	<b>-</b>	<b>3,694.86</b>


**NOTE: 18 REVENUE FROM OPERATIONS**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
A. Sale of Goods	63,151.72	60,045.92
Gross Sales		
Less: Excise Duty	-	-
Net Sales	63,151.72	60,045.92
B. Other Operating Revenue	1,546.76	173.07
<b>Total</b>	<b>64,698.49</b>	<b>60,218.99</b>

**NOTE: 19 OTHER INCOME**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Interest income	2.86	1.43
Provision written back	25.59	80.78
Dividend	91.60	-
Net Gain on sale of fixed assets	21.70	1.43
Misc. Income	5.91	0.01
<b>Total</b>	<b>147.66</b>	<b>83.64</b>

**NOTE: 20 COST OF MATERIALS CONSUME**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Raw materials consumed	52,415.47	52,263.67
<b>Total</b>	<b>52,415.47</b>	<b>52,263.67</b>

**NOTE: 21 CHANGED IN INVENTORIES OF FINISHED GOODS & WORK IN PROGRESS**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Inventories at the end of the year		
Finished Goods	19,783.40	22,487.25
Work-in-progress	774.73	758.75
Sub Total	20,558.13	23,246.01
Inventory at the beginning of the year		
Finished Goods	22,487.25	20,301.99
Work-in-progress	758.75	678.88
Sub Total	23,246.01	20,980.87
<b>Total</b>	<b>2,687.87</b>	<b>(2,265.13)</b>

**NOTE: 22 EMPLOYEE BENEFIT EXPENSES**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Salary & Wages & Bonus	1,653.10	1,459.96
Contribution to provident & other funds	148.79	109.69
Workman and staff welfare	73.04	59.44
<b>Total</b>	<b>1,874.93</b>	<b>1,629.09</b>

**NOTE: 23 FINANCE COSTS**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Interest Expense	1,507.98	1,480.32
Interest Impact on Gratuity	37.52	25.95
Interest on amortisation of Loans	-	-
<b>Total</b>	<b>1,545.50</b>	<b>1,506.28</b>

**NOTE:24 DEPRECIATION AND AMORTIZATION EXPENSES****(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Depreciation of tangible assets	1,897.59	1,850.34
Amortization of intangible assets	0.26	0.26
<b>Total</b>	<b>1,897.85</b>	<b>1,850.60</b>

**NOTE:25 OTHER EXPENSES****(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Consumption of stores & spare parts	1,679.76	2,333.66
Power & fuel	0.69	0.61
Material Handling Expenses	238.03	238.85
Repairs & maintenance		
-Plant & Machinery	2,055.15	1,607.48
-Building	242.62	200.89
-Others	227.42	257.67
Insurance (Net)	26.53	6.38
Rent	29.39	24.08
Rates & Taxes	58.38	32.15
Legal & Professional Charges	124.11	90.19
Telephone,Postage & Telegram	8.63	8.33
Travelling & Conveyance	78.81	70.64
Director's Sitting Fee	0.32	0.41
Auditor's Remuneration:	-	-
-As Audit Fee	3.00	2.25
-Certification & Company Law	1.63	1.00
-Expenses Reimbursement	-	-
<u>Prior Period Adjustments</u>	-	-
Freight & Forwarding	33.45	33.31
Commission to selling agents	233.06	135.02
Other selling expenses	1.04	720.93
Royalty Expenses	315.19	296.74
Other expenses	253.45	241.06
Provision for Bad & doubtful debts/Advances	21.48	-
Security Guard Expenses	63.09	64.73
Vehicle Expenses	20.01	17.52
<b>Total</b>	<b>5,715.24</b>	<b>6,383.89</b>

**NOTE:26 EARNINGS PER SHARE****(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Net profit/ (loss) as per Statement of Profit & Loss (for calculation of basic EPS)	(1,290.72)	(1,065.77)
Weighted average number of equity shares in calculating basic EPS	4,76,53,880.00	4,76,53,880.00
Basic earning per share	(2.71)	(2.24)
Diluted earning per share	(2.71)	(2.24)


**NOTE 27: Contingent Liabilities**
**Claims against the Company not acknowledged as debts are as under:**
**(Amount in Lakhs)**

S.No.	Particulars	As at 31.03.2023	As at 31.03.2022
i)	Outstanding against Guarantee given to SVC Co-operative Bank Limited on behalf of SBEC Bio-energy Ltd.	Nil	526.67
ii)	Corporate Guarantee given to the Government of Jharkhand against the Soft Loan (excluding Interest) given to the Bihar Sponge Iron Limited.	2125.00	3250.00
iii)	Duties and Tax liabilities disputed by the Company	338.19	341.36

Based on legal advice, discussions with the solicitors, etc., the management believes that there is fair chance of decisions in the company's favor in respect of all the items listed at (i) to (iii) above and hence no provision is considered necessary against the same. The management believes that the ultimate outcome of these proceedings will not have a material adverse effect on the company's financial position and results of operations.

**Note 28: Commitment**
**28.1 Capital Commitments:**

Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances): 173.44 lacs (P.Y. Rs.443.90 lakhs).

**28.2 Other Commitments: Rs.Nil (P.Y. Nil).**
**Note 29: Employee Benefits**

The disclosure of 'Employee Benefits' as defined in IND AS-19 is as under:

**Expenses recognized in the statement of Profit & Loss**
**(i) Defined Contribution Plan**
**(Amount. in Lakhs)**

Particulars	Current Year	Previous Year
Employer's Contribution to Provident Fund	124.15	91.67

**(ii) Defined Benefits Plan**
**(Amount. in Lakhs)**

Particulars	Gratuity Unfunded		Leave Encashment Unfunded	
	C. Yr.	P. Yr.	C. Yr.	P. Yr.
Current service cost	43.58	41.13	3.08	2.77
Interest cost	37.52	25.95	3.22	2.97
Expected Return on Plan Assets	-	-	-	-
Net Actuarial (gain)/loss	-	-	0.79	(4.76)
Past service cost	-	-	-	-
Re-measurements recognized in OCI (Gain)/Loss	-	-	-	-
Comprehensive Income on Gratuity	10.54	(74.94)	-	-
Expenses recognized in the statement of Profit & Loss	43.58	41.13	7.10	0.98
Interest Impact on Gratuity	37.52	25.95	-	-

**(a) The assumptions used to determine the benefit obligations:**
**(Amount. in Lakhs)**

Particulars	Gratuity		Leave Encashment	
	C. Yr.	P. Yr.	C. Yr.	P. Yr.
Discount Rate	7.32%	7.13%	7.32%	7.13%
Expected Rate of increase in Compensation Levels	5.50%	5.50%	5.50%	5.50%
Expected Rate of Return on Plan Assets	NA	NA	NA	NA
Expected Average remaining working lives of employees (years)	13.75 Years	14.36 Years	10.52 years	11 years



**(b) Reconciliation of Opening and Closing balances of benefit obligations:****(Amount. in Lakhs)**

Particulars	Gratuity Unfunded		Leave Encashment Unfunded	
	C. Yr.	P. Yr.	C. Yr.	P. Yr.
Benefit obligation at beginning of the year	526.23	387.35	45.19	44.27
Current service cost	43.58	41.13	3.08	2.77
Interest Cost	37.52	25.95	3.22	2.97
Benefits paid	(11.86)	(3.15)	(0.12)	(0.05)
Past service cost Curtailment Gains/Losses	-	-	-	-
Contribution by plan participants	-	-	-	-
Re-measurements Recognized in OCI (gain)/ loss	-	-	-	-
Actuarial (gain)/ loss	(10.54)	74.94	0.79	(4.76)
Projected benefit obligation at end of the year	-	-	-	-
Net amount recognized in the balance sheet as at the end of the year	584.93	526.23	52.16	45.19

**(c) There is no plan asset at the beginning and at the closing of the year.****Note 30: RELATED PARTY DISCLOSURE****(A) Name of Related Parties where control exists and with whom transactions have taken place during the year:**

S.No.	Name of Related Party	Nature of Relationship
<b>A</b>	<b>(i) A person or a close member of that person's family of a reporting entity has control or joint control over the reporting entity</b>	
1	Umesh Kumar Modi	Promoters having voting control
2	Kumkum Modi	Promoters having voting control
3	Jayesh Modi	Promoters having voting control
	<b>(ii) A person or a close member of that person's family of a reporting entity is a member of the Key Management Personnel of the reporting entity or of a parent of the reporting entity.</b>	
1	Abhishek Modi	Whole Time Director
2	Anil Kumar Goel	Chief Financial Officer
3	Ankit K. Srivastava	Company Secretary
4	Vipin Kumar	Occupier
<b>B</b>	<b>(i) The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others)</b>	
1	SBEC Stockholding & Investment Limited	Wholly Owned Subsidiary
2	SBEC Bioenergy Limited	Subsidiary
	<b>(ii) The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity</b>	
	SBEC Sugar EPF Trust	Trust
	<b>(iii) (a) The entity is controlled or jointly controlled by a person identified in (a).</b>	
	<b>(iii) (b) A person identified in (a)(i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).</b>	



1	A to Z holdings Pvt. Limited	Directorship and Shareholding along with relatives in the Company
2	Bihar Sponge Iron Limited	
3	Jai Abhishek Investments Pvt. Ltd.	
4	Longwell Investment Pvt. Ltd.	
5	Modi Goods and Retail Services Pvt. Ltd.	
6	Modi Hitech India Limited	
7	Modi Illva India Pvt. Ltd.	
8	Modi Industries Limited	
9	Modi – Mundipharma Healthcare Pvt. Ltd.	
10	Modi-Mundipharma Beauty Products Private Limited	
11	Modi-Mundipharma Pvt. Ltd.	
12	SBEC Bioenergy Ltd	
13	SBEC Stockholding & Investment Limited	
14	SBEC Systems (India) Ltd.	
15	Umesh Modi Corp Pvt. Ltd	
16	Win-Medicare Private Limited	
17	Modi-Senator (India) Pvt. Ltd.	
18	Abhikum Leasing & Investments Pvt. Ltd.	
19	ABC Holding Pvt. Ltd	
20	Kumabhi Investments Pvt. Ltd	
21	Meghkum Leasing & Investment Pvt. Ltd.	
22	Trimium Advisors LLP (Formerly Known as Trimium Advisors Private Limited)	
23	JayeshTradex Pvt. Ltd.	
24	M First Trading Pvt. Ltd.	
25	Meghna Autoworks Pvt. Ltd	
26	MG Mobiles India Pvt. Ltd	
27	Modi Arts Pvt. Ltd	
28	Modi Diagnostics Pvt. Ltd	
29	Modi Motors Pvt. Ltd.	
30	PHD Chamber of Commerce and Industry	
31	MG Mobiles India Trading Pvt. Ltd	
32	H.M. Tubes & Containers Pvt. Ltd	
33	Moderate Leasing & Capital Services Limited	
34	Modiline Travel Services Pvt. Ltd.	
35	G S Pharmabutor Pvt. Ltd.	
36	Arvind Continental Pvt Ltd.	
37	Mahabir Export & Import Co. Ltd.	
38	Modi Casings And Packaging Private Limited	
39	Modi-Ecoweld Private Limited	
(iv)	<b><u>Reporting entity being an associate of the other entity.</u></b>	
1	SBEC SYSTEMS (India) Limited	

**(B) Details of transactions with related parties****(Amount. in Lakhs)**

Transactions		Other Related parties	Key managerial personnel	Total
<b>i. Sitting Fees paid to:</b>				
Umesh Kumar Modi	31-Mar-23	-		0.00
	31-Mar-22	0.05		0.05
Kumkum Modi	31-Mar-23	0.03		0.03
	31-Mar-22	0.04		0.04
Jayesh Modi	31-Mar-23	0.03		0.03
	31-Mar-22	0.04		0.04
<b>Total F.Y. 2022-23</b>		<b>0.06</b>		<b>0.06</b>
<b>Total F.Y. 2021-22</b>		<b>0.13</b>		<b>0.13</b>
<b>ii. Remuneration paid to:</b>				
<b>Company Secretary</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23		5.32	5.32
	31-Mar-22		4.90	4.90
-Contribution to PF and superannuation	31-Mar-23	-	0.27	0.27
	31-Mar-22	-	0.25	0.25
<b>Chief Financial Officer</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23		34.92	34.92
	31-Mar-22		32.85	32.85
-Contribution to PF and superannuation	31-Mar-23	-	2.71	2.71
	31-Mar-22	-	2.56	2.56
<b>Occupier</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23		21.27	21.27
	31-Mar-22			
-Contribution to PF and superannuation	31-Mar-23	-	1.65	1.65
	31-Mar-22			
<b>Total F.Y. 2022-23</b>		<b>-</b>	<b>66.14</b>	<b>66.14</b>
<b>Total F.Y. 2021-22</b>		<b>-</b>	<b>40.56</b>	<b>40.56</b>
<b>iii Reimbursement of expenses paid to:</b>				
Win Medicare Pvt. Ltd.	31-Mar-23	0.10		0.10
	31-Mar-22	0.98		0.98
<b>Total F.Y. 2022-23</b>		<b>0.10</b>		<b>0.10</b>
<b>Total F.Y. 2021-22</b>		<b>0.98</b>		<b>0.98</b>
<b>iv Purchase of materials/Paid for Exp.</b>				
Modiline Travels Service Pvt. Ltd.	31-Mar-23	1.69		1.69
	31-Mar-22	1.25		1.25
Modihitech India Ltd.	31-Mar-23	19.92		19.92
	31-Mar-22	22.61		22.61
Modi Industries Ltd (Modi Sugar Mills)	31-Mar-23	9.66		9.66
	31-Mar-22	2.31		2.31
Jayesh Tradex Pvt. Ltd.	31-Mar-23	20.38		20.38
	31-Mar-22	13.14		13.14
SBEC Bioenergy Ltd	31-Mar-23	409.15		409.15
	31-Mar-22	355.94		355.94
Umesh Modi Corp. P Ltd	31-Mar-23	2.95		2.95
	31-Mar-22	2.95		2.95
HM Tube & Containers P Ltd	31-Mar-23	-		-
	31-Mar-22	0.38		0.38
Modi Mundi Pharma Beauty Products Pvt. Ltd.	31-Mar-23	-		-
	31-Mar-22	1.55		1.55
SBEC System (I) Ltd.	31-Mar-23	371.92		371.92
	31-Mar-22	350.15		350.15
<b>Total F.Y. 2022-23</b>		<b>835.67</b>	<b>-</b>	<b>835.67</b>
<b>Total F.Y. 2021-22</b>		<b>750.28</b>	<b>-</b>	<b>750.28</b>



<b>V Sales of Materials</b>				
GS Pharmbutor Pvt. Ltd.	31-Mar-23	11493.73		11493.73
	31-Mar-22	8628.29		8628.29
Modi Industries Ltd (Modi Sugar Mills)	31-Mar-23	228.40		228.40
	31-Mar-22	8.91		8.91
SBEC Bioenergy Ltd	31-Mar-23	180.65		180.65
	31-Mar-22	144.09		144.09
<b>Total F.Y. 2022-23</b>		<b>11902.78</b>	-	<b>11902.78</b>
<b>Total F.Y. 2021-22</b>		<b>8781.29</b>	-	<b>8781.29</b>
<b>Vi Commission paid to</b>				
GS Pharmbutor Pvt. Ltd.	31-Mar-23	-		-
	31-Mar-22	24.05		24.05
<b>Total F.Y. 2022-23</b>		-	-	-
<b>Total F.Y. 2021-22</b>		<b>24.05</b>	-	<b>24.05</b>
<b>Vii Interest paid</b>				
Longwell Investment Pvt. Ltd.	31-Mar-23	-		-
	31-Mar-22	24.04		24.04
GS Pharmbutor Pvt. Ltd.	31-Mar-23	307.82		307.82
	31-Mar-22	116.55		116.55
Moderate leasing & capital service ltd.	31-Mar-23	680.46		680.46
	31-Mar-22			
<b>Total F.Y. 2022-23</b>		<b>988.28</b>	-	<b>988.28</b>
<b>Total F.Y. 2021-22</b>		<b>140.59</b>	-	<b>140.59</b>
<b>Viii Amount Paid against Loan</b>				
GS Pharmbutor Pvt. Ltd.	31-Mar-23	1500.00	-	1500.00
	31-Mar-22	242.98	-	242.98
Moderate leasing & capital service ltd.	31-Mar-23	2836.21	-	2836.21
	31-Mar-22			
<b>Total F.Y. 2022-23</b>		<b>4336.21</b>	-	<b>4336.21</b>
<b>Total F.Y. 2021-22</b>		<b>242.98</b>	-	<b>242.98</b>
<b>Ix Debt Assignment Receivable from MIL</b>				
Modi Industries Ltd (Sugar section)	31-Mar-23	14685.98		14685.98
	31-Mar-22	14685.98	-	14685.98
<b>Total F.Y. 2022-23</b>		<b>14685.98</b>	-	<b>14685.98</b>
<b>Total F.Y. 2021-22</b>		<b>14685.98</b>	-	<b>14685.98</b>
<b>x Advance from Customer/ICD</b>				
GS Pharmbutor Pvt. Ltd.	31-Mar-23	1500.00		1500.00
	31-Mar-22	1500.00		1500.00
Moderate leasing & capital service ltd.	31-Mar-23	3917.33		3917.33
	31-Mar-22			-
<b>Total F.Y. 2022-23</b>		<b>5417.33</b>	-	<b>5417.33</b>
<b>Total F.Y. 2021-22</b>		<b>1500.00</b>	-	<b>1500.00</b>
<b>Xi Outstanding " Receivables"</b>				
SBEC stockholding & Investment Ltd.	31-Mar-23	-	-	-
	31-Mar-22	1850.50	-	1850.50
Modi Industries Ltd (Modi Sugar Mills)	31-Mar-23	33.11	-	33.11
	31-Mar-22	6.60	-	6.60
Modi Industries Ltd (Debt Assignment)	31-Mar-23	14685.98	-	14685.98
	31-Mar-22	14685.98	-	14685.98
<b>Total F.Y. 2022-23</b>		<b>14719.09</b>	-	<b>14719.09</b>
<b>Total F.Y. 2021-22</b>		<b>16543.08</b>	-	<b>16543.08</b>



Transactions		Other Related parties	Key managerial personnel	Total
<b>Xii Outstanding " Payables"</b>				
Modiline Travels Service Pvt. Ltd.	31-Mar-23	1.79	-	1.79
	31-Mar-22	0.10	-	0.10
Chief Financial Officer	31-Mar-23	-	0.72	0.72
	31-Mar-22	-	0.59	0.59
SBEC Bio-Energy Ltd.	31-Mar-23	70.03		70.03
	31-Mar-22	1536.21		1536.21
Win Medicare Pvt. Ltd.	31-Mar-23	1.17	-	1.17
	31-Mar-22	1.06	-	1.06
Jayesh Tradex Pvt. Ltd.	31-Mar-23	2.31	-	2.31
	31-Mar-22	-	-	-
GS Pharmbutor Pvt. Ltd.	31-Mar-23	2609.91	-	2609.91
	31-Mar-22	1453.04	-	1453.04
Modi Mundi Pharma Beauty Products Pvt. Ltd.	31-Mar-23	4.41	-	4.41
	31-Mar-22	4.41	-	4.41
Umesh Modi Corp. P Ltd	31-Mar-23	-	-	-
	31-Mar-22	5.46	-	5.46
SBEC System (I) Ltd.	31-Mar-23	80.97	-	80.97
	31-Mar-22	28.81	-	28.81
Modihitech India Ltd	31-Mar-23	2.16	-	2.16
	31-Mar-22	3.74	-	3.74
Occupier	31-Mar-23		0.71	0.71
	31-Mar-22			
Moderate leasing & capital service ltd.	31-Mar-23	4953.63		4953.63
	31-Mar-22			
<b>Total F.Y. 2022-23</b>		<b>7726.38</b>	<b>1.43</b>	<b>7727.81</b>
<b>Total F.Y. 2021-22</b>		<b>3032.83</b>	<b>0.59</b>	<b>3033.42</b>

**Note 31: Segment Reporting**

The Company is a single location single product company and hence the requirement of Ind As-108 On segment reporting is not required.

**Note 32: Outstanding dues to micro, small and medium Enterprises:**

The disclosure of dues details relating to enterprises covered under micro, small and medium enterprises Development Act 2006, to the extent the information are available With the company, are as under:

S.No.	Particulars	As at 31.03.2023	As at 31.03.2022
a)	(i) Principal amount remaining unpaid to any supplier as at the end of the accounting year.	294.68	58.84
	(ii) Interest due thereon.		
b)	(i) The amount of interest paid in terms of sec.16 of MSMED Act, 2006 beyond the respective due date during the year.		
	(ii) The amount of principal paid beyond the due date during the year.	307.09	303.40
c)	The amount of interest due and payable for delay period (where principal has already been paid after due date.)	13.92	3.19
d)	The amount of further interest remaining due and payable even in the succeeding years for the purpose of disallowance as a deductible expenditure under section 23 of MSMED Act, 2006.	3.19	-
e)	The amount of interest accrued and remaining unpaid as at the end of the accounting year.	13.92	3.19

**Note 33: Financial Instruments****a) Financial risk management**

The Company's activities expose it to a variety of financial risks which includes market risk (including currency risk, interest rate risk and other price risk), credit risk and liquidity risk.



The Company's focus is to ensure liquidity which is sufficient to meet the Company's operational requirements. The Company monitors and manages key financial risks so as to minimize potential adverse effects on its financial performance. The Company has a risk management policy which covers the risks associated with the financial assets and liabilities. The details for managing each of these risks are summarized ahead.

**b) Market risk**

Market risk is the risk that the expected cash flows or fair value of a financial instrument could change owing to changes in market prices. The Company's activities expose it primarily to the financial risks of changes in foreign currency exchange rates and interest rates.

**c) Credit risk management**

Credit risk refers to the risk that a counter party will default on its contractual obligations resulting in financial loss to the Company. The Company's exposure to credit risk primarily arises from trade receivables, balances with banks, investments and security deposits. The credit risk on bank balances is limited because the counter parties are banks with good credit ratings.

**d) Trade Receivables**

Credit risk is managed through credit approvals, establishing credit limits, continuous monitoring of creditworthiness of customers to which the company grants credit terms in the normal course of business. The Company also assesses the financial reliability of customers taking into account the financial condition, current economic trends and historical bad debts and ageing of accounts receivables.

**e) Investments**

The Company limits its exposure to credit risk by generally investing with counter parties that have a good credit rating. The Company has funded defined-benefit gratuity plans. The funded status of these plans is influenced by movements in financial market. A negative performance of the financial markets could have a material impact on cash funding requirements.

**f) Cash & cash equivalents**

With respect to credit risk arising from financial assets which comprise of cash and cash equivalents, the Company's risk exposure arises from the default of the counter party, with a maximum exposure equal to the carrying amount of these financial assets at the reporting date. Since the counter party involved is a bank, Company considers the risks of non-performance by the counter party as non-material.

**g) Liquidity risk**

Liquidity risk is defined as the risk that the Company will not be able to settle or meet its obligations on time or at a reasonable price. The Company's treasury department is responsible for liquidity, funding as well as settlement management. In addition, processes and policies related to such risks are overseen by senior management. Management monitors the Company's net liquidity position through rolling forecasts on the basis of expected cash flows.

**h) Maturity profile of financial liabilities**

The table below provides details regarding the remaining contractual maturities of financial liabilities at the reporting date based on contractual undiscounted payments.

**As at 31.03.2023**

**(Amount in Lakhs)**

Particulars	Less than 1 year	1 to 5 years	Total
Non-Current borrowings	-	695.40	695.40
Current borrowings	9503.64	-	9503.64
Trade payables	51093.59		51093.59
Other financial liabilities	3427.46		3427.46

**AS AT 31.03.2022**

Particulars	Less than 1 year	1 to 5 years	Total
Non-Current borrowings	-	5489.18	5489.18
Current borrowings	9253.36	-	9253.36
Trade payables	50653.84	-	50653.84
Other financial liabilities	3694.86	-	3694.86

- i) The Company manages its capital to ensure that the entities in the Company will be able to continue as going concern while maximizing the return to shareholders and also complying with the ratios stipulated in the loan agreements through the optimization of the debt and equity balance.

The Company is not subject to any externally imposed capital requirements.

**Note:**

In order to achieve this overall objective, the Group's capital management, amongst other things, aims to ensure that it meets financial covenants attached to the interest-bearing loans and borrowings that define capital structure requirements. Breaches in meeting the financial covenants would permit the bank to call loans and borrowings or charge some penal interest. There have been no breaches in the financial covenants of any interest-bearing loans and borrowing in the current period.

No changes were made in the objectives, policies or processes for managing capital during the Current years and previous years



## j) Key Financial Ratio

Particulars	Numerator	Denominator	as at 31.03.2023	as at 31.03.2022	Percentage Variation	Reason of Variation (in case variation is more than 25%)
1. Current Ratio	Current Assets	Current Liability	0.36	0.44	(17.73)	
2. Debt -Equity Ratio	Total Debt	Total Equity	(1.91)	(3.63)	47.39	Decrease of debt due to repayment of debt.
3. Debt. Service Coverage Ratio	Earning before Interest & depreciation	Debt Service = Interest + Principle Liability	0.18	0.14	29.99	Decrease of debt due to repayment of debt.
4. Return on Equity Ratio	Profit for the year	Total Equity	(24.14)	(26.21)	7.89	
5. Inventory Turnover Ratio	Cost of Goods Sold	Average	3.03	3.06	(0.98)	-
6. Trade Receivable turnover ratio	Net Sales	Average Trade receivable	63.44	42.75	48.41	Decrease in Average Debtors
7. Trade Payable turnover ratio	Net Credit purchase	Average Trade Payable	1.05	1.18	(10.35)	
8. Net Capital Ratio	Total Sale	Working capital	(1.58)	(1.69)	6.60	
9. Net Profit Ratio	Profit for the year	Total Sale	(1.99)	(1.77)	(12.72)	
10. Return on capital employed	Earning before Interest & Tax	Capital employed (Equity + Debt)	5.25	4.13	27.25	Decrease in capital employed due to repayment of debts
11. Return on Investment (G/R)	Profit for the year	Capital employed (Equity + Debt)	(26.60)	(9.98)	(166.44)	Decrease in capital employed due to repayment of debts

## k) Categories of financial instruments

(Amount. in Lakhs)

Particulars	As at 31 March, 2023 (Rs.)	As at 31 March, 2022 (Rs.)
<b>Financial assets</b>		
<b>Measured at amortized cost</b>		
Other non-current assets	64.43	28.14
Other financial assets (non current)	14,685.98	14,685.98
Trade receivables	1,216.95	822.80
Cash and cash equivalents	354.80	336.88
Bank Balances other than Cash and cash equivalents	25.00	16.20
Other current assets	140.52	850.63
Other financial assets (current)	-	-
Loan	243.08	2,042.66
<b>Measured at fair value through Profit &amp; Loss</b>		
Investments		
<b>Financial liabilities</b>		
<b>Measured at amortized cost</b>		
Borrowings (non-current)	695.40	5,489.18
Borrowings (current)	9,503.64	9,253.36
Trade payables	51,093.59	50,653.84
Other financial liabilities (non-current)	-	-
Other financial liabilities (current)	3,427.46	3,694.86
Other current liabilities	562.83	338.86
Other Non-Current liabilities	11.55	10.47




**I) Fair value of the financial assets and liabilities that are not measured at fair value (but fair value disclosures are required)**
**(Amount. in Lakhs)**

Particulars	As at 31 March, 2023		As at 31 March, 2022	
	Carrying amount	Fair value	Carrying amount	Fair value
<b>Financial Assets</b>				
Financial Assets at amortized cost:	18,251.63		19,630.35	
<b>Financial Liabilities</b>				
Financial Liabilities held at amortized cost:	64,720.09		69,091.24	

**Exposure to credit risk**
**Financial assets for which loss allowance is measured using 12 months Expected Credit Losses (ECL)**
**(Amount. in Lakhs)**

Particulars	As at 31 March, 2023	As at 31 March, 2022
Investments	1,725.83	1,725.83
Cash and bank balances	354.80	336.88
Bank deposit	25.00	16.20
Short-term loans and advances	243.08	2,042.66

Balance with banks is subject to low credit risks due to good credit ratings assigned to these banks.

Financial assets for which loss allowance is measured using life time Expected Credit Losses (ECL)

**(Amount. in Lakhs)**

Particulars	As at 31 March, 2023	As at 31 March, 2022
Trade Receivable	1216.95	822.80

The ageing analysis of the receivables (gross of provision) has been considered from the date the invoice falls due.

Particulars	
<b>As at 31.03.2023</b>	
Up to 6 months	1208.37
More than 6 months	57.62
<b>As at 31.03.2022</b>	
Up to 6 months	808.52
More than 6 months	53.84

During the year the Company has recognized loss allowance of Rs. NIL under 12 months expected credit loss model.

No significant changes in estimation techniques or assumptions were made during the reporting period.

**Note 34. Other Disclosures**

- (i) During the year 2006-2007, a One Time Settlement (OTS) dated 22nd January, 2007 was signed between the Company, Punjab National Bank (PNB), Mr. Umesh K. Modi (as Guarantor of MIL) and Modi Industries Limited (MIL) on the terms as contained in the PNB's letter dated 28th September, 2006. In terms of this settlement, the Company had agreed to make payment of Rs. 2,810.60 lacs together with interest to PNB. In consideration of the same, PNB had agreed to assign all its claims, interest and charges against the Steel Section of MIL in favour of the Company. The Company has made full payment of the settlement amount together with interest aggregating to Rs. 3,351.21 lacs to PNB. As per expert legal opinion, during the year interest amounting to Rs. 417.63lacs (previous year Rs. 417.63 lacs for the period from 22nd January, 2007 to 31st March, 2012) has been allocated to the cost of "Debt Assignment" acquired by the company from PNB, since in the opinion of the management the borrowing of the company were raised to pay for Debt Assignment.

PNB thereafter executed a "Deed of Assignment" on 15th May, 2012(an event occurring after the date of the Balance Sheet) in favour of the company by which PNB assigned all its claim together with all securities and charges created by MIL in its favour, to the company.

The company thereafter executed a "Deed of Assignment" on 31st December, 2012 in favour of its subsidiary M/s. SBEC Bioenergy Limited (SBL) by which the company assigned all its claim together with all securities and charges created by PNB for a consideration of Rs. 12,500.00 Lacs. A sum of Rs. 4,200.00 lacs had been paid simultaneously with the execution of this deed and the remaining sum of Rs. 8,300.00 lacs was to be paid as per the mutually agreed installments within a period of five years from the date of execution of this deed. However, upto 31.03.2018, no payment had been received by the Company due to financial distress in SBEC Bioenergy Limited.



In the year 2018-19, SBEC Bioenergy Limited being unable to pay the balance amount of Rs. 8300.00 Lacs as per agreed terms and conditions approached the Company with a proposal to return the said debt to the Company at a total consideration of Rs. 12,500 Lacs at which the said assignment was originally acquired. Accordingly, SBL had executed a deed of assignment on 06th June, 2018 in favour of the Company and has assigned all its claims together with all securities and charges created. As per Assignment Deed, a sum of Rs. 7530.00 Lacs has been paid simultaneously at the time of execution of the Deed, and the balance amount of Rs. 4970.00 Lacs shall be payable in the mutually agreed installments within a period of 10 years from the date of execution of this Deed.

- (ii) M/s. SBEC Bioenergy Limited (SBL), a Subsidiary of the Company had negotiated, settle and acquired the Debt of IDBI in Modi Industries Limited (MIL) and entered into an agreement on 6th October, 2007 with IDBI. This agreement was in terms of IDBI's Letter dated 09th February, 2007. Under the said agreement IDBI agreed to assign its entire debt due and payable by the MIL to IDBI, subject to the OTS amount of Rs. 1232.20 Lacs together with interest. IDBI has executed a Deed of assignment on 05th March, 2018 in favour of SBL by which IDBI assigned all its rights together with all securities and charges created by MIL in favour of SBL. The Registrar of Companies has registered the modification of charge in favour of the SBL.

In the Year 2018-19, SBL gave a proposal to transfer the above debt by way of assignment to the Company at a total consideration of Rs. 1232.20 Lacs at which the said debt was acquired by SBL from IDBI. Thereafter, SBL has executed a Deed of Assignment on 12th June, 2018 in favour of the Company and assigned all its claims together with all securities and charges created in the assets of MIL. The Registrar of Companies has registered the modification of charge in favour of the Company. The said debts are now receivable by the Company from Modi Industries Limited.

- (iii) M/s. SBEC Bioenergy Limited (SBL), a Subsidiary of the Company had negotiated, settle and acquired the Debt of IFCI in Modi Industries Limited (MIL) and entered into an agreement on 30th December, 2009 with IFCI. This agreement was in terms of IFCI's Letter dated 30th December, 2007. Under the said agreement IFCI agreed to assign its entire debt due and payable by MIL to IFCI, subject to payment of the OTS amount of Rs. 775 Lacs together with interest and in consideration thereof IFCI executed a Deed of assignment dated 19th April, 2012 and assigned all its claims against MIL together with securities and charges in favour of SBL. The Registrar of Companies has registered the modification of charge in favour of the SBL.

In the Year 2018-19, SBL gave a proposal to transfer the above debt by way of assignment to the Company at a total consideration of Rs. 775 Lacs at which the said debt was initially acquired from IFCI. Thereafter, SBL has executed a Deed of Assignment on 12th June, 2018 in favour of the Company and assigned all its claims together with all securities and charges created in the assets of MIL. The Registrar of Companies has registered the modification of charge in favour of the Company. The said debts are now receivable by the Company from Modi Industries Limited.

- (iv) The company has valued the closing stock of Inventory (Sugar) at net realizable value instead of "the lower of cost and net realisable value" as required under IND AS-2 "Inventories". Since NRV is higher than cost this has resulted in overstatement of Inventories (Finished Goods-Sugar) by Rs.720.54 lakhs and understatement of losses for the year by Rs.720.54 lakhs and its consequential impact on EPS.
- (v) The Hon'ble Supreme Court vide its order dated 23.04.2018 has upheld the order passed by the Hon'ble High Court of Judicature at Allahabad dated 9th March, 2017 in PIL No. 67617/2004, where the said court has set aside the decision of the state Government for the waiver of interest for the year 2012-13, 2013-14 and 2014-15 and proceeded to ask the Cane Commissioner to take a final call in the matter. Pending final order, the Company has not made provision for interest on the late payment of cane dues for the years 2012-13, 2013-14 and 2014-15. The Matter is Sub-Judice. Under the power vested with the Cane Commissioner (U.P.) for waiver of interest under UP Sugar Cane (Regulation of Supply & Purchase) Act, 1953 in respect of loss making/sick companies, the company had made an application to Cane Commissioner (U.P.) for waiver of interest on cane dues. Pending receipt of the Cane Commissioner's decision, no interest has been provided on the cane dues. The company has decided to account for the same upon decision in the matter/payment.

#### Note 35: Other Statutory Information

- I. The company does not have any benami property, where any proceeding has been initiated or pending against the company for holding any benami property.
- II. The company does not have any transactions with companies struck off.
- III. The company does not have any charges or satisfaction which is yet to be registered with ROC beyond the statutory period.
- IV. The company has not traded or invested in crypto currency or virtual currency during the financial year
- V. The company has not been declared willful defaulter by any bank or financial institution or government or any government authority
- VI. All the title deeds of immovable properties are held in the name of company as at the balance sheet date.
- VII. The company has not advanced or loaned or invested funds (either borrowed funds or share premium or any other sources or kind of funds) to any other person(s) or entity(ies), including foreign entities (Intermediaries) with the understanding (whether recorded in writing or otherwise) that the Intermediary shall lend or invest in party identified by or on behalf of company (Ultimate beneficiaries)
- VIII. The company has not received any fund from any party(s) (funding party) with the understanding that the company shall whether directly or indirectly lend or invest in other person or entities identified by or on behalf of company ("ultimate beneficiaries") or provide any guarantee, security or the like on behalf of the ultimate beneficiaries.
- IX. The Company does not have any transaction which is not recorded in the books of accounts that has been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (such as, search or survey or any other relevant provisions of the Income Tax Act, 1961).


**Note 36: Additional information pursuant to provisions of Part II of Schedule III of Companies Act 2013:**
**(a) Capacity**

Installed Capacity(as certified by the management)	Year Ended 31 <sup>st</sup> March, 2023	Year Ended 31 <sup>st</sup> March, 2022
Sugarcane Crushing M.T. per day (No License required)	9,000	8,000

**(b) Production Purchase, Turnover & Stock**

Classes of Goods	Opening stock – Quantity	Production Quantity	Sales		Closing stock	
	(Qtls.)	(Qtls.)	Quantity (Qtls.)	Value	Quantity (Qtls.)	Value
Sugar	5,88,676	15,69,462.00	1660342*	55668.63	4,97,796	17508.68
	(574,620)	(16,40,564)	(16,26,508)	(53,422.74)	(5,88,676)	(19450.62)
Molasses (By-product)	3,08,931.85	6,78,600.30	6,61,620.30	4747.51	2,94,758**	2116.02
	(298,364.26)	(6,89,349.48)	(6,78,781.89)	(4267.22)	(3,08,931.85)	(2536.63)
		<b>Purchases</b>				
Sugar Trading	-	-	-	-	-	-
	(-)	(-)	(-)	(-)	(-)	(-)

\*Sales Include 150.50 Qtls of sugar, which was theft and the same was recovered from security department.

\*\*Difference of 31153.85 Qtls of closing stock due to molasses burnt by Spontaneous combustion

**(c) Consumption of Raw Material**

Particulars	Year ended 31 <sup>st</sup> March, 2023		Year ended 31 <sup>st</sup> March, 2022	
	Quantity (Quintals)	Value (Rs. In lacs)	Quantity (Quintals)	Value (Rs. In lacs)
Sugar Cane	1,44,95,319.23	50231.20	147,81,113.11	50088.24

**(d) Expenditure in foreign currency (On accrual basis)**
**(Rs. in lacs)**

Particulars	Current year	Previous Year
Purchase of Spares.	7.79	26.44

**(e) CIF Value of import**
**(Rs. in lacs)**

Particulars	Current year	Previous Year
Store & Spares	7.79	26.44

**(f) Earning in foreign currency**
**(Rs. in lacs)**

Particulars	Current year	Previous Year
Export of goods calculated on FOB basis	-	-

**(g) Value if imported/Indigenous Raw Materials, Stores and Spares Consumed**
**(Rs. in lacs)**

Particulars	Indigenous Value	%age	Imported Value	%age
Raw Materials	50231.20	100%	-	Nil
Previous Year	(50,088.24)	100%	-	Nil
Stores & Spares*	4246.08	99.82%	7.79	0.18%
Previous Year	(5113.16))	(99.49%)	(26.44)	(0.51%)

\*Excluding spares used for capitalization.

\* ( ) Show Previous year figures.

**Note: 37 Recent Accounting Pronouncements** (Standards/ amendments issued but not yet effective)

The Ministry of Corporate Affairs ("MCA") notifies new standards or amendments to the existing standards under Companies (Indian Accounting Standards) Rules as issued from time to time. On March 31, 2023, MCA amended the Companies (Indian Accounting Standards) Amendment Rules, 2023, as below

**a) Ind AS 1: Presentation of Financial Statements**

This amendment requires the entities to disclose their material accounting policies rather than their significant accounting policies. The effective date for adoption of this amendment is annual periods beginning on or after April 1, 2023. The Company has evaluated the amendment and the impact of the amendment is insignificant in the standalone financial statements.

**b)** This amendment has introduced a definition of 'accounting estimates' and included amendments to Ind AS 8 to help entities distinguish changes in accounting policies from changes in accounting estimates. The effective date for adoption of this amendment is annual periods beginning on or after April 1, 2023. The Company has evaluated the amendment and there is no impact on its standalone financial statements**c) Ind AS 12 - Income Taxes:**

This amendment has narrowed the scope of the initial recognition exemption so that it does not apply to transactions that give rise to equal and offsetting temporary differences. The effective date for adoption of this amendment is annual periods beginning on or after April 1, 2023. The Company has evaluated the amendment and there is no impact on its standalone financial statement

**Note: 38. The financial statements were approved for issue by the Board of Directors, at its meeting held on 26 May, 2023**

Previous Year Figures have been recast/restated.

Note 1 to 38 Containing Accounting Policies and General Notes from part of the financial statements.

**For Doogar & Associates**

Chartered Accountants

**Firm Registration No 000561N**

**Sd/-**

**(Mukesh Goyal)**

Partner

**Membership No. 081810**

**Sd/-**

**Umesh Kumar Modi**

(Chairman & President)

DIN: 00002757

**Sd/-**

**Abhishek Modi**

(Whole Time Director)

DIN: 00002798

**Sd/-**

**J.C. Chawla**

(Director)

DIN: 05316202

**Sd/-**

**Ankit K. Srivastava**

(Company Secretary)

**Sd/-**

**Vijay Kumar Modi**

(Director)

DIN: 00004606

**Sd/-**

**N.P. Bansal**

(Director)

DIN: 00010587

Place: New Delhi

Date: 26<sup>th</sup> May, 2023

**Sd/-**

**A.K. Goel**

(Chief Financial Officer)



## INDEPENDENT AUDITOR'S REPORT

To the members of SBEC Sugar Limited

Report on the Consolidated Ind AS Financial Statements

### Qualified Opinion

We have audited the accompanying consolidated financial statements of SBEC Sugar Limited (hereinafter referred to as "the Holding Company") and its subsidiaries (the Holding Company and its subsidiaries together referred to as "the Group"), comprising of the consolidated balance sheet as at 31st March, 2023, the consolidated statement of profit and loss including other comprehensive income, the consolidated cash flow statement, the consolidated statement of changes in equity for the year then ended, and a summary of significant accounting policies and other explanatory information (hereinafter referred to as "the consolidated Ind AS financial statements").

In our opinion and to the best of our information and according to the explanations given to us, except for the possible effects of the matter described in the **Basis for Qualified Opinion** section of our report, and based on the reports of other auditors as referred in the Other Matters paragraph, the aforesaid consolidated financial statements give the information required by the Companies Act, 2013 ("the Act") in the manner, so required and give a true and fair view in conformity with the Indian Accounting Standards prescribed under Section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended ("Ind AS") and other accounting principles generally accepted in India, of the consolidated state of affairs of the Company and its Subsidiaries as at 31st March, 2023, and the consolidated loss, consolidated Total Comprehensive Income, the consolidated Statement of Changes in Equity and the consolidated Cash Flows for the year ended on that date.

### Basis for Qualified Opinion

- 1) **During the year ended 31st March 2023, the holding company has not made provision for interest on late payment of cane dues amounting to Rs 725.41 lacs for sugar season 2022-23, Rs.3,850.13 lacs for the sugar season 2021-22, Rs.101.50 lacs for the sugar season 2020-21, had the company made provisions the loss for the year would have been higher by Rs.4,677.04 lacs respectively and its consequential impact on EPS.**
- 2) **The holding company has taken the debt of IDBI, PNB & IFCI in Modi Industries Limited. As at 31st March, 2023 the company has net exposure of Rs.14,685.98 lacs. No Interest on the said amount has been provided as there is no reasonable certainty of its collection since the networth of Modi Industries Limited has been completely eroded. Recoverability of the above balance is also doubtful. However, no provisions for doubtful debts were made in the financial statements of the company and consequently we are unable to opine on the appropriateness of the same and its consequential impact on the financial statements.**
- 3) **The holding company has valued the closing stock at NRV instead of "the lower of cost and net realizable value" as required under IND AS-2 "Inventories". Since the NRV is higher than cost this has resulted in overstatement of Inventories (Finished Goods and WIP-Sugar) by Rs. 720.54 lacs, understatement of losses for the year by Rs. 720.54 lacs and its consequential impact on EPS.**

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

### Emphasis of Matters

We draw attention to note no 36(v) of the consolidated financial statement regarding interest payment on cane dues where the High Court vide its order dated 9th March, 2017 has set aside the decision of State Government for the waiver of Interest for the year 2012-13, 2013-14 and 2014-15 and asked the Cane Commissioner to take a final call in the matter, pending final order the Company has not made provision for interest, on the late payment of cane dues for years 2012-13, 2013-14 and 2014-15. The Hon'ble Supreme Court vide its order dated 23.04.2018 has upheld the Hon'ble High Court order dated 9th March, 2017. The matter is still sub-judice.

Under the power vested with the Cane Commissioner (U.P.) for waiver of interest under UP Sugar Cane (Regulation of Supply & Purchase) Act, 1953 in respect of loss making/sick companies, the company had made an application to Cane Commissioner (U.P.) for waiver of interest on cane dues. Pending receipt of the Cane Commissioner's decision, no interest has been provided on the cane dues. The holding company has decided to account for the same upon decision in the matter/payment.

Our opinion is not qualified in respect of this matter

### Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. We have determined that except for the matter described in the "Basis for Qualified Opinion" section, there are no other key audit matters to communicate in our report.

### Information Other than the Consolidated Ind AS Financial Statements and Auditor's Report thereon

The Company's Board of Directors is responsible for the preparation of the other information. The other information comprises the information included in the Management Discussion and Analysis, Board's Report including Annexures to Board's Report, Business Responsibility Report, Corporate Governance and Shareholders' Information Report, but does not include the consolidated Ind AS financial statements and our auditor's report thereon.

Our opinion on the consolidated financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the consolidated Ind AS financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.



### **Responsibilities of Management and Those Charged with Governance for the consolidated 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 consolidated Ind AS financial statements that give a true and fair view of the Consolidated Financial Position, Consolidated Financial Performance, Consolidated Total Comprehensive Income, Consolidated Changes in Equity and Consolidated Cash Flows of the Company including its subsidiaries in accordance with the Indian Accounting Standards (Ind AS) and other accounting principles generally accepted in India, including the Accounting Standards specified under section 133 of the Act. The Board of Directors of the Company and of its Subsidiaries are responsible for maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgement and estimates that are reasonable and prudent; and the design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error, which have been used for the purpose of preparation of the consolidated Ind AS financial statements by the Board of Directors of the Company.

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

The respective Board of Directors of the Company and of its Subsidiaries are also responsible for overseeing the financial reporting process of the Company and its Subsidiaries.

### **Auditor's Responsibilities for the Audit of the Consolidated Financial Statements**

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

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

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

We communicate with those charged with governance of the Company and such other entities included in the consolidated financial statements of which we are the Independent Auditors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

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

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



**Other Matters**

We did not audit the financial statements/financial information of two subsidiaries included in the consolidated quarterly and yearly financial results, whose financial statements / financial information reflect total assets of Rs 11,140.69lacs (PY Rs. 12,974.22lacs) as at 31st March, 2023, total income of Rs 2,155.44 lacs (PY Rs 1,773.92 lacs), total net profit after tax of Rs 289.05 lacs (PY Rs 208.74 lacs) total comprehensive income of Rs 287.68 lacs (PY Rs 220.25 lacs) for the year ended on that date, as considered in the consolidated financial results.

These financial statements have been audited by other auditors whose reports have been furnished to us by the Management and our opinion on the consolidated financial statements, in so far as it relates to the amounts and disclosures included in respect of these subsidiaries and our report in terms of sub-sections (3) and (11) of Section 143 of the Act, in so far as it relates to the aforesaid subsidiaries, is based solely on the reports of the other auditors.

Our opinion on the consolidated financial statements, and our report on Other Legal and Regulatory Requirements below, is not modified in respect of the above matters with respect to our reliance on the work done and the reports of the other auditors and the financial statements certified by the Management.

**Report on Other Legal and Regulatory Requirements**

1. As required by paragraph 3(xxi) of the Companies (Auditor's Report) Order, 2020 ("the Order") issued by the Central Government in terms of sub section (11) of section 143 of the Act, we report that there are no qualifications or adverse remarks by the respective auditors in the Companies (Auditor's Report) Order (CARO) reports of the subsidiaries included in the consolidated financial statements.
2. As required by Section 143(3) of the Act, based on our audit, we report, that:
  - (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit of the aforesaid consolidated financial statements.
  - (b) In our opinion, proper books of accounts as required by law relating to preparation of aforesaid consolidated financial statements have been kept so far as it appears from our examination of those books and reports of the other auditors.
  - (c) The Consolidated Balance Sheet, the Consolidated Statement of Profit and Loss including Other Comprehensive Income, the Consolidated Statement of Changes in Equity and the Consolidated Statement of Cash Flows dealt with by this Report are in agreement with the relevant books of accounts maintained for the purpose of preparation of the consolidated financial statements.
  - (d) In our opinion, the aforesaid consolidated financial statements comply with the Indian Accounting Standards specified under section 133 of the Act, read with the Companies (Indian Accounting Standards) Rules, 2015, as amended.
  - (e) On the basis of the written representations received from the directors as on 31st March, 2023 taken on record by the Board of Directors of the Company and the reports of the Statutory Auditors of its Subsidiaries Companies incorporated in India, none of the Directors of the Company and its Subsidiaries Companies incorporated in India is disqualified as on 31st March, 2023 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"; which is based on the auditor's reports of the Company and its Subsidiaries Companies incorporated in India. Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the internal financial control over financial reporting of those Companies, for reasons stated therein.
  - (g) With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended: In our opinion and to the best of our information and according to the explanations given to us and reports of the other auditors, the remuneration paid by the Company and its Subsidiaries Companies to its Directors during the year is in accordance with the provisions of Section 197 of the Act.
  - (h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended in our opinion and to the best of our information and according to the explanations given to us and reports of the other auditors:
    - i. The consolidated Ind AS financial statements disclose the impact of pending litigations on its consolidated financial position of the Group and its subsidiary – Refer Note 29 to the consolidated Ind AS financial statements;
    - ii. The Group and its subsidiaries did not have any material foreseeable losses in long-term contracts including derivative contracts during the year ended 31st March, 2023.
    - iii. There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Holding Company and its subsidiaries incorporated in India during the year ended 31st March, 2023.
    - iv)
      - (a) The respective Managements of the Parent and its subsidiaries which are companies incorporated in India, whose financial statements have been audited under the Act, have represented to us and to the other auditors of such subsidiaries respectively that, to the best of their knowledge and belief as disclosed in note 37(vii) to the consolidated financial statements, no funds have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the Parent or any of such subsidiaries to or in any other person(s) or entity(ies), including foreign entities ("Intermediaries"), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Parent or any of such subsidiaries ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.
      - (b) The respective Managements of the Parent and its subsidiaries which are companies incorporated in India, whose financial statements have been audited under the Act, have represented to us and to the other auditors of such subsidiaries respectively that, to the best of their knowledge and belief as disclosed in note 37(viii) to the consolidated financial statements, no funds have been received by the Parent or any of such subsidiaries from any person(s) or entity(ies), including foreign entities ("Funding Parties"), with the understanding, whether recorded in writing or otherwise, that the Parent or any of such





subsidiaries shall, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.

Based on the audit procedures that has been considered reasonable and appropriate in the circumstances performed by us and those performed by the auditors of the subsidiaries which are companies incorporated in India whose financial statements have been audited under the Act, nothing has come to our or other auditor's notice that has caused us or the other auditors to believe that the representations under sub-clause (i) and (ii) of Rule 11(e), as provided under (a) and (b) above, contain any material misstatement.

- v) The company has not declared or paid any dividend during the year and has not proposed final dividend for the year.

**For Doogar & Associates**  
**Chartered Accountants**  
**Firm Registration No. 000561N**

**Sd/-**  
**Mukesh Goyal**  
**Partner**

**Membership No.081810**  
**UDIN: 23081810BHZCIK9155**

**Place: New Delhi**

**Date: 26.05.2023**

**Annexure A to the Independent Auditor's Report on the Consolidated Financial Statement to the members of SBEC Sugar Limited dated 31st March,2023.**

**Report on the Internal Financial Controls under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 ("the Act") as referred to in paragraph 2(f) of 'Report on Other Legal and Regulatory Requirements' section**

In conjunction with our audit of the consolidated financial statement of **SBEC Sugar Limited** as of 31st March,2023. We have audited the internal financial controls over financial reporting of SBEC Sugar Limited (hereinafter referred to as the "Holding Company") and two subsidiaries (the Holding Company and its subsidiaries together referred to as "the Group") incorporated in India, as of the date.

#### **Management's Responsibility for Internal Financial Controls**

The respective Board of Directors of the Holding Company and subsidiary companies which are incorporated in India, are 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". 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 the respective company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

#### **Auditors' Responsibility**

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit.

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

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness.

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

We believe that the audit evidence we have obtained and the audit evidence obtained by the other auditors in terms of their reports referred to in the Other Matters paragraph below, is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.

#### **Meaning of Internal Financial Controls over Financial Reporting**

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that:

- pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;
- provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and



- c) Provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

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

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

**Opinion**

In our opinion, the Holding Company and two subsidiary companies, which are companies incorporated in India, have, maintained 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, 2023, 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"

**Other matters**

Our aforesaid reports under Section 143(3)(i) of the Act on the adequacy and operating effectiveness of the internal financial controls over financial reporting insofar as it relates to two subsidiaries which are companies incorporated in India, is based on the corresponding reports of the auditors of such companies.

**For Doogar & Associates**  
**Chartered Accountants**  
**Firm Registration No. 000561N**

**Sd/-**  
**Mukesh Goyal**  
**Partner**

**Membership No.081810**

**Place: New Delhi**

**Date: 26.05.2023**

**CONSOLIDATED BALANCE SHEET AS AT 31.03.2023**

(Amount in Lakhs)

Particulars	Note No.	As at 31.03.2023	As at 31.03.2022
<b>ASSETS</b>			
<b>1 Non-current assets</b>			
(a) Property, plant and equipment	3	24,774.87	24,155.83
(b) Other intangible assets	3(a)	0.34	0.60
(c) Capital work - in - progress	3(b)	357.33	1,756.86
(d) Financial assets			
- Investments	4	3,803.34	3,803.34
- Others	5	14,685.98	14,685.98
(e) Other non - current assets	6	124.72	87.31
(f) Deferred tax assets (net)	7	569.28	569.28
		<b>44,315.85</b>	<b>45,059.20</b>
<b>2 Current assets</b>			
(a) Inventories	8	21,874.63	24,614.73
(b) Financial assets			
(i) Trade receivables	9	1,688.72	1,419.43
(ii) Cash and cash equivalents	10	466.47	499.37
(iii) Loans & other financial assets	11	281.54	222.65
(iv) Other Bank Balances	12	25.00	16.20
(c) Other current assets	6	202.80	901.60
		<b>24,539.15</b>	<b>27,673.99</b>
(d) Non Current assets held for sale		-	-
		<b>24,539.15</b>	<b>27,673.99</b>
<b>Total assets</b>		<b>68,855.01</b>	<b>72,733.19</b>
<b>EQUITY AND LIABILITIES</b>			
<b>EQUITY</b>			
(a) Equity share capital	13	4,769.40	4,769.40
(b) Other equity	14	(6,992.39)	(6,129.84)
		<b>(2,222.99)</b>	<b>(1,360.44)</b>
Non Controlling Interest		2,799.21	2,974.67
<b>LIABILITIES</b>			
<b>1 Non-current liabilities</b>			
(a) Financial liabilities			
(i) Borrowings	15	1,895.91	5,497.32
(ii) Trade payables	19	-	-
- Total Outstanding dues of micro enterprises and small enterprises		-	-
- Total Outstanding dues of creditors other than micro enterprises and small enterprises		-	-
(b) Deferred Revenue/Income		-	-
(c) Provisions	16	691.54	503.36
(d) Other financial liabilities	17	0.45	0.45
(e) Other non-current liabilities	18	11.55	10.47
		<b>2,599.44</b>	<b>6,011.60</b>
<b>2 Current liabilities</b>			
(a) Financial liabilities			
(i) Borrowings	15	10,142.74	11,257.70
(ii) Trade payables	19	-	-
- Total Outstanding dues of micro enterprises and small enterprises		329.59	58.94
- Total Outstanding dues of creditors other than micro enterprises and small enterprises		50,965.95	50,818.56
(iii) Other financial liabilities	17	3,515.87	2,369.14
(b) Other current liabilities	18	691.48	452.82
(c) Provisions	16	33.71	150.20
		<b>65,679.34</b>	<b>65,107.37</b>
<b>Total Equity &amp; Liabilities</b>		<b>68,855.01</b>	<b>72,733.19</b>

The accompany note no. (3 to 28) are integral part of the financial statement.

Summary of Significant Accounting Policies

As per our report of even date, attached

For Doogar &amp; Associates

Chartered Accountants

Firm Registration No. 000561N

Sd/-

(Mukesh Goyal)

Partner

Membership No. 081810

Sd/-

Umesh Kumar Modi

(Chairman &amp; President)

DIN: 00002757

Sd/-

A.K. Goel

(Chief Financial Officer)

Sd/-

Abhishek Modi

(Whole Time Director)

DIN: 00002798

Sd/-

J.C. Chawla

(Director)

DIN: 05316202

Sd/-

Ankit K. Srivastava

(Company Secretary)

Sd/-

Vijay Kumar Modi

(Director)

DIN: 00004606

Sd/-

N.P. Bansal

(Director)

DIN: 00010587

Place: New Delhi  
Date: 26th May ,2023



## CONSOLIDATED STATEMENT OF PROFIT AND LOSS FOR THE PERIOD ENDED 31.03.2023

(Amount in Lakhs)

Particulars	Note No.	For the Year Ended 31.03.2023	For the Year Ended 31.03.2022
<b>I</b> Revenue from operations	20	65,846.19	61,401.33
<b>II</b> Other income	21	1,064.40	653.95
<b>III Total income (I + II)</b>		<b>66,910.59</b>	<b>62,055.28</b>
<b>IV</b> Expenses			
Cost of materials consumed	22	52,415.47	52,263.67
Changes in inventories of finished goods, stock - in - trade and work - in - progress	23	2,688.99	(2,264.26)
Employee benefits expenses	24	2,211.12	1,913.94
Finance costs	25	1,836.75	1,844.92
Depreciation and amortization expenses	26	2,117.59	2,070.61
Other expenses	27	6,470.73	6,968.99
<b>Total expenses</b>		<b>67,740.65</b>	<b>62,797.88</b>
<b>V</b> Profit / (loss) before exceptional items and tax (I - IV)		<b>(830.06)</b>	(742.60)
<b>VI</b> Exceptional items		-	-
<b>VII</b> Profit / (loss) before tax (V - VI)		<b>(830.06)</b>	(742.60)
<b>VIII</b> Tax expense			
(1) Current tax		225.18	114.44
(2) Deferred tax		-	-
(3) Adjustment of Tax for Earlier Years		(8.07)	-
		<b>217.11</b>	<b>114.44</b>
<b>IX Profit / (loss) from discontinued operations (VII - VIII)</b>		<b>(1,047.17)</b>	(857.03)
<b>X</b> Profit / (loss) from discontinued operations (VII - VIII)		-	-
<b>XI</b> Tax expense of discontinued operations		-	-
<b>XII Profit / (loss) from discontinued operations (after tax) (X - XI)</b>		-	-
<b>XIII Profit / (loss) for the period (IX + XII)</b>		<b>(1,047.17)</b>	(857.03)
<b>XIV</b> Other comprehensive income			
<b>A</b> (i) Items that will not be reclassified to profit or loss		9.17	(63.42)
(ii) Income tax relating to items that will not be reclassified to profit or loss		-	-
<b>B</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		-	-
		9.17	63.42
<b>XV Total comprehensive income for the period (XIII + XIV)</b>		<b>(1,038.00)</b>	(920.45)
<b>Shareholders of the company</b>		<b>(862.55)</b>	(845.99)
Non Controlling Interest		<b>(175.46)</b>	(74.45)
Of the total comprehensive income above, profit for the year attributable to:			
Shareholders of the company		<b>(872.33)</b>	(777.39)
Non Controlling Interest		<b>(174.84)</b>	(79.64)
Of the total comprehensive income above, other comprehensive income attributable to:			
Shareholders of the company		9.79	(68.60)
Non Controlling Interest		<b>(0.61)</b>	5.18
<b>XVI</b> Earnings per equity share (for continuing operations)			
(1) Basic	28	<b>(2.20)</b>	(1.80)
(2) Diluted	28	<b>(2.20)</b>	(1.80)

The accompanying note no. (3 to 28) are integral part of the financial statement.

### Summary of Significant Accounting Policies

As per our report of even date, attached

For Doogar &amp; Associates

Chartered Accountants

Firm Registration No. 000561N

Sd/-

(Mukesh Goyal)

Partner

Membership No. 081810

Sd/-

Umesh Kumar Modi  
(Chairman & President)  
DIN: 00002757

Sd/-

A.K. Goel  
(Chief Financial Officer)

Sd/-

Abhishek Modi  
(Whole Time Director)  
DIN: 00002798

Sd/-

J.C. Chawla  
(Director)  
DIN: 05316202

Sd/-

Ankit K. Srivastava  
(Company Secretary)

Sd/-

Vijay Kumar Modi  
(Director)  
DIN: 00004606

Sd/-

N.P. Bansal  
(Director)  
DIN: 00010587

Place: New Delhi  
Date: 26th May, 2023



## CONSOLIDATED CASH FLOW STATEMENT FOR THE YEAR ENDED 31ST MARCH, 2023

(Amount in Lakhs)

Particulars	Year Ended 31.03.2023	Year Ended 31.03.2022
<b>A. Cash flow from operating activities:</b>		
Profit for the year before tax	(830.07)	(742.60)
Adjustments for:		
Finance costs	1,836.75	1,844.92
Interest income	(2.86)	(1.43)
Depreciation and amortisation expense	2,117.59	2,070.61
Loss/(Profit) on sale of Fixed Assets	-	(0.01)
Provision for Bad & doubtful debts/Advances	-	-
Provision written back	-	-
Dividend Income	(1,005.61)	(501.15)
<b>Operating Profit/(Loss) before working capital changes</b>	<b>2,115.80</b>	<b>2,670.35</b>
Movements in working capital:		
Trade receivables	(269.29)	1,327.31
Other assets	652.59	449.96
Inventories	2,740.10	(2,300.23)
Loans	(58.88)	54.66
Adjustments for increase / (decrease) in operating liabilities:		
Trade payables	418.04	6,013.40
Other current liabilities	239.74	(15.29)
Other financial liabilities	1,146.73	1,703.45
Provisions/other items	80.87	70.39
<b>Cash generated from operations</b>	<b>7,065.70</b>	<b>9,974.01</b>
Income tax paid	(217.11)	(114.44)
<b>Net cash generated by operating activities (A)</b>	<b>6,848.59</b>	<b>9,859.57</b>
<b>B. Cash flows from investing activities</b>		
Investment	-	(0.00)
Purchases of fixed assets (including WIP)	(1,464.43)	(2,053.06)
Interest received	2.86	1.43
Dividend received	1,005.61	501.15
Proceeds from Sales of Fixed Assets	127.60	25.77
Non Current assets held for sale	-	-
<b>Net cash generated by/(used in) investing activities (B)</b>	<b>(328.36)</b>	<b>(1,524.72)</b>
<b>C. Cash flow from financing activities (refer note 44)</b>		
Proceed /Repayment of term loan	(4,716.38)	(6,345.66)
Interest paid	(1,836.75)	(1,844.92)
<b>Net cash generated by/(used in) financing activities (C)</b>	<b>(6,553.13)</b>	<b>(8,190.58)</b>
<b>Net Increase/decrease in Cash and cash equivalents (A+B+C)</b>	<b>(32.90)</b>	<b>144.27</b>
Cash and cash equivalents at the beginning of the year	10 499.37	355.11
<b>Cash and cash equivalents at the end of year end</b>	<b>10 466.47</b>	<b>499.37</b>

In terms of our report of even date, attached

For Doogar & Associates  
Chartered Accountants  
Firm Registration No. 000561N

Sd/-  
(Mukesh Goyal)  
Partner  
Membership No. 081810

Sd/-  
Umesh Kumar Modi  
(Chairman & President)  
DIN: 00002757

Sd/-  
Abhishek Modi  
(Whole Time Director)  
DIN: 00002798

Sd/-  
Vijay Kumar Modi  
(Director)  
DIN: 00004606

Sd/-  
J.C. Chawla  
(Director)  
DIN: 05316202

Sd/-  
N.P. Bansal  
(Director)  
DIN: 00010587

Place: New Delhi  
Date: 26th May, 2023

Sd/-  
A.K. Goel  
(Chief Financial Officer)

Sd/-  
Ankit K. Srivastava  
(Company Secretary)



## CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED MARCH 31, 2023

(Amount in Lakhs)

Particulars	Equity Share Capital	Reserves & Surplus			Other items of other comprehensive income	Total Other Equity	Total Equity
		Capital reserve	Surplus in the statement of profit & loss	Storage fund for molasses Account	Actuarial gain/(loss) on employee benefit plans through OCI		
<b>As at April 01, 2021</b>	<b>4,769.40</b>	<b>49.17</b>	<b>(5,306.63)</b>	<b>21.19</b>	<b>(47.57)</b>	<b>(5,283.85)</b>	<b>(514.45)</b>
Add: Profit for the Year	-	-	(777.39)	-	-	(777.39)	(777.39)
Add: Transfer to/ (from) storage fund for molasses	-	-	12.48	(12.48)		-	
Add: Reimbursement of defined benefit obligation	-	-		-	(68.60)	(68.60)	(68.60)
Transfer to retained earnings			(100.03)	-			
Any other changes			100.03	-			
<b>As at March 31, 2022</b>	<b>4,769.40</b>	<b>49.17</b>	<b>(6,071.55)</b>	<b>8.71</b>	<b>(116.17)</b>	<b>(6,129.84)</b>	<b>(1,360.44)</b>
Add: Profit for the Year	-	-	(872.33)	-	-	(872.33)	(872.33)
Add: Transfer to/ (from) storage fund for molasses	-	-	(3.31)	3.31		-	
Add: Reimbursement of defined benefit obligation	-	-		-	9.79	9.79	9.79
<b>As at March 31, 2023</b>	<b>4,769.40</b>	<b>49.17</b>	<b>(6,947.18)</b>	<b>12.02</b>	<b>(106.39)</b>	<b>(6,992.39)</b>	<b>(2,222.99)</b>

**For Doogar & Associates**  
Chartered Accountants  
**Firm Registration No. 000561N**

**Sd/-**  
**(Mukesh Goyal)**  
Partner  
**Membership No. 081810**

**Sd/-**  
**Umesh Kumar Modi**  
(Chairman & President)  
DIN: 00002757

**Sd/-**  
**Abhishek Modi**  
(Whole Time Director)  
DIN: 00002798

**Sd/-**  
**J.C. Chawla**  
(Director)  
DIN: 05316202

**Sd/-**  
**Ankit K. Srivastava**  
(Company Secretary)

**Sd/-**  
**Vijay Kumar Modi**  
(Director)  
DIN: 00004606  
**Sd/-**  
**N.P. Bansal**  
(Director)  
DIN: 00010587

Place: New Delhi  
Date: 26th May, 2023

**Sd/-**  
**A.K. Goel**  
(Chief Financial Officer)



## NOTES TO CONSOLIDATED FINANCIAL STATEMENT FOR THE YEAR ENDED 31 MARCH 2023

### Note: 1. BASIS AND PRINCIPLES OF CONSOLIDATION

The consolidated financial statements of the company and its subsidiaries "SBEC Bio-Energy Limited.", & and its Wholly Owned Subsidiary "SBEC Stock Holding & Investment Limited" used in the consolidation are drawn for a period of Twelve months ended on 31st March, 2023 (hereinafter referred to as "the subsidiary companies").

### Note: 2 SUMMARIES OF SIGNIFICANT ACCOUNTING POLICIES

#### 2.1 Basis of preparation of financial information

The financial statements have been prepared in accordance with Indian Accounting Standards ("Ind AS") notified under the Companies (Indian Accounting Standards) Rules, 2015 (as amended from time to time)

The preparation of financial statements requires the use of certain significant accounting estimates and judgments. It also requires the management to exercise judgment in applying the Company's accounting policies.

The Financial statement are prepared and rounded off to nearest lakhs rupees

#### 2.2 Historical Cost Convention

The financial statements are prepared on accrual basis of accounting under historical cost convention in accordance with generally accepted accounting principles in India and the relevant provisions of the Companies Act, 2013 including Indian Accounting Standards notified there under, except for certain financial instruments which are measured at fair values at the end of each reporting period, as explained in the accounting policies below. Historical cost is generally based on the fair value of the consideration given in exchange for goods and services.

#### 2.3 Summary of Significant Accounting Policies

##### (A) Principles of Consolidation

- (i) The financial statements of the holding company and subsidiary companies have been consolidated on a line-by-line basis by adding together the book value of like items of assets, liabilities, income and expenses after fully eliminating intra-group balances, intra-group transactions and the unrealized profits.

The financial statements of the holding company and the subsidiary companies have been consolidated using uniform accounting policies for like transactions and other events in similar circumstances except where otherwise stated.

- (ii) The Subsidiary Companies considered in the consolidated financial statement:

Name of the Company	Country of Incorporation	% of Voting Power as on 31.03.2023
SBEC Bio-Energy Limited	India	55
SBEC Stockholding & Investment Limited	India	100

- (iii) Minority Interest's share of net profit of subsidiaries for the year is identified and adjusted against the income of the group in order to arrive at the net income attributable to shareholders of the company.
- (iv) Minority Interest's share of net assets of subsidiaries is identified and presented in the consolidated balance sheet separate from liabilities and the equity of the company's shareholders.

##### (B) Current and non-current classification:

**The Group presents assets and liabilities in the balance sheet based on current/non-current classification.**

**An asset is treated as current when it is:**

- expected to be realized or intended to be sold or consumed in normal operating cycle,
- held primarily for the purpose of trading,
- expected to be realized within twelve months after the reporting period,
- cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period, or
- Carrying current portion of non-current financial assets. All other assets are classified as non-current.

##### A liability is current when:

- it is expected to be settled in normal operating cycle,
- it is held primarily for the purpose of trading,
- it is due to be settled within twelve months after the reporting period,
- there is no unconditional right to defer the settlement of the liability for at least twelve months after the reporting period, or
- it includes current portion of non-current financial liabilities.

All other liabilities are classified as non-current.

##### (C) Recognition of Revenues & Expenses

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

Revenue is recognized only if the following conditions are satisfied: -





The Company has transferred risks and rewards incidental to ownership to the customer;

The Company retains neither continuing managerial involvement to the degree usually associated with ownership nor effective control over the goods sold

It is probable that the economic benefit associated with the transaction will flow to the Company; and

It can be reliably measured and it is reasonable to expect ultimate collection

Dividends income is recognized when the shareholders right to receive payment was established by the balance sheet date.

**(D) Inventory Valuation**

- (i) Finished Goods (Sugar): Sugar – at net realizable value.
- (ii) Goods in Process - at cost
- (iii) Raw material - at cost
- (iv) Stores and spares - at cost (computed on Weighted Average basis)
- (v) Molasses (By-product) is valued at net realizable value.
- (vi) Provision for obsolescence and other anticipated losses are made on the stocks, whenever identified / considered necessary.
- (vii) Closing Stock of Power Banked is valued at lower of cost and market value. (Cost includes raw material, stores and spares consumed and factory overheads.)

**(E) Property, plant and equipment**

Property, plant and equipment are stated at cost, net of accumulated depreciation and accumulated impairment losses, if any. When significant parts of plant and equipment are required to be replaced at intervals, the Company depreciates them separately based on their specific useful lives. Subsequent expenditures relating to property, plant and equipment is capitalized only when it is probable that future economic benefits associated with these will flow to the company and the costs of the item can be measured reliably. Repairs and maintenance costs are charged to the statement of profit and loss when incurred. An item of property, plant and equipment and any significant part initially recognized is de-recognized upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on DE recognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the income statement when the asset is derecognized. The residual values, useful lives and methods of depreciation of property, plant and equipment are reviewed at each financial year end and adjusted prospectively.

**(F) Intangible assets**

Intangible assets are stated at their cost of acquisition. The cost comprises purchase price, borrowing cost if capitalization criteria are met and directly attributable cost of bringing the asset to its working condition for the intended use. Any trade discount and rebates are deducted in arriving at the purchase price.

**(G) Depreciation**

Depreciation on Tangible fixed assets other than land is charged on straight line method so as to write off the cost/carrying amount of assets. The useful life of assets as prescribed under Part C of Schedule II of the Companies Act 2013 and depreciation is charged on that are on the following basis:-

- (i) Depreciation on All Assets is charged at Straight Line Method basis in the manner as prescribed in Companies Act 2013 and rate as per prescribed useful life
- (ii) Intangible assets are amortized over a period of 5 year on a straight line basis.

The management has estimated the useful life is different as below:

Assets	Useful Life (Years)
Plant & Machinery	25-32
Building	30-60

**-(H) Impairment of Non Financial Assets**

The carrying amount of any property, plant and equipment and intangible assets with finite lives are reviewed at each balance sheet date, if there is any indication of impairment based on internal / external factor. An asset is impaired when the carrying amount of the asset exceeds the recoverable amount. Recoverable amount is higher of an asset's or cash generating unit's net selling price and its value in use. An impairment loss is charged to the statement of profit and loss in the year in which an asset is identified as impaired. An impairment loss recognized in prior accounting periods is reversed if there has been change in the estimate of the recoverable amount. At each balance sheet date, the Company assesses whether there is any indication that any property, plant and equipment and intangible assets with finite lives may be impaired. If any such impairment exists, the recoverable amount of an asset is estimated to determine the extent of impairment, if any. Where it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the cash-generating unit to which the asset belongs.

**(I) Expenditure during Construction**

In respect of new projects, all expenses including interest incurred up to the date of commencement of commercial production are capitalized.

In respect of substantial expansion of business, at existing locations, only direct costs are capitalized together with interest on the funds relatable to them up to the date of commercial production.

**(J) Foreign Currency Transactions**

- (i) Foreign currency transactions are recorded at the rates of exchange prevailing on the date of transaction. Monetary foreign currency assets and liabilities outstanding at the close of the financial year are revalued at the exchange rates prevailing on the balance sheet date. Exchange differences arising on account of fluctuation in the rate of exchange is recognised in the statement of profit and loss.



- ii) Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value is determined. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e., translation differences on items whose fair value gain or loss is recognised in OCI or statement of profit and loss are also recognised in OCI or statement of profit and loss, respectively).

**(K) Investments**

- Long term Investments are stated at cost of acquisition. Provision for diminution in the value is made only if the decline is other than temporary.
- Unquoted investments are stated at cost.
- Current investments are valued at carrying value without any adjustment for increase/diminution, if any is accounted at the time of sale of such investments.

**(L) Borrowing Cost**

Borrowing Cost attributable to the acquisition or construction of qualifying assets is capitalized as part of cost of that asset. Other borrowing costs are recognized as expense in the period in which they relate.

**(M) Employee Benefits**

Expenses and liabilities in respect of employee benefits are recorded in accordance with Indian Accounting Standard (Ind AS) -19 – 'Employee Benefits'.

**(i) Provident Fund and ESI**

The Company makes contribution to statutory Provident Fund and Employee State Insurance in accordance with Employees Provident Fund and Miscellaneous Provisions Act, 1952 and Employee State Insurance Act, 1948 which is a defined contribution plan and contribution paid or payable is recognized as an expense in the period in which services are rendered by the employee.

**(ii) Gratuity**

Gratuity is a post employment benefit and is in the nature of a defined benefit plan. The liability recognized in the balance sheet in respect of gratuity is the present value of the defined benefit/obligation at the balance sheet date less the fair value of plan assets, together with adjustment for unrecognized actuarial gains or losses and past service costs. The defined benefit/obligation is calculated at or near the balance sheet date by an independent actuary using the projected unit credit method.

Gains and losses through re-measurements of the net defined benefit liability/asset are recognized in other comprehensive income. The actual return of the portfolio of plan assets, in excess of the yields computed by applying the discount rate used to measure the defined benefit obligations recognized in Other Comprehensive Income. The effect of any plan amendments is recognized in net profits in the Statement of Profit and Loss.

**(iii) Compensated Absence**

Liability in respect of compensated absence becoming due or expected after the balance sheet date is estimated on the basis of an actuarial valuation performed by an independent actuary using the projected unit credit method.

**(iv) Other Short Term Benefits**

Expense in respect of other short term benefits is recognized on the basis of the amount paid or payable for the period during which services are rendered by the employee.

**(v) Leave Encashment**

The Liability on account of un-availed earned leave at the year end is fully provided for on actuarial valuation basis.

**(N) Leases**

Ind AS 116 requires lessees to determine the lease term as the non-cancellable period of a lease adjusted with any option to extend or terminate the lease, if the use of such option is reasonably certain. The Company makes an assessment on the expected lease term on a lease-by-lease basis and thereby assesses whether it is reasonably certain that any options to extend or terminate the contract will be exercised. In evaluating the lease term, the Company considers factors such as any significant leasehold improvements undertaken over the lease term, costs relating to the termination of the lease and the importance of the underlying asset to Company's operations taking into account the location of the underlying asset and the availability of suitable alternatives. The lease term in future periods is reassessed to ensure that the lease term reflects the current economic circumstances. After considering current and future economic conditions, the company has concluded that no changes are required to lease period relating to the existing lease contracts.

**The Company as a lessee**

The Company's lease asset classes primarily consist of leases for buildings. The Company assesses whether a contract contains a lease, at inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company assesses whether: (i) the contract involves the use of an identified asset (ii) the Company has substantially all of the economic benefits from use of the asset through the period of the lease and (iii) the Company has the right to direct the use of the asset.

At the date of commencement of the lease, the Company recognizes a right-of-use asset ("ROU") and a corresponding lease liability for all lease arrangements in which it is a lessee, except for leases with a term of twelve months or less (short-term leases) and low value leases. For these short-term and low value leases, the Company recognizes the lease payments as an operating expense on a straight-line basis over the term of the lease.

Certain lease arrangements include the options to extend or terminate the lease before the end of the lease term. ROU assets and lease liabilities includes these options when it is reasonably certain that they will be exercised.



The right-of-use assets are initially recognized at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or prior to the commencement date of the lease plus any initial direct costs less any lease incentives. They are subsequently measured at cost less accumulated depreciation and impairment losses.

Right-of-use assets are depreciated from the commencement date on a straight-line basis over the shorter of the lease term and useful life of the underlying asset. Right of use assets are evaluated for recoverability whenever events or changes in circumstances indicate that their carrying amounts may not be recoverable. For the purpose of impairment testing, the recoverable amount (i.e. the higher of the fair value less cost to sell and the value-in-use) is determined on an individual asset basis unless the asset does not generate cash flows that are largely independent of those from other assets. In such cases, the recoverable amount is determined for the Cash Generating Unit (CGU) to which the asset belongs.

The lease liability is initially measured at amortized cost at the present value of the future lease payments. The lease payments are discounted using the interest rate implicit in the lease or, if not readily determinable, using the incremental borrowing rates in the country of domicile of these leases. Lease liabilities are re-measured with a corresponding adjustment to the related right-of-use asset if the Company changes its assessment if whether it will exercise an extension or a termination option. Lease liability and ROU asset have been separately presented in the Balance Sheet and lease payments have been classified as financing cash flows.

#### **The Company as a Lessor**

Leases for which the Company is a lessor is classified as a finance or operating lease. Whenever the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee, the contract is classified as a finance lease. All other leases are classified as operating leases. When the Company is an intermediate lessor, it accounts for its interests in the head lease and the sublease separately. The sublease is classified as a finance or operating lease by reference to the right-of-use asset arising from the head lease. For operating leases, rental income is recognized on a straight line basis over the term of the relevant lease.

#### **(O) Financial instruments:**

##### **i) Financial assets**

##### **A. Initial recognition**

The Company classifies financial instruments, or their component parts, on initial recognition as a financial asset, a financial liability or an equity instrument in accordance with the substance of the contractual arrangement. Financial instruments are recognized when the group becomes a party to the contractual provisions of the instrument. Financial instruments are recognized initially at fair value plus transactions costs that are directly attributable to the acquisition or issue of the financial instrument, except for financial assets at fair value through statement of profit and loss, which are initially measured at fair value, excluding transaction costs (which is recognized in statement of profit and loss).

##### **B. Subsequent measurement**

- a) Financial assets carried at amortized cost (AC) A financial asset is subsequently measured at amortized cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

##### **C. Financial assets at fair value through other comprehensive income (FVTOCI)**

A financial asset is subsequently measured at fair value through other comprehensive income if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

##### **D. Financial assets at fair value through statement of profit and loss (FVTPL)**

##### **Equity instruments**

All equity investments in scope of Ind AS 109 are measured at fair value either as at FVTOCI or FVTPL. The Company makes such election on instrument-by-instrument basis. For equity instruments measured as at FVTOCI, all fair value changes on the instrument, excluding dividends, are recognized in the OCI. Equity instruments included within the FVTPL category are measured at fair value with all changes recognized in the P&L.

Investment in subsidiaries and associates

Investment in subsidiaries and associates are carried at cost.

##### **E. Impairment of financial assets**

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

1. Financial assets that are debt instruments, and are measured at amortized cost e.g., loans, debt securities, deposits, trade receivables and bank balance
2. Financial assets that are debt instruments and are measured as at FVTOCI
3. Lease receivables
4. Trade receivables or any contractual right to receive cash or another financial asset
5. Loan commitments which are not measured as at FVTPL

The Company follows 'simplified approach' for recognition of impairment loss allowance on: Trade receivables or contract revenue receivables; and all lease receivables. The application of simplified approach does not require the Company to track changes in credit risk rather; it recognizes impairment loss allowance based on 12 months ECLs at each reporting date, right from its initial recognition. For recognition of impairment loss on other financial assets and risk exposure, the Company determines that whether there has been a significant increase in the credit risk since initial recognition. If credit risk has not increased significantly, 12-month ECL is used to provide for impairment loss. However, if credit risk has increased significantly, lifetime ECL is used. If, in a subsequent period, credit quality of the instrument improves such that there is no longer a significant increase in credit risk since initial recognition, then the entity reverts to recognizing impairment loss allowance based on 12-month ECL. Lifetime ECL are the expected credit losses resulting from all possible default events over the expected life of a financial instrument. The 12-month ECL is a portion of the lifetime ECL which results from default events that are possible within 12 months after the reporting date.



## ii) Financial liabilities

### A. Initial recognition and measurement:

All financial liabilities are recognized initially at fair value and in case of loans and borrowings and payables, net of directly attributable cost. Fees of recurring nature are directly recognized in statement of profit and loss as finance cost.

### B. Subsequent measurement:

Financial liabilities are subsequently carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the balance sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

**a) Loans and borrowings after initial recognition,** interest bearing loans and borrowings are subsequently measured at amortized cost using the effective interest rate (EIR) method. Gains and losses are recognized in statement of profit and loss when liabilities are derecognized. Amortized cost is calculated by taking into account any discount or premium on acquisition and fees or costs that are an integral part of the EIR. The EIR amortization is included as finance cost in the statement of profit and loss.

### b) Compound financial instruments

At the issue date the fair value of the liability component of a compound instrument is estimated using the market interest rate for a similar non-convertible instrument. This amount is recorded as a liability at amortized cost using the effective interest method until extinguished upon conversion or at the instrument's redemption date. The equity component is determined as the difference of the amount of the liability component from the fair value of the instrument. This is recognized in equity, net of income tax effects, and is not subsequently re-measured.

### iii) De-recognition of financial instruments

The Company derecognizes a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the financial asset and the transfer qualifies for de-recognition under Ind AS 109. A financial liability (or a part of a financial liability) is derecognized from the Company's balance sheet when the obligation specified in the contract is discharged or cancelled or expires.

### iv) Fair value of financial instruments

In determining the fair value of its financial instruments, the Company uses a variety of methods and assumptions that are based on market conditions and risks existing at each reporting date. The methods used to determine fair value include discounted cash flow analysis, available quoted market prices. All methods of assessing fair value result in general approximation of value and such value may vary from actual realization on future date.

### v) Derivative financial instruments

Derivative financial instruments are initially recognized at fair value on the date on which a derivative contract is entered into and are subsequently re-measured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative. Any gains or losses arising from changes in the fair value of derivatives are taken directly to statement of profit and loss, except for the effective portion of cash flow hedges which is recognized in other Comprehensive Income and later to statement of profit or loss when the hedge item effects profit or loss or treated as basis adjustment if a hedged forecast transaction subsequently results in the recognition of a non-financial assets or non-financial liability.

## (P) Accounting for Taxes

- (i) Provision for Current Tax is made on the basis of applicable Income Tax Act, 1961.
- (ii) Deferred Tax assets and liabilities are accounted for in accordance with IND AS-12.

## (Q) Earnings per Share

Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders (after deducting preference dividends and attributable taxes) by the weighted average number of equity shares outstanding during the period.

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

## (R) Miscellaneous Expenditure

Preliminary expenses and deferred revenue expenses are being amortized over a period of ten years from the date of commencement of commercial operations.

## (S) Provisions, Contingent Liabilities and Contingent Assets

Provisions are recognized when the company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation.

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

## (T) Cash and Cash Equivalent

Cash and cash equivalents for the purpose of Cash Flow Statement comprise cash at Bank, cash in hand and demand deposits with bank with an original maturity of three months or less than the date of acquisition.

## (U) Cash Flow Statement

Cash flow are reported using the indirect method, whereby profit before extraordinary items and tax is adjusted for the effects of transactions of non-cash nature and any deferrals or accruals of past or future cash receipts or payments and item of income or expenses associated with investing or financing cash flows.

The cash flows from operating, investing and financing activities of the company are segregated based on the available information.

**(V) Estimates and assumptions**

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year, are described below:

**i) Depreciation and useful lives of property, plant and equipment:**

Property, plant and equipment are depreciated over the estimated useful lives of the assets, after taking into account their estimated residual value. Management reviews the estimated useful lives and residual values of the assets annually in order to determine the amount of depreciation to be recorded during any reporting period. The useful lives and residual values are based on the Company's historical experience with similar assets and take into account anticipated technological changes. The depreciation for future periods is adjusted if there are significant changes from previous estimates.

**ii) Recoverability of trade receivable:**

Judgments are required in assessing the recoverability of overdue trade receivables and determining whether a provision against those receivables is required. Factors considered include the credit rating of the counterparty, the amount and timing of anticipated future payments and any possible actions that can be taken to mitigate the risk of non-payment.

**iii) Provisions:**

Provisions and liabilities are recognized in the period when it becomes probable that there will be a future outflow of funds resulting from past operations or events and the amount of cash outflow can be reliably estimated. The timing of recognition and quantification of the liability require the application of judgment to existing facts and circumstances, which can be subject to change. Since the cash outflows can take place many years in the future, the carrying amounts of provisions and liabilities are reviewed regularly and adjusted to take account of changing facts and circumstances.

**iv) Impairment of non-financial assets:**

The Company assesses at each reporting date whether there is an indication that an asset may be impaired. If any indication exists, or when annual impairment testing for an asset is required, the Company estimates the asset's recoverable amount. An asset's recoverable amount is the higher of an asset's or CGU's fair value less costs of disposal and its value in use. It is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or groups of assets. Where the carrying amount of an asset or CGU exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount. In assessing value in use, the estimated future cash flows are discounted to their present value using pretax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. In determining fair value less costs of disposal, recent market transaction are taken into account, if no such transactions can be identified, an appropriate valuation model is used.

**v) Impairment of financial assets:**

The impairment provisions for financial assets are based on assumptions about risk of default and expected cash loss rates. The Company uses judgment in making these assumptions and selecting the inputs to the impairment calculation, based on Company's past history, existing market conditions as well as forward looking estimates at the end of each reporting period.

**Fair value measurement of financial instruments:** The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year. The Company based its assumptions and estimates on parameters available when the financial statements were prepared. Existing circumstances and assumptions about future developments, however, may change due to market changes or circumstances arising that are beyond the control of the Company. Such changes are reflected in the assumptions when they occur.

**NOTE:3 PROPERTY, PLANT AND EQUIPMENT****(Amount in Lakhs)**

Gross Block										
	Land		Buildings	Lease Hold	Plant &	Office	Computer	Factory	Furniture	Vehicles
	Freehold	Leasehold		Improvements	Machinery	Equipment	Equipment	Approach Road	& Fixtures	
As at 31st March 2019	2,701.90	4,322.75	3,584.31	0.85	34,729.71	47.64	120.18	253.02	75.43	301.26
Additions	-	-	-	-	1,198.78	6.67	6.09	-	-	10.52
Disposals	-	-	-	-	-	-	-	-	-	53.75
As at 31st, March 2020	2,701.90	4,322.75	3,584.31	0.85	35,928.49	54.31	126.27	253.02	75.43	258.03
Additions	-	-	-	-	610.97	11.75	11.85	-	0.08	12.37
Disposals	-	-	-	-	-	0.01	-	-	-	32.62
As at 31st March 2021	2,701.90	4,322.75	3,584.31	0.85	36,539.46	66.04	138.12	253.02	75.51	237.77
Additions	-	-	4.64	-	385.04	6.82	3.09	95.41	-	15.37
Disposals	-	-	-	-	34.47	-	-	-	-	3.88
As at 31st March,2022	2,701.90	4,322.75	3,588.95	0.85	36,890.02	72.87	141.21	348.43	75.51	249.26
Additions	-	-	519.52	-	2,324.47	8.90	10.66	-	0.42	-
Disposals	-	-	-	-	372.25	-	-	-	-	-
As at 31st March,2023	2,701.90	4,322.75	4,108.47	0.85	38,842.25	81.77	151.87	348.43	75.93	249.26

Depreciation										
	Land		Buildings	Lease Hold	Plant &	Office	Computer	Factory	Furniture	Vehicles
	Freehold	Leasehold		Improvements	Machinery	Equipment	Equipment	Approach Road	& Fixtures	
As at 31st March 2019	-	830.20	1,113.93	0.85	15,559.75	39.72	108.18	252.58	70.68	134.08
Charged for the year	-	272.73	157.03	-	1,566.61	5.53	8.56	-	2.09	31.25
Disposals	-	-	-	-	-	-	-	-	-	52.67
As at 31st March 2020	-	1,102.93	1,270.96	0.85	17,126.36	45.25	116.74	252.58	72.76	112.67
Charged for the year	-	272.73	157.03	-	1,627.70	7.80	11.66	-	1.85	30.38
Disposals	-	-	-	-	-	-	-	-	-	32.10
As at 31st March 2021	-	1,375.65	1,427.99	0.85	18,754.07	53.05	128.40	252.58	74.62	110.95
Charged for the year	-	272.73	157.03	-	1,604.66	7.82	-0.90	-	-1.51	30.53
Disposals	-	-	-	-	8.91	-	-	-	-	3.68
As at 31st March,2022	-	1,648.38	1,585.02	0.85	20,349.82	60.87	127.50	252.58	73.11	137.80
Charged for the year	-	272.73	163.78	-	1,637.06	6.11	7.49	-	0.05	30.11
Disposals	-	-	-	-	244.65	-	-	-	-	-
As at 31st March,2023	-	1,921.11	1,748.79	0.85	21,742.23	66.99	134.99	252.58	73.16	167.91

Net Block										
As at 31st, March 2019	2,701.90	3,492.55	2,470.38	-	19,169.96	7.92	12.00	0.43	4.75	167.18
As at 31st March 2020	2,701.90	3,219.82	2,313.35	-	18,802.12	9.06	9.53	0.43	2.67	145.36
As at 31st March 2021	2,701.90	2,947.09	2,156.32	-	17,785.39	12.99	9.72	0.43	0.89	126.82
As at 31st March 2022	2,701.90	2,674.37	2,003.94	-	16,540.21	12.00	13.72	95.84	2.40	111.46
As at 31st March 2023	2,701.90	2,401.64	2,359.68	-	17,100.01	14.79	16.88	95.84	2.77	81.35

**NOTE:3(a) INTANGIBLE ASSETS****(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
<b>Gross Block</b>		
Opening	24.48	24.48
Additions	-	-
Disposals	-	-
<b>Closing</b>	24.48	24.48
<b>Depreciation</b>		
Opening	23.88	23.62
Charge for the Year	0.26	0.26
Disposals	-	-
<b>Closing</b>	24.14	23.88
<b>Net Block</b>	0.34	0.60


**NOTE:3(b) CAPITAL WORK -IN-PROGRESS**
**(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
Plant and machinery under erection	1,756.86	214.17
Additions	1,343.60	1,812.69
Disposals	2,743.14	270.00
<b>Total as at 31.03.2023</b>	<b>357.33</b>	<b>1,756.86</b>

**CWIP AGEING SCHEDULE**

Particulars	Amount of CWIP for a period of				Total
	Less than 1 Year	1-2 Year	2-3 Year	More Than 3 Years	
Cane Yard Rcc Road Wip	0.49	10.24	44.52	-	55.25
Etp Extension Wip	125.57	-	-	-	125.57
Mech. Circulator Wip	54.25	36.35	12.65	-	103.25
New Sugar Godown No.5	5.50				5.50
Safety Equipment	33.20				33.20
Ethanol Project	3.88	5.00		25.69	34.56
<b>Total</b>	<b>222.89</b>	<b>51.59</b>	<b>57.17</b>	<b>25.69</b>	<b>357.33</b>

**CWIP COMPLETION SCHEDULE FOR PROJECTS**

Particulars	To be completed in			Total
	Less than 1 Year	1-2 Year		
Cane Yard Rcc Road Wip	55.25			55.25
Etp Extension Wip	125.57	-		125.57
Mech. Circulator Wip	103.25	-		103.25
New Sugar Godown No.5	5.50	-		5.50
Safety Equipment	33.20	-		33.20
Ethanol Project		34.56		34.56
<b>Total</b>	<b>322.77</b>	<b>34.56</b>		<b>357.33</b>

**NOTE:4 INVESTMENTS**
**(Amount in Lakhs)**

Particulars	Non - current As at 31.03.2023	Current As at 31.03.2023	Non - current As at 31.03.2022	Current As at 31.03.2022
<b>Investment in Susidiary Companies</b>				
of Joint venture companies (379,25,000 equity shares @Rs.10/- each of fully paid up in Modi Ilva India Pvt.Ltd) (P.Y. 3,21,25,000 as at 31st March,2020 @ Rs.10/-each)	<b>3,792.50</b>		3,792.50	
of other entities(100 equity shares @Rs.10/-each of fully paid up in Chandil Power Ltd) (P.Y. 100 as at 31st March,2020 @ Rs.10/-each)	<b>0.01</b>		0.01	
40,000 Equity Shares of Rs.25/-each in The SVC Bank Ltd (P.Y. 40,000 Equity Shares of Rs.25/-each)	<b>10.00</b>		10.00	
<b>Tranfer /Stamp Fee</b>	<b>0.83</b>		0.83	
<b>Total</b>	<b>3,803.34</b>	-	3,803.34	-

Aggregate amount of unquoted investments

**3,803.34**

-

3,803.34

-

**NOTE 5:Financial Assets-Other**
**(Amount in Lakhs)**

Particulars	Non - current As at 31.03.2023	Current As at 31.03.2023	Non - current As at 31.03.2022	Current As at 31.03.2022
Debt Assignment Recoverable	14,685.98	-	14,685.98	-
Other Receivable	-	-	-	-
	<b>14,685.98</b>	-	14,685.98	-



**NOTE:6 OTHER ASSETS****(Amount in Lakhs)**

Particulars	Non - current As at 31.03.2023	Current As at 31.03.2023	Non - current As at 31.03.2022	Current As at 31.03.2022
<b>- Unsecured, considered good</b>				
Advances recoverable in cash or kind or for value to be received	-	73.06	-	771.89
Advances other than Capital Advances -	-	-	-	-
Security deposits	6.34	0.18	4.76	-
-Prepaid Expenses	-	55.86	-	52.37
Balances with statutory authorities	-	73.70	-	77.34
-Direct tax Recoverable	118.38	-	82.55	-
<b>Total other assets</b>	<b>124.72</b>	<b>202.80</b>	<b>87.31</b>	<b>901.60</b>

**NOTE 7: Deferred tax (assets) / Liability (net)****(Amount in Lakhs)**

Particulars	As At 31.03.2023	For the year	As At 31.03.2022
<b>Deferred tax assets on account of:</b>			
Depreciation	(172.35)	-	(172.35)
Disallowance u/s 43B	4.66	-	4.66
Gratuity	16.74	-	16.74
Other disallowance under income tax act	-	-	-
Carry Forward Losses	720.23	-	720.23
<b>Total</b>	<b>569.28</b>	<b>-</b>	<b>569.28</b>

**NOTE:8 INVENTORIES****(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
Raw Materials	4.94	2.88
Stores & Spares	1,304.82	1,357.48
Work - in - progress	774.73	758.75
Finished goods	17,514.57	19,457.63
Others	2,275.57	3,037.98
<b>Total</b>	<b>21,874.63</b>	<b>24,614.73</b>

**NOTE:9 TRADE RECEIVABLES****(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
<b>Exceeding 6 months from payment due date</b>		
- Unsecured, considered good	36.72	42.42
- Unsecured, considered Doubtful	49.04	39.56
- Allowance for bad & doubtful debts	(49.04)	(39.56)
	<b>36.72</b>	<b>42.42</b>
<b>Less than 6 months</b>		
- Unsecured, considered good	1,652.00	1,377.01
<b>Total</b>	<b>1,688.72</b>	<b>1,419.43</b>


**TRADE RECEIVABLE SCHEDULE**
**(Amount in Lakhs)**

Particulars	Outstanding for following period from due Date of Payment					as on 31.03.2023
	Less than 6 months	6 Months - 1 Year	1-2 years	2-3 years	More than 3 years	Total
Undisputed Trade Receivables - Considered good	1,652.00	8.29		0.30	39.70	1,700.29
Undisputed Trade Receivables - which has significant increase in credit risk						-
Undisputed Trade Receivables - Credit Impaired						-
Disputed Trade Receivables - Considered good					28.14	28.14
Disputed Trade Receivables - which has significant increase in credit risk					9.33	9.33
Disputed Trade Receivables - Credit Impaired						-
<b>Total</b>	<b>1,652.00</b>	<b>8.29</b>	<b>-</b>	<b>0.30</b>	<b>77.17</b>	<b>1,737.76</b>

**TRADE RECEIVABLE SCHEDULE**
**(Amount in Lakhs)**

Particulars	Outstanding for following period from due Date of Payment					as on 31.03.2022
	Less than 6 months	6 Months - 1 Year	1-2 years	2-3 years	More than 3 years	Total
Undisputed Trade Receivables - Considered good	1,377.01		0.30	13.99	67.69	1,458.99
Undisputed Trade Receivables - which has significant increase in credit risk						-
Undisputed Trade Receivables - Credit Impaired						-
Disputed Trade Receivables - Considered good						-
Disputed Trade Receivables - which has significant increase in credit risk						-
Disputed Trade Receivables - Credit Impaired						-
<b>Total</b>	<b>1,377.01</b>	<b>-</b>	<b>0.30</b>	<b>13.99</b>	<b>67.69</b>	<b>1,458.99</b>

**NOTE:10 CASH & CASH EQUIVALENTS**
**(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
Balances with banks		
- in Current Accounts	462.93	494.71
Cash in hand	3.54	4.66
<b>Total</b>	<b>466.47</b>	<b>499.37</b>

**NOTE:11 LOANS**
**(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
Advance to vendors	321.62	247.08
Less: Provision for Doubtful Advance	(40.08)	(24.42)
<b>Total</b>	<b>281.54</b>	<b>222.65</b>

**NOTE: 12 OTHER BANK BALANCES**
**(Amount in Lakhs)**

Particulars	As At 31.03.2023	As At 31.03.2022
Margin Money	-	2.20
Fixed Deposit	25.00	14.00
<b>Total</b>	<b>25.00</b>	<b>16.20</b>

**NOTE 13: SHARE CAPITAL****(1) Current reporting Period****(Amount in Lakhs)**

Particular	Balance at the beginning of the current reporting period	Changes in share capital due to prior period errors	Restated balance at the beginning of current reporting period	Changes in equity share capital during the current year	Balance at the end of current reporting period
<b>Authorised Share Capital:</b>					
100,000,000 (Previous Year 100,000,000) Equity Shares of Rs.10/- each.	10,000.00	-	-	-	10,000.00
<b>Issued, Subscribed Capital:</b>					
47,814,430 (Previous Year 47,814,430) Equity Shares of Rs.10/- each.	4,781.44	-	-	-	4,781.44
<b>Paid Up Capital:</b>					
47,653,880 (Previous Year 47,653,880) Equity Shares of Rs.10/- each.	4,765.39	-	-	-	4,765.39
Share Forfeiture Account	4.01	-	-	-	4.01
<b>Total</b>	<b>4,769.40</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>4,769.40</b>

**(1) Previous reporting Period****(Amount in Lakhs)**

Particulars	Balance at the beginning of the current reporting period	Changes in share capital due to prior period errors	Restated balance at the beginning of current reporting period	Changes in equity share capital during the current year	Balance at the end of current reporting period
<b>Authorised Share Capital:</b>					
100,000,000 (Previous Year 100,000,000) Equity Shares of Rs.10/- each.	10,000.00	-	-	-	10,000.00
<b>Issued, Subscribed Capital:</b>					
47,814,430 (Previous Year 47,814,430) Equity Shares of Rs.10/- each.	4,781.44	-	-	-	4,781.44
<b>Paid Up Capital:</b>					
47,653,880 (Previous Year 47,653,880) Equity Shares of Rs.10/- each.	4,765.39	-	-	-	4,765.39
Share Forfeiture Account	4.01	-	-	-	4.01
<b>Total</b>	<b>4,769.40</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>4,769.40</b>

**a) Terms/rights attached to Equity Shares**

Company has only one class of equity shares having a par value of Rs.10/-. Each holder of equity shares is entitled to one vote per share. The Company declares and pays dividends in Indian rupees. The dividend, if any, proposed by the Board of Directors is subject to the approval of the shareholders in the ensuing Annual General Meeting.

In the event of liquidation of the Company, the holders of equity shares will be entitled to receive remaining assets of the company, after distribution of all preferential amounts. The distribution will be in proportion to the number of equity shares held by the shareholders.

**b) Detail of Shareholders holding more than 5% Equity Shares in the company**

Name of Shareholder	As at 31.03.2023		As At 31.03.2022	
	No. of shares Held	% age of Holding	No. of shares Held	%age of Holding
<b>Equity Shares</b>				
1. M/s SBEC Systems (India) Ltd.	1,42,30,884.00	29.86%	1,42,30,884.00	29.86%
2. M/s Moderate Leasing & Capital Services Ltd	90,65,568.00	19.02%	90,65,568.00	19.02%
3. M/s Abhikum Leasing and Investment Pvt. Ltd.	56,25,844.00	11.81%	56,25,844.00	11.81%
4. M/s A to Z Holdings Pvt. Ltd.	33,60,070	7.05%	33,60,070	7.05%
5. M/s Longwell Investments Pvt. Ltd.	27,21,500.00	5.71%	27,21,500.00	5.71%


**c) Shares held by the promoters as on 31.03.2023**

S.No.	Promoters Name	No. of Shares	% of Total Shares	% changes during the year
1	M/s SBEC Systems (India) Ltd.	1,42,30,884.00	29.86%	-
2	M/s Moderate Leasing & Capital Services Ltd	90,65,568.00	19.02%	-
3	M/s Longwell Investments Pvt. Ltd.	27,21,500.00	5.71%	-
4	M/s A to Z Holdings Pvt. Ltd.	33,60,070.00	7.05%	-
5	Mr. Umesh Kumar Modi	15,71,223.00	3.30%	-
6	Mr. Jayesh Modi	55,487.00	0.12%	-
7	Mrs. Kumkum Modi	28,300.00	0.06%	-
Total		3,10,33,032.00	65.12%	-

**d) Reconciliation of the shares outstanding at the beginning and at the end of the reporting period**

Equity Shares	As at 31.03.2023		As At 31.03.2022	
	No. of shares	(Rs.)	No. of shares	(Rs.)
At the beginning of the year	4,76,53,880.00	47,65,38,800.00	4,76,53,880.00	47,65,38,800.00
Add: Shares Issued during the year	-	-	-	-
Less: Bought back during the year	-	-	-	-
<b>Outstanding at the end of the year</b>	<b>4,76,53,880.00</b>	<b>47,65,38,800.00</b>	<b>4,76,53,880.00</b>	<b>47,65,38,800.00</b>

- e) The Company has not allotted any fully paid up shares pursuant to contract(s) without payment being received in cash nor has allotted any fully paid up shares by way of bonus shares nor has bought back any class of shares during the period of five years immediately preceding the balance sheet date.

**NOTE 14: OTHER EQUITY**
**(1) Current Reporting Period**
**(Amount in Lakhs)**

Particular	Reserve and surplus			other items of other comprehensive income	Total
	Capital reserve	Other reserve (Molasses storage fund)	Retained earnings		
Balance at the beginning of the current reporting period	49.17	8.71	(6,071.54)	(116.17)	(6,129.84)
Changes in accounting policy of prior period items	-	-	-	-	-
Restated balance at the beginning of current reporting period	49.17	8.71	(6,071.54)	(116.17)	(6,129.84)
Total comprehensive Income For the Year	-	-	(872.33)	9.79	(862.55)
Dividends	-	-	-	-	-
Transfer to retained earnings	-	-	-	-	-
Any other changes	-	3.31	(3.31)	-	-
<b>Balance at the end of current reporting period</b>	<b>49.17</b>	<b>12.02</b>	<b>(6,947.19)</b>	<b>(106.39)</b>	<b>(6,992.39)</b>

**(2) Previous Reporting Period**
**(Amount in Lakhs)**

Particular	Reserve and surplus			other items of other comprehensive income	Total
	Capital reserve	Other reserve (Molasses storage fund)	Retained earnings		
Balance at the beginning of the current reporting period	49.17	21.19	(5,306.63)	(47.57)	(5,283.85)
Changes in accounting policy of prior period items	-	-	-	-	-
Restated balance at the beginning of current reporting period	49.17	21.19	(5,306.63)	(47.57)	(5,283.85)
Total comprehensive Income For the Year	-	-	(777.39)	(68.60)	(845.99)
Dividends	-	-	-	-	-
Transfer to retained earnings	-	-	(112.51)	-	(112.51)
Any other changes	-	(12.48)	124.99	-	112.51
<b>Balance at the end of current reporting period</b>	<b>49.17</b>	<b>8.71</b>	<b>(6,071.54)</b>	<b>(116.17)</b>	<b>(6,129.84)</b>

**NOTE:15 BORROWINGS****(Amount in Lakhs)**

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
<b>Term Loan /Unsecured Loans:</b>				
- Term Loan				
From Banks	691.75	-	5,480.30	-
Current maturities of long term debt	-	4,543.42	-	6,096.71
<b>Net Balance</b>	<b>691.75</b>	<b>4,543.42</b>	<b>5,480.30</b>	<b>6,096.71</b>
From Others	-	-	-	-
	691.75	4,543.42	5,480.30	6,096.71
Vehicle Loan	3.65	10.71	17.02	19.75
<b>Total</b>	<b>695.40</b>	<b>4,554.13</b>	<b>5,497.32</b>	<b>6,116.46</b>
<b>- Unsecured</b>				
Deposits from selling agent	-	-	-	-
From Body Corporates	1,200.51	-	-	-
Inter Corporate Deposits	-	4,953.63	-	3,676.72
<b>Working capital loan from banks repayable on demand</b>				
Others	-	634.98	-	1,464.53
<b>Total</b>	<b>1,895.91</b>	<b>10,142.74</b>	<b>5,497.32</b>	<b>11,257.70</b>

**NOTE:15 (1) Loan repayment and security schedule**

S. No.	Name of Bank/ Financial Institution/Lender	Nature of Loan	Amount outstanding as on 31st March, 2023	Interest Rate (Per Annum)	Repayment Periodicity	Remaining Installments as on 31st March, 2023	Security
	Secured						
1.	U.P. Co-operative Bank Limited - 201 crores	Soft Loan	4,711.75	5%	Rs. 335 Lacs Plus applicable interest per month	15	1. First and exclusive charge on our Complete plant and machinery ,building,land , Road and all civil work. Value of above security will be Rs.255 crores.  2. First and paripasu cahрге on assets of SBEC Bioenergy limited . Value of Bioenergy Assets was Rs 56 crores.  3. Colleteral security on Mr. Umesh kumar Modi Delhi's farmhouse value of such farmhouse was Rs. 91 crores. Total Security value of Rs. 402 crores.  4. Mr. Umesh Kumar Modi and Mr. Abhishek Modi has given their personal guarantee for the loan from U.P. Co-operative Limited
2.	U.P. Co-operative Bank Limited - 46.50 Crores	Soft Loan	523.42	5%	Rs. 129.17 Lacs Plus applicable interest per month	5	
3.	Punjab National Bank - 8.90 lacs	Vehicle Loan -1	2.27	8.55%	Rs. 0.20 Lacs per Month	12	
4.	Punjab National Bank- 9.60 lacs	Vehicle Loan -2	3.81	8.55%	Rs. 0.20 Lacs per Month	21	Hypothecation/Mortgage of Assets created out of bank finance
5.	Punjab National Bank -6.34 lacs	Vehicle Loan -3	4.16	8.20%	Rs. 0.15 Lacs per Month	31	
	Unsecured						
1.	Modearte Leasing and capital service Ltd.	Inter corporate Deposit	3,494.52	16.00%	NA	NA	N.A.
2.	Modearte Leasing and capital service Ltd.	Inter corporate Deposit for 10 Years	1,459.11	16.00%	Monthly installment for principle plus applicable interest	67	
Total			10,199.04				


**In case of SBEC bioenergy limited**

S. No.	Name of Bank/ Financial Institution/ Lender	Loan Type	Amount outstanding as on 31st March , 2023	Interest Rate (Per Annum )	Repayment Periodicity	Amount of Installment	Remaining Installments as on 31st March ,2023	Security
	Secured							
1.	Toyota Financial Services Limited - 16.76 lacs	Vehicle Loan -4	1.03	9.24%	Monthly	0.35	03	Hypothecation/ Mortgage of Assets created out of bank finance
2.	Daimler Financial Services Pvt. Ltd	Vehicle Loan -5	3.08	9.25%	Monthly	1.04	03	
	Unsecured							
3.	Priyadarshani Polysacks Limited	Short Term Loan	505.73	15.00%	As per agreement			Nil
4.	T C HEALTH CARE PVT LTD	Inter corporate Deposit	129.25	13.00%	NA			
	Total		639.09					

**In case of SBEC stockholding & investment limited**

S. No.	Name of Bank/ Financial Institution/ Lender	Loan Type	Amount outstanding as on 31st March , 2023	Interest Rate (Per Annum )	Repayment Periodicity	Amount of Installment	Remaining Installments as on 31st March , 2023	Security
<b>Unecured</b>								
1.	Moderate Leasing Capital Service Private Limited -1200 lacs	Inter corporate deposit	1,200.51	16.00%	NA	NA	NA	Nil
<b>Total</b>			<b>1,200.51</b>	-	-	-		

**NOTE:16 PROVISIONS**

(Amount in Lakhs)

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
<b>Provision for employee benefits</b>				
- Gratuity	626.97	26.20	450.64	139.04
- Leave Encashment	64.57	7.51	52.72	11.16
<b>Total</b>	<b>691.54</b>	<b>33.71</b>	<b>503.36</b>	<b>150.20</b>

**NOTE: 17 OTHER FINANCIAL LIABILITIES**

(Amount in Lakhs)

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
Security Deposits (Retention Money)	0.45	-	0.45	-
Employees related dues	-	248.09	-	247.42
Advance from Customer	-	2,955.25	-	1,714.27
Other Liabilities for Expenses	-	249.11	-	235.22
Other Payables	-	63.42	-	172.23
<b>Total</b>	<b>0.45</b>	<b>3,515.87</b>	<b>0.45</b>	<b>2,369.14</b>

**NOTE: 18 OTHER LIABILITIES**

(Amount in Lakhs)

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
Other Liabilities	-	-	-	0.31
Security Deposits	11.55	-	10.47	-
Statutory Payables	-	659.16	-	398.51
Retention money	-	32.32	-	54.00
<b>Total</b>	<b>11.55</b>	<b>691.48</b>	<b>10.47</b>	<b>452.82</b>

**NOTE:19 TRADE PAYABLE****(Amount in Lakhs)**

Particulars	Non - Current	Current	Non - Current	Current
	As at 31.03.2023	As at 31.03.2023	As at 31.03.2022	As at 31.03.2022
Due to parties registered under MSMED Act	-	329.59	-	58.94
Due to other parties	-	50,965.95	-	50,818.56
Due to related parties	-	-	-	-
<b>Total</b>	-	<b>51,295.54</b>	-	<b>50,877.50</b>

Particular	OUTSTANDING 31.03.23				
	LESS THAN 1 YEAR	1-2 YEARS	2-3 YEARS	MORE THAN 3 YEARS	Total
Others	2,162.87	74.23	12.45	28.16	2,277.72
Sugarcane	49,017.83	-	-	-	49,017.83
<b>TOTAL</b>	<b>51,180.70</b>	<b>74.23</b>	<b>12.45</b>	<b>28.16</b>	<b>51,295.54</b>

Particular	OUTSTANDING 31.03.23				
	LESS THAN 1 YEAR	1-2 YEARS	2-3 YEARS	MORE THAN 3 YEARS	TOTAL
Others	2,484.71	55.51	18.32	60.45	2,618.99
Sugarcane	48,258.51	-	-	-	48,258.51
<b>TOTAL</b>	<b>50,743.22</b>	<b>55.51</b>	<b>18.32</b>	<b>60.45</b>	<b>50,877.50</b>

**NOTE:20 REVENUE FROM OPERATIONS****(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
A. Sale of Goods	64,299.43	61,228.26
Gross Sales	-	-
Less:Excise Duty	-	-
Net Sales	64,299.43	61,228.26
B.Other Operating Revenue	1,546.76	173.07
<b>Total</b>	<b>65,846.19</b>	<b>61,401.33</b>

**NOTE:21 OTHER INCOME****(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Interest income	2.86	1.43
Provision written back	28.33	149.93
Dividend	1,005.61	501.15
Net Gain on sale of fixed assets	21.70	1.43
Misc. Income	5.90	0.01
Hiring Charges	-	-
<b>Total</b>	<b>1,064.40</b>	<b>653.95</b>

**NOTE:22 COST OF MATERIALS CONSUMED****(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Raw materials consumed	52,415.47	52,263.67
<b>Total</b>	<b>52,415.47</b>	<b>52,263.67</b>

**NOTE:23 CHANGED IN INVENTORIES OF FINISHED GOODS & WORK IN PROGRESS****(Amount in Lakhs)**





Particulars	Year ended 31.03.2023	Year ended 31.03.2022
<b>Inventories at the end of the year</b>		
Finished Goods	19,789.29	22,494.26
Work-in-progress	774.73	758.75
Stock in trade	-	-
Sub Total	20,564.03	23,253.02
<b>Inventory at the beginning of the year</b>	-	-
Finished Goods	22,494.26	20,309.88
Work-in-progress	758.75	678.88
Stock in trade	-	-
Sub Total	23,253.02	20,988.76
<b>Total</b>	<b>2,688.99</b>	<b>(2,264.26)</b>

**NOTE: 24 EMPLOYEE BENEFIT EXPENSES**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Salary & Wages & Bonus	1,960.92	1,720.26
Contribution to provident & other funds	172.14	129.82
Workman and staff welfare	73.46	59.48
Gratuity	4.60	4.38
<b>Total</b>	<b>2,211.12</b>	<b>1,913.94</b>

**NOTE:25 FINANCE COSTS**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Interest Expense	1,785.63	1,795.35
EIR Adjustment on Borrowing	-	-
Interest Impact on Gratuity	42.04	30.61
Other Interest	9.08	18.96
Interest on amortisation of Loans	-	-
<b>Total</b>	<b>1,836.75</b>	<b>1,844.92</b>

**NOTE:26 DEPRECIATION AND AMORTIZATION EXPENSES**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Depreciation of tangible assets	2,117.33	2,070.35
Amortization of intangible assets	0.26	0.26
<b>Total</b>	<b>2,117.59</b>	<b>2,070.61</b>

**NOTE:27 OTHER EXPENSES**
**(Amount in Lakhs)**

Particulars	Year ended 31.03.2023	Year ended 31.03.2022
Consumption of stores & spare parts	1,747.38	2,415.45
Power & fuel	8.71	4.39
Material Handling Expenses	238.03	238.85
Repairs & maintenance		
-Plant & Machinery	2,395.17	1,825.07



-Building	242.62	200.89
-Others	228.09	259.91
Insurance (Net)	42.77	22.91
Rent	29.39	24.08
Rates & Taxes	58.81	32.48
Legal & Professional Charges	149.36	105.15
Telephone, Postage & Telegram	9.94	8.95
Travelling & Conveyance	175.05	107.87
Director's Sitting Fee	0.55	0.62
Auditor's Remuneration	-	-
-As Audit Fee	4.78	3.68
-Certification & Company Law	1.82	1.00
-Expenses Reimbursement	-	-
Prior Period Adjustments	-	-
Freight & Forwarding	33.45	33.31
Commission to selling agents	233.06	135.02
Other selling expenses	1.05	720.93
Royalty Expenses	315.19	296.74
Other expenses	341.63	325.03
Provision for Bad & doubtful debts/Advances	24.99	(19.85)
Security Guard Expenses	79.75	80.98
Loss on sale of Fixed Assets	-	24.73
Bank Charges	0.08	0.07
Fee for GST	0.10	-
Bagasse and Ash Handling Charges	80.54	92.06
Vehicle Expenses	28.42	28.70
<b>Total</b>	<b>6,470.73</b>	<b>6,968.99</b>

**NOTE:28 EARNINGS PER SHARE****(Amount in Lakhs)**

<b>Particulars</b>	<b>Year ended 31.03.2023</b>	<b>Year ended 31.03.2022</b>
Net profit/ (loss) as per Statement of Profit & Loss (for calculation of basic EPS)	(1,047.17)	(857.03)
Weighted average number of equity shares in calculating basic EPS	4,76,53,880.00	4,76,53,880.00
Basic earning per share	(2.20)	(1.80)
Diluted earning per share	(2.20)	(1.80)

**NOTE 29: Contingent Liabilities****Claims against the Company not acknowledged as debts are as under:****In the case of the Holding Company:****(Amount in Lakhs)**

<b>S. No.</b>	<b>Particulars</b>	<b>As at 31.03.2023</b>	<b>As at 31.03.2022</b>
i)	Outstanding against Guarantee given to SVC Co-operative Bank Limited on behalf of SBEC Bio-energy Ltd.	Nil	526.67
ii)	Corporate Guarantee given to the Government of Jharkhand against the Soft Loan (excluding Interest) given to the Bihar Sponge Iron Limited.	2125.00	3250.00
iii)	Duties and Tax liabilities disputed by the Company	338.19	341.36

**In the case of the Bio-Energy Limited: N.A.**

Based on legal advice, discussions with the solicitors, etc., the management believes that there is fair chance of decisions in the company's favour in respect of all the items listed at (i) to (iii) above and hence no provision is considered necessary against the same. The management believes that the ultimate outcome of these proceedings will not have a material adverse effect on the company's financial position and results of operations.

**NOTE 30: Commitments****30.1 Capital Commitments:**

Estimated amount of contracts remaining to be executed on capital account and not provided for (net of advances) **Rs.173.44 lakhs** (P.Y. Rs.443.90 lakhs).



30.2 Other Commitments: Rs. Nil (P.Y. Nil)

### Note 31: Employee Benefits

The disclosure of 'Employee Benefits' as defined in IND AS-19 is as under:

#### Expenses recognized in the statement of Profit & Loss

##### (i) Defined Contribution Plan

(Amount in Lakhs)

Particulars	Current Year	Previous Year
Employer's Contribution to Provident Fund	145.29	109.64

##### (ii) Defined Benefits Plans

(Amount in Lakhs)

Particulars	Gratuity Unfunded		Leave Encashment Unfunded	
	C. Yr.	P. Yr.	C. Yr.	P. Yr.
Current service cost	48.18	45.51	3.82	3.40
Interest cost	42.04	30.61	3.88	3.58
Expected Return on Plan Assets	-	-	-	-
Net Actuarial (gain)/loss	-	-	1.66	(5.89)
Past service cost	-	-	-	-
Re-measurements recognized in OCI (Gain)/Loss	-	-	-	-
Comprehensive Income on Gratuity	11.91	(86.46)	-	-
Expenses recognized in the statement of Profit & Loss	48.18	45.51	9.37	1.09
Interest Impact on Gratuity	42.04	30.61		

##### (a) The assumptions used to determine the benefit obligations:

Particulars	Gratuity		Leave Encashment Unfunded	
	C. Yr.	P. Yr.	C. Yr.	P. Yr.
Discount Rate	7.32%	7.13%	7.32%	7.13%
Expected Rate of increase in Compensation Levels	5.50%	5.50%	5.50%	5.50%
Expected Rate of Return on Plan Assets	NA	NA	NA	NA
Expected Average remaining working lives of employees (years)	13.75 Years	14.36 Years	10.52 years	11 years

##### (b) Reconciliation of Opening and Closing balances of benefit obligations:

(Amount in Lakhs)

Particulars	Gratuity Unfunded		Leave Encashment Unfunded	
	C. Yr.	P. Yr.	C. Yr.	P. Yr.
Benefit obligation at beginning of the year	589.69	456.89	54.39	53.36
Current service cost	48.18	45.51	3.82	3.40
Interest Cost	42.04	30.61	3.88	3.58
Benefits paid	(17.56)	(6.75)	(0.12)	(0.05)
Past service cost Curtailment Gains/Losses	-	-	-	-
Contribution by plan participants	-	-	-	-
Re-measurements Recognized in OCI (gain)/ loss	-	-	-	-
Actuarial (gain)/ loss	(9.17)	63.42	1.66	(5.89)
Projected benefit obligation at end of the year				
Net amount recognized in the balance sheet as at the end of the year	653.18	5,89.69	63.63	54.39

##### (c) There is no plan asset at the beginning and at the closing of the year.

### NOTE 32: RELATED PARTY DISCLOSURE

#### (A) Name of Related Parties where control exists and with whom transactions have taken place during the year:

S.No.	Name of Related Party	Nature of Relationship
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A	(i)	<b><u>A person or a close member of that person's family of a reporting entity has control or joint control over the reporting entity</u></b>	
		Umesh Kumar Modi	Promoters having voting control
		Kumkum Modi	Promoters having voting control
		Jayesh Modi	Promoters having voting control
	(ii)	<b><u>A person or a close member of that person's family of a reporting entity is a member of the Key Management Personnel of the reporting entity or of a parent of the reporting entity.</u></b>	
		Abhishek Modi	Whole Time Director
		Nandini Modi	Vice President – New Projects
		Anil Kumar Goel	Chief Financial Officer
		Ajay Gupta	Chief Financial Officer
		Ankit K. Srivastava	Company Secretary
B	(i)	<b><u>The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others)</u></b>	
	1	SBEC Bioenergy Limited	Subsidiary
	2	SBEC Stockholding & Investment Limited	Wholly Owned Subsidiary
	(ii)	<b><u>The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity</u></b>	
		SBEC Sugar EPF Trust	Trust
	(iii) (a)	<b><u>The entity is controlled or jointly controlled by a person identified in (a).</u></b>	
	(iv) (b)	<b><u>A person identified in (a)(i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).</u></b>	



	1	A to Z holdings Pvt. Limited	Directorship and Shareholding along with relatives in the Company.
	2	Bihar Sponge Iron Limited	
	3	Jai Abhishek Investments Pvt. Ltd.	
	4	Longwell Investment Pvt. Ltd.	
	5	Modi Goods and Retail Services Pvt. Ltd.	
	6	Modi Hitech India Limited	
	7	Modi Ilva India Pvt. Ltd.	
	8	Modi Industries Limited	
	9	Modi – Mundipharma Healthcare Pvt. Ltd.	
	10	Modi-Mundipharma Beauty Products Private Limited	
	11	Modi-Mundipharma Pvt. Ltd.	
	12	SBEC Bioenergy Ltd	
	13	SBEC Stockholding & Investment Limited	
	14	SBEC Systems (India) Ltd.	
	15	Umesh Modi Corp Pvt. Ltd	
	16	Win-Medicare Private Limited	
	17	Modi-Senator (India) Pvt. Ltd.	
	18	Abhikum Leasing & Investments Pvt. Ltd.	
	19	ABC Holding Pvt. Ltd	
	20	Kumabhi Investments Pvt. Ltd	
	21	Meghkum Leasing & Investment Pvt. Ltd.	
	22	Trimium Advisors LLP (Formerly Known as Trimium Advisors Private Limited)	
	23	JayeshTradex Pvt. Ltd.	
	24	M First Trading Pvt. Ltd.	
	25	Meghna Autoworks Pvt. Ltd	
	26	MG Mobiles India Pvt. Ltd	
	27	Modi Arts Pvt. Ltd	
	28	Modi Diagnostics Pvt. Ltd	
	29	Modi Motors Pvt. Ltd.	
	30	PHD Chamber of Commerce and Industry	
	31	MG Mobiles India Trading Pvt. Ltd	
	32	H.M. Tubes & Containers Pvt. Ltd	
	33	Moderate Leasing & Capital Services Limited	
	34	Modiline Travel Services Pvt. Ltd.	
	35	G S Pharmabutor Pvt. Ltd.	
	36	Arvind Continental Pvt. Ltd.	
	37	Mahabir Export & Import Co. Ltd.	
	38	Modi Casings And Packaging Private Limited	
	39	Modi-Ecoweld Private Limited	
		(v) Reporting entity being an associate of the other entity	
	SBEC Sugar Limited is the associate Company of SBEC SYSTEMS (India) Limited		
	SBEC Bioenergy is the Associate Company of Moderate Leasing and Capital Services Limited		

**(B) Details of transactions with related parties****(Amount. in Lakhs)**

Transactions		Other Related parties	Key managerial personnel	Total
<b>Sitting Fees paid to:</b>				
Umesh Kumar Modi	31-Mar-23	-		-
	31-Mar-22	0.08		<b>0.08</b>
Kumkum Modi	31-Mar-23	0.03		<b>0.03</b>
	31-Mar-22	0.04		<b>0.04</b>
Jayesh Modi	31-Mar-23	0.06		<b>0.06</b>
	31-Mar-22	0.08		<b>0.08</b>
<b>Total F.Y. 2022-23</b>		<b>0.09</b>	-	<b>0.09</b>
<b>Total F.Y. 2021-22</b>		<b>0.20</b>	-	<b>0.20</b>
<b>Remuneration paid to:</b>				
<b>Whole Time Director</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23	94.52	-	94.52
	31-Mar-22	80.69	-	80.69
-Contribution to PF and superannuation	31-Mar-23	6.47	-	6.47
	31-Mar-22	5.58	-	5.58
<b>Vice President</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23	41.69	-	41.69
	31-Mar-22	37.26	-	37.26
-Contribution to PF and superannuation	31-Mar-23	4.40	-	4.40
	31-Mar-22	3.79	-	3.79
<b>Company Secretary</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23	-	5.32	5.32
	31-Mar-22	-	4.90	4.90
-Contribution to PF and superannuation	31-Mar-23	-	0.27	0.27
	31-Mar-22	-	0.25	0.25
<b>Chief Financial Officer</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23	-	34.92	34.92
	31-Mar-22	-	32.86	32.86
-Contribution to PF and superannuation	31-Mar-23	-	2.71	2.71
	31-Mar-22	-	2.56	2.56
<b>Occupier</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23	-	21.27	21.27
	31-Mar-22	-	-	-
-Contribution to PF and superannuation	31-Mar-23	-	1.65	1.65
	31-Mar-22	-	-	1.54
<b>Company Secretary(Bio)</b>				
-Professional Fee	31-Mar-23	-	1.20	1.20
	31-Mar-22	-	0.60	-
<b>Chief Financial Officer(Bio)</b>				
-Salary and Allowances (Including Perquisites)	31-Mar-23	-	6.35	6.35
	31-Mar-22	-	5.87	5.86
-Contribution to PF and superannuation	31-Mar-23	-	0.40	0.40
	31-Mar-22	-	0.37	0.37
<b>Total F.Y. 2022-23</b>		<b>147.08</b>	<b>74.09</b>	<b>221.17</b>
<b>Total F.Y. 2021-22</b>		<b>127.32</b>	<b>47.41</b>	<b>174.73</b>



<b>Reimbursement of expenses paid to:</b>				
Win Medicare Pvt. Ltd.	31-Mar-23	0.10	-	0.10
	31-Mar-22	0.98	-	0.98
<b>Total F.Y. 2022-23</b>		<b>0.10</b>	<b>-</b>	<b>0.10</b>
<b>Total F.Y. 2021-22</b>		<b>0.98</b>	<b>-</b>	<b>0.98</b>
<b>Purchase of materials/Paid for Exp.</b>				
Modiline Travels Service Pvt. Ltd.	31-Mar-23	24.84	-	<b>24.84</b>
	31-Mar-22	12.75	-	<b>12.75</b>
Modihitech India Ltd.	31-Mar-23	19.92	-	<b>19.92</b>
	31-Mar-22	22.61	-	<b>22.61</b>
Modi Industries Ltd (Sugar section)	31-Mar-23	9.66	-	<b>9.66</b>
	31-Mar-22	2.31	-	<b>2.31</b>
Jayesh Tradex Pvt. Ltd.	31-Mar-23	20.44	-	<b>20.44</b>
	31-Mar-22	13.43	-	<b>13.43</b>
HM Tube & Containers P Ltd	31-Mar-23	-	-	-
	31-Mar-22	0.38	-	<b>0.38</b>
SBEC System (I) Ltd.	31-Mar-23	371.93	-	<b>371.93</b>
	31-Mar-22	350.15	-	<b>350.15</b>
Umesh Modi Corp. P Ltd	31-Mar-23	2.95	-	<b>2.95</b>
	31-Mar-22	2.95	-	<b>2.95</b>
Modi Mundi Pharma Beauty Products Pvt. Ltd.	31-Mar-23	-	-	-
	31-Mar-22	1.55	-	<b>1.55</b>
<b>Total F.Y. 2022-23</b>		<b>449.74</b>	<b>-</b>	<b>449.74</b>
<b>Total F.Y. 2021-22</b>		<b>406.13</b>	<b>-</b>	<b>406.13</b>
<b>Sales of Materials</b>				
GS Pharmbutor Pvt. Ltd.	31-Mar-23	11493.73		11493.73
	31-Mar-22	8628.29	-	8628.29
Modi Industries Ltd (Modi Sugar mills)	31-Mar-23	228.40		228.40
	31-Mar-22	9.59		9.59
Modi Ilva India P Ltd	31-Mar-23	-		-
	31-Mar-22	0.55		0.55
<b>Total F.Y. 2022-23</b>		<b>11722.13</b>	<b>-</b>	<b>11722.13</b>
<b>Total F.Y. 2021-22</b>		<b>8638.43</b>	<b>-</b>	<b>8638.43</b>
<b>Commission paid to</b>				
GS Pharmbutor Pvt. Ltd.	31-Mar-23	-		-
	31-Mar-22	24.05		24.05
<b>Total F.Y. 2022-23</b>		<b>-</b>	<b>-</b>	<b>-</b>
<b>Total F.Y. 2021-22</b>		<b>24.05</b>	<b>-</b>	<b>24.05</b>
<b>Interest paid</b>				
Longwell Investment Pvt. Ltd.	31-Mar-23	-		-
	31-Mar-22	24.04		24.04
GS Pharmbutor Pvt. Ltd.	31-Mar-23	307.82		307.82
	31-Mar-22	116.55		116.55
Moderate leasing & capital service ltd.	31-Mar-23	680.46		680.46
	31-Mar-22			
<b>Total F.Y. 2022-23</b>		<b>988.28</b>	<b>-</b>	<b>988.28</b>
<b>Total F.Y. 2021-22</b>		<b>140.59</b>	<b>-</b>	<b>140.59</b>
<b>Advance from Customer / ICD</b>				
GS Pharmbutor Pvt. Ltd.	31-Mar-23	1500.00	-	1500.00
	31-Mar-22	1500.00	-	1500.00





Moderate leasing &amp; capital service ltd.

	31-Mar-23	3917.33		3917.33
	31-Mar-22			
<b>Total F.Y. 2022-23</b>		<b>5417.33</b>	-	<b>5417.33</b>
<b>Total F.Y. 2021-22</b>		<b>1500.00</b>	-	<b>1500.00</b>
<b>Amount Paid against Loan</b>				
GS Pharmbutor Pvt. Ltd.	31-Mar-23	1500.00	-	1500.00
	31-Mar-22	242.98	-	242.98
Moderate leasing & capital service ltd.	31-Mar-23	2836.21	-	2836.21
	31-Mar-22			
<b>Total F.Y. 2022-23</b>		<b>4336.21</b>	-	<b>4336.21</b>
<b>Total F.Y. 2021-22</b>		<b>242.98</b>	-	<b>242.98</b>
<b>Debt Assignment Receivable from MIL</b>				
Modi Industries Ltd (Sugar section)	31-Mar-23	14685.98	-	14685.98
	31-Mar-22	14685.98	-	14685.98
<b>Total F.Y. 2022-23</b>		<b>14685.98</b>		<b>14685.98</b>
<b>Total F.Y. 2021-22</b>		<b>14685.98</b>		<b>14685.98</b>
<b>Outstanding "Receivables"</b>				
SBEC stockholding & Investment Ltd.	31-Mar-23	-	-	-
	31-Mar-22	1850.50	-	1850.50
Modi Industries Ltd (Sugar section)	31-Mar-23	33.11	-	33.11
	31-Mar-22	6.60	-	6.60
Modi Industries Ltd (Debt Assignment)	31-Mar-23	14685.98	-	14685.98
	31-Mar-22	14685.98	-	14685.98
Modi Illva India P Ltd	31-Mar-23	0.55	-	0.55
	31-Mar-22	0.55	-	0.55
CFO	31-Mar-23	-	0.07	0.07
	31-Mar-22	-	0.00	
<b>Total F.Y. 2022-23</b>		<b>14719.64</b>	<b>0.07</b>	<b>14719.71</b>
<b>Total F.Y. 2021-22</b>		<b>16543.63</b>	-	<b>16543.63</b>
<b>Outstanding "Payables"</b>				
Modiline Travels Service Pvt. Ltd.	31-Mar-23	6.69	-	6.69
	31-Mar-22	2.33	-	2.33
Chief Financial Officer	31-Mar-23	-	0.72	0.72
	31-Mar-22	-	0.59	0.59
Occupier	31-Mar-23	-	0.71	0.71
	31-Mar-22	-	-	0.32
GS Pharmbutor Pvt. Ltd.	31-Mar-23	2609.91	-	2609.91
	31-Mar-22	1453.04	-	1453.04
Modi Mundi Pharma Beauty Products Pvt. Ltd.	31-Mar-23	4.52	-	4.52
	31-Mar-22	4.52	-	4.52
Win Medicare Pvt Ltd	31-Mar-23	1.17	-	1.17
	31-Mar-22	1.06	-	1.06
Jayesh Tradex Pvt. Ltd.	31-Mar-23	2.31	-	2.31
	31-Mar-22	-	-	-
Umesh Modi Corp. P Ltd	31-Mar-23	-	-	-



	31-Mar-22	5.46		5.46
Modihitech India Ltd.	31-Mar-23	2.16	-	2.16
	31-Mar-22	3.74		3.74
Moderate Leasing and Service Capital Ltd.	31-Mar-23	4953.63	-	4953.63
	31-Mar-22	-		-
<b>Company Secretary Bio</b>	31-Mar-23	-	0.09	0.09
	31-Mar-22	-	0.04	0.45
SBEC System (I) Ltd.	31-Mar-23	80.97	-	80.97
	31-Mar-22	28.81	-	28.81
<b>Total F.Y. 2022-23</b>		<b>7661.36</b>	<b>1.52</b>	<b>7662.88</b>
<b>Total F.Y. 2021-22</b>		<b>1498.96</b>	<b>0.63</b>	<b>1499.59</b>

### Note 33: Segment Reporting

The Company is a single location single product company and hence the requirement if Ind As-108 on segment reporting are not required.

### Note 34: Outstanding dues to micro, small and medium Enterprises:

The disclosure of dues details relating to enterprises covered under micro, small and medium enterprises Development Act 2006, to the extent the information are available with the company, are as under:

S.No.	Particulars	As at 31.03.2023	As at 31.03.2022
a)	(i) Principal amount remaining unpaid to any supplier as at the end of the accounting year. (ii) Interest due thereon.	329.60	58.94
b)	(i) The amount of interest paid in terms of sec.16 of MSMED Act, 2006 beyond the respective due date during the year. (ii) The amount of principal paid beyond the due date during the year.	307.09	303.40
c)	The amount of interest due and payable for delay period (where principal has already been paid after due date.)	13.92	3.19
d)	The amount of further interest remaining due and payable even in the succeeding years for the purpose of disallowance as a deductible expenditure under section 23 of MSMED Act, 2006.	3.19	
e)	The amount of interest accrued and remaining unpaid as at the end of the accounting year.	13.92	3.19

### Note 35: Financial Instruments

#### i) Financial risk management

The Company's activities expose it to a variety of financial risks which includes market risk (including currency risk, interest rate risk and other price risk), credit risk and liquidity risk.

The Company's focus is to ensure liquidity which is sufficient to meet the Company's operational requirements. The Company monitors and manages key financial risks so as to minimize potential adverse effects on its financial performance. The Company has a risk management policy which covers the risks associated with the financial assets and liabilities. The details for managing each of these risks are summarized ahead.

#### ii) Market risk

Market risk is the risk that the expected cash flows or fair value of a financial instrument could change owing to changes in market prices. The Company's activities expose it primarily to the financial risks of changes in foreign currency exchange rates and interest rates.

#### iii) Credit risk management

Credit risk refers to the risk that a counter party will default on its contractual obligations resulting in financial loss to the Company. The Company's exposure to credit risk primarily arises from trade receivables, balances with banks, investments and security deposits. The credit risk on bank balances is limited because the counter parties are banks with good credit ratings.

#### iv) Trade Receivables



Credit risk is managed through credit approvals, establishing credit limits, continuous monitoring of creditworthiness of customers to which the company grants credit terms in the normal course of business. The Company also assesses the financial reliability of customers taking into account the financial condition, current economic trends and historical bad debts and ageing of accounts receivables.

**v) Investments**

The Company limits its exposure to credit risk by generally investing with counter parties that have a good credit rating. The Company has funded defined-benefit gratuity plans. The funded status of these plans is influenced by movements in financial market. A negative performance of the financial markets could have a material impact on cash funding requirements.

**vi) Cash & cash equivalents**

With respect to credit risk arising from financial assets which comprise of cash and cash equivalents, the Company's risk exposure arises from the default of the counter party, with a maximum exposure equal to the carrying amount of these financial assets at the reporting date. Since the counter party involved is a bank, Company considers the risks of non-performance by the counter party as non-material.

**vii) Liquidity risk**

Liquidity risk is defined as the risk that the Company will not be able to settle or meet its obligations on time or at a reasonable price. The Company's treasury department is responsible for liquidity, funding as well as settlement management. In addition, processes and policies

Related to such risks are overseen by senior management. Management monitors the Company's net liquidity position through rolling forecasts on the basis of expected cash flows.

**viii) Maturity profile of financial liabilities**

The table below provides details regarding the remaining contractual maturities of financial liabilities at the reporting date based on contractual undiscounted payments.

**As at 31.03.2023**

**(Amount. in Lakhs)**

Particulars	Less than 1 year	1 to 5 years	Total
Non-Current borrowings		695.40	695.40
Current borrowings	10142.74		10142.74
Trade payables	51295.24		51295.24
Other financial liabilities (Current)	3515.87		3515.87
Other financial liabilities (Non-Current)		0.45	0.45

**AS AT 31.03.2022**

**(Amount. in Lakhs)**

Particulars	Less than 1 year	1 to 5 years	Total
Non-Current borrowings	-	5497.32	5497.32
Current borrowings	11257.70	-	11257.70
Trade payables	50877.50	-	50877.50
Other financial liabilities (Current)	2369.14	-	2369.14
Other financial liabilities (Non-Current)	-	0.45	0.45

- a) The Company manages its capital to ensure that the entities in the Company will be able to continue as going concern while maximizing the return to shareholders and also complying with the ratios stipulated in the loan agreements through the optimization of the debt and equity balance.

The capital structure of the Company consists of net debt (borrowings as detailed in note 15 offset by cash and bank balances as detailed in note 10 & 12) and total equity of the Company.

The Company is not subject to any externally imposed capital requirements.

**Note:**

In order to achieve this overall objective, the Group's capital management, amongst other things, aims to ensure that it meets financial covenants attached to the interest-bearing loans and borrowings that define capital structure requirements. Breaches in meeting the financial covenants would permit the bank to call loans and borrowings or charge some penal interest. There have been no breaches in the financial covenants of any interest-bearing loans and borrowing in the current period.

No changes were made in the objectives, policies or processes for managing capital during the current years and previous years.

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No changes were made in the objectives, policies or processes for managing capital during the current years and previous years.


**b) Key Financial Ratio**

The gearing ratio at the end of the reporting period was as follows:

Particulars	Numerator	Denominator	as at 31.03.2023	as at 31.03.2022	Variation in percentage	Reason of Variation (in case variation is more than 25%)
1. Current Ratio	Current Assets	Current Liability	0.37	0.43	(12.10)	-
2. Debt -Equity Ratio	Total Debt	Total Equity	(5.42)	(12.32)	56.03	Reduction in debt & Decrease in Shareholder's fund
3. Debt. Service Coverage Ratio	Earnings before In- terest & depreciation	Debt Service = Interest + Principle Liability	0.23	0.17	31.99	Increase in earning before inter- est & Depreciation and reduction in both interest & principle liability
4. Return on Equity Ratio	Profit for the year	Total Equity	(47.11)	(63.00)	25.22	Increase in losses
5. Inventory Turn- over Ratio	Net Sales	Average Inventory	2.83	2.62	8.25	-
6. Trade Receiv- able turnover ratio	Net Sales	Average Trade re- ceivable	42.37	29.48	43.74	Reduction in Average Debtor
7. Trade Payable turnover ratio	Net Credit purchase	Average Trade Payable	1.12	1.18	(4.37)	-
8. Net Capital Ratio	Total Sale	Working capital	(1.60)	(1.64)	2.42	-
9. Net Profit Ratio	Profit for the year	Total Sale	(1.59)	(1.40)	(13.94)	
10.Return on capi- tal employed	Earning before Inter- est & Tax	Capital employed (Equity + Debt)	8.04	6.42	25.35	Decrease in earning before inter- est & tax and reduction in debts
11. Return on Investment (G/R)	Profit for the year	Capital employed (Equity + Debt)	(10.67)	(5.57)	(91.63)	Increase in losses and decrease in capital employed due to repay- ment of debt

**c) Categories of financial instruments**

Particulars	As at 31 March, 2023 (Rs. in Lakhs)	As at 31 March, 2022 (Rs. in Lakhs)
<b>Financial assets</b>		
<b>Measured at amortized cost</b>		
Other non current assets	124.73	87.31
Other financial assets (non current)	14685.98	14685.98
Trade receivables	1688.72	1419.43
Cash and cash equivalents	466.47	499.37
Bank Balances other than Cash and cash equivalents	25.00	16.20
Other current assets	202.62	901.60
Other financial assets (current)		
Loans	281.54	222.65
<b>Measured at fair value through Profit &amp; Loss</b>		
Investments		
<b>Financial liabilities</b>		
<b>Measured at amortized cost</b>		
Borrowings (non-current)	695.40	5497.32
Borrowings (current)	10142.74	11257.70
Trade payables	51295.24	50877.50
Other financial liabilities (non-current)	0.45	0.45
Other financial liabilities (current)	3515.87	2369.14
Other current liabilities	691.48	452.82



Other Non-Current liabilities	11.55	10.47
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**d) Fair value of the financial assets and liabilities that are not measured at fair value (but fair value disclosures are required)**

(Amount in Lakhs)

Particulars	As at 31 March, 2023		As at 31 March, 2022	
	Carrying amount	Fair value	Carrying amount	Fair value
<b>Financial Assets</b>				
<b>Financial Assets at amortized cost:</b>	20951.05		20646.98	
Financial Liabilities				
Financial Liabilities held at amortized cost:	66850.06		70001.67	

**Exposure to credit risk**

Financial assets for which loss allowance is measured using 12 months Expected Credit Losses (ECL)

(Amount in Lakhs)

Particulars	As at 31 March, 2023	As at 31 March, 2022
Investments	3803.34	3803.34
Cash and bank balances	466.47	499.37
Bank deposit	25.00	16.20
Short-term loans and advances	281.54	222.65

Balance with banks is subject to low credit risks due to good credit ratings assigned to these banks.

Financial assets for which loss allowance is measured using life time Expected Credit Losses (ECL)

(Amount in Lakhs)

Particulars	As at 31 March, 2023	As at 31 March, 2022
Trade Receivable	1688.72	1419.43

The ageing analysis of the receivables (gross of provision) has been considered from the date the invoice falls due.

Particulars	
<b>As at 31.03.2023</b>	
Up to 6 months	1651.99
More than 6 months	85.76
<b>As at 31.03.2022</b>	
Up to 6 months	1377.01
More than 6 months	81.97

During the year the Company has recognized loss allowance of Rs. Nil (Previous Year Rs. Nil/-) under 12 months expected credit loss model.

No significant changes in estimation techniques or assumptions were made during the reporting period.

**Note 36. Other Disclosures**

**In Case of Holding Company**

- (i) During the year 2006-2007, a One Time Settlement (OTS) dated 22nd January, 2007 was signed between the Company, Punjab National Bank (PNB), Mr. Umesh K. Modi (as Guarantor of MIL) and Modi Industries Limited (MIL) on the terms as contained in the PNB's letter dated 28th September, 2006. In terms of this settlement, the Company had agreed to make payment of Rs. 2,810.60 lacs together with interest to PNB. In consideration of the same, PNB had agreed to assign all its claims, interest and charges against the Steel Section of MIL in favour of the Company. The Company has made full payment of the settlement amount together with interest aggregating to Rs. 3,351.21 lacs to PNB. As per expert legal opinion, during the year interest amounting to Rs. 417.63lacs (previous year Rs. 417.63 lacs for the period from 22nd January, 2007 to 31st



March, 2012) has been allocated to the cost of "Debt Assignment" acquired by the company from PNB, since in the opinion of the management the borrowing of the company were raised to pay for Debt Assignment.

PNB thereafter executed a "Deed of Assignment" on 15th May, 2012 (an event occurring after the date of the Balance Sheet) in favour of the company by which PNB assigned all its claim together with all securities and charges created by MIL in its favour, to the company.

The company thereafter executed a "Deed of Assignment" on 31st December, 2012 in favour of its subsidiary M/s. SBEC Bioenergy Limited (SBL) by which the company assigned all its claim together with all securities and charges created by PNB for a consideration of Rs. 12,500.00 Lacs. A sum of Rs. 4,200.00 lacs had been paid simultaneously with the execution of this deed and the remaining sum of Rs. 8,300.00 lacs was to be paid as per the mutually agreed installments within a period of five years from the date of execution of this deed. However, upto 31.03.2018, no payment had been received by the Company due to financial distress in SBEC Bioenergy Limited.

In the year 2018-19, SBEC Bioenergy Limited being unable to pay the balance amount of Rs. 8300.00 Lacs as per agreed terms and conditions approached the Company with a proposal to return the said debt to the Company at a total consideration of Rs. 12,500 Lacs at which the said assignment was originally acquired. Accordingly, SBL had executed a deed of assignment on 06th June, 2018 in favour of the Company and has assigned all its claims together with all securities and charges created. As per Assignment Deed, a sum of Rs. 7530.00 Lacs has been paid simultaneously at the time of execution of the Deed, and the balance amount of Rs. 4970.00 Lacs shall be payable in the mutually agreed instalments within a period of 10 years from the date of execution of this Deed.

- (ii) M/s. SBEC Bioenergy Limited (SBL), a Subsidiary of the Company had negotiated, settle and acquired the Debt of IDBI in Modi Industries Limited (MIL) and entered into an agreement on 6th October, 2007 with IDBI. This agreement was in terms of IDBI's Letter dated 09th February, 2007. Under the said agreement IDBI agreed to assign its entire debt due and payable by the MIL to IDBI, subject to the OTS amount of Rs. 1232.20 Lacs together with interest. IDBI has executed a Deed of assignment on 05th March, 2018 in favour of SBL by which IDBI assigned all its rights together with all securities and charges created by MIL in favour of SBL. The Registrar of Companies has registered the modification of charge in favour of the SBL.

In the Year 2018-19, SBL gave a proposal to transfer the above debt by way of assignment to the Company at a total consideration of Rs. 1232.20 Lacs at which the said debt was acquired by SBL from IDBI. Thereafter, SBL has executed a Deed of Assignment on 12th June, 2018 in favour of the Company and assigned all its claims together with all securities and charges created in the assets of MIL. The Registrar of Companies has registered the modification of charge in favour of the Company. The said debts are now receivable by the Company from Modi Industries Limited.

- (iii) M/s. SBEC Bioenergy Limited (SBL), a Subsidiary of the Company had negotiated, settle and acquired the Debt of IFCI in Modi Industries Limited (MIL) and entered into an agreement on 30th December, 2009 with IFCI. This agreement was in terms of IFCI's Letter dated 30th December, 2007. Under the said agreement IFCI agreed to assign its entire debt due and payable by MIL to IFCI, subject to payment of the OTS amount of Rs. 775 Lacs together with interest and in consideration thereof IFCI executed a Deed of assignment dated 19th April, 2012 and assigned all its claims against MIL together with securities and charges in favour of SBL. The Registrar of Companies has registered the modification of charge in favour of the SBL.

In the Year 2018-19, SBL gave a proposal to transfer the above debt by way of assignment to the Company at a total consideration of Rs. 775 Lacs at which the said debt was initially acquired from IFCI. Thereafter, SBL has executed a Deed of Assignment on 12th June, 2018 in favour of the Company and assigned all its claims together with all securities and charges created in the assets of MIL. The Registrar of Companies has registered the modification of charge in favour of the Company. The said debts are now receivable by the Company from Modi Industries Limited.

- (iv) The company has valued the closing stock of Inventory (Sugar) at net realizable value instead of "the lower of cost and net realisable value" as required under IND AS-2 "Inventories". Since NRV is higher than cost this has resulted in overstatement of Inventories (Finished Goods-Sugar) by Rs.720.54 lakhs and understatement of losses for the year by Rs.720.54 lakhs and its consequential impact on EPS.
- (v) The Hon'ble Supreme Court vide its order dated 23.04.2018 has upheld the order passed by the Hon'ble High Court of Judicature at Allahabad dated 9th March, 2017 in PIL No. 67617/2004, where the said court has set aside the decision of the state Government for the waiver of interest for the year 2012-13, 2013-14 and 2014-15 and proceeded to ask the Cane Commissioner to take a final call in the matter. Pending final order, the Company has not made provision for interest on the late payment of cane dues for the years 2012-13, 2013-14 and 2014-15. The Matter is Sub-Judice. Under the power vested with the Cane Commissioner (U.P.) for waiver of interest under UP Sugar Cane (Regulation of Supply & Purchase) Act, 1953 in respect of loss making/sick companies, the company had made an application to Cane Commissioner (U.P.) for waiver of interest on cane dues. Pending receipt of the Cane Commissioner's decision, no interest has been provided on the cane dues. The company has decided to account for the same upon decision in the matter/payment.

#### **Note 37: Other Statutory Information**

- I. The company does not have any benami property, where any proceeding has been initiated or pending against the company for holding any benami property.
- II. The company does not have any transactions with companies struck off.
- III. The company does not have any charges or satisfaction which is yet to be registered with ROC beyond the statutory period.
- IV. The company has not traded or invested in crypto currency or virtual currency during the financial year
- V. The company has not been declared wilful defaulter by any bank or financial institution or government or any government authority
- VI. All the title deeds of immovable properties are held in the name of company as at the balance sheet date.
- VII. The company has not advanced or loaned or invested funds (either borrowed funds or share premium or any other sources or kind of funds) to any other person(s) or entity(ies), including foreign entities (Intermediaries) with the understanding (whether recorded in writing or otherwise) that the Intermediary shall lend or invest in party identified by or on behalf of company (Ultimate beneficiaries)
- VIII. The company has not received any fund from any party(s) (funding party) with the understanding that the company shall whether directly or indirectly lend or invest in other person or entities identified by or on behalf of company ("ultimate beneficiaries") or provide any guarantee, security or the like on behalf of the ultimate beneficiaries.
- IX. The Company does not have any transaction which is not recorded in the books of accounts that has been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (such as, search or survey or any other relevant provisions of the Income Tax Act, 1961).

**In Case of Bio-Energy Limited:**

- i) The 132 KV Line was laid by Uttar Pradesh Power Corporation Limited (UPPCL) and commissioned on 1st December, 2005. The Company's contribution in respect of the line amounted to Rs.19,545,474/- as demanded by UPPCL till end of March, 2017. The total expenditure in laying the line is pending finalization by UPPCL. The ownership of the line however, vests with UPPCL.
- ii) UPPCL has charged Rs. 7.35 lacs for the year 2022-23 (Previous Year Rs. 7.08 lacs) as Annual Maintenance Charges

**NOTE 38: MANAGERIAL REMUNERATION****In Case of Bio-Energy Limited**

**Mr. Abhishek Modi**, Executive director was paid remuneration in accordance with Schedule V to the Companies Act, 2013. The same having been included under different heads of expenditure is as follows: **(Amount. in Lakhs)**

Particulars	Current Year	Previous Year
Salary & Bonus	90.75	78.23
Cont. to Provident Fund	6.47	5.58
Others	3.77	2.46

**Note:** Remuneration excludes provision for gratuity determined on actuarial basis as these are determined for the company as a whole.

**Computation of profit in accordance with section 198 of the companies act, 2013 is as under:-**

Particulars	Current Year	Previous Year
Profit (Loss) for the year before taxation (as per Profit & Loss Account)	(388.54)	(176.98)
<b>Add:-</b>		
(a) Depreciation provided in the Accounts	219.74	220.01
(b) Director and Manager Remuneration	100.99	86.27
(c) Loss on sale of Fixed Assets	-	-
<b>Less:-</b>		
(a) Depreciation as per section 123 of the Companies Act, 2013	219.74	220.01
(b) Profit on sale of Fixed Assets	-	-
<b>Profit(Loss) u/s 198</b>	<b>(287.55)</b>	<b>(90.71)</b>

**Note 39: Additional information****In Case of Holding Company****(a) Capacity**

Installed Capacity(as certified by the management)	Year Ended 31st March,2023	Year Ended 31st March,2022
Sugarcane Crushing M.T. per day (No License required)	9000	8000

**(b) Production Purchase, Turnover & Stock**

Classes of Goods	Opening stock – Quantity	Production Quantity	Sales		Closing stock	
	(Qtls.)	(Qtls.)	Quantity (Qtls.)	Value (In Lacs)	Quantity (Qtls.)	Value (In Lacs)
Sugar	5,88,676	15,69,462.00	1660342*	55668.63	4,97,796	17508.68
	(574,620)	(16,40,564)	(16,26,508)	(53,422.74)	(5,88,676)	(19450.62)
Molasses (By-product)	3,08,931.85	6,78,600.30	6,61,620.30	4747.51	2,94,758**	2116.02
	(298,364.26)	(6,89,349.48)	(6,78,781.89)	(4267.22)	(3,08,931.85)	(2536.63)
		<b>Purchases</b>				
Sugar Trading	-	-	-	-	-	-
	(-)	(-)	(-)	(-)	(-)	(-)

\*Sales Include 150.50 Qtls of sugar , which was theft and the same was recovered from security department.

\*\*Difference of 31153.85 Qtls of closing stock due to molasses burnt by Spontaneous combustion.




**(C) Consumption of Raw Material**

Particulars	Year ended 31st March, 2023		Year ended 31st March, 2022	
	Quantity (Quintals)	Value (Rs. In lacs)	Quantity (Quintals)	Value (Rs. In lacs)
Sugar Cane	1,44,95,319.23	50231.20	147,81,113.11	50088.24

**(d) Expenditure in foreign currency (On accrual basis)**

(Rs. in lacs)

Particulars	Current year	Previous Year
Purchase of Spares.	7.79	26.44

**(e) CIF Value of import**

(Rs. in lacs)

Particulars	Current year	Previous Year
Store & Spares	7.79	26.44

**(f) Earning in foreign currency**

(Rs. in lacs)

Particulars	Current year	Previous Year
Export of goods calculated on FOB basis	-	-

**(g) Value if imported/Indigenous Raw Materials, Stores and Spares Consumed**

(Rs. in lacs)

Particulars	Indigenous Value	%age	Imported Value	%age
Raw Materials	50231.20	100%	-	Nil
Previous Year	(50,088.24)	100%	-	Nil
Stores & Spares*	4246.08	99.82%	7.79	0.18%
Previous Year	(5113.16)	(99.49%)	(26.44)	(0.51%)

\*Excluding spares used for capitalization.

\* ( ) Show Previous year figures.

**In Case of Bio-Energy Limited**

Additional information required to be given pursuant to Part II of Schedule III to the Companies Act, 2013 (to the extent applicable) is as follows:

**a. Statement of Installed & Licensed Capacity and Generation Quantity: @**

Description	Licensed Capacity	Installed Capacity	Actual Generation*
Power	Not Applicable	24MW (24MW)	82,510,400 kwh (86,308,400) kwh)
Steam	Not Applicable	77 tph (77 tph)	302480 tonnes (330,105) tonnes)

Figures in brackets are for Previous Year.

\* Transmission losses have not been considered in arriving at generation quantity.

@ The plant operated for 184 days in the current year (previous year 212) days).

**b. Details of Sales/Conversions.**

(Rs. in Lakhs)

Description	Op. Stock		Conversion		Sales		Cl .Stock	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity*	Value
Power	749,279 kwh (633,421 kwh)	7.01 7.88	40,929,020 kwh (42,225,650) kwh	---- ----	36,215,429 kwh (37,647,026) kwh)	1160.30 1182.34	504434 kwh (749,279) kwh)	5.89 7.01
Steam	----	----	302480 tonnes (330,105) tonnes)	Nil (Nil)	Nil (Nil)	Nil (Nil)	Nil (Nil)	Nil (Nil)

Figures in brackets are for previous Year.



\* Includes 68786 kwh (Previous Year 97,770 kwh) charged as banking fee by UPPCL.

**c. Consumption of Imported and Indigenous Raw Material and Stores & Spares** (Rs. in Lakhs)

Particulars	Indigenous		Imported	
	Value	%	Value	%
Store / Spares	325.41 273.87	100% 100%	Nil Nil	Nil Nil

Figures in brackets are for previous year.

**d. Value of Import on CIF Basis**

Particulars	Current year	Previous Year
Store & Spares	Nil	Nil

**e. Expenditure in Foreign Currency (Paid)**

Particulars	Current year	Previous Year
Purchase of stores and spares	NIL	NIL
Others	79.42	24.66

**Note: 40. Recent Accounting Pronouncements** (Standards/ amendments issued but not yet effective)

The Ministry of Corporate Affairs ("MCA") notifies new standards or amendments to the existing standards under Companies (Indian Accounting Standards) Rules as issued from time to time. On March 31, 2023, MCA amended the Companies (Indian Accounting Standards) Amendment Rules, 2023, as below

**a) Ind AS 1: Presentation of Financial Statements**

This amendment requires the entities to disclose their material accounting policies rather than their significant accounting policies. The effective date for adoption of this amendment is annual periods beginning on or after April 1, 2023. The Company has evaluated the amendment and the impact of the amendment is insignificant in the standalone financial statements.

**b) Ind AS 8: Accounting Estimates**

This amendment has introduced a definition of 'accounting estimates' and included amendments to Ind AS 8 to help entities distinguish changes in accounting policies from changes in accounting estimates. The effective date for adoption of this amendment is annual periods beginning on or after April 1, 2023. The Company has evaluated the amendment and there is no impact on its standalone financial statements

**c) Ind AS 12 - Income Taxes:**

This amendment has narrowed the scope of the initial recognition exemption so that it does not apply to transactions that give rise to equal and offsetting temporary differences. The effective date for adoption of this amendment is annual periods beginning on or after April 1, 2023. The Company has evaluated the amendment and there is no impact on its standalone financial statement

**Note: 41**

The financial statements for the year ended 31 March, 2023 were approved by the Board of Directors and authorize for issue on 26th May, 2023.

Previous Year Figures have been recast/restated.

Note 1 to 41 Containing Accounting Policies and General Notes from part of the financial statements.

**For Doogar & Associates**  
Chartered Accountants  
Firm Registration No 000561N

**Sd/-**  
**(Mukesh Goyal)**  
Partner  
Membership No. 081810

**Sd/-**  
**Umesh Kumar Modi**  
(Chairman & President)  
DIN: 00002757

**Sd/-**  
**Abhishek Modi**  
(Whole Time Director)  
DIN: 00002798

**Sd/-**  
**Vijay Kumar Modi**  
(Director)  
DIN: 00004606

**Sd/-**  
**J.C. Chawla**  
(Director)  
DIN: 05316202

**Sd/-**  
**N.P. Bansal**  
(Director)  
DIN: 00010587

Place: New Delhi  
Date: 26<sup>th</sup> May, 2023

**Sd/-**  
**A.K. Goel**  
(Chief Financial Officer)

**Sd/-**  
**Ankit K. Srivastava**  
(Company Secretary)

*If undelivered, please return to:*

**SBEC SUGAR LIMITED**

REGISTERED OFFICE & PLANT

Village: Lohan Malakpur,

Tehsil: Baraut - 250 611,

Distt. Baghpat,

Uttar Pradesh